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New Southwark Plan Proposed Submission Version: Amended Policies 2019 Consultation Report

January 2019

1. Introduction

1.1 What is the New Southwark Plan?

The New Southwark Plan (**NSP**) is a borough-wide planning policy document which will guide regeneration and development in Southwark. It will enable the delivery of homes and jobs that make the borough a better and more sustainable place to live and work. When adopted, the New Southwark Plan will replace the Core Strategy (2011) and saved Southwark Plan (2007) policies. It is therefore essential that the plan is developed in meaningful consultation with key stakeholders, such as residents, community groups, workers, landowners and developers, who have an interest in the future of the borough.

1.2 What is this consultation report?

This consultation report publishes comments received by the Council on the Proposed Submission Version of the New Southwark Plan which was consulted on between December 2017 and February 2018. Prior to this four stages of consultation were held, outlined in **Section 2.1** of the report. All the policies contained in the Proposed Submission Version of NSP were prepared in light of the comments received through previous stages of consultation.

During the consultation that took place between December 2017 and February 2018 334 detailed consultation responses were received on the Proposed Submission Version of the NSP. This has subsequently led to amendments in certain policies to better reflect the opinions of our community. For this reason, this report will not publish responses to all the comments we received during this consultation, but rather focus only on policies with further amendment. **Section 4** of the report publishes the comments we received in relation to those changing policies in full, as well as officer responses to those comments.

The consultation report that contains all consultation responses we received for the consultation between December 2017 to February 2018 will be published with the New Southwark Plan when it is submitted to the Secretary of State, along with officer responses. All of the responses we received to the Proposed Submission version will be published on our website.

2. Stages of Consultation

2.1 What stages of consultation have been completed so far?

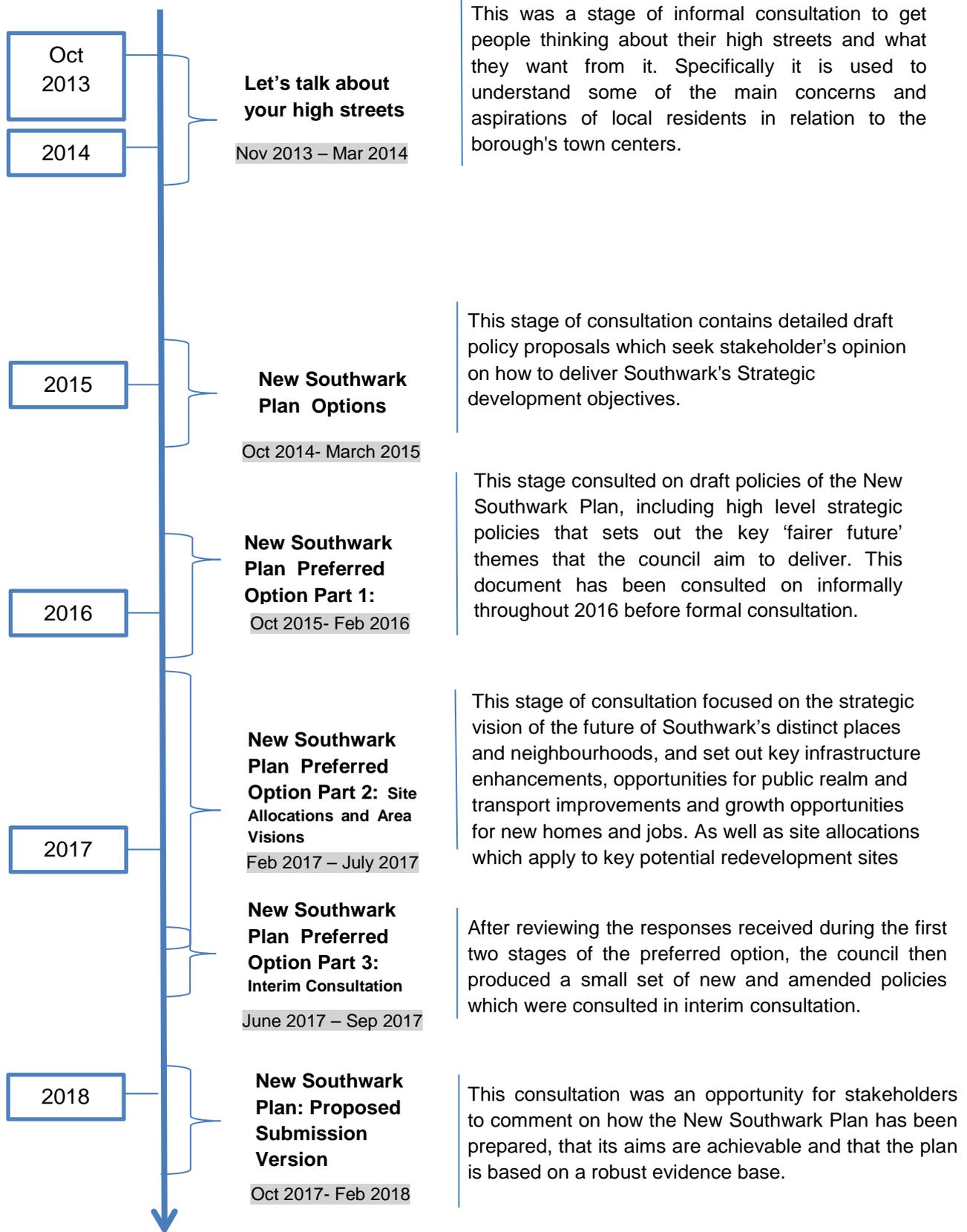
This section of the report explains the consultation that has been undertaken in preparation of the New Southwark Plan: Proposed Submission version document. To date the Council has undertaken four stages of consultation to inform the formulation of New Southwark Plan policies.

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

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

Figure 1. Shows the consultation of the New Southwark Plan in stages.

Figure 1. Consultation Theme & Time Line



2019

Cabinet to Consider final version with any amendments for final consultation

Jan 2019

Officer will propose any changes that need to be incorporated into the final version. Cabinet will consider if they approve this amended version to go out for consultation.

Cabinet Assembly to consider final version with any amendments for final consultation

Feb 2019

Cabinet Assembly will need to consider if they agree for this amended version to go out for consultation.

Public Consultation for final amendments

Jan 2019 – May 2019

Public consultation for the New Southwark Plan Proposed Submission Version- Amended Policies. This includes an informal period from the 15 January 2019 to 27 March 2019

Submission of the New Southwark Plan

July 2019

The New Southwark Plan will be submitted to the Secretary of State once it has been finalised.

Public Examination of the New Southwark Plan

Proposed Time frame:
2019
(to be confirmed)

The New Southwark Plan will be placed under examination by the Independent Planning Inspector.

2020

Adoption of the New Southwark Plan

Proposed Time frame:
2020
(to be confirmed)

The New Southwark Plan once adopted will replace any old plans and core strategy.



As set out above, the Proposed Submission Version, which contains all policies including strategic policies, detailed development management policies, the area visions for the borough's neighbourhoods and the final list of development site allocations, was consulted on between October 2017 to January 2018.

Unlike previous consultations, this consultation asked two specific questions to give our residents and stakeholders 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.' These are the same questions the independent Planning Inspector will be asking as part of the examination.

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](#).

- 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 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.

Respondents were asked 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.
- **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 our 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?

This consultation has led to further amendments to certain policies; Southwark Council has subsequently produced the amended policies which will be consulted on during this consultation between 15 January 2019 to 27 May 2019.

2.3 What happens next?

For the next stage the council will be consulting on the Amended Policies of the New Southwark Plan: Proposed Submission Version between **15 January 2019 until 17 May 2019**. This includes an informal period from the 15 January 2019 to 27 March 2019. The scope of the consultation for the Amended Policies is the same as the Proposed Submission Version consultation, to ask whether the aims of the policies are achievable and whether they are based on a robust evidence base. These are known as the 'Test of Soundness' as detailed above.

The Council will seek the views of the full range of statutory and non-statutory stakeholders on the policies. Stakeholders are requested to submit full and detailed comments, backed up by evidence, to justify any support or opposition for the draft policy proposals.

Once we have finished consulting on the New Southwark: Proposed submission version – Amended Policies, we will collate all the responses we received and see whether we need to amend the policies further. We will provide officer comments on all the responses we receive which will set out whether we have changed the plan to reflect the response, and will explain our reasoning for why we have/have not amended the plan. This will be published in full in our next consultation report when the plan is submitted to the Secretary of State for a public examination.

The New Southwark Plan: Proposed Submission Version with Amended Policies is the version of the plan the council intends to submit to the Secretary of State for a public examination. However, subject to the result of the consultation, the council might hold further consultation if this is necessary and appropriate. Participants in the final stage of consultation have the right to represent themselves at the public examination.

Southwark Council may make minor editorial amendments to the New Southwark Plan up to the submission to the Secretary of State and the Examination in Public, until the Inspector has published his/her recommendation report after the public examination. The final version of the New Southwark Plan will be considered by the Cabinet and the Council Assembly prior to adoption. More information regarding the next stage of consultation on the New Southwark Plan: Proposed Submission Version - Amended Policies can be found in Appendix B – Consultation Plan.

3. Summary of Consultation

3.1 Who was consulted and how?

For the Proposed Submission Version stage all statutory and non-statutory consultees on the planning policy database (10,000+) were emailed about the consultation which set out the timescale for consultation and how people can comment on the NSP through the consultation hub set up specifically for the consultation, or via email. Officers attended local stakeholder group meetings throughout the consultation period including making announcements at the five Community Council's, Planning Committee, Southwark Planning Network, Southwark Future Steering Board, Southwark Cyclists and Southwark Pensioners Action Group.

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

Consultation was also notified through the website, consultation hub webpage, emails, physical letters to landowners and in local newspaper, Southwark News. Physical forms and copies of the plan were also held at the council offices, the libraries and My Southwark service points for people to review the document and make comments.

Annex 1 to this report (consultation materials) contains a copy of the email mailout notification, the library poster, example landowner letter, newspaper notification and representation form.

4. Representations Received and Officer Responses

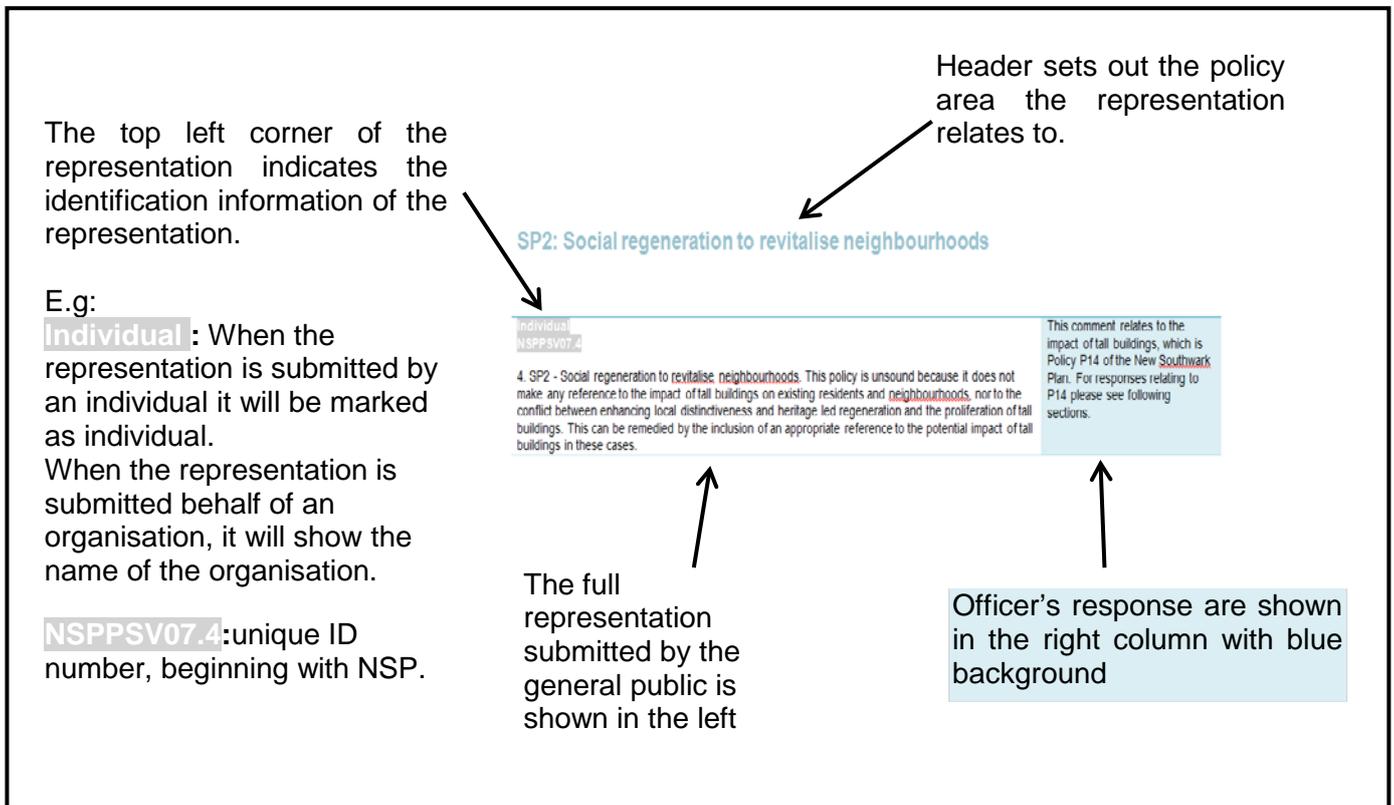
This section of the report publishes all the relevant representations received by Policy to the consultation held between Oct 2017 to Feb 2018 for the Proposed Submission Version of the New Southwark Plan. Only representations related to the policies summarised in the table below are included in this chapter, as these are the policies the council is amending.

The representations are divided into its corresponding policy area in a table format, with each representation followed by the officer's response, as indicated in **Figure 2**.

Amended Policies		Policy status
Strategic Policies		
SP2:	Social regeneration to revitalise neighbourhoods Regeneration that works for all	Amended policy
Development Management Policies		
P1:	Affordable homes Social rented and intermediate homes	Amended policy
P4:	Private rented homes	Amended policy
P9:	Optimising delivery of new homes	Amended policy
P13:	Residential Design	Deleted policy
P14:	Tall buildings	Amended policy
P28:	Small and independent businesses Affordable workspace	Amended policy
P36:	Hotels and other visitor accommodation	Amended policy
P70:	Local list	New policy
P71:	Homes for Travellers and Gypsies	New policy
Annex 4:	Borough views	Amendment to Annex 4
Area Visions		
Aylesbury		New vision
Site Allocations		
NSP 13:	Old Jamaica Road Industrial Estate	Deleted policy
NSP 46:	Skipton House	Deleted policy
NSP 57:	Mandela Way	Amended policy
NSP 65:	Land bounded by Glengall Road, Latona Road and Old Kent Road	Amended policy

NSP 69 and 70: Hatcham and Ilderton Road	Amended policy
NSP 80: St Olav's Business Park, Lower Road	Amended policy
NSP 85: Croft Street Depot	Amended policy
Policies map schedule changes	
Old Jamaica Road Industrial Estate	Strategic Protected Industrial Land (SPIL)
Strategic Protected Industrial Land (SPIL) boundary amendment (gasworks site, Old Kent Road)	Boundary amendments
Camberwell town centre	Boundary amendments

Figure 2. How to Read this Document



SP2: Social regeneration to revitalise neighbourhoods

Individual
NSPPSV07.4

4. SP2 - Social regeneration to revitalise neighbourhoods. This policy is unsound because it does not make any reference to the impact of tall buildings on existing residents and neighbourhoods, nor to the conflict between enhancing local distinctiveness and heritage led regeneration and the proliferation of tall buildings. This can be remedied by the inclusion of an appropriate reference to the potential impact of tall buildings in these cases.

This comment relates to the impact of tall buildings, which is Policy P14 of the New Southwark Plan. For responses relating to P14 please see following sections.

SP2: Social regeneration to revitalise neighbourhoods

Better Bankside
NSPPSV22.3

Support noted.

Better Bankside's placemaking strategy, known as the Bankside Urban Forest (BUF), is comprised by a programme of projects aiming to create healthier, more attractive and better-connected streets within the Bankside neighbourhood, that respond to the expressed needs of local businesses and residents whilst enhancing and celebrating the many heritage assets that augment its local distinctiveness. Over the last ten years, the BUF has provided a holistic approach that include many of the urban greening, lighting and streetscape improvements outlined within Policy P11.

Better Bankside particularly welcomes point four within Spatial Policy 2; ensuring that development and regeneration schemes enhance the contextual heritage of the area. This Strategic Policy also outlines the importance of creating attractive and appropriately designed public realms that encourage sustainable ways to travel and greening measures. These are in conjunction with Better Bankside's wider objectives relating to BUF's projects affect the public realm.

The list of considerations set out within Spatial Policy 2 identifies how the Council intends to achieve the policy's objectives in revitalising neighbourhoods within the Borough. Point number 3 places specific emphasis on how the local authority will ensure that "local residents and neighbourhoods prosper from growth through giving people from every community the opportunity to get their voices heard from the earliest point and when decisions are made".

Although the Plan's reasoning behind this policy recognises that development proposals ought to "make sure... businesses are always considered and listened to" in addition to existing residents, we believe it would be more appropriate to make specific reference to local businesses within Point 3 of the policy. This would help to ensure that members of the local business community are duly consulted on in order to capture the views of different local stakeholders in equal measure.

We therefore recommend that point number 3 of SP2 makes specific mention of local businesses to ensure an adequate level of stakeholder engagement.

SP2: Social regeneration to revitalise neighbourhoods

Individual NSPPSV40.6

This policy is not positively prepared, not justified and not effective as there is no evidence that it is integrated into the Development Management Policies.

Although it has a welcome addition of needing to benefit existing residents as well as new residents, this is not translated into the rest of the plan.

Also, please see notes below in my grouped response to P10, P11, P12 and P13.

Individual NSPPSV56.2

This policy is not positively prepared because it fails to relate to all the planning policies which are relevant, fails to show how the redevelopment of physical environments through the proposed policies leads to human health and wellbeing, and does not show how the NSP will translate the development and regeneration policies into being of benefit for existing residents and neighbourhoods.

Links between social regeneration and planning policies

Linking the idea of social regeneration to physical regeneration is a welcome step towards managing the different departments of the large local government institution in a more joined up way. But the idea was added to SP2 in a consultation just before the submission version consultation, and has not brought about an integration or effective linking of social regeneration policy and development management policies. The Council has acknowledged that it is a late addition and that much work still needs to be done to integrate the two. But that doesn't make it sound. For example:

- SP2 is confined simply to P11 – P22. All these policies are about the design, construction, conservation and location of physical structures. There is no mention of people and their social relations which are inseparable from social regeneration. Then the monitoring table 4 in Annex 5 is simply about monitoring aspects of the work and programmes relating to those physical structures. There is no monitoring of the impact on people of that work and those programmes. Take for example P14 policy for tall buildings. There

This strategic policy sets the objective of revitalising neighborhoods to benefit existing residents and businesses. This will be achieved by policies throughout the New Southwark Plan which draw on an evidence base that has been published with each stage of consultation.

SP2 is a strategic policy which sets out the councils regeneration strategy and will be delivered through the application of the relevant development management policies. This policy has been amended to include details on the social regeneration framework, which outlines how the council intends to take to ensure community participation. The accompanying Integrated Impact Assessment will in turn, propose new social indicators to evaluate and monitor policies.

SP2: Social regeneration to revitalise neighbourhoods

is no monitoring of who inhabits the buildings, and the impact on them and their health and wellbeing of living in those structures.

- There seems to be no monitoring planned of the impact on social regeneration, health and wellbeing of the human personal, psychological and social stress from the upheaval caused by so much redevelopment imposed across the borough. It is especially significant because the impact will be found in longitudinal studies of the impact on the same individuals over a long time period and not snapshots of the inhabitants of the same place at different times. This is recognised not in the NSP but in a paper to the Health and Wellbeing Board (November 2017) that they should aim to secure funding for a longitudinal study to understand the impact of regeneration on established and new communities over time. But if this understanding is at such an early stage it has not even yet been funded, it cannot be justified to stimulate such massive programmes of physical regeneration across the borough affecting so many thousands of people in settled neighbourhoods. To be effective the introduction into the NSP of the Social Regeneration policy should have been to slow down the massive physical regeneration programme to learn about its effects on people and their social communities and health and well being.

Links between physical environments and health and well being

It is the case that health is impacted by the physical environment and certain environments will cause sickness. That does not mean that reengineering the physical environment will create health and wellbeing. The famous Peckham Experiment of the 1930s to 1950 explored the factors that cultivate health and wellbeing and showed how the self management of the individual in a self managed social context was key to health and well being. The social regeneration policy is not effective because it is too focussed on the engineering of the built environment without adequate attention to the provision of social and physical contexts enabling self management and the nurturing of social relationships.

Regeneration for the benefit of existing residents and neighbourhoods.

This is a welcome though overdue acknowledgement that regeneration can be to the disadvantage of existing residents and neighbourhoods. There is nothing in the NSP which shows that the massive regeneration programmes in the borough are being pursued in a different way to those which have already caused harm to residents whose neighbourhoods have been dramatically changed. This is because the significance of continuity in social relationships as well as physical environments has not been a feature of planning policies. The social regeneration policy is at an early stage and will need to develop a set of policies that reflect this before it can be sound.

One of these policies should be a procedure which requires a physical, social and economic audit before

SP2: Social regeneration to revitalise neighbourhoods

any site is considered for redevelopment. This audit would record the facts of the current condition and uses on the site including the social and economic uses. The audit would also seek the views of stakeholders in the site about the future plans and potential for the existing uses. The report on this audit would be subject to consultation to check the accuracy. This report and the consultation report would form an essential part of any redevelopment proposals and would need to demonstrate that the redevelopment would produce better benefits than the support and nurturing of the current uses.

Community involvement in regeneration

The policy acknowledges that the community needs to be involved in regeneration from the earliest point, to have their voices 'heard'. This is not an implementation of the Council's voluntary and community sector strategy 'Common Purpose, Common Cause' (November 2016). This emphasises the importance of moving on from 'consultation and informing' to co-production forms of working with the community across all the Council's work including planning and regeneration. This must be informed by the 'Gunning Principles' endorsed by the courts. There are no signs yet that there is a co-production policy being developed to enable this in planning and regeneration.

Proposed changes to make the NSP sound

As the Council recognises, the new policy for Social Regeneration needs much further development. This includes:

- The need to take into account the significance of human social relationships to health and well being and, with that understanding, reassess the impact of policies for such extensive disruption of existing neighbourhoods.
- There needs to be a suite of development management policies to enable social regeneration which would articulate the relationship between social and physical regeneration of neighbourhoods. These would include 'community spaces' to provide activity space for the organised and informal community sector and informal social meeting places.
- The process for engaging existing residents and neighbourhoods needs to be reformed to enable the co-production of planning and regeneration policies required by national policies and the Council's own policies.
- The pace and extent of regeneration needs to be slowed down until those processes have been developed and reformed.
- A process for a physical, social and economic audit report, before any site is considered for redevelopment, should be introduced as outlined above.

I will be able to offer further suggestions by the time of the oral examination as the nature of the Social Regeneration policy and its processes are revealed over the next few months.

SP2: Social regeneration to revitalise neighbourhoods

Elephant Amenity Network
NSPPSV57.2

Whilst the social dimension to planning is very important, this policy is unsound for the following reasons:

The important claims to provide the best outcomes for existing residents and to support empowered local communities would be much more meaningful if this strategic policy had been co-designed and co-produced with existing community groups rather than introduced into the NSP at the last moment in a top down manner.

Important community needs are not recognised, particularly the value we give to community spaces. There are major issues with being able to access community meeting space in the Borough that is accessible and affordable. Youth centres have been lost and need to be re-provided.

In terms of the deliverability of this policy, it is unsound that no planning mechanisms are proposed to ensure that regeneration benefits existing residents and that community voices are heard in decision making. To make this policy sound we propose:

- The use of social impact assessments both as an instrument of planning policy and a requirement of major planning applications.
- Work with Universities on longitudinal studies to monitor and evaluate what is really happening as a result to existing residents and businesses as a result of the regeneration. These will be reported annually and look at change over the long term (a minimum of 10 years).

These tools will help ensure regeneration is not equivalent to gentrification nor based on the destruction of council estates or the displacement of small businesses.

The existing diversity of Southwark is highly valued, but too many are under-represented or completely excluded by the current development trajectory. All of the policies in this Plan require differentiation to recognise the specific needs of diverse groups and an approach to empowerment that build solidarities between groups.

Development Management policies need to be revised with targets and precise proposals to ensure each point in this Strategic Policy can be delivered.

Noted, the policy was amended to make reference to the social regeneration framework which is a new initiative set in place to determine community participation.

SP2: Social regeneration to revitalise neighbourhoods

Historic England NSPPSV83.2

We welcome and support the Borough Council's overarching objectives within the Plan, including those of revitalising existing neighbourhoods and town centres. We particularly welcome the commitment to enhance local distinctiveness and encourage heritage-led regeneration in SP2. We would suggest that the text here could go further in supporting development that conserves and enhances the historic environment by making clear that an understanding of the significance of the historic environment should guide the design of new proposals. The following could simply be added to the first sentence in clause 4: 'and ensuring that new development is informed by an understanding of the heritage significance of the existing built environment'.

Individual NSPPSV86.1

In September 2017, Southwark Council's cabinet adopted a Social Regeneration Policy. This policy focuses upon developing and implementing policies and strategies that are people-related, people-focused and which involve residents and their organisations/networks in shaping and delivering outcomes that best address the social issues facing the borough.

This policy is encouraging cross-discipline working across the Council (and with its partners) and is expected to lead to more cross-sectoral working groups that steer the path that public services follow in Southwark over the coming years.

It is probably the most momentous change in approach that Southwark Council has taken for many years, and one that will lead to people and communities being part of the assets of the area to be employed and invested in local solutions. However, unfortunately the New Southwark Plan has been prepared without its benefit or guiding principles.

The Social Regeneration Policy should have come first and under-pinned all the Implementation Policies; and then all NSP implementation, strategic and management policies considered "through that lens". Without that the Plan is deficient in terms of people-related and people-focused issues, irrespective of the fact that the Council has included issues it considers Social Policy-related in Strategic Policy 3 (Plan Page

Noted. The design policies have been amended to reflect the comments and emphasize the significance of heritage.

The strategic policy sets the objective of revitalising neighborhoods to benefit existing residents and businesses. This will be achieved by the policies throughout the plan. The comments relating to engagement have been noted, and the policy has been amended to make reference to the social regeneration framework which is being developed.

SP2: Social regeneration to revitalise neighbourhoods

17) and Management Policies P11 to P22 (Plan pages 37 to 50). has made its aspirations clear(er) in SP3 ... there are currently no management policies to deliver it.

Consequently, it is neither positively prepared or effective, as Social Policy targets and outcomes will increasingly become the focus of measuring the achievements of the Council.

Nor is it justified, because it has not adequately considered the views and perspectives of need through “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” and therefore the Plan does not reflect a “collective vision” as specified in the National Planning Policy Framework.

Suggested improvements:

1/ The NSP is reviewed to identify and address any policies that should have been the subject of greater involvement of local people “from an early stage before options were created” in the manner that both the Social Regeneration approach, and an associated revised Statement of Community Involvement (SCI), would require.

2/ Further to “1” above, Area Visions are re-examined, as these are key to enabling local people to engage (as the least technical of Plan documents); and then each of the Site Allocations also re-considered in light of the updated Area Visions.

SP2: Social regeneration to revitalise neighbourhoods

Individual
NSPPSV86.4

The adoption of a Social Regeneration Policy in September 2017 marked a huge leap forward by Southwark Council on terms of re-focusing its activities, strategies/policies and processes, towards greater involvement of and co-production with its residents. The Policy will secure more effective and focused cross-discipline working across the Council to focus on bigger picture issues and on bigger developments ahead that cross-sectoral activity (including involving local people and their communities) can focus their respective strengths on. But the late appearance in the NSP time-table and the minimal effect it has had on the NSP, so far, means it is neither positively prepared or effective.

It should have been a policy in place before the proposed NSP was developed, so that all NSP issues and policies were developed through that lens; and without that the NSP is deficient in people-related and people-focused issues. SP2 on page 17 sets out laudable aspirations for the Social Regeneration Policy, but the management policies to deliver these are not reflected in the NSP. Those that have been associated with Social Regeneration to Revitalise Neighbourhoods from P11 to P22 on pages 37 to 50 are an assortment of management policy areas some of which might fit with Social Regeneration but others that would appear to have been put there for lack of another appropriate Strategic Policy (and could hardly be justified on a Social Regeneration basis).

The inappropriateness of four of the Management Policies (P14, and P16-18 below), serve to illustrate the need for Policies to be reviewed through the Social Regeneration prism.

It could perhaps quite reasonably be argued that a wide range of other Management Policies ought to be associated with Social Regeneration, for example P5 Housing for Older People; P6 Homes for households with specialist needs; P23 and P24 concerning Best start in Life; P42 to P53 concerning Healthy, active lives; etc.

As previously referred to in my response on Implementation Policies, the Social Regeneration Policy is not just key to getting local communities involved at the earliest stage; it is what National Planning Guidance requires but the Council does not currently do, and that is regrettable.

Whilst reasons are often offered that working with, and trusting, local people increases risk of not delivering; that approach fails to understand that working closely with local people can mitigate against risk through developing solutions that people both need and want, and have a real stake in. Adding to that, the obverse

The SCI is being redrafted for consultation and the NSP will be under regular review to consider how Social Regeneration can be further considered.

SP2: Social regeneration to revitalise neighbourhoods

of risk management is not that you are risk averse, but you risk not taking opportunities that are created, and lose the chance of the much greater potential rewards that a bigger vision might bring.

Suggested improvements:

1/ The Social Regeneration Policy, it's values, principles and processes; be reflected in the urgent review of the SCI that is needed and overdue.

2/ The NSP be reviewed to identify and address those policies that should require greater involvement of local people "from an early stage before options were created" in the spirit of Social Regeneration and as a revised SCI would require.

SP2: Social regeneration to revitalise neighbourhoods

Individual
NSPPSV87.4

4. SP2 - Social regeneration to revitalise neighbourhoods. This policy is unsound because it does not make any reference to the impact of tall buildings on existing residents and neighbourhoods, nor to the conflict between enhancing local distinctiveness and heritage led regeneration and the proliferation of tall buildings. This can be remedied by the inclusion of an appropriate reference to the potential impact of tall buildings in these cases.

Individual
NSPPSV91.84

Objection to SP2: Social Regeneration to revitalise neighbourhoods policy.

Objection 66.

We object to this late addition to the NSP which is unsound because it is not properly integrated into the NSP.

This comment relates to the impact of tall buildings, which is Policy P14 of the New Southwark Plan. For responses relating to P14 please see following sections. The design policies have been amended to reflect the comments and emphasize the significance of heritage.

Policy P14 of the New Southwark Plan is the tall buildings policy.

SP2: Social regeneration to revitalise neighbourhoods

Individual
NSPPSV93.6

To be sound the principles in SP2 Social Regeneration require a package of support being identified that will empower communities and make this community form of housing deliverable. This could include working with the Mayor to provide access to expertise, partnering with smaller housing associations, the Local Authority arranging the appropriate checks on land and ensuring the register is fully accessible to community builders, neighbourhood forums and other community interests.

Noted.

SP2: Social regeneration to revitalise neighbourhoods

King's College Hospital NHS Foundation Trust.
NSPPSV102.4

Social Regeneration to revitalise neighbourhoods – Policy SP2 (NSP – Dec 2017)

Policy SP2 states the council will continue to revitalise our neighbourhoods to make them healthier places we can all be proud of to live and work. This will be achieved through:

1. Ensuring that all residents and particularly existing residents can assess the benefits of our regeneration programmes and the opportunities created by those programmes for new homes, new jobs and new infrastructure; and
2. Encouraging residential development above shops to enliven town centres; and
3. Ensuring that existing residents and neighbourhoods prosper from growth through giving people from every community the opportunity to get their voices heard from the earliest point and when decisions are made;
4. Enhancing local distinctiveness and heritage led regeneration by requiring the highest possible standard of design, creating attractive, healthy and distinctive buildings and places. This will be supported by providing green infrastructure and opportunities for healthy activities and improving streets, squares and public places between buildings;
5. Providing targeted support in regeneration areas for all communities and particularly the disadvantaged, involving all of our services, partners and community based activities.

We agree with this policy and believe Camberwell will benefit from strengthened social cohesion and believe this can be achieved through the regeneration of parts of the borough, such as the Camberwell Area Vision, where much of the medical services and buildings are for public use. Policy SP2 could go further by stating that all development should be future proofed to enable and facilitate future development within the immediate vicinity.

Noted. The adaptability and quality of new development will be assessed during the planning application process.

SP2: Social regeneration to revitalise neighbourhoods

Individual
NSPPSV110.2

2. New Southwark Plan Strategic priorities

The strategic priorities are unsound because they are not effective. The dependencies between SP2 (Social regeneration to revitalise neighbourhoods) and SP4 (Strong local economy) are not brought out fully in the Plan. It is clear, in a neighbourhood such as Peckham, that enterprise is intimately linked to sense of community. However, SP5 does recognise the importance of SMEs and of helping start ups, through the High Street Challenge, which is to be encouraged. Economic diversification is essential if a community is to be more resilient; without stating those dependencies, SP2 is not effective.

Individual
NSPPSV120.2

* SP2 SOCIAL REGENERATION Regeneration to revitalize neighborhoods via the above has wasted thousand of pounds of Council fiancé in failed new homes delivery programs in Rotherhithe. Planning affidavits issued directly by Elected Members has been undertaken with non transparency, with this data not accessible via Cabinet minutes or on the Council's web site. The unhealthy, incestuous relationship between the tenant movement and political parties has prevented open, all inclusive community engagement from progressing. Canvassing, polling and balloting estate residents should be undertaken professionally and under the same scrutiny as electoral registers. Resident bodies should not be accountable for the determination of planning matters. They should have contribution. But not totally, unsupervised collective opinion, as illustrated in Rotherhithe, where strong personality and political ties have hindered progressive regeneration of the area. Housing Forum agendas and minutes should be publicly accessible. Questionable, non transparent decision making at political Elected Member level has hindered sensible planning review and delivery in Rotherhithe.

The NSP includes policies to secure affordable housing, small business space and small shops to protect against displacement of residents and businesses.

Noted

SP2: Social regeneration to revitalise neighbourhoods

Individual
NSPPSV128.84

Objection to SP2: Social Regeneration to revitalise neighbourhoods policy.

Objection 66.

We object to this late addition to the NSP which is unsound because it is not properly integrated into the NSP.

The strategic policy sets the objective of revitalising neighborhoods to benefit existing residents and businesses. This will be achieved by policies throughout the plan.

Individual
NSPPSV136.6

Inconsistent with Mayor of London's London Plan

The NSP Strategic Policy SP6 Cleaner Greener Safer and Policy P56 Open Space are unsound because they are inconsistent with the draft London Plan and internally inconsistent

Strategic Policy SP6 and Policy P56 are inconsistent with the London Plan because the London Plan's sections on green and open space emphasise the need for the extension as well as the protection of green and open space:

- Policy G3 Metropolitan Open Land states that:

The extension of MOL [Metropolitan Open Land] designations should be supported where appropriate.

- Policy G4 Local green and open space states:

The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.

C Boroughs should undertake a needs assessment of local green and open space to inform policy.

Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required.

Southwark Council's Open Space Strategy (OSS, 2013) noted that the projected growth in the borough's

This comment relates to Open Space within Southwark, the New Southwark Plan incorporates a policy specifically for Open space which should be referred to.

SP2: Social regeneration to revitalise neighbourhoods

population of 19% between 2012 -26 would increase the demand for green space. The OSS argued that because of the limited opportunities to create new open space, the focus would need to be on improving access to and the quality of existing green space. However, the proposed London Plan indicates a stronger presumption towards the creation of new open space.

Ineffective in relation to SP2

NSP SP2 Social regeneration to revitalise neighbourhoods states that the SP will be achieved through, among other things, “providing green infrastructure and opportunities for healthy activities...” (p17). Southwark’s Open Space Strategy (2013) recognised deficiencies in the provision of green space in parts of the borough where good quality open space can help address socio-economic issues (OSS, p16). Given these deficiencies, achieving SP2 will require the extension of green and open space and the creation of new green and open spaces.

Proposed change

The NSP SP6 Cleaner, Greener, Safer and P56 Open Space should include something like the proposed London Plan policy: “The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space”.

NSP P56 should identify areas of the borough where new open space will be provided and the kinds of facilities needed for particular kinds of users, e.g. young children, older children, young adults, older adults.

SP2: Social regeneration to revitalise neighbourhoods

Individual
NSPPSV136.14

Not effective

The proposed Strategic Policy on Social Regeneration is unsound because it is not effective as it cannot be implemented. Furthermore it is inconsistent with other parts of the NSP where the social regeneration aspirations set out are not upheld.

The idea of having a strategic policy within the NSP which looks at the effect on the local population of policies to redevelop neighbourhoods is welcome. The question needs to be asked, however, why is the aspiration that local residents should be positively affected by the Council's planning policies limited to those in regeneration areas. One of the main weaknesses of this strategic policy is the failure to identify the people who are its intended audience or beneficiaries.

SP2 proposes to ensure that "all our residents, and particularly existing residents, can access the benefits of our regeneration programme." However, with no policy or programme of systematic engagement with residents in regeneration areas, or indeed in any area across the borough where the Council or developers are considering major development plans, it is not clear how the Council will identify the possible impacts of proposed changes on local residents or even how they would know who the potentially affected residents are.

A second aspect that makes this strategic policy ineffective is that there are many other aspects of development that affect local residents and not just residential development. The Council should change the wording of SP2 to include developments of green space, transport infrastructure and enterprise development, to ensure that local people are also able to contribute to those discussions.

Not justified

SP2 is confined simply to P11 – P22. All these policies are about the design, construction, conservation and location of physical structures. There is no mention of people and their social relations which are inseparable from social regeneration. Then the monitoring table 4 in Annex 5 is simply about monitoring aspects of the work and programmes relating to those physical structures. There is no monitoring of the impact on people of that work and those programmes.

Proposed changes

The failure to set out an effective social regeneration policy undermines the NSP overall. It would be

The strategic policy sets the objective of revitalising neighbourhoods to benefit existing residents and businesses. This will be achieved by policies throughout the plan. This will also be complemented by other regeneration strategies developed such as the social regeneration charter to enable the delivery of this strategic policy.

SP2: Social regeneration to revitalise neighbourhoods

advisable for the Council to withdraw the NSP to allow time to consult and develop a properly effective Strategic Policy on this theme.

Individual NSPPSV148.3

The Plan does not have a vision and its Strategic Policies are disconnected from the Development Management Policies.

Several of the Strategic Policies have no or very minimal policies to give expression to their ideals and ambitions. SP2 Social Regeneration was introduced into the Plan at the last moment. It aims to provide the best outcomes for existing residents and to support empowered local communities but in terms of the deliverability of this policy no planning mechanisms are proposed. The DM policies cover design and conservation issues only; there is no community spaces policy, no policy on estate regeneration etc.

SP3 Best Start in Life mentions childcare, playspace, library access but the DM policies only cover education places and student homes.

Individual NSPPSV148.7

NSP Policy P1 AFFORDABLE HOMES

This policy is unsound because 35% affordable housing does not meet housing need in Southwark.

The Council says that only 8% of households have an income which disqualifies them from affordable housing assistance and that 48% are in affordable housing need. By either measure 35% minimum affordable housing is inadequate.

The policy is not 35% of all new housing but 35% of developments of 11 or more homes.

This strategic policy sets the objective of revitalising neighborhood's to benefit existing residents and businesses.

These issues are addressed within the housing policies

SP2: Social regeneration to revitalise neighbourhoods

The policy fails to provide information on what % of total new build will be affordable, but the small sites allocation of 800 homes per year (see draft London Plan 2017) suggests the real policy figure will be under 30%.

The policy requirement of 25% social rented is under the 33% of households with incomes that qualify them for social rented housing.

Confusion in the Reasons and Fact Box cast doubt on whether the Council intend to deliver 25% social rented homes. Social rent is relabelled as social housing, which in turn is sub-divided into affordable rent and London affordable rent (both at much higher rent levels) as well as social rent. This illuminates why the Council has consistently failed to achieve policy compliance on social rented housing. We note a net loss of 912 social rented units in the latest available comparison between existing and proposed planning approvals (London Plan Annual Monitoring Report 13 Table 3.16).

The transparency and deliverability of the policy is further undermined by too much emphasis (points 7 and 8) on developments achieving policy compliance by providing off-site and in lieu payments. housing on site. This policy creates no go areas for social rented housing, widening spatial inequality in the Borough and is inconsistent with Strategic Policy 2 Social Regeneration.

The prominence given to viability is not qualified with the policy approach required by the Mayor of London, such as the publication of full viability assessments at the time of the validation of planning applications and variations (NB not just the publication of executive summaries) and access to expertise independent of the developer

SP2: Social regeneration to revitalise neighbourhoods

Tesco Stores Ltd.
NSPPSV180.1

Policy SP2 of the New Southwark Plan sets out the Council's overarching objectives for revitalising neighbourhoods across the borough, creating healthier places where people are proud to live and work. Our client supports the Council's objectives for the regeneration and revitalisation of neighbourhoods in the borough. In particular our client supports the Council's specific acknowledgement of the role that residential development above shops can perform in revitalising existing town centres and securing wider regeneration benefits.

Vital OKR
NSPPSV205.42

Objection to SP2: Social Regeneration to revitalise neighbourhoods policy.

Objection 66.

We object to this late addition to the NSP which is unsound because it is not properly integrated into the NSP.

Support noted.

The strategic policy sets the objective of revitalising neighborhood's to benefit existing residents and businesses. This will be achieved by policies throughout the plan.

SP2: Social regeneration to revitalise neighbourhoods

Individual
NSPPSV316.3

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

We fully appreciate the importance of the new Social Regeneration Policy (SP2) now referred to in the plan; it is as an approach built on engagement and co-production which mirrors other strategic developments within the borough building cross-sectoral collaboration and partnership. However, this was included late in the development of the plan, and the principles of this policy are not reflected throughout; and, therefore, has not been used to ensure that the plan has been produced through early and meaningful engagement. Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments. This policy is unsound because 35% affordable housing does not meet housing need in Southwark. The Council say the need is 48%, but then say 92% of households in Southwark have an income which requires some form of affordable housing.

This is because the threshold to qualify for affordable housing is set at a household income of £90,000 which renders need and affordability meaningless. The policy is not 35% of all new housing but 35% of developments of 11 or more homes. The policy fails to provide information on what % of total new build will be affordable, but the small sites allocation of 800 homes per year (see draft London Plan 2017) suggests the real policy figure will be under 30%. The policy requirement of 25% social rented is subject to the same caveat as above, well under the stated need for 33% of all new housing as social rented. Confusion in the Reasons and Fact Box cast doubt on whether the Council intend to deliver 25% social rented homes. Social rent is relabelled as social housing, which in turn is sub-divided into affordable rent and London affordable rent (both at much higher rent levels) as well as social rent. This illuminates why the Council has consistently failed to achieve policy compliance on social rented housing. The transparency and deliverability of the policy is further undermined by too much emphasis (points 7 and 8) on developments achieving policy compliance even if they do not provide affordable housing on site. This policy creates no go areas for social rented housing, widening spatial inequality in the Borough and inconsistent with Strategic Policy 2 Social Regeneration.. The prominence given to viability is not qualified with the policy approach required by the Mayor of London, such as full public disclosure of all viability assessments (not only viability

Noted. The policy has now been amended to include details on how the council intends on encouraging community engagement. The housing issues are addressed in the housing policies.

SP2: Social regeneration to revitalise neighbourhoods

reviews) and access to expertise independent of the developer. To make the plan sound, the following changes are needed: • Higher policy requirement for affordable housing in general and social rented housing in particular • The supporting text and Fact Box to be consistent with the social rented requirement to give confidence that the policy is deliverable. • Changes on small sites and viability to bring conformity with the draft London Plan Do you consider that the New Southwark Plan is unsound because it is not: -

Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

The policy is unsound because it does not consider the key planning objectives of a) retaining the existing stock of affordable/ social rented housing and b) bringing vacant properties into use, where possible as social rented housing. It is therefore inconsistent with current London Plan Policy 3.14 and draft London Plan 2017 Policy H10. Within the plan, there is inconsistency between this policy and SP2 which emphasises giving every community the opportunity to get their voices heard. There is huge disquiet across the Borough with the policy of estate demolitions, but these voices are not being heard or responded to. To make the policy sound, Southwark needs to make use of all the tools that are available to protect and increase social rented housing across the Borough. These should include: • Independent analysis of all estate regeneration options, including refurbishment, with a binding ballot of tenants and leaseholders to decide what regeneration programme goes forward, • A social impact assessment so that social, health and wellbeing indicators are incorporated into decision making around regeneration schemes, • Any replacement of social rented housing should be carried out on the basis of like for like in terms of tenure, rental cost and size.

SP2: Social regeneration to revitalise neighbourhoods

Individual
NSPPSV318.1

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

This objection relates to SP2, in the light of the likelihood, inter alia, that SP2 will be used to justify compulsory purchase orders under S 226 1A Town and Country Planning Act, with the consequent detriment to existing residents' well-being.

1 SP2 is not based upon a robust and credible evidence base. Docs EB 12 -14 are irrelevant and/or insignificant for the purpose. 2 SP2 is not in accordance with the requirements for clarity and practicality set out in the National Planning Policy Framework (NPPF), e.g. para 17 (first and third bullets), para 154 and para 184. Paras 151 and 184 of the NPPF are also relevant. 3 Justice and the public interest require that an acquiring authority base the use of compulsory purchase in respect of homeowners on clear and well-evidenced strategies, not least to ensure that the right balance is struck with regard to well-being, and detriment thereto, and to ensure the protection of the human rights of residents facing loss of home and property, displacement and disruption of family life.

4 It is evident from the cabinet member's foreword to the submission NSP, and from SP1, that regeneration involving demolition of existing council estates, not confined to development sites specified in the NSP, is likely to be proposed, thus threatening the well-being of existing tenants and leaseholders in those estates.

5 SP2 is not lawful in as much as the consultation, required by the cabinet's decision of 19 September 2017, on the draft "Social Regeneration Framework" has not taken place and/or not been reported upon.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. At a minimum the submission NSP should be withdrawn until

The strategic policy sets the objective of revitalising neighborhood's to benefit existing residents and businesses. This will be achieved by policies throughout the plan, which draws on evidence base which has also been published at each stage of consultation. The policy has been amended to make reference to the social regeneration charter.

SP2: Social regeneration to revitalise neighbourhoods

such time as: (a) the consultation referred to at 5 above has taken place and been reported upon to cabinet, so as to enable revision to their draft "Social Regeneration Framework" and consequent revisions and improvements to SP2; (b) the cabinet has received officers' advice on points 1 - 4 above, and on all related matters such as how to achieve an adequate evidence base, how to integrate SP2 with their "Social Regeneration Framework", and how to provide better mitigation of disbenefits resulting from regeneration, having regard, for example, to DCLG's Estate Renewal National Strategy and the Mayor of London's draft Good Practice Guide to Estate Regeneration, both dated December 2016, and to the DCLG guidance of October 2015 on the use of compulsory purchase.

P1: Affordable housing

GL Hearn
NSPPSV17.2

Affordable Housing

Policy P1 proposes a minimum of 35% affordable homes, subject to viability. Whilst we have not examined the BNP Paribas Viability Report in detail, we understand that the figure of 35% has been tested and it has been demonstrated that the Council's Policy P1 requirement of 35% affordable housing remains a reasonable requirement across all developments in the London Borough of Southwark. This figure is supported by our client.

We note that the part 4 of the former draft Policy DM1 has been removed from the policy, but the supporting text of the policy states that a financial appraisal must be submitted to demonstrate the deliverability of affordable housing for all applications, not just those that are unviable. This requirement is at odds with the Mayor of London's recently adopted SPG for Affordable Housing and Viability and the draft London Plan, which do not require a 'viability appraisal' to be provided unless the minimum 35% affordable housing requirements have not been met. It is on this basis that we propose that supporting text be revised as follows (our emphasis added to highlight the proposed additional text):

We require planning applications to show that the developments are viable and deliverable and provide a full viability assessment. A financial viability appraisal must be submitted to demonstrate the deliverability of affordable housing where the minimum requirement for 35% affordable housing is not proposed.

Policy P1 has been amended to allow the fast track route if development proposes 40% affordable housing, with a compliant tenure split.

P1: Affordable housing

Bankside Residents Forum
NSPPSV19.1

This policy is unsound because 35% affordable housing does not meet housing need in Southwark. The Council say the need is 48%, but then say 92% of households in Southwark have an income which requires some form of affordable housing. This is because the threshold to qualify for affordable housing is set at a household income of £90,000 which renders need and affordability meaningless.

The policy is not 35% of all new housing but 35% of developments of 11 or more homes. The policy fails to provide information on what % of total new build will be affordable, but the small sites allocation of 800 homes per year (see draft London Plan 2017) suggests the real policy figure will be under 30%. The policy requirement of 25% social rented is subject to the same caveat as above, well under the stated need for 33% of all new housing as social rented.

Confusion in the Reasons and Fact Box cast doubt on whether the Council intend to deliver 25% social rented homes. Social rent is relabelled as social housing, which in turn is sub-divided into affordable rent and London affordable rent (both at much higher rent levels) as well as social rent. This illuminates why the Council has consistently failed to achieve policy compliance on social rented housing.

The transparency and deliverability of the policy is further undermined by too much emphasis (points 7 and 8) on developments achieving policy compliance even if they do not provide affordable housing on site. This policy creates no go areas for social rented housing, widening spatial inequality in the Borough and inconsistent with Strategic Policy 2 Social Regeneration..

The prominence given to viability is not qualified with the policy approach required by the Mayor of London, such as full public disclosure of all viability assessments (not only viability reviews) and access to expertise independent of the developer.

50% affordable housing is the aspirational target for the borough. This will be achieved through achieving a higher provision of affordable housing on council owned land. Where viable, on council owned land a greater provision of 50% affordable housing will be provided. This commitment is set out on page 12 (A Fairer Future - a place to belong) of the Council Plan. We will continue our long-term homebuilding programme, delivering on our commitment to build 11,000 new council homes by 2043.

The affordable housing target of 35% is set out in Policy P1. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Policy P1 and the Development Viability Supplementary Planning Document (2016) require viability appraisals to be submitted with all planning applications to be validated unless 40% affordable housing that is tenure compliant is proposed (under the revised Policy P1), where the developer can follow the fast track route. As such the maximum viable provision of affordable housing can be achieved on schemes not achieving 40% (tenure compliant) affordable housing. Where a development can viably provide a greater amount of affordable housing this will be identified if it is not following the fast track route.

Table 1 sets out the requirements for affordable housing requirements - 25% social rented homes. The factbox at page 24 is for information only, it is not policy. Therefore only social rented housing is sought, not social housing. The text box has now been removed to avoid confusion.

The Reasons under Policy P1 require viability appraisals to be submitted with all planning applications to be validated not following the fast track route, Policy P1 has now been amended to clarify this in policy.

P1: Affordable housing

To make the plan sound, the following changes are needed:

- Higher policy requirement for affordable housing in general and social rented housing in particular
- The supporting text and Fact Box to be consistent with the social rented requirement to give confidence that the policy is deliverable.
- Changes on small sites and viability to bring conformity with the draft London Plan

Affordable housing will only be delivered off-site or as an in-lieu payment in exceptional circumstances. This will need to be justified within any planning application. As set out in the Draft Affordable Housing SPD (2011) (page 41 at paragraph 6.3.3-6.3.4) where we allow either an off-site or pooled contribution, at least as much affordable housing must be provided as would have been provided if the minimum 35% affordable housing policy requirement were achieved on-site. 6.3.4 Affordable housing should be delivered at the same time as private housing. This should be the case for on-site, off-site and a pooled contribution provision.

Policy P1 has been amended to require both viability appraisals and reviews to be published for public scrutiny.

P1: Affordable housing

Barkwest and Regent Group
NSPPSV20.1

Point 6 and the policy supporting text states that LBS “will require planning applications to show that the developments are viable and deliverable and provide a full viability assessment. We ask for assessments for all applications, not just unviable ones”. This should be updated to accord with the threshold approach outlined within the Mayor’s ‘Homes for Londoners – Affordable Housing and Viability’ SPG (2017) to account for the fast track route where a viability appraisal is not required for applications that meet or exceed 35 per cent affordable housing provision without public subsidy, provide affordable housing on-site, meet the specified tenure mix, and meet other planning requirements and obligations to the satisfaction of the LPA and the Mayor where relevant.

Point 4 states that use of the ‘Vacant Building Credit’ will not be accepted. The Mayor’s ‘Homes for Londoners – Affordable Housing and Viability’ SPG identifies that there may be some circumstances where the credit should be applied. The wording of this policy should therefore be updated to allow for these circumstances, specifically where the criteria outlined at paragraphs 2.75 and 2.76 of the SPG are met.

Policy P1 has been amended to allow the fast track route if development proposed provides 40% affordable housing, with a compliant tenure split.

Vacant building credit is not accepted, as viability testing is undertaken within all applications, therefore it is not necessary. Affordable housing need is critical in Southwark, allowing vacant building credit could jeopardise the delivery of affordable housing.

P1: Affordable housing

Berkeley Homes (South East London)
NSPPSV21.2

Representations on earlier drafts of the NSP have highlighted Berkeley's concern over the impact of the Council's policy on affordable homes on development viability. In order for development to proceed it must be viable. As noted in Paragraph 173 of the NPPF Local Plans should be deliverable. Therefore, the sites and the scale of development identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. The evidence presented in August 2017 by the Council at the EIP for Southwark's revised CIL Charging Schedule has demonstrated that on the majority of the major projects assessed by the Council's consultant (BNPP) the provision of affordable housing would not be viable even where no increase in CIL was made. This included significant positive assumptions towards future growth in sales values.

The Council's overall target of a minimum of 35% of homes (by habitable room) is supported as it reflects the Mayor's target in his Affordable Housing and Viability SPG (August 2017) (Mayor's SPG). However we consider there needs to be a reassessment of the tenure split indicated in Table 1 to allow greater flexibility in the application of the split between tenures, in particular in Area Action Plans/Opportunity Area Planning Frameworks.

As noted in the accompanying text to Policy P1 approximately 57% of Southwark's total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. Notwithstanding this overall need for intermediate homes, the Council has identified that given the acute needs of social housing tenants the tenure split should be a minimum of 25% of homes in schemes as 'social rent' and 10% as intermediate.

As noted in previous representations to the Council on the Draft NSP, we consider the Council should continue to apply differential tenure splits on developments in areas which are subject to Area Action Plan policies and Opportunity Area Planning Frameworks. This will allow the need for affordable

Given the critical need of affordable housing and the acute need of social rented housing throughout the borough, Policy P1 (Table 1) sets a social rented and intermediate split for the whole borough. There is an exception for Aylesbury to ensure there are enough new affordable homes to house existing residents in the redevelopment of the estate. Further details are provided in the Aylesbury Area Action Plan (Page 35, paragraphs 3.1.1-3.1.2).

Policy P1 has been amended to allow the fast track route if development proposed provides 40% affordable housing, with a compliant tenure split, if this is not met, a viability appraisal will be required to ensure the maximum viable provision and preferred tenure split of affordable housing can be achieved.

The factbox at page 24 is for information only, it is not policy. Therefore only social rented housing is sought, not social housing. The text box has now been removed to avoid confusion.

The requirement for cascading to the London wide eligibility criteria after three months is not proposed within the Plan as it is not a substantial amount of time for securing a tenant, therefore to ensure the units go to the people most in need we are not imposing this.

P1: Affordable housing

homes to be balanced against the requirement to deliver major infrastructure improvements to an area (i.e. Bakerloo Line Extension) or provide other planning benefits in lieu of affordable housing (e.g. community facilities, new public realm etc.).

The delivery of the objectives of Area Action Plans or Opportunity Area Planning Frameworks are tied to viability and the Council should apply a flexible approach to this in-line with the guidance in Policy 3.11 of the draft London Plan which requires Council seek the maximum provision of affordable housing whilst taking into account the viability of future development.

We consider there is a good case for retaining differential rates in these key regeneration areas and we note that Part 1 of Policy P1 allows a differential rate in the Aylesbury Area Action Plan Area. Part 1 should be amended to include reference to other key opportunity areas including Old Kent Road, Canada Water and Elephant and Castle.

In addition to the above, we would like clarification on the use of the term 'social rent' within the policy. Table 1 refers to 'social rent', however the explanatory text within the Fact Box highlights that social housing products include Social Rent, Affordable Rent and London Affordable Rent (LAR). The Fact Box sets out weekly rents for Social Rent and LAR but not Affordable Rent.

London Plan Policy 3.10 states that affordable housing includes Social Rented, Affordable Rented and Intermediate housing. The DLP Policy H7 sets out a preference for LAR to be provided but does allow other forms of tenure to be provided. On this basis we consider that it would be beneficial if the wording of Table 1 references 'social housing homes' rather than 'social rent homes'. This would then tie in more closely to the text in the Fact Box on differing types of social housing product and provide flexibility for future schemes to provide a range of social housing tenures.

With regard to intermediate homes, Policy P1 states these homes should be

P1: Affordable housing

affordable to a range of incomes. The explanatory text for Policy P1 highlights the differences between household income in the Borough and the Mayor's £90,000 threshold. Whilst we broadly support the flexibility given by Policy P1 we would highlight that the Mayor in the draft London Plan (Paragraph 4.7.10) states that any local criteria including income caps should automatically cascade to the London Wide eligibility criteria after three months. On this basis we consider that it would be helpful if further guidance is provided within Policy P1 to reference to the cascade after three months.

P1: Affordable housing

Individual
NSPPSV40.4

This policy is not effective because it is not providing the social homes that are needed.

The system of delivering homes and offices in our towns and cities continues to be used primarily as a money making vehicle, where maximising profits is the sole driving factor. There are many examples in Southwark, where the effect of simply drawing a line around a site is enough to ensure the land within the site boundary experiences an inexorable rise in value.

The Council is complicit in this by marketing its property in the global arena and encouraging the upward trend of land value, which in turn creates further inequitable and unaffordable conditions further down the line. Gone are the ideals of the past where the provision of ensuring a good home to everyone in our society was a guiding principle.

So abused is the system and corrupted by greed that communities feel powerless and invisible. Their views are given little to no consideration, often suffering immeasurably without recourse from the wider, more damaging impacts upon them.

We need a different way to go about ensuring a better society for us all and our children to live in. Instead of developer driven projects we need a more community led approach.

Noted. Evidence has been prepared to support the affordable housing policies, which seek to address the need of affordable homes.

P1: Affordable housing

Individual
NSPPSV47.1

I contend that the planned percentages of both affordable and social homes are not commensurate with the housing needs of the borough. Recent developments appear to cater predominantly for affluent buyers (and profit for the developers) and contribute to so-called gentrification.

50% affordable housing is the aspirational target for the borough. This will be achieved through achieving a higher provision of affordable housing on council owned land. Where viable, on council owned land a greater provision of 50% affordable housing will be provided. This commitment is set out on page 12 (A Fairer Future - a place to belong) of the Council Plan. We will continue our long-term homebuilding programme, delivering on our commitment to build 11,000 new council homes by 2043 as set out in the council's Housing Strategy to 2043.

The affordable housing target of 35% is set out in Policy P1. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Policy P1 and the Development Viability Supplementary Planning Document (2016) require viability appraisals to be submitted with all planning applications to be validated unless 40% affordable housing that is tenure compliant is proposed, (under the revised Policy P1), where the developer can follow the fast track route. As such the maximum viable provision of affordable housing can be achieved on schemes not achieving 40% (tenure compliant) affordable housing. Where a development can viably provide a greater amount of affordable housing this will be identified if it is not following the fast track route.

P1: Affordable housing

Individual
NSPPSV50.2

This policy is unsound because 35% affordable housing does not meet housing need in Southwark. The Council say the need is 48%, but then say 92% of households in Southwark have an income which requires some form of affordable housing. This is because the threshold to qualify for affordable housing is set at a household income of £90,000 which renders need and affordability meaningless. The policy is not 35% of all new housing but 35% of developments of 11 or more homes. The policy fails to provide information on what % of total new build will be affordable, but the small sites allocation of 800 homes per year (see draft London Plan 2017) suggests the real policy figure will be under 30%. The policy requirement of 25% social rented is subject to the same caveat as above, well under the stated need for 33% of all new housing as social rented.

50% affordable housing is the aspirational target for the borough. This will be achieved through achieving a higher provision of affordable housing on council owned land. Where viable, on council owned land a greater provision of 50% affordable housing will be provided. This commitment is set out on page 12 (A Fairer Future - a place to belong) of the Council Plan. We will continue our long-term homebuilding programme, delivering on our commitment to build 11,000 new council homes by 2043 as set out in the council's Housing Strategy to 2043.

The affordable housing target of 35% is set out in Policy P1. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Policy P1 and the Development Viability Supplementary Planning Document (2016) require viability appraisals to be submitted with all planning applications to be validated unless 40% affordable housing that is tenure compliant is proposed (under the revised Policy P1), where the developer can follow the fast track route. As such the maximum viable provision of affordable housing can be achieved on schemes not achieving 40% (tenure compliant) affordable housing. Where a development can viably provide a greater amount of affordable housing this will be identified if it is not following the fast track route.

P1: Affordable housing

Dulwich Estate
NSPPSV52.4

The draft NSP describes at Policy P1 that a development that creates 10 homes or less must provide the maximum viable amount towards the delivery of new homes.

Firstly, the policy should clarify whether financial contributions or units would be sought on small sites. Whilst the supporting text suggests the former, the policy wording is ambiguous. We would recommend that the policy wording is explicit on the form of contribution sought by smaller sites to ensure that applicant's understand their obligations at the outset.

More fundamentally however, the Estate is concerned that this policy is not legal on the basis that it does not accord with the Written Ministerial Statement of November 2014 (and its correct application following various legal challenges). The WMS is clear that "Due to the disproportionate burden of developer contributions on small scale developers, for sites of 10-units or less, and which have a maximum combined gross floorspace of 1,000 square metres, affordable housing and tariff style contributions should not be sought." The Estate is also concerned that the policy is not justified as there is no evidence base (viability or otherwise) to support the requirement for schemes under 10 units to make a contribution.

The Estate is concerned that a number of the infill sites identified in Appendix II, alongside other future opportunities, could not be delivered if they are overly burdened by financial or other contributions. The Estate is bound to pursue development or other activities that secure best value. In the event that financial or other obligations render a development unviable, for example leaving 'as is', potentially with refurbishment, could lead to sites being under developed and opportunities for additional housing to upper floors for example, or to a rear yard area, being missed. Furthermore, very often these small sites (such as upper floors) create smaller apartments that widen housing choice, which is vital in areas such as Dulwich where there is a predominance of larger units.

The Estate recommends that the requirement for smaller sites to provide the maximum viable amount is removed to ensure that the vital contribution these sites can make to strategic planning objectives is not lost.

The Estate considers that part three of Policy P1 requires clarification as to how Southwark Council would deem a site or phase of a development to be artificially subdivided. The Estate is unique in that its

The Draft London Plan encourages boroughs to include policies requiring affordable housing from such sites of ten or fewer units in their Development Plan given the important role they play in contributing to unmet need for affordable housing.

For schemes of 10 units or less, we require the provision of affordable housing (35%) on-site, where this cannot be accommodated on-site this will need to be justified and either off-site contributions or financial contributions will be required. A viability appraisal will be required. The approach to financial contributions for in lieu payments will be clarified following the adoption of the Plan. The viability assessment (2015) sets out how this could be achieved.

The sub-division of sites will be considered and assessed on a site by site basis, we understand that there may be instances where a development does not come forward. Further information on what will be considered where it appears a site has been sub-divided is set out in the Draft Affordable Housing SPD.

P1: Affordable housing

portfolio is geographically concentrated and as such, proximity and often adjacency of property assets is unavoidable. As such, it is inevitable that, on occasion, adjacent sites may come forward for development at different times due to external factors, as opposed to any desire to circumnavigate affordable housing liability. The High Court has established three tests which, whilst not determinative, should broadly inform any assessment of circumnavigation:

Site ownership;

Whether the site comprises a single planning unit;

The nature of the development proposed.

As currently worded, the policy does not acknowledge that there are external factors that can inhibit delivery of a site or part of a site, including (but not limited to): ownership and leasehold implications, funding and site conditions. Failure to recognise these and instead suggest that there is an attempt to circumnavigate an affordable housing contribution could lead delays and possibly no proposals of otherwise acceptable developments that could deliver homes, offices, shops and community uses. We would recommend that this part of the policy is removed or qualified to set out the criteria that must be demonstrated as part of any relevant planning application to demonstrate how the policy has been taken into account, for example information on adjacent land ownership.

P1: Affordable housing

Individual
NSPPSV56.4

P1 Affordable homes: This policy is unsound because it does not meet housing need in Southwark. The Council say the need is 48%, but say 92% of households in Southwark have an income which requires some form of affordable housing. This is because the threshold to qualify for affordable housing is set at a household income of £90,000 which renders need and affordability meaningless. There is confusion and ambiguity in the various %figures given so that it is not clear what % of new housing is being required as 'affordable'. As 'affordable' is not really affordable, there is a serious overprovision of unaffordable housing and underprovision of genuinely affordable.

P1: There must be a higher policy requirement for affordable housing and particularly social rented housing. The % figures given need to be consistent with each other and with housing need % figures.

50% affordable housing is the aspirational target for the borough. This will be delivered through achieving a higher provision of affordable housing on council owned land. Where viable, on council owned land a greater provision of 50% affordable housing will be provided. This commitment is set out on page 12 (A Fairer Future - a place to belong) of the Council Plan. We will continue our long-term homebuilding programme, delivering on our commitment to build 11,000 new council homes by 2043 as set out in the council's Housing Strategy to 2043.

The affordable housing target of 35% is set out in Policy P1. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Policy P1 and the Development Viability Supplementary Planning Document (2016) require viability appraisals to be submitted with all planning applications to be validated unless 40% affordable housing that is tenure compliant is proposed (under the revised Policy P1), where the developer can follow the fast track route. As such the maximum viable provision of affordable housing can be achieved on schemes not achieving 40% (tenure compliant) affordable housing. Where a development can viably provide a greater amount of affordable housing this will be identified if it is not following the fast track route. In addition, Policy P1 requires affordable housing to be provided on small sites (10 homes or less) subject to viability.

The Fact Box has been removed from the document to ensure there is no confusion regarding the provision of social rented housing as per table 1.

P1: Affordable housing

Elephant Amenity Network
NSPPSV57.3

This policy is unsound because 35% affordable housing does not meet housing need in Southwark.

The Council says that only 8% of households have an income which disqualifies them from affordable housing assistance and that 48% are in affordable housing need. By either measure 35% minimum affordable housing is inadequate.

The policy is not 35% of all new housing but 35% of developments of 11 or more homes. The policy fails to provide information on what % of total new build will be affordable, but the small sites allocation of 800 homes per year (see draft London Plan 2017) suggests the real policy figure will be under 30%.

The policy requirement of 25% social rented is under the 33% of households with incomes that qualify them for social rented housing.

Confusion in the Reasons and Fact Box cast doubt on whether the Council intend to deliver 25% social rented homes. Social rent is relabelled as social housing, which in turn is sub-divided into affordable rent and London affordable rent (both at much higher rent levels) as well as social rent. This illuminates why the Council has consistently failed to achieve policy compliance on social rented housing. We note a net loss of 912 social rented units in the latest available comparison between existing and proposed planning approvals (London Plan Annual Monitoring Report 13 Table 3.16).

The transparency and deliverability of the policy is further undermined by too much emphasis (points 7 and 8) on developments achieving policy compliance by providing off-site and in lieu payments. housing on site. This policy creates no go

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The affordable housing target of 35% is set out in Policy P1. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Policy P1 and the Development Viability Supplementary Planning Document (2016) require viability appraisals to be submitted with all planning applications to be validated unless 40% affordable housing that is tenure compliant is proposed (under the revised Policy P1), where the developer can follow the fast track route. As such the maximum viable provision of affordable housing can be achieved on schemes not achieving 40% (tenure compliant) affordable housing. Where a development can viably provide a greater amount of affordable housing this will be identified if it is not following the fast track route.

Table 1 sets out the requirements for affordable housing requirements - 25% social rented homes. The factbox at page 24 is for information only, it is not policy. Therefore only social rented housing is sought, not social housing. The text box has now been removed to avoid confusion.

The Reasons under Policy P1 require viability appraisals to be submitted with all planning applications to be validated not following the fast track route, Policy P1 has now been amended to clarify this in policy.

Affordable housing will only be delivered off-site or as in-lieu payment in exceptional circumstances. This will need to be justified within any planning application. As set out in the Draft Affordable Housing SPD (2011) (page 41 at paragraph 6.3.3-6.3.4) where we allow either an off-site or pooled contribution provision, at least as much affordable housing must be provided

P1: Affordable housing

areas for social rented housing, widening spatial inequality in the Borough and is inconsistent with Strategic Policy 2 Social Regeneration.

The prominence given to viability is not qualified with the policy approach required by the Mayor of London, such as the publication of full viability assessments at the time of the validation of planning applications and variations (NB not just the publication of executive summaries) and access to expertise independent of the developer.

To make the plan sound, the following changes are needed:

- Higher policy requirement for affordable housing in general and social rented housing in particular
- The supporting text and Fact Box to be consistent with the social rented requirement to give confidence that the policy is deliverable.
- Changes on small sites and viability to bring conformity with the draft London Plan

as would have been provided if the minimum 35% affordable housing policy requirement were achieved on-site. 6.3.4 Affordable housing should be delivered at the same time as private housing. This should be the case for on-site, off-site and a pooled contribution provision.

Policy P1 has been amended to require both viability appraisals and reviews to be published for public scrutiny.

P1: Affordable housing

GLA
NSPPSV66.4

The Mayor is pleased to see that previous comments have been addressed such as payments in lieu for the provision of affordable housing off site. Table 1: Affordable homes requirement is broadly in line with the London Plan.

The requirement for development of more than 11 homes to provide a minimum 35% affordable homes is supported. However, the policy should reflect the threshold approach to viability as set out in the Mayor's Affordable Housing and Viability SPG 2017. This approach allows for 'fast tracking' applications that will provide 35% affordable housing without grant. The threshold set out in the draft new London Plan for development on public sector land, Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate for other uses is 50%. With the proposed release of significant amounts of industrial land within the borough, it would be useful to make reference to this approach, which is set out in Policy H6 Threshold approach to applications in the draft London Plan.

Policy P1 has been amended to allow the fast track route if development proposed provides 40% affordable housing, with a compliant tenure split. Fast track approach for industrial land is not proposed. Within the Draft London Plan, the 50% provision of affordable housing on industrial land is subject to an EIP and is not adopted policy.

P1: Affordable housing

Greenpruce GP
NSPPSV72.3

This draft policy sets out a clear position in respect of expectations for affordable housing delivery. Whilst the overall approach is not challenged, in principle, and it is noted that the requirement for a minimum of 35% is 'subject to viability' it is proposed that a greater acknowledgement of the potential costs of major transport infrastructure projects is made explicit.

There are relatively few sites in Southwark which are expected to accommodate significant transport infrastructure in the future. This Site could be one of them. The potential requirement to accommodate an identified tube station could significantly increase the complexity of redevelopment.

It is proposed that draft Policy P1 could incorporate the following text to acknowledge this potential space and complexity burden and the potential ramifications for also delivering significant levels of affordable housing and other public benefits:

"Where significant infrastructure and/or public amenities are required to be accommodated on-site, the viability process will take this into account and more flexibly apply the requirements of this policy."

The affordable housing target of 35% is set out in Policy P1. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Policy P1 and the Development Viability Supplementary Planning Document (2016) require viability appraisals to be submitted with all planning applications to be validated unless 40% affordable housing that is tenure compliant is proposed (under the revised Policy P1), where the developer can follow the fast track route. As such the maximum viable provision of affordable housing can be achieved on schemes not achieving 40% (tenure compliant) affordable housing. Where a development can viably provide a greater amount of affordable housing this will be identified if it is not following the fast track route.

P1: Affordable housing

Home Builders Federation (HBF)
NSPPSV84.3

Table 1: affordable housing requirement

The policy is unsound as it is unjustified and ineffective.

It is unclear what the Council is seeking in terms of affordable housing.

We understand the Mayor of London's threshold approach to affordable housing. If that is what the Council is seeking through the policy then it would be helpful if it explained this. If it does not support the emerging policy in the London Plan on the threshold approach to affordable housing then the Council needs to state this clearly.

We cannot see how dual affordable housing targets can operate. The Council needs to establish a clear percentage rate for affordable housing.

We note the following conclusion in the Council's local plan viability assessment at paragraph 7.4:

We recommend that the Council adopts a requirement of 35% affordable housing across all developments in the borough as we consider that the Council's flexible policy approach allowing for viability to be sufficient to assist where due to site specific circumstances schemes are unable to deliver 35% 87 affordable housing.

While there may well be circumstances where a rate higher than 35% could be secured, to set such a target in the local plan would militate against the purposes of the plan-led system which is to provide policy certainty for the applicant and the decision-taker.

50% affordable housing is the aspirational target for the borough. This will be achieved through achieving a higher provision of affordable housing on council owned land. Where viable, on council owned land a greater provision of 50% affordable housing will be provided.

This commitment is set out on page 12 (A Fairer Future - a place to belong) of the Council Plan.

We will continue our long-term homebuilding programme, delivering on our commitment to build 11,000 new council homes by 2043 as set out in the council's Housing Strategy to 2043

The affordable housing target of 35% is set out in Policy P1. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Policy P1 and the Development Viability Supplementary Planning Document (2016) require viability appraisals to be submitted with all planning applications to be validated unless 40% affordable housing that is tenure compliant is proposed (under the revised Policy P1), where the developer can follow the fast track route.

As such the maximum viable provision of affordable housing can be achieved on schemes not achieving 40% (tenure compliant) affordable housing. Where a development can viably provide a greater amount of affordable housing this will be identified if it is not following the fast track route.

P1: Affordable housing

We have been unable to locate the justification for what we assume to be the more aspirational target of 65% affordable housing. If 65% is the aspiration then we would have expected this to be tested. It appears that the viability modelling has only tested up to 50% affordable housing. Paragraph 7.3 of the report does observe:

“Some schemes (subject to their benchmark land values) are able to achieve higher amounts of affordable housing (50% affordable housing).

This would suggest that it may be possible to provide up to 50% affordable housing in some circumstances, the report does not refer to a figure of 65%. There is a scenario for 100% affordable housing but the results, on the whole, reveal non viability, although occasionally it is marginal. It would be sensible if the plan was revised to refer to an aspiration ceiling figure of 50%, but a minimum of 35% would be acceptable in most circumstances.

The policy should differentiate between public and privately owned land, reflecting the Replacement London Plan.

The results of the viability modelling seem very variable and is often viability is marginal. Moreover, viability depends very much on a range of assumptions. Viability appears to worsen with mixed use schemes. The new London Plan is placing a greater emphasis on mixed use schemes, integrating residential with industrial and commercial uses.

We note that the Council will not entertain affordable rent as part of the tenure mix and that its viability assessment justifies this (paragraph 7.5). Given our observations above, we are not so sure that this is the case. We recommend that the policy is amended to allow the provision of affordable rented products so

P1: Affordable housing

that the policy reflects the range of affordable tenures in the current London Plan, Policy 3.11A.

The Council may also wish to amend the policy to reflect the emerging London Plan affordable housing policy which recommends a split of 30% social rent/ London Affordable Rent and 30% London Living Rent and London Shared Ownership with the other 40% to be determined by Southwark.

The approach to securing affordable housing contributions from schemes of 10 units and fewer is at odds with national policy. National policy exempts schemes of 10 units or fewer, or with a floor area less than 1,000 square metres, from contributing to affordable housing (unless the scheme is located in a designated rural area). The policy should be amended to reflect the approach in national policy. This would help to support small developers and help London to achieve the high number of completions expected from small sites (defined as schemes on land of 0.25 ha and smaller) that is in the emerging London Plan.

Individual
NSPPSV93.8

35% affordable housing does not meet housing need in Southwark which makes the policy unsound. The Council say the need is 48%, but then say 92% of households in Southwark have an income which requires some form of affordable housing. This is because the threshold to qualify for affordable housing is set at a household income of £90,000 which renders need and affordability meaningless.

The policy is not 35% of all new housing but 35% of

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P1: Affordable housing

developments of 11 or more homes. The policy fails to provide information on what % of total new build will be affordable, but the small sites allocation of 800 homes per year (see draft London Plan 2017) suggests the real policy figure will be under 30%. The policy requirement of 25% social rented is subject to the same caveat as above, well under the stated need for 33% of all new housing as social rented.

Confusion in the Reasons and Fact Box cast doubt on whether the Council intend to deliver 25% social rented homes. Social rent is relabelled as social housing, which in turn is sub-divided into affordable rent and London affordable rent (both at much higher rent levels) as well as social rent. This illuminates why the Council has consistently failed to achieve policy compliance on social rented housing.

The transparency and deliverability of the policy is further undermined by too much emphasis (points 7 and 8) on developments achieving policy compliance even if they do not provide affordable housing on site. This policy creates no go areas for social rented housing, widening spatial inequality in the Borough and inconsistent with Strategic Policy 2 Social Regeneration.

The prominence given to viability is not qualified with the policy approach required by the Mayor of London, such as full public disclosure of all viability assessments (not only viability reviews) and access to expertise independent of the developer.

The following changes are needed in order to make the policy sound:

- Higher policy requirement for affordable housing in general and social rented housing in particular
- The supporting text and Fact Box to be consistent with the

and the Development Viability Supplementary Planning Document (2016) require viability appraisals to be submitted with all planning applications to be validated where there is a planning policy requirement to provide affordable housing or where the proposed development departs from other planning policy requirements due to viability, as such the maximum viable provision of affordable housing can be achieved. Where a development can viably provide a greater amount of affordable housing this will be identified if it is not following the fast track route. In addition, Policy P1 requires affordable housing to be provided on small sites (10 homes or less) subject to viability.

The Fact Box has been removed from the document to ensure there is no confusion regarding the provision of social rented housing as per table 1.

London Plan - small sites - this falls within our total housing requirement.

P1: Affordable housing

social rented requirement to give confidence that the policy is deliverable.

- Changes on small sites and viability to bring conformity with the draft London Plan
-

P1: Affordable housing

Peabody
NSPPSV137.2

NEW SOUTHWARK PLAN: PROPOSED SUBMISSION VERSION (DECEMBER 2017) REPRESENTATIONS SUBMITTED ON BEHALF OF PEABODY: NEWINGTON TRIANGLE (NSP42)

We are instructed by our client, Peabody, to submit representations in relation to the above site, in response to the London Borough of Southwark's (LBS) consultation on the New Southwark Plan (NSP): Proposed Submission Version.

As a general comment, we note that the National Planning Policy Framework (NPPF) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how this presumption should be applied at the local level.

The NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF and should be aspirational but realistic.

In responding to the Council's current Regulation 19 consultation, we have also made reference to the guidance set out in paragraph 182 of the NPPF, which requires Local Plans to be sound. To meet this requirement they should be:

- Positively Prepared – be based on objectively assessed development requirements, consistent with achieving sustainable development.
- Justified – be the most appropriate strategy based on proportionate evidence.
- Effective – be deliverable over its period and based on effective joint working.
- Consistent with National Policy – enable the delivery of sustainable development in accordance with the policies of the

Policy P1 requires 35 per cent affordable housing delivery within developments that include residential with a tenure split of 25% social rented and 10% intermediate housing.

There is a shortage of affordable homes in Southwark and across London. Providing new affordable homes suitable for a range of affordable housing need is our main priority. The Strategic Housing Market Assessment sets out the evidence to inform Policy P1, it identifies a need for around 800 affordable housing units per annum which is approximately 48% of Southwark's total annual housing need. Accordingly Policy SP1 of the New Southwark Plan sets target of 50% affordable housing to be delivered across the borough.

The requirement for social housing set out in the New Southwark Plan is higher than the London Plan and in some areas, the saved Southwark Plan policy, given the acute need for social housing in Southwark. Approximately 57% of the borough's total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute affordable housing need is for social rented housing to meet the needs of homeless households living in unsuitable temporary accommodation such as beds and breakfasts or overcrowded conditions. Overcrowding is strongly related to poor physical and mental health and can strain family relationships. Children in overcrowded homes often achieve poorly at school and suffer disturbed sleep. Social rented housing is vital to social regeneration as it allows residents who cannot afford suitable market housing to remain close to their families, friends and employment.

For this reason emerging Policy P1 requires a minimum 25% of homes to be provided as social rented housing aside from Aylesbury Action Area which has its own affordable housing requirement.

P1: Affordable housing

NPPF.

The following representations have been prepared with regard to these criteria and we set out below our comments on the soundness of the New Southwark Plan Proposed Submission Version (2017), taking into account its compliance with national planning policy.

1. Previous Representations

We have made representations on behalf of our client in response to the previous consultation versions of the NSP, most recently being the NSP Preferred Options: New and Amended Policies (September 2017). The Newington Triangle site has been retained as an allocated site throughout the emerging versions of the NSP and we have sought to engage with the Council to ensure that the allocation is appropriate and will not restrict the emerging redevelopment proposals from coming forward. We have sought to ensure that that the site allocation is justified and effective.

2. The Site Allocation (NSP42: Newington Triangle)

The Newington Triangle site extends to approximately 1.34 hectares in size and is located within the Elephant & Castle Opportunity Area and Central Activities Zone (CAZ), as defined in the London Plan, Southwark UDP and Southwark Core Strategy. The site comprises brownfield land in an accessible location (PTAL 6a) and is not located within a Conservation Area and does not contain any listed buildings.

The site is allocated for comprehensive redevelopment in the NSP: Site NSP42. Acceptable uses for this site are considered to include residential, employment and retail floorspace.

Commercial uses are required at ground floor level in order to provide active frontages along Newington Causeway and

P1: Affordable housing

Borough Road.

We strongly support the allocation of this site for significant residential-led mixed use redevelopment which is considered to be consistent with the sites location within the Elephant and Castle Opportunity Area and CAZ. The site allocation is considered to be consistent with the NPPF core principles which promote mixed use development and encourage multiple benefits from the use of previously developed urban land.

3. Development Management Policies

Draft Policy P1 'Affordable Homes'

Draft Policy P1 requires new development that will result in 11 or more new homes to provide a minimum of 35% affordable units. Peabody support this commitment to maximising affordable housing provision and this approach is considered to be consistent with both the adopted and emerging London Plan. Our previous representations (NSP Preferred Options: New and Amended Policies, September 2017) suggested that the affordable housing tenure split should reflect the Elephant and Castle SPG (2012) and Affordable Housing SPD (2008) which set a tenure split of 50% social rented and 50% intermediate units. These adopted policy documents have set a precedent for affordable housing tenure split in the Elephant and Castle Opportunity Area.

We suggest there should be greater flexibility with regards to the proposed tenure split for affordable housing provision, based on local housing need. This would help to ensure the NSP is effective in its delivery of affordable housing.

Draft Policy P9 'Optimising delivery of new homes'

Draft Policy P9 sets out appropriate density ranges for new development in certain locations. The suggested density range for sites located within the CAZ is between 650 – 1,100 habitable rooms per hectare.

P1: Affordable housing

Whilst Policy P9 does provide some flexibility that in exceptional circumstances development may exceed these density ranges where appropriate, the approach set out in the NSP is not consistent with the emerging London Plan. The Draft London Plan (December 2016) no longer specifies an appropriate density range, in contrast with Table 3.2 of the adopted London Plan. Instead emerging Policy D6 states “the optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to the site context, its connectivity and accessibility and the capacity of surrounding infrastructure”.

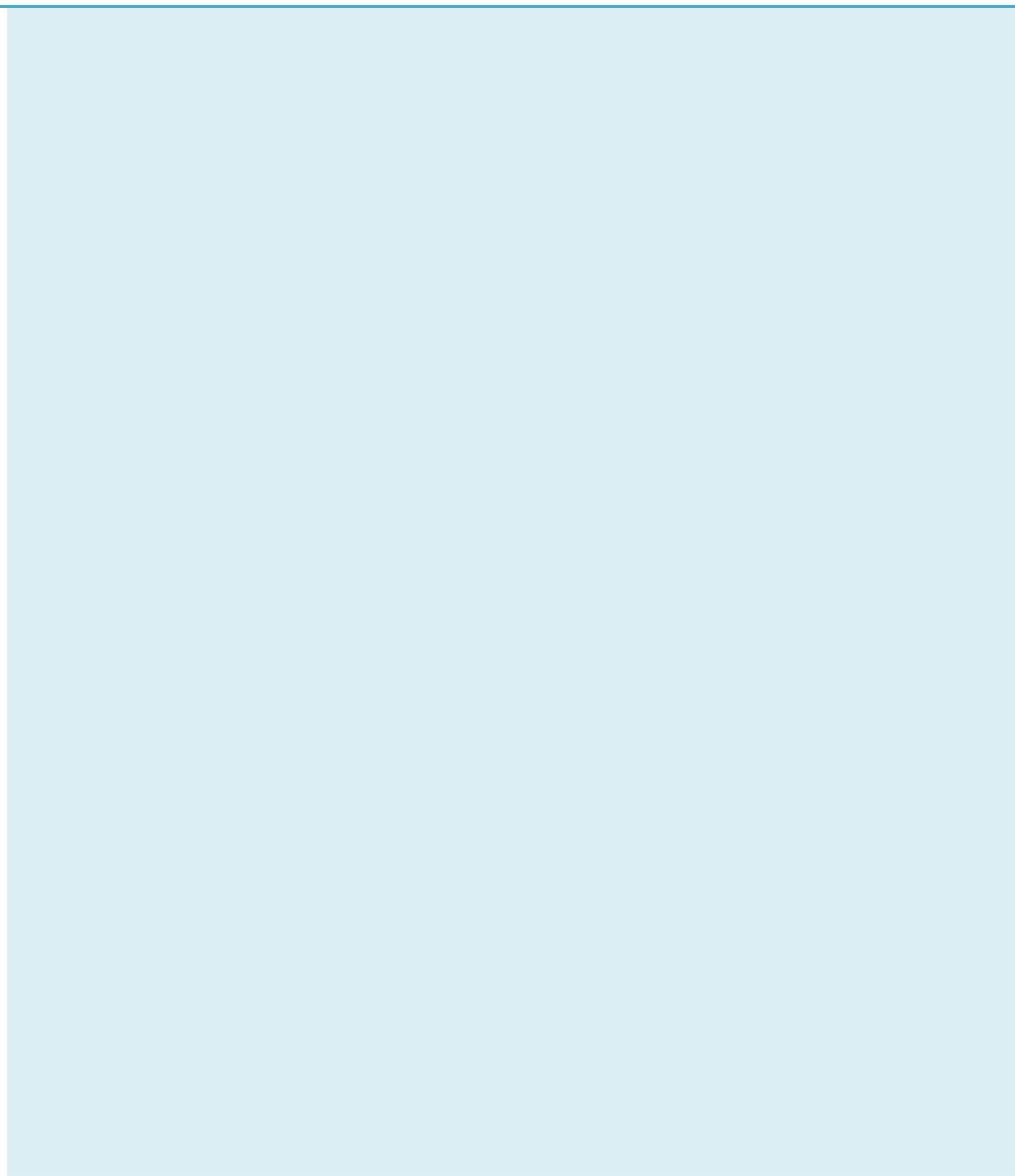
We therefore suggest that it is no longer appropriate to specify density ranges and this could the effect of unnecessarily straining development and design. It is important to allow sufficient flexibility in the wording of policies relating to density so as not to stifle development coming forward, in line with the aspirations of NPPF Paragraph 58 which seeks to optimise the potential of a site to accommodate development. Greater flexibility is therefore required to ensure that the NSP is effective in its delivery and consistent with regional and national planning policy.

Draft Policy P50 ‘Cycling’

Peabody consider that LBS should allow greater flexibility with regards to overall design specifications and requirements. As stated in our previous representations, the increased cycle space requirement will lead to a significant number of cycle parking spaces within developments and for large developments these numbers are considered to be excessive. There is a need to acknowledge that the way people travel by bicycle is changing, evidenced by Brompton folding bicycles and the recent introduction of dockless cycle hires. As such, cycle parking standards should not always result in a blanket requirement for all development and should instead be based on evidenced need. We suggest that the provision of cycle parking spaces should be focused on how the spaces can be used, and the quality of the

P1: Affordable housing

provision rather than just quantity. Greater flexibility should be allowed for in the policy, taking into consideration other scheme benefits.



P1: Affordable housing

Individual
NSPPSV148.6

NSP Policy P1 AFFORDABLE HOMES

This policy is unsound because 35% affordable housing does not meet housing need in Southwark.

The Council says that only 8% of households have an income which disqualifies them from affordable housing assistance and that 48% are in affordable housing need. By either measure 35% minimum affordable housing is inadequate.

The policy is not 35% of all new housing but 35% of developments of 11 or more homes.

The policy fails to provide information on what % of total new build will be affordable, but the small sites allocation of 800 homes per year (see draft London Plan 2017) suggests the real policy figure will be under 30%.

The policy requirement of 25% social rented is under the 33% of households with incomes that qualify them for social rented housing.

Confusion in the Reasons and Fact Box cast doubt on whether the Council intend to deliver 25% social rented homes. Social rent is relabelled as social housing, which in turn is sub-divided into affordable rent and London affordable rent (both at much higher rent levels) as well as social rent. This illuminates why the Council has consistently failed to achieve policy compliance on social rented housing. We note a net loss of 912 social rented units in the latest available comparison between existing and proposed planning approvals (London Plan Annual Monitoring Report 13 Table 3.16).

The transparency and deliverability of the policy is further

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The affordable housing target of 35% is set out in Policy P1. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Policy P1 and the Development Viability Supplementary Planning Document (2016) require viability appraisals to be submitted with all planning applications to be validated unless 40% affordable housing that is tenure compliant is proposed (under the revised Policy P1), where the developer can follow the fast track route. As such the maximum viable provision of affordable housing can be achieved on schemes not achieving 40% (tenure compliant) affordable housing. Where a development can viably provide a greater amount of affordable housing this will be identified if it is not following the fast track route. In addition, Policy P1 requires affordable housing to be provided on small sites (10 homes or less) subject to viability.

The Fact Box has been removed from the document to ensure there is no confusion regarding the provision of social rented housing as per table 1.

London Plan - small sites - this falls within our total housing requirement.

P1: Affordable housing

undermined by too much emphasis (points 7 and 8) on developments achieving policy compliance by providing off-site and in lieu payments. housing on site. This policy creates no go areas for social rented housing, widening spatial inequality in the Borough and is inconsistent with Strategic Policy 2 Social Regeneration.

The prominence given to viability is not qualified with the policy approach required by the Mayor of London, such as the publication of full viability assessments at the time of the validation of planning applications and variations (NB not just the publication of executive summaries) and access to expertise independent of the developer.

P1: Affordable housing

Individual
NSPPSV151.3

P1

The policy defines the Council approach to the provision of affordable housing associated with development schemes. The principal approach to seek affordable housing at 10 or more units is well established. The policy though does also seek affordable housing – “the maximum viable amount” – associated with schemes of 10 or less. Whilst it is recognised that all options need to be explored to deliver as many affordable homes as is possible, regard must be had always to scheme viability. Para 173 of the NPPF seeks to ensure that obligations associated with development are not so great as to fetter development coming forward.

The draft policy also states that “use of Vacant Building Credit will not be accepted.” This statement is contrary the ministerial statement. It should be qualified such that it identifies those instances when the VBC could apply where it is demonstrated that the sites in question have not been deliberately and/or recently made vacant to benefit from the credit.

The policy should be amended to explicitly acknowledge that viability considerations will be factored into any assessment of affordable housing.

The policy should acknowledge that there may be instances where the Vacant Building Credit is justified.

Policy P1 has now been amended to introduce to allow a fast track route to be followed if 40% affordable housing is being provided with a policy compliant tenure split which does not require a viability appraisal to be submitted.

Policy P1 requires viability appraisals to be submitted with all planning applications to be validated where there is a planning policy requirement to provide affordable housing or where the proposed development departs from other planning policy requirements due to viability unless the fast track route is being followed, this is to ensure the maximum viable provision of affordable housing can be achieved. Therefore a scheme of less than 10 units will expect to provide the maximum amount of affordable housing or payment in lieu.

Vacant building credit is not accepted as viability testing is undertaken within all applications unless the fast track route is being followed, therefore it is not necessary. Affordable housing need is critical in Southwark, allowing vacant building credit could jeopardise the delivery of affordable housing.

P1: Affordable housing

Individual
NSPPSV162.2

New Southwark Plan Policy P1 AFFORDABLE HOMES

This policy is unsound because 35% affordable housing does not meet housing need in Southwark. The Council say the need is 48%, but then say 92% of households in Southwark have an income which requires some form of affordable housing. This is because the threshold to qualify for affordable housing is set at a household income of £90,000 which renders need and affordability meaningless.

The policy is not 35% of all new housing but 35% of developments of 11 or more homes. The policy fails to provide information on what % of total new build will be affordable, but the small sites allocation of 800 homes per year (see draft London Plan 2017) suggests the real policy figure will be under 30%. The policy requirement of 25% social rented is subject to the same caveat as above, well under the stated need for 33% of all new housing as social rented.

Confusion in the Reasons and Fact Box cast doubt on whether the Council intend to deliver 25% social rented homes. Social rent is relabelled as social housing, which in turn is sub-divided into affordable rent and London affordable rent (both at much higher rent levels) as well as social rent. This illuminates why the Council has consistently failed to achieve policy compliance on social rented housing.

The transparency and deliverability of the policy is further undermined by too much emphasis (points 7 and 8) on developments achieving policy compliance even if they do not provide affordable housing on site. This policy creates no go areas for social rented housing, widening spatial inequality in the

50% affordable housing is the aspirational target for the borough. This will be achieved through achieving a higher provision of affordable housing on council owned land. Where viable, on council owned land a greater provision of 50% affordable housing will be provided. This commitment is set out on page 12 (A Fairer Future - a place to belong) of the Council Plan. We will continue our long-term homebuilding programme, delivering on our commitment to build 11,000 new council homes by 2043 as set out in the council's Housing Strategy to 2043.

The affordable housing target of 35% is set out in Policy P1. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Policy P1 and the Development Viability Supplementary Planning Document (2016) require viability appraisals to be submitted with all planning applications to be validated where there is a planning policy requirement to provide affordable housing or where the proposed development departs from other planning policy requirements due to viability, as such the maximum viable provision of affordable housing can be achieved. Where a development can viably provide a greater amount of affordable housing this will be identified if it is not following the fast track route. In addition, Policy P1 requires affordable housing to be provided on small sites (10 homes or less) subject to viability.

The Fact Box has been removed from the document to ensure there is no confusion regarding the provision of social rented housing as per table 1.

London Plan - small sites - this falls within our total housing requirement.

P1: Affordable housing

Borough and inconsistent with Strategic Policy 2 Social Regeneration.

The prominence given to viability is not qualified with the policy approach required by the Mayor of London, such as full public disclosure of all viability assessments (not only viability reviews) and access to expertise independent of the developer.

To make the plan sound, the following changes are needed:

- Higher policy requirement for affordable housing in general and social rented housing in particular
- The supporting text and Fact Box to be consistent with the social rented requirement to give confidence that the policy is deliverable.
- Changes on small sites and viability to bring conformity with the draft London Plan

P1: Affordable housing

Six Bridges Estate
NSPPSV163.4

Policy P1: Affordable Housing

Policy P1 states that developments must provide a minimum of 35% affordable housing measured by habitable rooms with a 70/30 split between intermediate and social rented tenures. Policy P1 allows for a recognition of viability where all development that does not meet affordable housing requirements for viability reasons will be subject to viability reviews. This is supported. The definition of habitable rooms provided within the NSP is considered to be overly complex and will make calculating affordable housing contributions in a transparent and consistent way throughout the development and planning process a challenge. As such it is considered the definition should remain consistent within adopted planning policy.

Sites released from industrial use such as the Six Bridges Estate which have been identified for redevelopment in the NSP and the Old Kent Road Area Action Plan have the objective to deliver innovative mixing of industrial and residential use. This has not been done in London before and will be complex and risky to deliver with significant additional viability challenges. In recognition of this, Royal London will be challenging Draft London Plan Policy H6 and support Southwark's position to apply 35% as the threshold for viability testing.

To clarify, Policy P1 sets out requirement of 70% social rented and 30% intermediate housing.

The Policy has been amended to make the detail on habitable rooms clearer.

P1: Affordable housing

Individual
NSPPSV172.1

This policy is unsound because 35% affordable housing does not meet housing need in Southwark. The Council say the need is 48%, but then say 92% of households in Southwark have an income which requires some form of affordable housing. This is because the threshold to qualify for affordable housing is set at a household income of £90,000 which renders need and affordability meaningless. In my view the definition of affordability should be linked to the London Living Wage (LLW) and housing should be seen as a basic need and therefore costs should be 25% of the LLW.

The policy is not 35% of all new housing but 35% of developments of 11 or more homes. The policy fails to provide information on what % of total new build will be affordable, but the small sites allocation of 800 homes per year (see draft London Plan 2017) suggests the real policy figure will be under 30%. The policy requirement of 25% social rented is subject to the same caveat as above, well under the stated need for 33% of all new housing as social rented.

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The Fact Box has been removed from the document to ensure there is no confusion regarding the provision of social rented housing as per table 1.

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P1: Affordable housing

areas for social rented housing, widening spatial inequality in the Borough and inconsistent with Strategic Policy 2 Social Regeneration.

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Tesco Stores Ltd.
NSPPSV180.3

Policy P1 of the New Southwark Plan establishes the Council's policy with regards to the delivery of affordable homes within the borough. At the heart of Policy P1 is the requirement for developments of 11 or more homes to provide a minimum of 35% affordable homes (subject to viability).

Whilst our client supports the Council's objectives for the delivery of affordable homes within the borough, our client contends that any viability assessments associated with affordable housing provision must adequately reflect the costs associated with the redevelopment of the site. These costs are particularly acute in

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P1: Affordable housing

respect of the redevelopment of existing retail sites. Our client therefore requests that application of Policy P1 of the New Southwark Plan accounts for the following costs typically associated with the redevelopment of an existing retail site.

Existing Use Value

Loss of Income, either as a result of temporary closure or reduced operation of existing retail store

Cost of Re provision, either associated with replacement store or reconfiguration of existing store

Failure to reflect these true costs associated with redevelopment within the viability process, will restrict the release of sites (including our client's sites) for redevelopment, which in turn will restrict the Council's ability to meet its ambitious redevelopment and regeneration benefits. This effect will be particularly acute within existing town centres.

It should be noted that our client has made similar representations to the London Plan and Mayor's Affordable Housing SPG on this matter.

In the New London Plan representations, Gerald Eve state that Tesco has identified redevelopment opportunities across London that could lead to the construction of circa 10,000 homes. It follows that Tesco's London portfolio represents a significant opportunity for delivery of housing in the capital.

Gerald Eve has carried out viability assessments of four over-store development typologies, representing a cross section of Tesco's assets across London. The results indicate that 35% affordable housing across the whole of London is not achievable when it comes to assessing the redevelopment of operational assets such as food-retail stores, in all but a small number of cases.

It is clear that there would need to be a reasonable and sensible business case for Tesco to vacate or redevelop its London assets as a 'landowner' receiving a 'competitive return', in order to bring

validated unless 40% affordable housing that is tenure compliant is proposed (under the revised Policy P1), where the developer can follow the fast track route. As such the maximum viable provision of affordable housing can be achieved on schemes not achieving 40% (tenure compliant) affordable housing. Where a development can viably provide a greater amount of affordable housing this will be identified if it is not following the fast track route.

P1: Affordable housing

their sites forward for re-development. In line with these representations, Gerald Eve make the point that this comprises three principle strands:

The Site Value of the land;

Vacant possession costs; and

Disturbance during the life cycle of the development (under the assumption that the land is not surplus to requirements and a store is to be re-provided).

Whilst Tesco is not seeking to persuade the Mayor to change the threshold approach to viability in the NLP, it does seek recognition within the Plan that the special circumstances governing the development of food stores will be acknowledged and taken into account as part of the process.

Vanguard Metropolitan Ltd (VML),
NSPPSV203.2

Whilst we support Southwark Council in its policy objective of providing 35% affordable housing, we recommend that this policy sets out affordable housing requirements in relation to the type of scheme proposed. If a mixed use scheme were to be proposed, providing a proportion of affordable workspace, it may become unviable to also demand a proportion of affordable homes. We therefore recommend that Policy P1 sets out exceptions for not meeting its requirements with regard to the viability of future mixed use development proposals.

Policy P1 and the Development Viability Supplementary Planning Document (2016) require viability appraisals to be submitted with all planning applications to be validated where there is a planning policy requirement to provide affordable housing or where the proposed development departs from other planning policy requirements due to viability, as such if a mixed use development is proposed requiring the delivery of affordable workspace, this will be accounted for in the viability appraisal, determining the maximum viable amount of affordable housing and affordable workspace that can be provided.

P1: Affordable housing

313-349 Ilderton Road LLP
NSPPSV217.1

Affordable homes requires development that creates 11 or more homes must provide a minimum 35% affordable homes, as set out in Table 1, subject to viability except in the Aylesbury Area Action Plan area where requirements are set out in the Area Action Plan.

We support the threshold approach and affordable housing requirement set out in the NSP. It is considered however that the recognition of a prompt commencement of development and subsequent delivery of affordable housing at the policy-compliant level should therefore be unfettered by any review mechanism.

This aligns with the GLA Affordable Housing SPG (2017).

It is also important to note that any increase to the 35% provision as suggested by the new draft London Plan in areas designated as Strategic Industrial Land (mindful of the London Borough of Southwark's Development Viability SPD (2016) recommends 35% and also with the increased CIL charging rate of £218/sqm for the Bakerloo line extension and B Use class floorspace re-provision) will ultimately jeopardise the delivery of 20,000 homes in the Old Kent Rd Opportunity Area and AAP over the next 20 years.

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P1: Affordable housing

Individual
NSPPSV218.12

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The policy is not 35% of all new housing but 35% of developments of 11 or more homes. The policy fails to provide information on what % of total new build will be affordable, but the small sites allocation of 800 homes per year (see draft London Plan 2017) suggests the real policy figure will be under 30%. The policy requirement of 25% social rented is subject to the same caveat as above, well under the stated need for 33% of all new housing as social rented.

Confusion in the Reasons and Fact Box cast doubt on whether the Council intend to deliver 25% social rented homes. Social rent is relabelled as social housing, which in turn is sub-divided into affordable rent and London affordable rent (both at much higher rent levels) as well as social rent. This illuminates why the Council has consistently failed to achieve policy compliance on social rented housing.

The transparency and deliverability of the policy is further undermined by too much emphasis (points 7 and 8) on developments achieving policy compliance even if they do not provide affordable housing on site. This policy creates no go areas for social rented housing, widening spatial inequality in the Borough and inconsistent with Strategic Policy 2 Social Regeneration..

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The Fact Box has been removed from the document to ensure there is no confusion regarding the provision of social rented housing as per table 1.

London Plan - small sites - this falls within our total housing requirement.

P1: Affordable housing

The prominence given to viability is not qualified with the policy approach required by the Mayor of London, such as full public disclosure of all viability assessments (not only viability reviews) and access to expertise independent of the developer.

To make the plan sound, the following changes are needed:

- Higher policy requirement for affordable housing in general and social rented housing in particular
- The supporting text and Fact Box to be consistent with the social rented requirement to give confidence that the policy is deliverable.
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Individual
NSPPSV239.1

This policy is unsound because 35% affordable housing does not meet housing need in Southwark. The Council say the need is 48%, but then say 92% of households in Southwark have an income which requires some form of affordable housing. This is because the threshold to qualify for affordable housing is set at a household income of £90,000 which renders need and affordability meaningless.

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The affordable housing target of 35% is set out in Policy P1. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Policy P1 and the Development Viability Supplementary Planning Document (2016) require viability appraisals to be submitted with all planning applications to be validated unless 40% affordable housing that is tenure compliant is proposed (under the revised Policy P1), where the developer can follow the fast track

P1: Affordable housing

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Confusion in the Reasons and Fact Box cast doubt on whether the Council intend to deliver 25% social rented homes. Social rent is relabelled as social housing, which in turn is sub-divided into affordable rent and London affordable rent (both at much higher rent levels) as well as social rent. This illuminates why the Council has consistently failed to achieve policy compliance on social rented housing.

The transparency and deliverability of the policy is further undermined by too much emphasis (points 7 and 8) on developments achieving policy compliance even if they do not provide affordable housing on site. This policy creates no go areas for social rented housing, widening spatial inequality in the Borough and inconsistent with Strategic Policy 2 Social Regeneration..

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route. As such the maximum viable provision of affordable housing can be achieved on schemes not achieving 40% (tenure compliant) affordable housing. Where a development can viably provide a greater amount of affordable housing this will be identified if it is not following the fast track route. In addition, Policy P1 requires affordable housing to be provided on small sites (10 homes or less) subject to viability.

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London Plan - small sites - this falls within our total housing requirement.

P1: Affordable housing

Individual
NSPPSV305.4

This policy is unsound because 35% affordable housing does not meet housing need in Southwark. The Council say the need is 48%, but then say 92% of households in Southwark have an income which requires some form of affordable housing. This is because the threshold to qualify for affordable housing is set at a household income of £90,000 which renders need and affordability meaningless.

The policy is not 35% of all new housing but 35% of developments of 11 or more homes. The policy fails to provide information on what % of total new build will be affordable, but the small sites allocation of 800 homes per year (see draft London Plan 2017) suggests the real policy figure will be under 30%. The policy requirement of 25% social rented is subject to the same caveat as above, well under the stated need for 33% of all new housing as social rented.

Higher policy requirement for affordable housing in general and social rented housing in particular

- The supporting text and Fact Box to be consistent with the social rented requirement to give confidence that the policy is deliverable.
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P1: Affordable housing

Individual
NSPPSV316.4

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P1: Affordable housing

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P1: Affordable housing

Individual
NSPPSV324.3

Page 16 of the NSP states of aim of “50% of all new homes as affordable homes”. Despite this the Camberwell plan does not contain a single mention of affordable homes or council housing. This suggests ineffective development of the stated aims and is also inconsistent with Southwark Council, London and national house building policy. The housing crisis across London is one of affordability and cannot therefore be addressed simply in terms of the number of homes built. For example, on the new South Gardens complex at Elephant Park, all 51 homes have been sold to overseas investors. In Camberwell, properties at Elmington Green, currently under development, are also being advertised as “suitable for investors”. With rents for two-bedroom flats in Southwark now averaging £2,400 per month, developments such as these are clearly not meeting the needs of local people for genuinely affordable rented property. Both South Gardens and Elmington Green are on sites formerly occupied by council housing. The net loss of council homes in Southwark is helping to increase rent inflation by forcing people into the private rented market where there is no guarantee of affordable rents. Similarly, the NSP does not address the purchase of land and property by foreign investors or the sale of public land to private developers. The identification in the Camberwell Area Vision of privately owned sites potentially suitable for redevelopment is likely to have the effect of increasing the value of these sites on the open market, and so increasing the cost of any homes subsequently built there and the eventual affordability for local people.

While powers of compulsory purchase to bring empty homes back into use are an effective way to increase affordable housing provision there is no mention in the entire plan of using the powers in this way. The only mention is the “compulsorily purchase [of] land when necessary” (page 14) which is an ineffective use of the powers compared to bringing empty homes back into occupancy. Provision should be made within the NSP to use powers to bring affordable housing back into the market. The Camberwell Area Vision needs specific mentions of areas that have been identified for the development of truly affordable housing or overall aims of the NSP, Southwark Council and the Mayor of London will not be effectively achieved.

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Policy P1 covers the whole borough; therefore housing development in Camberwell will have to comply with Policy P1.

P1: Affordable housing

Individual
NSPPSV325.7

CONSIDERS THE NEW SOUTHWARK PLAN TO BE SOUND AND LEGALLY COMPLIANT

Noted.

P4: Private rented homes

Individual
NSPPSV331.3

The council has changed the wording on the provision of affordable homes. It used to say that there would only be offsite provision or in lieu payments in exceptional circumstances. There is no justification for relaxing this wording. Also, the council cannot claim to be delivering tenure blind homes when there are fully private glass towers in one place and council properties in another part of the borough. Therefore it cannot meet the aims of SP1.

The wording "shall be delivered on-site except in exceptional circumstances" should be reintroduced when applying the requirement for affordable housing.

This will be considered on a site-by-site basis. The sequential approach to affordable housing is set out in the Draft Affordable Housing SPD at Section 6.3, which any development which requires the provision of affordable housing will have to comply with.

P4: Private rented homes

Bankside Residents Forum
NSPPSV19.4

It is unsound to apply the 35% affordable housing requirement differently to private rented homes. In Policy P4, affordable housing only applies to schemes providing more than 100 homes and there is the option to provide only 12% of homes at social rent equivalent and 23% as intermediate homes (reversing the proportion in Policy P1). Consideration of actual planning applications shows that social rent equivalent schemes can be £160, £175 and £190 for 1,2 and 3 bed homes respectively compared with target social rents of £97, £111, and £ 124. Social rent equivalents would also only have 3 year tenancies.

The introduction in Policy P4 of a new rent product called discount market rent further confuses and dilutes the need for genuine social rent homes. No evidence is presented about how large scale private rented sector developments meet housing needs when their offer is inferior to conventional housing schemes.

To make this policy sound, the affordable housing offer provided by private rented schemes must be the same as required under Policy P1. The entire Policy P4 must apply to all new private rented housing so that improvements in conditions for private renters, such as longer -term tenancies, benefit everyone.

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft 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 Draft 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.

Where a development provides less than 100 units, the development will be required to comply with Policy P1.

P4: Private rented homes

Barkwest and Regent Group
NSPPSV20.3

1.7 states that developments must provide affordable homes in accordance with P1 or Table 3, subject to viability. A failure to apply a flexible approach to the split based upon site specific circumstances will impact on the delivery of affordable homes, particularly in large, mixed-used developments. Unlike policy P1, there is no reference to a flexible approach being applied to the mix targets included within the supporting text and this flexibility should be included for the policy to be sound.

1.7 also states that “where the provision of private rented homes generates a higher development value than if the homes were built for sale, the minimum affordable housing requirement will increase to the point where there is no financial benefit to providing private rented homes over built for sale homes”. LBS recognises that the private rented sector meets the housing needs of residents who cannot afford to, or do not want to buy homes in Southwark, and as such the Council wants to encourage professionally managed private rented products. This sentence is unnecessary, as private rented units are automatically pegged to the market, with the ability for rents to fall in the future. 1.7 as drafted will deter the delivery of professionally managed private rented products, and this sentence should be deleted as it cannot be justified.

Paragraph 1.8 should be amended to reflect the Mayors Homes for Londoners – Affordable Housing and Viability’ SPG. It should not be necessary for affordable housing reviews to be required where 35% affordable housing has been provided and implementation targets have been met.

Under Policy P4, London Living Rent is required as there is a Council Plan commitment to secure new 1,000 London Living Rent homes by 2022. Social rent equivalent is required, given the identified need for social housing in Southwark.

This is necessary to ensure the maximum viable amount of affordable housing is provided through the provision of private rented homes.

Reviews are required to ensure the maximum viable amount of affordable housing is delivered.

P4: Private rented homes

Dolphin Living
NSPPSV49.3

Dolphin Living Ltd welcomes the inclusion of Draft Policy P4 which provides a useful policy for the burgeoning 'Build to Rent' sector. However, aspects of the policy are at odds with the current GLA guidance and emerging policy. Furthermore, our client has specific concerns in relation to the viability and deliverability of the policy as currently drafted.

The GLA has provided significant policy guidance through the Affordable Housing and Viability Supplementary Planning Guidance (AHV SPG). More recently, the Draft New London Plan (DNLP) 2018 also provides draft policy guidance on this topic (refer to Policy H13).

Our comments on the wording of the proposed conditions are as follows:

- The 100 unit threshold relating to the application of the policy appears to be somewhat arbitrary and does not reflect current guidance and emerging policy from the GLA which applies a threshold of at least 50 units. We have suggested the wording be amended, as set out below, to introduce a margin of flexibility for schemes which fall just short of the proposed threshold;
- AHV SPG (Para 4.25) states that where a developer identifies a specific local need, a wider mix of discounted market rent products may be provided. This degree of flexibility should be applied to the supporting text of the Draft Policy P4. The London Plan suggestion is more appropriate i.e. 30% LLR and the rest a mix DMR below 80% of MR;
- Providing the same design standards as build for sale is considered to be too rigid and may stifle innovation in terms of providing alternative approaches to a new form of tenure which is recognised in the emerging GLA policy and guidance.
- 30 year covenant is not at odds with the draft London Plan which proposes 15 year covenants.

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft London Plan encourages solely Discount Market Rent, preferably London Living Rent. The Draft 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% affordable rent at London Living Rent equivalent and 15% social rent equivalent. London Living Rent is required as there is a Council Plan commitment to secure new 1,000 London Living Rent homes by 2022. Social rent equivalent is required, given the identified need for social housing in Southwark. The higher bracket of between £60-90,000 incomes per year has been removed in accordance with the draft London Plan.

Private rented homes should provide the same design standards as build for sale. If any development proposes to depart from this, it will need to be justified.

P4: Private rented homes

Individual
NSPPSV50.4

It is unsound to apply the 35% affordable housing requirement differently to private rented homes. In Policy P4, affordable housing only applies to schemes providing more than 100 homes and there is the option to provide only 12% of homes at social rent equivalent and 23% as intermediate homes (reversing the proportion in Policy P1). Consideration of actual planning applications shows that social rent equivalent schemes can be £160, £175 and £190 for 1,2 and 3 bed homes respectively compared with target social rents of £97, £111, and £ 124. Social rent equivalents would also only have 3 year tenancies. The introduction in Policy P4 of a new rent product called discount market rent further confuses and dilutes the need for genuine social rent homes. No evidence is presented about how large scale private rented sector developments meet housing needs when their offer is inferior to conventional housing schemes.

To make this policy sound, the affordable housing offer provided by private rented schemes must be the same as required under Policy P1. The entire Policy P4 must apply to all new private rented housing so that improvements in conditions for private renters, such as longer term tenancies, benefit everyone.

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft London Plan encourages solely Discount Market Rent, preferably London Living Rent. The Draft 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% affordable rent at London Living Rent equivalent and 15% social rent equivalent. London Living Rent is required as there is a Council Plan commitment to secure new 1,000 London Living Rent homes by 2022. Social rent equivalent is required, given the identified need for social housing in Southwark.

P4: Private rented homes

Elephant Amenity Network
NSPPSV57.6

It is unsound to apply the 35% affordable housing requirement differently to private rented homes.

We note that the Private Rented Policy, now P4, has undergone significant changes through the various drafts of the NSP. Hitherto the Council has maintained that Build to Rent schemes were capable of providing the same level and type of affordable housing as Build for Sale schemes. Abandoning this position is not justified by the 'Reasons', which are merely descriptive.

In Policy P4, the affordable housing requirement only applies to schemes providing more than 100 homes. No justification is provided for this.

P4 1.6's clawback mechanism tacitly acknowledges that the 30 year term for securing the homes for the rental market can be breached. The clawback mechanism is not an effective means of ensuring that homes remain in the rental market, against the imperative for a private institutional investor of realising a profit at an early point.

P4 1.6 and P4 1.7 are inconsistent. The minimum 30 year term for securing the homes for the rental market diminishes the likelihood of providing affordable housing in perpetuity and is not effective.

P4 1.7 allows for a different kind of affordable contribution to that of Policy P1 and one that is inferior to that of P1, both in kind (eg social rent and London Living Rent 'equivalents') and amount (eg a 12% social rent 'equivalent', rather than 24.5% social rent). There is no justification for this. The proportions of social rented and intermediate housing are reversed from that given in P1, also with no justification. (NB consideration of actual planning applications shows that weekly social rent equivalent rents can be £160, £175 and £190 for 1,2 and 3 bed homes respectively compared with target social rents of £97, £111, and £ 124. Social rent equivalent homes would also only have 3 year tenancies).

The assumption of P4 1.7 that a Build to Rent development can generate a higher value than a Build for Sale option further undermines any justification for reducing the social rent requirement for Build to Rent.

The second sentence of P4.17 is difficult to understand. It appears to be an attempt to maximise affordable housing to a level that a Build for Sale option would provide. This could be more effectively achieved by applying Policy P1.

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft 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 Draft 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.

Under 1.7 affordable homes would be required in perpetuity.

Policy P4 has been amended to require 20% affordable rent at London

P4: Private rented homes

The introduction in Policy P4 of a new rent product called discount market rent further confuses and dilutes the need for genuine social rent homes. No evidence is presented about how large scale private rented sector developments meet housing needs, when their offer is inferior to conventional Build for Sale schemes.

P4 1.8 appears to be tautological. An improvement in scheme viability can only be demonstrated by a viability assessment and will not be apparent without one. The aim of maximising affordable housing requires a fixed timetable of reviews to be effective. We repeat our comment about viability made under P1 here - all full viability assessments should be published at the time of the validation of planning applications or variations (NB not just the publication of executive summaries).

To make this policy sound, the affordable housing offer provided by private rented schemes must be the same as required under Policy P1. The entire Policy P4 must apply to all new private rented housing so that improvements in conditions for private renters, such as longer term tenancies, benefit everyone.

Living Rent equivalent and 15% social rent equivalent. London Living Rent is required as there is a Council Plan commitment to secure new 1,000 London Living Rent homes by 2022. Social rent equivalent is required, given the identified need for social housing in Southwark. The higher bracket of between £60-90,000 incomes per year has been removed in accordance with the draft London Plan.

P4: Private rented homes

Firmdale Holdings
NSPPSV59.3

Policy P4 sets out a series of requirements for new self-contained, private rented homes in developments of more than 100 homes. Within Policy P4, paragraph 1.6 sets out a 'clawback mechanism' whereby if "any private rented homes are sold from the private rented sector" before a fixed period of time has expired, this results in penalty charge towards affordable housing. Whilst this approach is accepted as reasonable in principle, the minimum term for all units in such developments to be required to remain privately rented is identified as 30 years. This period of time is considered to be unduly restrictive with no clear rationale as to why this is double the 15 year period proposed to be applied by the Draft London Plan (at Draft Policy H13).

A 30 year minimum term is considered to be highly restrictive and is likely to dissuade developers from investing in developments incorporating this relatively new housing product, given the significant uncertainty about its long-term viability and the long-timescales necessary to secure profitable returns for developers.

Accordingly, draft Policy P4 is considered to be 'unsound' in that it is not 'consistent' as it is not in accordance with the emerging London Plan (which will form part of the development plan for the area), with the lack of evidence to support a 30 year term instead of a 15 year term not adequately 'justified'.

Change sought – It is requested that paragraph 1.6 of draft Policy P4 be amended to refer to a minimum term of 15 years for new private rented homes to remain in this tenure, rather than 30 years, as follows:

P4: Private rented homes

New self-contained, private rented homes in developments providing more than 100 homes must..

...1.6 Be secured for the rental market for a minimum 15 year term. Where any private rented homes are sold from the private rented sector within 15 years this will trigger a clawback mechanism resulting in a penalty charge towards affordable housing; and".....

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft 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 Draft 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% affordable rent at London Living Rent equivalent and 15% social rent equivalent. London Living Rent is required as there is a Council Plan commitment to secure new 1,000 London Living Rent homes by 2022 (Social rent equivalent is required, given the identified need for social housing in Southwark. The higher bracket of between £60-90,000 incomes per year has been removed in accordance with the draft London Plan.

P4: Private rented homes

Greenpruce GP
NSPPSV72.4

In principle, this policy is welcomed. It is recognised by both the Government and the Mayor of London that this sector plays a crucial role in housing Londoners unable, or who choose not, to purchase their own homes. This recognition in the draft New Southwark Plan is a positive. Whilst generally the wording of the proposed policy is supported, it is noted that the requirement for a minimum 30 year covenant on any homes built to rent is out of alignment with the Mayor's recommended 15 year minimum covenant, as per the Mayor's Housing SPG (2016) and the draft New London Plan. Whilst the draft London Plan recognises that covenant lengths will increase as the market matures, this sector is still very much in its nascent stages and has not matured to any significant extent. It is suggested that this 30 year covenant length requirement should be reduced to a minimum requirement of 15 years, in line with the Mayor's current and emerging requirements.

It is noted that draft Policy P4 does not make any material allowance for the distinct economics of build to rent development, as required by Central Government, the London Plan and the GLA SPG, subject to viability. It is proposed that explicit recognition of the distinct economics of this housing sector should be included in Policy P4, rather than the blanket stipulation of a minimum 35% affordable housing delivery.

Further consideration should also be given to proposed tenure mix set out in Policy P4. It is clear that it is not possible to deliver the stipulated proportions of social rent equivalent, London Living Rent and depth of discounts required whilst still meeting the headline of 35% affordable housing delivery. There needs to be a trade off if build to rent is to be delivered at scale.

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft 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 Draft 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% affordable rent at London Living Rent equivalent and 15% social rent equivalent. London Living Rent is required as there is a Council Plan commitment to secure new 1,000 London Living Rent homes by 2022. Social rent equivalent is required, given the identified need for social housing in Southwark. The higher bracket of between £60-90,000 incomes per year has been removed in accordance with the draft London Plan.

P4: Private rented homes

Grosvenor
NSPPSV74.4

Wider Policy Context

Grosvenor has been engaging with Central Government and the GLA through the British Property Federation and London First for several years as the Build to Rent (BTR) sector has become fully recognised in planning policy and guidance at the national, London wide and local level.

The Government's Housing White Paper and the Draft New London Plan policy H13 both fully recognise the critical role that purpose built rental housing can make in contributing to solving the housing crisis by:

- providing accessible high quality well managed rented housing for a wide range of households;
- encouraging a private rented sector which provides a greater level of security for tenants to that which is offered by much of the current private rented sector;
- ensuring a commitment to, and investment in, place-making through single ownership;
- providing better management standards and better quality homes than much of the mainstream private rented sector; and
- accelerating the delivery of new homes.

Draft New London Plan policy H13 recognises that the BTR development model differs from a traditional for sale scheme. BTR developments rely upon income generated from rent over a long period, as opposed to profit realised upfront from the sale of new homes. This is referred to as the "distinct economics" of the sector.

Draft New London Plan policy H 13 also states that where a development meets certain criteria, the affordable housing offer can be solely Discounted Market Rent (DMR) homes managed by the BTR provider, fully integrated into the development and with no differences between DMR and market units.

Draft Policy P4

Grosvenor welcomes the inclusion of draft policy P4 as an important and proactive step to enable BTR developments to contribute to the delivery of new homes in Southwark. In particular, we support:

- Criteria 1.2- providing a mix of unit sizes which reflects local need for rented property;
- Criteria 1. 7- the provision of affordable housing as "discount market rent" homes⁵ into perpetuity;
- Criteria 1.8 - the inclusion of a viability review mechanism to increase the number of and/ or affordability of affordable homes⁶;

Private rented homes should provide the same design standards as build for sale. If any development proposes to depart from this, it will need to be justified.

The break clause gives flexibility to the tenant and will allow them to reduce their tenancy as required.

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft London Plan encourages solely Discount Market Rent, preferably London Living Rent.

The Draft London Plan at Policy H13 sets out that,

P4: Private rented homes

- The acknowledgement of the potential benefits BTR housing can bring to the local economy; and
- The encouragement for a private rented sector which provides high quality professionally managed accommodation and a greater level of security for tenants.

There are a number of aspects of draft Policy P4 however, that in our view require refinement in order to support the supply of BTR housing.

- Criteria 1.3- design standards

We agree that BTR housing should generally meet the same standards of design as build for sale homes. However there are some differences in the design approach for purpose built rental housing which can improve the quality of experience for private tenants and discount market rent tenants alike. In particular this includes the provision of communal facilities for residents, potentially in lieu of balconies on some units, to encourage community building and social interaction. We would suggest an addition to the wording to state "meeting the same standards of design as build for sale, whilst reflecting the specifics of Build to Rent housing and the demands of those renting".

- Criteria 1.4 -tenancies for a minimum of three years

We support the proposal to provide private renters with the option to request a tenancy of up to three years with tenant's break clause if there is demand for this, but suggest that private renters should not be obliged to take a three year tenancy if they would prefer a shorter term.

- Criteria 1.6- private rented homes to be secured for the rental market for a minimum 30 year term.

Where any private rented homes are sold from the private rented sector within 30 years this will trigger a clawback mechanism resulting in a penalty charge towards affordable housing

- The minimum 30 year term over which the private rented homes are to be secured appears excessive and is double the minimum 15 year term recommended by the GLA in draft policy H13, and Central Government guidance. We would recommend that this is reduced to 15 years for consistency.
- We understand and support the need for a "clawback" mechanism if the private rented/ BTR homes are sold within the covenant period. However the use of the term "penalty charge" is not appropriate. The clawback should reflect the extent of any financial benefit secured by the Applicant of breaking the covenant. If there is no financial benefit (for instance where all the units are sold as 'market sale' but their value is equal or less than their value as BTR) there should be no 'charge'.

Boroughs may set their own local threshold to reflect local housing market circumstances and affordable housing need.

The clawback review penalty charge will be reflective of the financial benefit of the units being market homes.

Policy P4 has been amended to require 20% affordable rent at London Living Rent equivalent and 15% social rent equivalent. London Living Rent is required as there is a Council Plan commitment to secure new 1,000 London Living Rent homes by 2022

Social rent equivalent is required, given the identified need for social housing in Southwark. Viability testing has confirmed, it is viable to deliver the affordable housing requirement. As the policy is subject to viability, if development cannot provide compliant

P4: Private rented homes

5 This will enable the affordable homes to be managed by the build to rent provider and be fully integrated into the development with no differences between DMR and market units

6 Grosvenor has offered a one off post completion review mechanism in its October 2017 planning application to ensure future upside can be shared with Southwark Council to maximise affordable housing delivery

- Criteria 1. 7 - Provide at least 35% affordable discount market rent homes at discounts in line with Table 3, subject to viability.
 - The New London Plan recognises that the economics of BTR housing are distinct from private for sale housing. BTR developments rely upon income generated from rent over a long period, as opposed to profit realised upfront from the sale of new homes. Unlike private for sale housing, the BTR sector is in its infancy and there is limited evidence and data available to assess the likely financial performance of schemes.
 - In response to the New London Plan draft policy H13, and in the context of the distinct economics of BTR housing, various industry bodies have expressed concerns around the ability of BTR developments in London to deliver 35% affordable housing - a concern we share.
 - The evidence base that supports the development of draft policy P4 is contained within BNPP's September 2015 Viability Report and is limited being based on only one relatively small site -site 67.
 - Our analysis to date demonstrates a clear trade-off between the quantum of affordable units deliverable and the depth to which the rents can be discounted.
 - Our findings (which Grosvenor are willing to share in full), have shown that it is not possible to reach the headline target of 35% whilst also delivering meaningful levels of discount. Nor is it possible to deliver the 35% headline target alongside the discounts set out in Table 3.

The early stage of the BTR sector in London and Southwark, coupled with the limited evidence currently available to assess likely performance leads us to recommend that a flexible approach is adopted in the refinement and application of draft policy P4, with sufficient weight to be given to the "subject to viability" component of this draft policy.

Grosvenor is committed to adopting a fully transparent approach to forthcoming affordable housing and financial viability discussions with Southwark Council and will share the analysis carried out to date in full with officers and councillors in support of these representations.

In light of the challenges described above, Grosvenor offered a post completion review mechanism within its October 2017 planning application to ensure the council is able to maximise affordable housing delivery if the performance of the completed scheme can support this.

affordable housing this will need to be demonstrated through the submission of a viability assessment.

P4: Private rented homes

Individual
NSPPSV93.11

It is unsound to apply the 35% affordable housing requirement differently to private rented homes. In Policy P4, affordable housing only applies to schemes providing more than 100 homes and there is the option to provide only 12% of homes at social rent equivalent and 23% as intermediate homes (reversing the proportion in Policy P1). Consideration of actual planning applications shows that social rent equivalent schemes can be £160, £175 and £190 for 1,2 and 3 bed homes respectively compared with target social rents of £97, £111, and £ 124. Social rent equivalents would also only have 3 year tenancies.

The introduction in Policy P4 of a new rent product called discount market rent further confuses and dilutes the need for genuine social rent homes. No evidence is presented about how large scale private rented sector developments meet housing needs when their offer is inferior to conventional housing schemes.

To make this policy sound, the affordable housing offer provided by private rented schemes must be the same as required under Policy P1. The entire Policy P4 must apply to all new private rented housing so that improvements in conditions for private renters, such as longer term tenancies, benefit everyone.

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft 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 Draft 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% affordable rent at London Living Rent equivalent and 15% social rent equivalent. London Living Rent is required as there is a Council Plan commitment to secure new 1,000 London Living Rent homes by 2022. Social rent equivalent is required, given the identified need for social housing in Southwark. The higher bracket of between £60-90,000 incomes per year has been removed in accordance with the draft London Plan.

P4: Private rented homes

L&G
NSPPSV104.3

REPRESENTATIONS

Policy P4: Private Rented Homes

Policy P4 provides a specific policy on private rented homes. The provision of a specific policy for this sector is supported in recognition that the private rented sector provides an alternative model to traditional developments. Affordable housing requirements are set out for private rented homes in developments of more than 100 dwellings including the need for 35% Affordable Housing overall of which a minimum of 34% should be social rent, a minimum of 52% should be London Living Rent and a minimum of 5% should be Affordable Rent. There is also a requirement for homes to be secured on the rented market for a minimum of a 30 years.

In contrast Draft London Plan Policy H13 on Build to Rent provides different affordable housing requirements.

Draft London Plan Policy H13 states that for Build to Rent schemes to follow the fast track route to viability, they must deliver at least 35% affordable housing. Draft London Plan Policy H13 allows the affordable housing offer to be solely Discounted Market Rent and if following the fast track route at least 30% should be London Living Rent. The time period within which the homes must be held as Build to Rent is 15 years.

In order to ensure consistency with the Draft London Plan Policy H13 and to encourage the development of this sector we consider that Policy P4 should be amended to be consistent with the requirements of the Draft London Plan.

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft 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 Draft 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% affordable rent at London Living Rent equivalent and 15% social rent equivalent. London Living Rent is required as there is a Council Plan commitment to secure new 1,000 London Living Rent homes by 2022 (.). Social rent equivalent is required, given the identified need for social housing in Southwark. The higher bracket of between £60-90,000 incomes per year has been removed in accordance with the draft London Plan.

P4: Private rented homes

LGIM Real Assets (LGIM RA),
NSPPSV109.2

Representations

Policy P4: Private rented homes

Policy P4 sets out a series of requirements for new self-contained, private rented homes in developments of more than 100 homes. Within Policy P4, paragraph 1.6 sets out a 'clawback mechanism' whereby if "any private rented homes are sold from the private rented sector" before a fixed period of time has expired, this results in penalty charge towards affordable housing. Whilst this approach is accepted as reasonable in principle, the minimum term for all units in such developments to be required to remain privately rented is identified as 30 years. This period of time is considered to be unduly restrictive with no clear rationale as to why this is double the 15 year period proposed to be applied by the Draft London Plan (at Draft Policy H13).

A 30 year minimum term is considered to be highly restrictive and is likely to dissuade developers from investing in developments incorporating this relatively new housing product, given the significant uncertainty about its long-term viability and the long-timescales necessary to secure profitable returns for developers.

Accordingly, draft Policy P4 is considered to be 'unsound' as it is not 'consistent' with the emerging London Plan (which will form part of the development plan for the area), with the lack of evidence to support a 30 year term instead of a 15 year term not adequately 'justified'.

Change sought – It is requested that paragraph 1.6 of draft Policy P4 be amended to refer to a minimum term of 15 years for new private rented homes to remain in this tenure, rather than 30 years, as follows:

P4: Private rented homes

New self-contained, private rented homes in developments providing more than 100 homes must..

...1.6 Be secured for the rental market for a minimum 15 year term. Where any private rented homes are sold from the private rented sector within 15 years this will trigger a clawback mechanism resulting in a penalty charge towards affordable housing; and".....

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft 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 Draft 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% affordable rent at London Living Rent equivalent and 15% social rent equivalent. London Living Rent is required as there is a Council Plan commitment to secure new 1,000 London Living Rent homes by 2022 (.). Social rent equivalent is required, given the identified need for social housing in Southwark. The higher bracket of between £60-90,000 incomes per year has been removed in accordance with the draft London Plan.

P4: Private rented homes

London School of Economics and Political Science (LSE)
NSPPSV113.1

This comment refers to Policy P24.

Representations by London School of Economics and Political Science on
The draft New Southwark Plan: Regulation 19 Consultation

These representations have been prepared on behalf of The London School of Economics and Political Science (LSE) regarding the draft New Southwark Plan Proposed Submission Version (NSP) consultation. LSE broadly supports the Council in its objectives to deliver new homes and jobs in the Borough. However to assist the Council in these objectives we set out a series of amendments aimed at ensuring the NSP is both legal and sound in order to promote good growth throughout the Borough.

Where suggestions are put forward these are designed to help guide the Council on the deliverability of the policies as well as their compliance with the London Plan and other strategic guidance. The Draft London Plan (DLP) was issued by the Mayor of London on 1st December 2017 and is subject to consultation up to the start of March 2018. Many of the key policies within the NSP reflect the wording of the Draft London Plan (DLP) 2017 which will maintain consistency across the policy framework. We have included references where appropriate to the DLP as well as the current adopted London Plan. LSE will be making representations on the Draft London Plan.

The London School of Economics and Political Science (LSE)

LSE ranks second on the world for social sciences (QS World University Rankings 2016-2017) and is classed as world leading for research. The School has a distinct student population, relative to its competitors, with a high proportion of one year Masters students, and a particularly international student body. There were 11,885 students in 2016-2017; 5082 undergraduates and 5,990 graduates. Over 8000 students were from overseas with a majority from non EU countries. The total number of students is set to increase and LSE's investment plans in its campus and student residences reflect its ambition to maintain its place and ranking as a world class university located at the heart of London.

Data shows that LSE postgraduate student demand for accommodation significantly surpasses supply. The School wishes to move to a position where it can guarantee an offer of accommodation to all new first year students. Currently LSE's guarantee is for first year undergraduate students only, while applications for appropriate accommodation from students with disabilities continue to be prioritised. On current projections on student numbers, this amounts to a required capacity of between 6,000 - 7,000 bed spaces in the next eight years. Bed space numbers total 4,669 in 2017/18.

The overarching objective of LSE's Student Bed Space Strategy (SBSS) is to continue to attract the brightest students

P4: Private rented homes

from around the world and enhance the student experience through the provision of a competitive residential offer. This is underpinned by several evidence-based principles including: wishing to make guaranteed offers for all first-year students; having a significant proportion of economy priced bed spaces to meet the demand for affordable accommodation; a location model that meets student demand for sustainable and accessible accommodation; and increasing the number of LSE owned and managed bed spaces.

The unique selling point of LSE residences is that they are within walking distance to the School which is firmly established, and will remain, in the heart of London. LSE therefore seeks growth in accommodation capacity in close proximity to the School campus. This location supports the business model of LSE's renowned Summer School and other student group lettings and also the commercial lettings outside of term time which allows for shorter student contracts and therefore a lower annual cost to students. LSE is keen to work in partnership with local authorities whose policies recognise the School's unique position and contribution.

Representations on behalf of the LSE

The principal area of concern for LSE is the impact the NSP will have on the opportunities to develop the LSE's property at Bankside House. Bankside House currently provides approximately 600 student beds in a converted office building behind Tate Modern. The LSE has a strategic plan to replace the current Bankside House with a substantially improved and larger facility which will cater for the strong demand for places at LSE. The importance of this site is the number of beds it provides and the close proximity to the main LSE campus at Aldwych which is a short walk away.

Please note where paragraph numbers are given, these have been counted down from the relevant section referenced.
Policy P4 – Private Rented Homes

The LSE does not wish to comment on this policy specifically however it is referenced in Policy P24 related to Student Homes and the application of affordable housing policy. It is considered that Policy P4 it is not an appropriate policy to reference in regard to affordable housing and student homes. As noted in the response to Policy P24 there will be very limited circumstances where on site affordable homes for rent will be appropriate or viable to provide in association with student housing schemes. The provision of on-site rented homes requires separate cores, separate servicing and access and separate management and service charge regimes. This creates wholly inefficient site layouts and conflicting uses for any student accommodation site. A requirement to provide on-site or off site contributions would make development schemes to deliver more student homes unviable regardless of their ownership and this will have a serious impact on the long term delivery of higher education accommodation in Southwark as well as impacting on higher education delivery in the city centre.

P4: Private rented homes

As highlighted in the Council's Evidence Base document - New Southwark Plan Evidence Base: Housing Policy Viability Update Study (BNPP 2017)

Our testing of nomination schemes/schemes let by universities at low rental levels and on shorter tenancies has identified that such schemes are unable to support much conventional affordable housing (up to circa 5% depending on the benchmark land value of the site).

Table 6.25.1 in the BNPP Study highlights the issues related to nominated schemes being non-viable if affordable housing is sought.

P4: Private rented homes

Individual
NSPPSV148.9

NSP POLICY P4 PRIVATE RENTED HOMES

It is unsound to apply the 35% affordable housing requirement differently to private rented homes. In Policy P4, affordable housing only applies to schemes providing more than 100 homes and there is the option to provide only 12% of homes at social rent equivalent and 23% as intermediate homes (reversing the proportion in Policy P1). Consideration of actual planning applications shows that social rent equivalent schemes can be £160, £175 and £190 for 1,2 and 3 bed homes respectively compared with target social rents of £97, £111, and £ 124. Social rent equivalents would also only have 3 year tenancies.

The introduction in Policy P4 of a new rent product called discount market rent further confuses and dilutes the need for genuine social rent homes. No evidence is presented about how large scale private rented sector developments meet housing needs when their offer is inferior to conventional housing schemes.

To make this policy sound, the affordable housing offer provided by private rented schemes must be the same as required under Policy P1. The entire Policy P4 must apply to all new private rented housing so that improvements in conditions for private renters, such as longer term tenancies, benefit everyone.

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft 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 Draft 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% affordable rent at London Living Rent equivalent and 15% social rent equivalent. London Living Rent is required as there is a Council Plan commitment to secure new 1,000 London Living Rent homes by 2022 (.). Social rent equivalent is required, given the identified need for social housing in Southwark. The higher bracket of between £60-90,000 incomes per year has been removed in accordance with the draft London Plan.

P4: Private rented homes

Individual
NSPPSV151.5

P4

This relates to private rented homes in development schemes of plus 100 units. Whilst some of the stated criteria are understood e.g. to seek the same design standards as build-for-sale homes, others appear onerous and might frustrate the delivery of new housing. The requirement that the private rented units must be secured for the rental market for a minimum of 30 years is likely to impact potential funding opportunities etc.

Remove the word 'must' and consider amending criteria that are set out having regard to draft London Plan.

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P4: Private rented homes

Royal Mail Pension Trustees Limited.
NSPPSV155.2

Dear Sir/Madam,
New Southwark Plan - Proposed Submission Version (December 2017)
Representations on behalf of Royal Mail Pension Trustees Limited
We write on behalf of our client, Royal Mail Pension Trustees Limited, to submit representations to the New Southwark Plan - Proposed Submission Version – which are provided below.

Our client
Royal Mail Pension Trustees Limited are the freehold owners of the Bricklayers Arms Distribution Centre, Mandela Way which is proposed for allocation as part of 'Site OKR3: Mandela Way in the emerging Old Kent Road Area Action Plan ("AAP") for mixed use redevelopment to include employment (B use class), residential (C3 use class), primary school (D1 use class) development and a new park.

Representations

Policy P4: Private rented homes

Policy P4 sets out a series of requirements for new self-contained, private rented homes in developments of more than 100 homes. Within Policy P4, paragraph 1.6 sets out a 'clawback mechanism' whereby if "any private rented homes are sold from the private rented sector" before a fixed period of time has expired, this results in penalty charge towards affordable housing. Whilst this approach is accepted as reasonable in principle, the minimum term for all units in such developments to be required to remain privately rented is identified as 30 years. This period of time is considered to be unduly restrictive with no clear rationale as to why this is double the 15 year period proposed to be applied by the Draft London Plan (at Draft Policy H13).

A 30 year minimum term is considered to be highly restrictive and is likely to dissuade developers from investing in developments incorporating this relatively new housing product, given the significant uncertainty about its long-term viability and the long-timescales necessary to secure profitable returns for developers.

Accordingly, draft Policy P4 is considered to be 'unsound' as it is not 'consistent' with the emerging London Plan (which will form part of the development plan for the area), with the

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P4: Private rented homes

lack of evidence to support a 30 year term instead of a 15 year term not adequately 'justified'.

Change sought – It is requested that paragraph 1.6 of draft Policy P4 be amended to refer to a minimum term of 15 years for new private rented homes to remain in this tenure, rather than 30 years, as follows:

P4: Private rented homes

New self-contained, private rented homes in developments providing more than 100 homes must:..

...1.6 Be secured for the rental market for a minimum 15 year term. Where any private rented homes are sold from the private rented sector within 15 years this will trigger a clawback mechanism resulting in a penalty charge towards affordable housing; and”

P4: Private rented homes

Individual
NSPPSV162.5

New Southwark Plan Policy P4 PRIVATE RENTED HOMES

It is unsound to apply the 35% affordable housing requirement differently to private rented homes. In Policy P4, affordable housing only applies to schemes providing more than 100 homes and there is the option to provide only 12% of homes at social rent equivalent and 23% as intermediate homes (reversing the proportion in Policy P1). Consideration of actual planning applications shows that social rent equivalent schemes can be £160, £175 and £190 for 1,2 and 3 bed homes respectively compared with target social rents of £97, £111, and £ 124. Social rent equivalents would also only have 3 year tenancies.

The introduction in Policy P4 of a new rent product called discount market rent further confuses and dilutes the need for genuine social rent homes. No evidence is presented about how large scale private rented sector developments meet housing needs when their offer is inferior to conventional housing schemes.

To make this policy sound, the affordable housing offer provided by private rented schemes must be the same as required under Policy P1. The entire Policy P4 must apply to all new private rented housing so that improvements in conditions for private renters, such as longer term tenancies, benefit everyone.

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft 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 Draft 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.

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P4: Private rented homes

Six Bridges Estate
NSPPSV163.6

Policy P4: Private Rented Homes

Policy P4 provides a specific policy on private rented homes. The provision of a specific policy for this sector is supported in recognition that the private rented sector provides an alternative model to traditional developments. Affordable housing requirements are set out for private rented homes in developments of more than 100 dwellings including the need for 35% Affordable Housing overall of which a minimum of 34% should be social rent, a minimum of 52% should be London Living Rent and a minimum of 5% should be Affordable Rent. There is also a requirement for homes to be secured on the rented market for a minimum of a 30 years.

In contrast Draft London Plan Policy H13 on Build to Rent provides different affordable housing requirements and allows the affordable housing offer to be solely Discounted Market Rent and if following the fast track route as least 30% should be London Living Rent. The time period within which the homes must be held as Build to Rent is 15 years.

In order to ensure consistency with the Draft London Plan Policy H13 and to encourage the development of this sector we consider that Policy P4 should be amended to be consistent with the requirements of the Draft London Plan.

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft 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 Draft 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.

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P4: Private rented homes

Individual
NSPPSV172.4

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To make this policy sound, the affordable housing offer provided by private rented schemes must be the same as required under Policy P1. The entire Policy P4 must apply to all new private rented housing so that improvements in conditions for private renters, such as longer term tenancies, benefit everyone.

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P4: Private rented homes

Strathclyde Regional Pension Fund
NSPPSV174.2

Policy P4 sets out a series of requirements for new self-contained, private rented homes in developments of more than 100 homes. Within Policy P4, paragraph 1.6 sets out a 'clawback mechanism' whereby if "any private rented homes are sold from the private rented sector" before a fixed period of time has expired, this results in penalty charge towards affordable housing. Whilst this approach is accepted as reasonable in principle, the minimum term for all units in such developments to be required to remain privately rented is identified as 30 years. This period of time is considered to be unduly restrictive with no clear rationale as to why this is double the 15 year period proposed to be applied by the Draft London Plan (at Draft Policy H13).

A 30 year minimum term is considered to be highly restrictive and is likely to dissuade developers from investing in developments incorporating this relatively new housing product, given the significant uncertainty about its long-term viability and the long-timescales necessary to secure profitable returns for developers.

Accordingly, draft Policy P4 is considered to be 'unsound' as it is not 'consistent' with the emerging London Plan (which will form part of the development plan for the area), with the lack of evidence to support a 30 year term instead of a 15 year term not adequately 'justified'.

Change sought – It is requested that paragraph 1.6 of draft Policy P4 be amended to refer to a minimum term of 15 years for new private rented homes to remain in this tenure, rather than 30 years, as follows:

P4: Private rented homes

New self-contained, private rented homes in developments providing more than 100 homes must:..

...1.6 Be secured for the rental market for a minimum 15 year term. Where any private rented homes are sold from the private rented sector within 15 years this will trigger a clawback mechanism resulting in a penalty charge towards affordable housing; and".....

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft 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 Draft 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.

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P4: Private rented homes

TfL Commercial Development
NSPPSV182.6

TfL CD has previously stated that the NSP policy in respect of 'build to rent' (BtR) development should accord with the Mayor's SPG Homes for Londoners: Affordable Housing and Viability, 2017. Since then, the DLP has introduced a very similar planning policy. The Mayor is promoting a consistent approach within London to encouraging BtR development and we therefore reiterate that the Council's policies in respect of BtR should be consistent with 'Homes for Londoners' and the DLP, including the definition of BtR schemes. Please see our representation letter of 13 September 2017 for further details.

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft 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 Draft 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.

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P4: Private rented homes

TH Real Estate
NSPPSV183.4

Draft Policy P4 advises that “new self-contained, private rented homes in developments providing more than 100 homes” must meet a range of criteria.

The Draft New London Plan (Policy H13) advises that to qualify as a Build to Rent scheme, inter alia, “the development, or block or phase within the development has at least 50 units”. This also reflects the Mayor’s Affordable Housing and Viability SPG (August 2017).

Whilst the draft New London Plan acknowledges that Boroughs may set their own thresholds to reflect local housing market circumstances and affordable housing need, there is no justification in the Plan as to why the threshold for the policy relating to Private Rented Homes is 100 units and not 50 units, as per emerging London Plan policy.

The Mayor of London and the emerging London Plan is clear that the planning system should take a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes and that such developments can make a positive contribution to increasing housing supply. Therefore, having a higher threshold for the number of units for Private Rented scheme conflicts with the aims of the London Plan to promote this sector and the delivery of housing and a lower threshold in line with emerging London Plan requirements is appropriate.

As such, we consider that in line with the objectives of the emerging London Plan, draft Policy P4 should be amended to refer to “new self-contained, private rented homes in developments providing at least 50 units.” As such and as currently worded, we do not consider that draft Policy P4 is justified or ‘sound’ and does not reflect emerging regional planning policy.

Policy P4 has been introduced to provide more security than the Draft 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 Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft 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 Draft 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.

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P4: Private rented homes

Tiger Developments Ltd
NSPPSV191.4

Sub-section 1.6 refers to expected terms for such a rental product. It is considered that the 30 year period should be reduced to a minimum 15 year period to reflect market expectations and the Mayor's SPG as follows:

"A Built to Rent development must:

- hold its constituent homes as Build to Rent under a covenant for at least 15 years;"

A claw-back arrangement (or "penalty charge") could therefore still apply to a 15 year period.

This would ensure that the policy is effective in promoting this sector and delivering new homes within the Borough, whilst discouraging applicants from amending the tenure shortly after permission / completion.

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P4: Private rented homes

John Lyon's Charity
NSPPSV214.3

The policy supports the development of purpose built rented accommodation provided the homes provide a high-quality accommodation with more secure tenancies and good standards of management.

Draft Policy P4 does not prescribe a mix for private dwellings (albeit Policy P2 prescribes the required housing mix for family homes within the Action Area Core) and this is supported by John Lyon's Charity. The private mix of any development should be determined by market conditions and demand. The Charity support the policy.

Noted.

P4: Private rented homes

Individual
NSPPSV218.15

It is unsound to apply the 35% affordable housing requirement differently to private rented homes. In Policy P4, affordable housing only applies to schemes providing more than 100 homes and there is the option to provide only 12% of homes at social rent equivalent and 23% as intermediate homes (reversing the proportion in Policy P1). Consideration of actual planning applications shows that social rent equivalent schemes can be £160, £175 and £190 for 1,2 and 3 bed homes respectively compared with target social rents of £97, £111, and £ 124. Social rent equivalents would also only have 3 year tenancies.

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P4: Private rented homes

Individual
NSPPSV239.4

It is unsound to apply the 35% affordable housing requirement differently to private rented homes. In Policy P4, affordable housing only applies to schemes providing more than 100 homes and there is the option to provide only 12% of homes at social rent equivalent and 23% as intermediate homes (reversing the proportion in Policy P1). Consideration of actual planning applications shows that social rent equivalent schemes can be £160, £175 and £190 for 1,2 and 3 bed homes respectively compared with target social rents of £97, £111, and £ 124. Social rent equivalents would also only have 3 year tenancies.

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P9: Optimising delivery of new homes

Aviva and Galliard
NSPPSV18.6

Policy P9 seeks to identify a residential density range of 650-1,100 habitable rooms per hectare within the Old Kent Road Opportunity Area Core.

The Policy is considered to be overly restrictive and greater flexibility should be introduced to ensure the delivery of residential units can be optimised. This is particularly relevant for sites within the OKRAAP and Opportunity Area where a series of sites have been identified as being appropriate for taller buildings and denser forms of development. See Policy AAP8 of the OKRAAP.

The appropriateness of the final level of density can only be judged on a site by site basis. This will need to take into consideration a range of matters linked to accessibility, quality of accommodation and place, amenity and social infrastructure.

If the proposed density range is to be retained within the Policy, it should be made clear that this is a general range. Further flexibility should be included, particularly for sites within the Old Kent Road Opportunity Area where there is the most comprehensive changes to build form and density proposed as part of the emerging spatial framework.

The above accords with the objectives of the London Plan and Draft London Plan in terms of optimising the delivery of new homes and the objectives of the Opportunity Area designation.

Noted. The density matrix will be removed to be in line with the London Plan.

P9: Optimising delivery of new homes

Bankside Residents Forum
NSPPSV19.7

The policy is unsound as it fails to balance the delivery of new housing with local character, social infrastructure and green infrastructure. Table 6 and Figure 2 over-develop North Southwark whilst protecting South Southwark thereby increasing the spatial inequality in the Borough

To make the Plan sound, the policy must include details from Lifetime Neighbourhood's Policy 7.1 of the current London Plan. This ensures that new developments build on rather than eradicate the existing qualities and diversity of Southwark's neighbourhoods. It develops inclusive and sustainable communities in which local employment, social and community facilities, parks and open spaces, local services and a wide range of homes are affordable and accessible to everyone. These criteria should be applied equally to residential neighbourhoods in the North and South of the Borough.

Barkwest and Regent Group
NSPPSV20.4

Point 1 states that Development must be within the residential density ranges outlined in Table 6 and Figure 2 but that in exceptional circumstances development may exceed these density ranges where it achieves an exemplary standard of residential design. The reference to density ranges should be deleted and amended to accord with the emerging New London Plan (December 2017).

Figure 2 should be amended to show the Old Kent Road Area Action Plan Core.

Noted. The density matrix will be removed to be in line with the London Plan. The principles of the lifetime neighbourhoods policy are taken into consideration through our strategic policies such as SP2 Social regeneration to revitalise neighbourhoods; SP3 Best start in life and SP6 Cleaner, Greener, Safer, which seek to ensure that we will continue to revitalise our neighbourhoods and will aim to create healthy neighbourhoods.

Map will be amended to show OKR Area Action Core.

P9: Optimising delivery of new homes

Berkeley Homes (South East London)
NSPPSV21.4

We would note that Figure 2 needs to be updated to show the Old Kent Road Area Action Plan Core Area. This approach is consistent with the DOKR AAP.

There is broad support for the objectives of Policy P9 which seeks to optimise density of development and ensure a high quality of design. This echoes Policy 3.4 of the London Plan and Policy D6 of the draft London Plan which notes that development proposals must make the most efficient use of land, optimising density through a design led approach.

Sustainability and high quality design is at the heart of everything Berkeley does and this applies to every project across the Group. Berkeley's single biggest contribution is to create new places that grace their surroundings and will stand the test of time. The environmental and design performance of each site is carefully considered at the early stages of each project to ensure we create beautiful, successful places.

Policy P9 notes that justification for higher densities above the ranges in Table 6 would be in exceptional circumstances and exemplary design based on applying the criteria within Policy P9. We consider it would be helpful to amend the wording to allow for higher densities where supported by a design led approach, detailed design scrutiny and an appropriate management plan. This amendment would retain the effectiveness and purpose of the policy but would provide better alignment with the new London Plan once both documents are adopted (by 2019).

Noted. The density matrix will be removed to be in line with the London Plan.

P9: Optimising delivery of new homes

Capital Industrial
NSPPSV30.2

This policy allows for development which exceeds the residential density range in exceptional circumstance where it achieves an exemplary standard of residential design. We consider that optimising housing density is necessary for regeneration areas such as the OKROA and it should be based on a design-led approach, as the emerging New London Plan suggests. Consideration should be given to a number of factors including the site's context and relationship with adjoining uses/sites and their regeneration schemes. In particular, for sites within the OKRPA where there are extensive regeneration schemes coming forward, high density should be achieved through a coordinated delivery of regeneration (to be secured through the AAP).

As such, we consider that allowing residential development which exceeds the residential density range based on the scheme satisfying an exemplary design standard has the potential to disregard the potential prejudicial impact on adjoining development sites. We therefore object to this policy and consider that this policy should be amended to include a criterion which seeks to ensure that the applicant demonstrates that it does not undermine or prejudice regeneration of the adjoining sites coming forward.

We consider that this change is necessary to ensure the delivery of the Local Plan as a whole, whilst ensuring that delivery of new homes is optimised.

Noted. The density matrix will be removed to be in line with the London Plan.

P9: Optimising delivery of new homes

Individual
NSPPSV56.6

P9 Optimising delivery of new homes: This policy is unsound as it takes no account of the impact of the delivery of new homes on local character, social infrastructure NS green infrastructure. All of these are essential parts of the neighbourhood which are essential for health and wellbeing. The policy is therefore inconsistent with SP2 Social regeneration to revitalise neighbourhoods.

P9: The policy should include methods to incorporate existing qualities and diversity of existing neighbourhoods rather than as now eradicate them. Otherwise it is impossible to achieve the SP2 social regeneration that benefits existing residents and neighbourhoods.

Elephant Amenity Network
NSPPSV57.10

The policy is unsound as it fails to balance the delivery of new housing with local character, social infrastructure and green infrastructure. Table 6 and Figure 2 over-develop North Southwark whilst protecting South Southwark thereby increasing the spatial inequality in the Borough

To make the Plan sound, the policy must include details from Lifetime Neighbourhoods Policy 7.1 of the current London Plan. This ensures that new developments build on rather than eradicate the existing qualities and diversity of Southwark's neighbourhoods. It develops inclusive and sustainable communities in which local employment, social and community facilities, parks and open spaces, local services and a wide range of homes are affordable and accessible to everyone. These criteria should be applied equally to residential neighbourhoods in the North and South of the Borough.

Noted. The density matrix will be removed to be in line with the London Plan.

Noted. The density matrix will be removed to be in line with the London Plan. The principles of the lifetime neighbourhoods policy are taken into consideration through our strategic policies such as SP2 Social regeneration to revitalise neighbourhoods; SP3 Best start in life and SP6 Cleaner, Greener, Safer, which seek to ensure that we will continue to revitalise our neighbourhoods and will aim to create healthy neighbourhoods.

P9: Optimising delivery of new homes

Firmdale Holdings
NSPPSV59.4

Whilst the Draft London Plan has removed reference to the indicative residential density ranges currently detailed in the current London Plan, in order to provide flexibility for proposals to be developed in response to site specific circumstances, draft Policy P9 proposes not only to maintain residential density ranges, but also states that “Development must be within the residential density ranges” other than in “exceptional circumstances”.

Accordingly, Policy P9 as currently drafted is considered to be ‘unsound’ as it not ‘consistent’ with the emerging London Plan (which will form part of the development plan for the area). Furthermore, the alternative approach that of the draft London Plan is not adequately ‘justified’, given the lack of evidence to support the imposition of blanket restrictions on development densities across the borough.

Change sought – It is requested that draft Policy P9 and “Table 6: Residential density ranges” be deleted, as other policies in the draft NSP PSV (including policies in respect of design, amenity and transport) are considered to be sufficient to ensure that delivery of housing will be optimised, without the need for unnecessary and unduly prescriptive residential density ranges to be imposed.

GLA
NSPPSV66.5

Southwark has a mixed record of housing delivery over the past few years, delivering 109% of its London Plan target in 2012- 2013, 75% in 2013 – 2014, 101% in 2014 – 2015 and 55% in 2015 – 2016. The borough should meet and exceed its target going forward as required in London Plan Policy 3.3 Increasing housing supply. The housing target referred to on page 35 is 2,376, which is likely a typographical error as it should be 2,736 homes per year, as set in the London Plan.

Noted. The density matrix will be removed to be in line with the London Plan.

This is noted; at it will be corrected to 2736.

P9: Optimising delivery of new homes

Greenpruce GP
NSPPSV72.5

This draft policy includes a table of recommended residential density ranges. It is proposed that this table should be omitted, recognising that the draft New London Plan (draft Policy 06) no longer includes a density matrix and instead emphasises that the optimum density of a development "should result from a design-led approach to determine the capacity of the site".

It is further suggested that the following text could be included:

"The highest residential densities will be encouraged and optimised in areas strategically identified for intensification and regeneration, including the CAZ and Opportunity Areas".

It is considered that the prescriptive list of requirements set out in draft Policy P9 are overly restrictive in the context of a design-led approach, and a wider policy context which is encouraging of innovative housing delivery and optimising of development capacity, particularly of relevance to this Site which could potentially support a new tube station as well as large-scale retail in combination with a range of other commercial and residential uses.

Aside from omitting the prescriptive density ranges, it is proposed that dense, high-quality housing should not necessarily be required to exceed minimum internal space standards (2.3), exceed private and communal amenity space standards (2.9) or provide private amenity space in a particular format (2.11), in the form of fully or partially inset balconies.

Housing of exceptional quality can be delivered through meeting minimum standards and emphasis should be placed on optimising development capacity in highly accessible locations without compromising overall housing numbers through exceeding standards that are considered perfectly acceptable elsewhere in the borough. Design solutions should be appropriate for the site in question, responding to the site-specific constraints and opportunities, with the ability to consider innovative typologies that also respond to demand, and are not constrained by prescriptive policy.

It is considered that draft Policy P9, if rigidly applied, could potentially restrict the capacity of major development sites, particularly those required to support a range of uses in innovative formats (i.e. residential mixed with large-scale retail as well as transport infrastructure).

Noted. The density matrix will be removed to be in line with the London Plan.

P9: Optimising delivery of new homes

Individual
NSPPSV93.4

The policy is unsound as it fails to balance the delivery of new housing with local character, social infrastructure and green infrastructure. Table 6 and Figure 2 over-develop North Southwark whilst protecting South Southwark thereby increasing the spatial inequality in the Borough

To make the Plan sound, the policy must include details from Lifetime Neighbourhoods Policy 7.1 of the current London Plan. This ensures that new developments build on rather than eradicate the existing qualities and diversity of Southwark's neighbourhoods. It develops inclusive and sustainable communities in which local employment, social and community facilities, parks and open spaces, local services and a wide range of homes are affordable and accessible to everyone. These criteria should be applied equally to residential neighbourhoods in the North and South of the Borough.

Noted. The density matrix will be removed to be in line with the London Plan. The principles of the lifetime neighbourhoods policy are taken into consideration through our strategic policies such as SP2 Social regeneration to revitalise neighbourhoods; SP3 Best start in life and SP6 Cleaner, Greener, Safer, which seek to ensure that we will continue to revitalise our neighbourhoods and will aim to create healthy neighbourhoods.

P9: Optimising delivery of new homes

L&G
NSPPSV104.4

LAND AT 585-589 OLD KENT ROAD, LONDON, SE15 1LA

We submit on behalf of our client, Legal & General Assurance Society Ltd ('L&G' hereafter), a representation in response to your consultation on the representations in response to your consultation on the New Southwark Plan (Proposed Submission Version published November 2017), herein referred as the NSP.

Consultation closes on 27 February 2018. CBRE Limited ('CBRE' hereafter) act as planning advisors with respect to land on the corner of Old Kent Road and Rotherhithe New Road (referred to as 'The Site' hereafter) shown within the Location Plan attached in Appendix A.

The Site currently comprises a modern retail warehouse unit (Use Class A1) currently occupied by Currys PC World with associated car parking, which fronts Old Kent Road.

L&G welcomes the opportunity to engage with Southwark Council in respect of its emerging policies in the Old Kent Road Opportunity Area and specifically the publication of the New Southwark Plan with respect to their site. In addition to these representations, representations will be issued as part of the Draft Old Kent Road Area Action Plan consultation which closes on the 21st March 2018.

As you will be aware, we have already met with Officers to discuss the emerging Old Kent Road Area Action Plan and to discuss the emerging development plans and principles surrounding the redevelopment of the site. We would welcome further engagement with the Council regarding the future of the site.

Site Location and Description

The Site currently comprises modern retail warehouse units and associated car parking as shown in the enclosed site location plan. The site area comprises 0.55 hectare. The site fronts Old Kent Road, with modern industrial warehouse buildings and hardstanding located to the north.

The adjoining sites, consist of a modern warehouse building used for storage with associated hardstanding service yard to the north, a small 3 storey building currently used as a dentist surgery and a modern retail warehouse with associated car parking to the east. To the west are parking areas and the Selco builders warehouse.

In addition to the north is a large electrical substation building situated on Verney Road. At 399 Rotherhithe New Road to the north of the site a residential led mixed use scheme is under construction. This consists of a part 6, part 19 storey building comprising of a primary school and 158 residential dwellings. A planning application has also been submitted for 6-10 Verney Road for mixed use redevelopment which comprises three tall buildings of 23, 18 and 17 storeys as well as lower elements comprising 340 residential units, A1 retail use (197.18 m2 GEA), B1 office use/workspace (4435 m2 GEA), D1 community use (394 m2 GEA) as

Noted. The density matrix will be removed to be in line with the London Plan.

P9: Optimising delivery of new homes

well as a section of the Surrey Canal Linear Park.

Whilst the area as a whole is currently characterised by large retail and industrial sheds with parcels of land dominated by areas of hard standing in the form of surface car parking and service yards, there is a changing emerging context. Strategic masterplans as part of the emerging Old Kent Road Area Action Plan will see much of the surrounding area coming forward for mixed use redevelopment including masterplan OKR 10 to the south and masterplan OKR 11 to the west. A number of planning applications are now coming forward within these masterplan areas.

Draft Old Kent Road Area Action Plan (2017) Requirements

The site falls within the allocation OKR 13 within the Draft AAP within Sub Area 3 Sandgate Street, Verney Road and Old Kent Road. Within the Draft AAP for OKR 13 indicative capacity is identified for 3,680 homes and 2,820 jobs.

Key requirements set out for the site within OKR 13 that relate to the site are as follows:

$\frac{3}{4}$ Replace existing retail space (A class use) and activate frontages on Old Kent Road through provision of retail (A use class), business (B use class) or community uses (D use class); and

$\frac{3}{4}$ Provide housing; and

$\frac{3}{4}$ Provide a new park on the alignment of the former Surrey Canal.

Within the tall buildings strategy within the AAP (Figure 9) a Tier 1 tall building is identified for the site (above 30 storeys). In terms of land use the site is identified for mixed use redevelopment within the 'high street' typology where new retail use is to be provided below residential flats or office uses.

The masterplan shows the Surrey Canal Linear Park cutting through the centre of the site which reduces to the developable area to approximately 75% of the site area and restricts the potential building footprints of any redevelopment proposal.

REPRESENTATIONS

Policy P9: Optimising Delivery of New Homes

L&G supports the high design standards set out for new homes and supports the principle of optimising density on any given site. Residential density ranges are set out with a range of 650-1100 habitable rooms per hectare set out for the Old Kent Road Opportunity Area core. The Draft London Plan has removed the density matrix. Given that the site has been identified as a location for tall buildings, the proposals will exceed the guidelines stated in this policy. In line with the Draft London Plan we suggest the density range is removed and instead the appropriate density should be a result of a design led approach (in response to the various design policies within the NSP and the Old Kent Road AAP), as well as response to context and public transport accessibility.

P9: Optimising delivery of new homes

LGIM Real Assets (LGIM RA),
NSPPSV109.3

Our client

Legal & General Group Plc (“L&G”), established in 1836, is a leading provider of risk, savings and investment management products in the UK. Legal & General Group Plc is listed on the London Stock Exchange (LSE: LGEN) and is a constituent of the FTSE 100 Index. Legal & General Investment Management (Holdings) Limited (“LGIM (H)”) is a wholly-owned subsidiary of Legal & General Group Plc. LGIM Real Assets (“LGIM RA”) is in turn a wholly-owned subsidiary of LGIM (H).

Legal & General Group employs over 9,000 people globally, with offices across the UK in Hove, Cardiff, Birmingham, and London. Legal & General Investment Management (“LGIM”) has also established offices in Tokyo, Chicago and Hong Kong.

Legal & General Investment Management’s (LGIM) direct investment capabilities in property and infrastructure were brought together as a single business for the very first time in the formation of LGIM Real Assets (LGIM RA), in January 2015. This restructure allowed the team to capitalise on cross-sector synergies and leverage its in-house expertise across the direct investment universe.

LGIM RA is one of largest investment managers in the UK by assets under management, with capabilities stretching across the sectors – from residential to high street retail, from leisure to logistics, from derivatives to development. LGIM RA manages 20 real estate investment vehicles with an aggregate asset value of £19 billion. Our UK-focused fund management platform has built and retained a strong track record of out-performance across investment strategies.

One of LGIM RA’s managed Funds is the freehold owner of a number of sites within the London Borough of Southwark (‘LBS’), including the Admiral Hyson Industrial Estate, located on the corner of Galleywall Road and Hyson Road (within the Old Kent Road Opportunity Area), which accommodates 8 single storey industrial units on a site that extends to 0.68 hectares in size

Representations

Policy P9: Optimising delivery of new homes

Whilst the Draft London Plan has removed reference to the indicative residential density ranges currently detailed in the current London Plan (in order to provide flexibility for proposals to be developed in response to site specific circumstances), draft Policy P9 proposes not only to maintain residential density ranges, but also states that “Development must be within the residential density ranges” other than in “exceptional circumstances”.

Accordingly, Policy P9 as currently drafted is considered to be ‘unsound’ as it not ‘consistent’ with the emerging

Noted. The density matrix will be removed to be in line with the London Plan. Whilst winter gardens can be an enhancement to amenity space and it’s necessary for certain environmental conditions; it is not considered to be a measure of exemplary architecture.

P9: Optimising delivery of new homes

London Plan (which will form part of the development plan for the area), with the alternative approach to the draft London Plan not adequately 'justified', given the lack of evidence to support the imposition of blanket restrictions on development densities across the borough.

In respect of amenity space provision, it is considered important to provide recognition that 'winter gardens' can contribute to the provision of residential amenity space, in circumstances where local conditions (such as noise, air quality and microclimatic effects such as wind), make 'winter gardens' more suitable than balconies. Without acknowledging the potential for winter gardens to provide residential amenity space the policy is considered not to be 'justified' as providing adequate flexibility to be considered the most appropriate strategy for optimising the delivery of new homes.

Change sought – It is requested that "Table 6: Residential density ranges" be deleted and paragraph 1 of draft Policy P9 be amended as detailed below, as it is unnecessary and unduly prescriptive for residential density ranges to be imposed to for the delivery of new homes to be optimised. Amendment to paragraph 2.11 of the draft policy is also sought (with the proposed revised wording also provided below) to incorporate specific reference to the contribution that winter gardens can make to securing amenity space for residential developments:

1. Development must be within the residential density ranges outlined in Table 6 and Figure 2. In exceptional circumstances development may exceed these density ranges where it achieves an exemplary standard of residential design High density development will be supported to optimise the delivery of new homes where it achieves an exemplary standard of residential design:

... 2.11 With fully or partially inset balconies, or, as appropriate, winter gardens.

P9: Optimising delivery of new homes

Individual
NSPPSV122.2

Unsound

- The policy is unsound as it fails to balance the delivery of new housing with local character, social infrastructure and green infrastructure. Aspects of the plan over-develop North Southwark whilst protecting South Southwark thereby increasing the spatial inequality, and therefore the segregation of communities based on economics in the Borough. The Camberwell Union proposal is representative of this, as it will dwarf the houses in the area, allowing for packed in units that put pressure on the surrounding infrastructure and increase competition for schools and other services, parking, public transport, health services.
- To make the Plan sound, the policy must include details from Lifetime Neighbourhoods Policy 7.1 of the current London Plan. This ensures that new developments build on rather than eradicate the existing qualities and diversity of Southwark's neighbourhoods. It develops inclusive and sustainable communities in which local employment, social and community facilities, parks and open spaces, local services and a wide range of homes are affordable and accessible to everyone. These criteria should be applied equally to residential neighbourhoods in the North and South of the Borough.

Noted. The density matrix will be removed to be in line with the London Plan. The principles of the lifetime neighbourhoods policy are taken into consideration through our strategic policies such as SP2 Social regeneration to revitalise neighbourhoods; SP3 Best start in life and SP6 Cleaner, Greener, Safer, which seek to ensure that we will continue to revitalise our neighbourhoods and will aim to create healthy neighbourhoods.

P9: Optimising delivery of new homes

Individual
NSPPSV125.1

Noted.

New Southwark Plan

Draft Future Steering Board Response to Proposed Submission Version Feb 2018

Background

The Southwark Future Steering Board (FSB) is a consultative body with membership drawn from the Council's Tenants Council, and Home Ownership Council. The terms of reference of the FSB set out its role to provide a formal, resident-led mechanism to work with Southwark Council on its Asset Management, New Build Homes and investment plan. The FSB has considered and commented on 2 previous drafts of the New Southwark Plan. These are the comments of the FSB on the Submission Draft of the New Southwark Plan in February 2018.

P9 Optimising Delivery of New Homes.

Density is related to PTAL. Public transport is provided where there are people. This is a circular relationship which means that where there is more population density, more public transport is provided, and then the planning process requires more density in new development. This means that density gets concentrated in areas with existing dense population. The New Southwark Plan reflects this, with lower densities, and no areas zoned as opportunity areas in the South of the borough. This is despite the provision of railway stations at East Dulwich, North Dulwich and West Dulwich and nearby railway stations at Denmark Hill, Herne Hill, Tulse Hill and Sydenham Hill. The plan could more evenly distribute new residential development to take advantage of these railway stations.

Wind Tunnel Effects

The increase in tall buildings in some areas of the borough has increased the wind shear effect. This particularly affects pedestrians and cyclists. Tall buildings are zoned in areas where there is an expectation of high street development. In the sections on Design Quality (p.39) and Tall Buildings (p.42) there is mention of; 'reduce...adverse local climatic conditions (e.g. wind shear)', and ;'Avoid harmful and uncomfortable environmental impacts including wind shear'. There is no mention of what standards will be applied to achieve this. The NSP needs to identify the relevant standards that these policies will be measured against, or explain how such standards will be developed. Wind shear not only has an impact on pedestrian and cyclists safety, but also has an impact on the 'pedestrian experience', and can be a contributory factor in the spread and intensity of fires.

P9: Optimising delivery of new homes

Peabody
NSPPSV137.3

NEW SOUTHWARK PLAN: PROPOSED SUBMISSION VERSION (DECEMBER 2017) REPRESENTATIONS SUBMITTED ON BEHALF OF PEABODY: NEWINGTON TRIANGLE (NSP42)

We are instructed by our client, Peabody, to submit representations in relation to the above site, in response to the London Borough of Southwark's (LBS) consultation on the New Southwark Plan (NSP): Proposed Submission Version.

As a general comment, we note that the National Planning Policy Framework (NPPF) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how this presumption should be applied at the local level.

The NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF and should be aspirational but realistic.

In responding to the Council's current Regulation 19 consultation, we have also made reference to the guidance set out in paragraph 182 of the NPPF, which requires Local Plans to be sound. To meet this requirement they should be:

- Positively Prepared – be based on objectively assessed development requirements, consistent with achieving sustainable development.
- Justified – be the most appropriate strategy based on proportionate evidence.
- Effective – be deliverable over its period and based on effective joint working.
- Consistent with National Policy – enable the delivery of sustainable development in accordance with the policies of the NPPF.

The following representations have been prepared with regard to these criteria and we set out below our comments on the soundness of the New Southwark Plan Proposed Submission Version (2017), taking into account its compliance with national planning policy.

1. Previous Representations

We have made representations on behalf of our client in response to the previous consultation versions of the NSP, most recently being the NSP Preferred Options: New and Amended Policies (September 2017). The Newington Triangle site has been retained as an allocated site throughout the emerging versions of the NSP and we have sought to engage with the Council to ensure that the allocation is appropriate and will not restrict the

Noted. The density matrix will be removed to be in line with the London Plan.

P9: Optimising delivery of new homes

emerging redevelopment proposals from coming forward. We have sought to ensure that that the site allocation is justified and effective.

2. The Site Allocation (NSP42: Newington Triangle)

The Newington Triangle site extends to approximately 1.34 hectares in size and is located within the Elephant & Castle Opportunity Area and Central Activities Zone (CAZ), as defined in the London Plan, Southwark UDP and Southwark Core Strategy. The site comprises brownfield land in an accessible location (PTAL 6a) and is not located within a Conservation Area and does not contain any listed buildings.

The site is allocated for comprehensive redevelopment in the NSP: Site NSP42. Acceptable uses for this site are considered to include residential, employment and retail floorspace. Commercial uses are required at ground floor level in order to provide active frontages along Newington Causeway and Borough Road.

We strongly support the allocation of this site for significant residential-led mixed use redevelopment which is considered to be consistent with the sites location within the Elephant and Castle Opportunity Area and CAZ. The site allocation is considered to be consistent with the NPPF core principles which promote mixed use development and encourage multiple benefits from the use of previously developed urban land.

3. Development Management Policies

Draft Policy P1 'Affordable Homes'

Draft Policy P1 requires new development that will result in 11 or more new homes to provide a minimum of 35% affordable units. Peabody support this commitment to maximising affordable housing provision and this approach is considered to be consistent with both the adopted and emerging London Plan.

Our previous representations (NSP Preferred Options: New and Amended Policies, September 2017) suggested that the affordable housing tenure split should reflect the Elephant and Castle SPG (2012) and Affordable Housing SPD (2008) which set a tenure split of 50% social rented and 50% intermediate units. These adopted policy documents have set a precedent for affordable housing tenure split in the Elephant and Castle Opportunity Area.

We suggest there should be greater flexibility with regards to the proposed tenure split for affordable housing provision, based on local housing need. This would help to ensure the NSP is effective in its delivery of affordable housing.

Draft Policy P9 'Optimising delivery of new homes'

Draft Policy P9 sets out appropriate density ranges for new development in certain locations. The suggested density range for sites located within the CAZ is between 650 – 1,100 habitable rooms per hectare.

P9: Optimising delivery of new homes

Whilst Policy P9 does provide some flexibility that in exceptional circumstances development may exceed these density ranges where appropriate, the approach set out in the NSP is not consistent with the emerging London Plan. The Draft London Plan (December 2016) no longer specifies an appropriate density range, in contrast with Table 3.2 of the adopted London Plan. Instead emerging Policy D6 states “the optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to the site context, its connectivity and accessibility and the capacity of surrounding infrastructure”. We therefore suggest that it is no longer appropriate to specify density ranges and this could be the effect of unnecessarily straining development and design. It is important to allow sufficient flexibility in the wording of policies relating to density so as not to stifle development coming forward, in line with the aspirations of NPPF Paragraph 58 which seeks to optimise the potential of a site to accommodate development. Greater flexibility is therefore required to ensure that the NSP is effective in its delivery and consistent with regional and national planning policy.

Draft Policy P50 ‘Cycling’

Peabody consider that LBS should allow greater flexibility with regards to overall design specifications and requirements. As stated in our previous representations, the increased cycle space requirement will lead to a significant number of cycle parking spaces within developments and for large developments these numbers are considered to be excessive. There is a need to acknowledge that the way people travel by bicycle is changing, evidenced by Brompton folding bicycles and the recent introduction of dockless cycle hires. As such, cycle parking standards should not always result in a blanket requirement for all development and should instead be based on evidenced need.

We suggest that the provision of cycle parking spaces should be focused on how the spaces can be used, and the quality of the provision rather than just quantity. Greater flexibility should be allowed for in the policy, taking into consideration other scheme benefits.

P9: Optimising delivery of new homes

Royal Mail Pension Trustees Limited.
NSPPSV155.3

Dear Sir/Madam,
New Southwark Plan - Proposed Submission Version (December 2017)
Representations on behalf of Royal Mail Pension Trustees Limited
We write on behalf of our client, Royal Mail Pension Trustees Limited, to submit representations to the New Southwark Plan - Proposed Submission Version – which are provided below.

Our client

Royal Mail Pension Trustees Limited are the freehold owners of the Bricklayers Arms Distribution Centre, Mandela Way which is proposed for allocation as part of 'Site OKR3: Mandela Way in the emerging Old Kent Road Area Action Plan ("AAP") for mixed use redevelopment to include employment (B use class), residential (C3 use class), primary school (D1 use class) development and a new park.

Representations

Policy P9: Optimising delivery of new homes

Whilst the Draft London Plan has removed reference to the indicative residential density ranges currently detailed in the current London Plan (in order to provide flexibility for proposals to be developed in response to site specific circumstances), draft Policy P9 proposes not only to maintain residential density ranges, but also states that "Development must be within the residential density ranges" other than in "exceptional circumstances". Accordingly, Policy P9 as currently drafted is considered to be 'unsound' as it not 'consistent' with the emerging London Plan (which will form part of the development plan for the area), with the alternative approach to the draft London Plan not adequately 'justified', given the lack of evidence to support the imposition of blanket restrictions on development densities across the borough.

In respect of amenity space provision, it is considered important to provide recognition that 'winter gardens' can contribute to the provision of residential amenity space, in circumstances where local conditions (such as noise, air quality and microclimatic effects such as wind), make 'winter gardens' more suitable than balconies. Without acknowledging the potential for winter gardens to provide residential amenity space the policy is considered not to be 'justified' as providing adequate flexibility to be considered the most appropriate strategy for

Noted. The density matrix will be removed to be in line with the London Plan. Whilst winter gardens can be an enhancement to amenity space and it's necessary for certain environmental conditions; it is not considered to be a measure of exemplary architecture.

P9: Optimising delivery of new homes

optimising the delivery of new homes.

Change sought – It is requested that “Table 6: Residential density ranges” be deleted and paragraph 1 of draft Policy P9 be amended as detailed below, as it is unnecessary and unduly prescriptive for residential density ranges to be imposed to for the delivery of new homes to be optimised. Amendment to paragraph 2.11 of the draft policy is also sought (with the proposed revised wording also provided below) to incorporate specific reference to the contribution that winter gardens can make to securing amenity space for residential developments:

1. High density development will be supported to optimise the delivery of new homes where it achieves an exemplary standard of residential design:

... 2.11 With fully or partially inset balconies, or, as appropriate, winter gardens.

Six Bridges Estate
NSPPSV163.7

Policy P9: Optimising the delivery of new homes

Royal London supports the high design standards set out for new homes and supports the principle of optimising density on any given site. Residential density ranges are set out with a range of 650-1100 habitable rooms per hectare set out for the Old Kent Road Opportunity Area core. The Draft London Plan has removed the density matrix. It is likely that many sites such as Six Bridges will exceed the guidelines stated in this policy given that tall buildings have been identified for the site within the Draft Old Kent Road Area Action Plan. In line with the Draft London Plan we suggest the density range is removed and instead the appropriate density should be a result of a design led approach (in response to the various design policies), response to context and public transport accessibility.

Noted. The density matrix will be removed to be in line with the London Plan.

P9: Optimising delivery of new homes

Individual
NSPPSV172.8

The policy is unsound as it fails to balance the delivery of new housing with local character, social infrastructure and green infrastructure. Table 6 and Figure 2 over-develop North Southwark whilst protecting South Southwark thereby increasing the spatial inequality in the Borough

To make the Plan sound, the policy must include details from Lifetime Neighbourhoods Policy 7.1 of the current London Plan. This ensures that new developments build on rather than eradicate the existing qualities and diversity of Southwark's neighbourhoods. It develops inclusive and sustainable communities in which local employment, social and community facilities, parks and open spaces, local services and a wide range of homes are affordable and accessible to everyone. These criteria should be applied equally to residential neighbourhoods in the North and South of the Borough.

Noted. The density matrix will be removed to be in line with the London Plan. The principles of the lifetime neighbourhood's policy are taken into consideration through our strategic policies such as SP2 Social regeneration to revitalise neighbourhoods; SP3 Best start in life and SP6 Cleaner, Greener, Safer, which seek to ensure that we will continue to revitalise our neighbourhoods and will aim to create healthy neighbourhoods.

P9: Optimising delivery of new homes

Strathclyde Regional Pension Fund
NSPPSV174.3

Whilst the Draft London Plan has removed reference to the indicative residential density ranges currently detailed in the current London Plan (in order to provide flexibility for proposals to be developed in response to site specific circumstances), draft Policy P9 proposes not only to maintain residential density ranges, but also states that “Development must be within the residential density ranges” other than in “exceptional circumstances”. Accordingly, Policy P9 as currently drafted is considered to be ‘unsound’ as it not ‘consistent’ with the emerging London Plan (which will form part of the development plan for the area), with the alternative approach to the draft London Plan not adequately ‘justified’, given the lack of evidence to support the imposition of blanket restrictions on development densities across the borough.

In respect of amenity space provision, it is considered important to provide recognition that ‘winter gardens’ can contribute to the provision of residential amenity space, in circumstances where local conditions (such as noise, air quality and microclimatic effects such as wind), make ‘winter gardens’ more suitable than balconies. Without acknowledging the potential for winter gardens to provide residential amenity space the policy is considered not to be ‘justified’ as providing adequate flexibility to be considered the most appropriate strategy for optimising the delivery of new homes.

Change sought – It is requested that “Table 6: Residential density ranges” be deleted and paragraph 1 of draft Policy P9 be amended as detailed below, as it is unnecessary and unduly prescriptive for residential density ranges to be imposed to for the delivery of new homes to be optimised. Amendment to paragraph 2.11 of the draft policy is also sought (with the proposed revised wording also provided below) to incorporate specific reference to the contribution that winter gardens can make to securing amenity space for residential developments:

1. Development must be within the residential density ranges outlined in Table 6 and Figure

2. In

exceptional circumstances development may exceed these density ranges where it achieves an

exemplary standard of residential design High density development will be supported to optimise the delivery of new homes where it achieves an exemplary standard of residential design:

... 2.11 With fully or partially inset balconies, or, as appropriate, winter gardens.

Noted. The density matrix will be removed to be in line with the London Plan. Whilst winter gardens can be an enhancement to amenity space and it's necessary for certain environmental conditions; it is not considered to be a measure of exemplary architecture.

P9: Optimising delivery of new homes

TfL City Planning
NSPPSV181.1

There is no specific mention of public transport accessibility and capacity in the policy, though it is mentioned in the supporting text. Draft New London Plan (NLP) policy D6 states that when determining density of development, particular consideration should be given to:

- 1.the site context
- 2.its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)
- 3.the capacity of surrounding infrastructure

As such, P9 could be strengthened by adding a line specifically on this.

Also, table 6 seems to preclude higher density development in the town centres, specifically Peckham and Camberwell that have a PTAL of 6.

Page 35 - Figure 2: Map of Residential Density Ranges

This needs to show the Old Kent Road Opportunity Area Core, as described on Table 6.

TfL Commercial Development
NSPPSV182.7

Consideration should be given to deleting the suggested residential density ranges and adopting a design-led approach to achieving high densities in accessible locations (particularly those with good public transport links) which would accord with emerging DLP policy D6 (Optimising housing density).

Map will be amended to show OKR Area Action Core. Noted. The density matrix will be removed to be in line with the London Plan.

Noted. The density matrix will be removed to be in line with the London Plan.

P9: Optimising delivery of new homes

313-349 Ilderton Road LLP
NSPPSV217.3

Optimising delivery of new homes sets out residential density ranges including a range between 650 and 1,100 habitable rooms per hectare in Central Activities Zone. The draft policy also notes that in exceptional circumstances development may exceed these density ranges where it achieves an exemplary standard of residential design and lists a number of criteria.

Continuation Sheet

We support the flexibility in approach to the density range and support the requirement for exemplar design in instances the density range has been exceeded

Individual
NSPPSV218.5

The policy is unsound as it fails to balance the delivery of new housing with local character, social infrastructure and green infrastructure. Table 6 and Figure 2 over-develop North Southwark whilst protecting South Southwark thereby increasing the spatial inequality in the Borough

To make the Plan sound, the policy must include details from Lifetime Neighbourhoods Policy 7.1 of the current London Plan. This ensures that new developments build on rather than eradicate the existing qualities and diversity of Southwark's neighbourhoods. It develops inclusive and sustainable communities in which local employment, social and community facilities, parks and open spaces, local services and a wide range of homes are affordable and accessible to everyone. These criteria should be applied equally to residential neighbourhoods in the North and South of the Borough.

Noted.

Noted. The density matrix will be removed to be in line with the London Plan. The principles of the lifetime neighbourhood's policy are taken into consideration through our strategic policies such as SP2 Social regeneration to revitalise neighbourhoods; SP3 Best start in life and SP6 Cleaner, Greener, Safer, which seek to ensure that we will continue to revitalise our neighbourhoods and will aim to create healthy neighbourhoods.

P9: Optimising delivery of new homes

Individual
NSPPSV239.7

The policy is unsound as it fails to balance the delivery of new housing with local character, social infrastructure and green infrastructure. Table 6 and Figure 2 over- develop North Southwark whilst protecting South Southwark thereby increasing the spatial inequality in the Borough

To make the Plan sound, the policy must include details from Lifetime Neighbourhood's Policy 7.1 of the current London Plan. This ensures that new developments build on rather than eradicate the existing qualities and diversity of Southwark's neighbourhoods. It develops inclusive and sustainable communities in which local employment, social and community facilities, parks and open spaces, local services and a wide range of homes are affordable and accessible to everyone. These criteria should be applied equally to residential neighbourhoods in the North and South of the Borough.

Noted. The density matrix will be removed to be in line with the London Plan. The principles of the lifetime neighbourhood's policy are taken into consideration through our strategic policies such as SP2 Social regeneration to revitalise neighbourhoods; SP3 Best start in life and SP6 Cleaner, Greener, Safer, which seek to ensure that we will continue to revitalise our neighbourhoods and will aim to create healthy neighbourhoods.

P9: Optimising delivery of new homes

Individual
NSPPSV305.6

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

The policy is unsound as it fails to balance the delivery of new housing with local character, social infrastructure and green infrastructure. Table 6 and Figure 2 over-develop North Southwark whilst protecting South Southwark thereby increasing the spatial inequality in the Borough

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To make the Plan sound, the policy must include details from Lifetime Neighbourhoods Policy 7.1 of the current London Plan. This ensures that new developments build on rather than eradicate the existing qualities and diversity of Southwark's neighbourhoods. It develops inclusive and sustainable communities in which local employment, social and community facilities, parks and open spaces, local services and a wide range of homes are affordable and accessible to everyone. These criteria should be applied equally to residential neighbourhoods in the North and South of the Borough.

Noted. The density matrix will be removed to be in line with the London Plan. The principles of the lifetime neighbourhood's policy are taken into consideration through our strategic policies such as SP2 Social regeneration to revitalise neighbourhoods; SP3 Best start in life and SP6 Cleaner, Greener, Safer, which seek to ensure that we will continue to revitalise our neighbourhoods and will aim to create healthy neighbourhoods.

P9: Optimising delivery of new homes

Individual
NSPPSV325.2

CONSIDERS THE NEW SOUTHWARK PLAN TO BE SOUND AND LEGALLY COMPLIANT

Noted.

P13: Residential design

Capital Industrial
NSPPSV30.4

Developments in the OKROA will likely be delivered in phases as some sites, including our clients' sites will remain operational until such time that the sites can be developed. Furthermore, the OKROA is expected to deliver a mixed use development including residential and industrial/commercial uses. As such, residential design should ensure that residential amenity is protected from both existing and future non-residential uses from the development itself and adjoining sites. As this vital consideration is not included in the policy, we object and request that this particular consideration is included as a residential design requirement in order to ensure that there will be no conflict between residential use and industrial/commercial use.

The policy requires amenity considerations such as appropriate daylight and sunlight alongside the residential design quality policy. Other policies in the plan such as policy P67 addresses the need to ensure noise management is taken into consideration.

P13: Residential design

Individual
NSPPSV31.12

Inconsistent with Mayor of London's New London Plan

NSP P13 does not specify the quality of play space necessary to satisfy children and young people's requirements, that the provision could be additional space not just an improvement of existing provision and the maximum walking distances to play spaces based on age. It states:

"1.3 Provide green communal amenity space for all residents and additional communal play areas for children ...

In exceptional circumstances, where communal amenity space and child play space cannot be provided on-site, we will seek a financial contribution towards improving existing play space provision in the vicinity of the site; and ... "

However, LP Policy 3.6 Children and young people's play and informal recreation, specifies:

"Development proposals should include good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery ..."

Also see: LP Policy 3.6 Children and young people's play and informal recreation, Play and Informal Recreation SPG

"4.38 The Mayor will expect provision to be made on-site in new development and regeneration schemes wherever possible. Play provision must therefore be considered at an early stage ..."

"2.5 Off-site provision, including the creation of new facilities, improvements to existing provision, and/or an appropriate financial contribution towards this provision may be acceptable where it can be demonstrated that it fully satisfies the needs of the development whilst continuing to meet the needs of existing residents."

4.11 Maximum walking distance to play space in new developments: "100m for under 5s; 400m for 5-11 yrs; 800m for over 12s"

Quality of play space is required in the mayor's play and informal recreation SPG.

P13: Residential design

Individual
NSPPSV40.10

These policies are not effective because they do not satisfy the needs of the myriad communities in Southwark.

The current prescriptive way in which places, spaces and homes are designed and delivered, does not take into account the needs of the myriad different cultural activities and ethnically diverse communities in Southwark, where the borough's provisions are inadequate. There needs to be a completely new way of looking at the way we socialise and the accommodation thereof. This is also relevant to SP2 Social Regeneration as the provision of social spaces is essential efficient social regeneration.

The lack of free community spaces with kitchen provisions, where it is safe for children and where people can meet and share sustenance, is having a devastating effect on our society. There are increasing numbers of disconnected and disenfranchised individuals and families unable to cope. Since 2007-8 in Southwark, there has been an upward trend in the suicide rate, which over the period 2013-15 was higher than the national average.

There is a failure to require larger predominantly residential developments to include smaller scale workspace for which there is a strong demand and that can be realistically combined with residential, including office, workshop and light industrial, studio and workroom storage. Also there is a failure to give clarity on policy about workspaces in combination with, or ancillary to, residential.

I would like to give more details in my further statement in advance of the oral examination.

Other policies in the plan include provision for employment floorspace which are also including in specific site allocations.

P13: Residential design

Greenpruce GP
NSPPSV72.6

A number of criteria are set out in this policy which are mostly positive in seeking to secure high standards for residential delivery. It is noted that criterion 1.5 stipulates shared entrances between affordable and market homes in apartment blocks will be required. Whilst this may well be achievable and appropriate in, for example, purpose built rental accommodation with affordable homes let at discounts to market rent, it is contended that this might not be practical or viable in all mixed-tenure schemes. For instance, where the affordable element may well be owned and operated by a standalone Registered Provider it is likely they would have their own specification for maintenance, entrances, circulation and common spaces which would create a ceiling at which a potential service charge could be set. This could well contrast and undermine the market element of the scheme. Whilst external design should be tenure blind, shared entrances will not necessarily provide the optimal arrangement. The wording of this criterion could therefore be more nuanced.

Clarification is sought in respect of criterion 1. 7 and those which follow. This criterion specifies that residential development must be dual aspect before proceeding to set out the standards that single aspect apartments must achieve. It is suggested that a small proportion of single aspect apartments will often be difficult to avoid- acknowledged in the criteria 1.8- 2- and thus criterion 1. 7 could be worded to acknowledge this more explicitly.

Support noted. The policy seeks to avoid dual aspect homes but it is understood that this may not always be possible and in exceptional circumstances, the policy may be applied flexibly.

P13: Residential design

Individual
NSPPSV91.73

Objections to Social regeneration to revitalise neighbourhoods chapter policies

P13: Residential design

Objection 55.

We object to failure to require larger predominantly residential developments to include smaller scale workspace for which there is strong demand and that can realistically be combined with residential, including office, workshop and light industrial, studio and workroom, storage.

NPPF para 14 requires Local Plans to meet objectively assessed needs.

London Plan para 6.3.4 states that The Mayor will encourage the delivery of new workspace for SMEs, the creative industries, artists and the fashion industry within new residential and mixed-use developments. He will also provide assistance to artists and creative businesses through the Mayor's Creative Enterprise Zones and promote schemes that provide linked affordable housing and business space in new housing developments.

Other policies in the plan include provision for employment floorspace which are also including in specific site allocations.

P13: Residential design

L&G
NSPPSV104.5

LAND AT 585-589 OLD KENT ROAD, LONDON, SE15 1LA

We submit on behalf of our client, Legal & General Assurance Society Ltd ('L&G' hereafter), a representation in response to your consultation on the representations in response to your consultation on the New Southwark Plan (Proposed Submission Version published November 2017), herein referred as the NSP. Consultation closes on 27 February 2018. CBRE Limited ('CBRE' hereafter) act as planning advisors with respect to land on the corner of Old Kent Road and Rotherhithe New Road (referred to as 'The Site' hereafter) shown within the Location Plan attached in Appendix A.

The Site currently comprises a modern retail warehouse unit (Use Class A1) currently occupied by Currys PC World with associated car parking, which fronts Old Kent Road.

L&G welcomes the opportunity to engage with Southwark Council in respect of its emerging policies in the Old Kent Road Opportunity Area and specifically the publication of the New Southwark Plan with respect to their site. In addition to these representations, representations will be issued as part of the Draft Old Kent Road Area Action Plan consultation which closes on the 21st March 2018.

As you will be aware, we have already met with Officers to discuss the emerging Old Kent Road Area Action Plan and to discuss the emerging development plans and principles surrounding the redevelopment of the site. We would welcome further engagement with the Council regarding the future of the site.

Site Location and Description The Site currently comprises modern retail warehouse units and associated car parking as shown in the enclosed site location plan. The site area comprises 0.55 hectare. The site fronts Old Kent Road, with modern industrial warehouse buildings and hardstanding located to the north.

The adjoining sites, consist of a modern warehouse building used for storage with associated hardstanding service yard to the north, a small 3 storey building currently used as a dentist surgery and a modern retail warehouse with associated car parking to the east. To the west are parking areas and the Selco builders warehouse.

In addition to the north is a large electrical substation building situated on Verney Road. At 399 Rotherhithe New Road to the north of the site a residential led mixed use scheme is under construction. This consists of a part 6, part 19 storey building comprising of a primary school and 158 residential dwellings. A planning application has also been submitted for 6-10 Verney Road for mixed use redevelopment which comprises three tall buildings of

The policy seeks to avoid single aspect homes but it is understood that this may not always be possible and in exceptional circumstances, the policy may be applied flexibly.

P13: Residential design

23, 18 and 17 storeys as well as lower elements comprising 340 residential units, A1 retail use (197.18 m² GEA), B1 office use/workspace (4435 m² GEA), D1 community use (394 m² GEA) as well as a section of the Surrey Canal Linear Park.

Whilst the area as a whole is currently characterised by large retail and industrial sheds with parcels of land dominated by areas of hard standing in the form of surface car parking and service yards, there is a changing emerging context. Strategic masterplans as part of the emerging Old Kent Road Area Action Plan will see much of the surrounding area coming forward for mixed use redevelopment including masterplan OKR 10 to the south and masterplan OKR 11 to the west. A number of planning applications are now coming forward within these masterplan areas.

Draft Old Kent Road Area Action Plan (2017) Requirements The site falls within the allocation OKR 13 within the Draft AAP within Sub Area 3 Sandgate Street, Verney Road and Old Kent Road. Within the Draft AAP for OKR 13 indicative capacity is identified for 3,680 homes and 2,820 jobs. Key requirements set out for the site within OKR 13 that relate to the site are as follows: $\frac{3}{4}$ Replace existing retail space (A class use) and activate frontages on Old Kent Road through provision of retail (A use class), business (B use class) or community uses (D use class); and $\frac{3}{4}$ Provide housing; and $\frac{3}{4}$ Provide a new park on the alignment of the former Surrey Canal. Within the tall buildings strategy within the AAP (Figure 9) a Tier 1 tall building is identified for the site (above 30 storeys). In terms of land use the site is identified for mixed use redevelopment within the 'high street' typology where new retail use is to be provided below residential flats or office uses.

The masterplan shows the Surrey Canal Linear Park cutting through the centre of the site which reduces the developable area to approximately 75% of the site area and restricts the potential building footprints of any redevelopment proposal.

REPRESENTATIONS

Policy P13: Residential Design

Detailed requirements are set out with respect to residential design. L&G supports the principle of high quality design. Given that the development potential of the site has already been constrained by the Surrey Canal Linear Park, detailed design requirements should be applied flexibly where possible without compromising the quality of the design in order to ensure that the Site remains deliverable.

At 1.1 – this requirement should be reworded to say '2.5 m minimum head height should be provided for all habitable rooms, including bedrooms and living areas'. This is because depending on the flat design and layout,

P13: Residential design

habitable rooms may account for 75% of the dwelling.

At point 2 and 1.7, in relation to single/dual aspect dwellings the requirements are more onerous than the standards adopted in the GLA's Housing SPG (2016). We consider that this requirement should be consistent with the GLA's adopted standards which states that "Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided". Furthermore single aspect north facing dwellings could potentially be provided on the upper levels of tall buildings, where overshadowing from adjacencies is not an issue, and a reasonable justification can be made.

At 1.5 – the requirement to share entrances for affordable and market tenures may not always be possible due to a range of factors such as separate management of the buildings.

Lend Lease (Elephant & Castle) Limited
NSPPSV107.2

THE NEW SOUTHWARK PLAN: PROPOSED SUBMISSION VERSION

Representations on behalf of Lend Lease (Elephant & Castle) Limited

These representations are submitted to Southwark Council (the "Council") on behalf of our client Lend Lease (Elephant and Castle) Limited ("Lendlease") in respect of the Council's New Southwark Plan: Proposed Submission Version (December 2017).

As the Council's development partner on Elephant Park (the redevelopment of the former Heygate Estate), Lendlease is committed to the delivery of significant regeneration at Elephant and Castle, which is a key policy aspiration of the Council. Since obtaining outline planning permission for Elephant Park in 2013, Lendlease has now secured reserved matters consents for four detailed phases – South Gardens, West Grove, the Energy Hub and Park Central (North) along with detailed planning permissions for Trafalgar Place and One the Elephant. The total combined quantum of development currently permitted on Lendlease's projects is up to 383,361 sqm, providing circa. 3,000 residential units, retail and leisure floorspace, business floorspace, community and cultural floorspace, a new energy centre and

The policy seeks to avoid dual aspect homes but it is understood that this may not always be possible and in exceptional circumstances, the policy may be applied flexibly.

P13: Residential design

a new park.

Given the scale of development being undertaken and all developments being in full delivery, Lendlease takes a very serious interest in emerging planning policy in Southwark. As a result of its significant regeneration schemes, Lendlease is fully informed and well placed to comment on the New Southwark Plan Proposed Submission Version, and has previously commented on both the Preferred Options Version and the New and Amended Preferred Options Policy Consultation. Lendlease supports the principle of the regeneration and wider improvements to the Borough and agrees that the pressing need for housing – of all tenure types for Southwark’s residents, should be answered.

Lendlease supports the aspiration of creating a strong economy and making Southwark a place where the town centres and high streets thrive and a place to do business in the central London and global economy. It is within this context that Lendlease welcomes the opportunity to make representations on the Proposed Submission Version of the New Southwark Plan. These representations should be read in conjunction with our previous representations to the consultation. Lendlease’s previous representations submitted pursuant to the Preferred Options version in September 2017.

Policy P13: Residential design

The Proposed Submission Version has stated that residential development must be dual aspect and allow for natural cross ventilation (paragraph 1.7). While achieving the maximum level of dual aspect units is supported by Lendlease to ensure residential quality, achieving 100% of residential development is not always possible in practice. We hope that this will be considered and that this would not conflict with the optimisation of the delivery of new homes, as aspired to by Policy P9.

P13: Residential design

LGIM Real Assets (LGIM RA),
NSPPSV109.4

Our client

Legal & General Group Plc (“L&G”), established in 1836, is a leading provider of risk, savings and investment management products in the UK. Legal & General Group Plc is listed on the London Stock Exchange (LSE: LGEN) and is a constituent of the FTSE 100 Index. Legal & General Investment Management (Holdings) Limited (“LGIM (H)”) is a wholly-owned subsidiary of Legal & General Group Plc. LGIM Real Assets (“LGIM RA”) is in turn a wholly-owned subsidiary of LGIM (H).

Legal & General Group employs over 9,000 people globally, with offices across the UK in Hove, Cardiff, Birmingham, and London. Legal & General Investment Management (“LGIM”) has also established offices in Tokyo, Chicago and Hong Kong.

Legal & General Investment Management’s (LGIM) direct investment capabilities in property and infrastructure were brought together as a single business for the very first time in the formation of LGIM Real Assets (LGIM RA), in January 2015. This restructure allowed the team to capitalise on cross-sector synergies and leverage its in-house expertise across the direct investment universe.

LGIM RA is one of the largest investment managers in the UK by assets under management, with capabilities stretching across the sectors – from residential to high street retail, from leisure to logistics, from derivatives to development. LGIM RA manages 20 real estate investment vehicles with an aggregate asset value of £19 billion. Our UK-focused fund management platform has built and retained a strong track record of out-performance across investment strategies.

One of LGIM RA’s managed Funds is the freehold owner of a number of sites within the London Borough of Southwark (‘LBS’), including the Admiral Hyson Industrial Estate, located on the corner of Galleywall Road and Hyson Road (within the Old Kent Road Opportunity Area), which accommodates 8 single storey industrial units on a site that extends to 0.68 hectares in size.

Shared entrances are encouraged by the council as an inclusive design principle. The policy can be applied flexibly where it is demonstrated that this is not feasible.

P13: Residential design

Representations

Policy P13: Residential Design

In respect of residential design, concern is expressed that the requirement of paragraph 1.5 of draft Policy P13 that residential development must “share entrances between affordable and market homes in apartment blocks” is unreasonable on the basis that it is not always practical or viable to achieve this.

Whilst it often the case that private buyer requirements necessitate a relatively high specification for fit-out of entrance lobbies, lifts and staircases and active management and regular maintenance of these areas, registered providers are often unwilling for their affordable housing stock be subject to the high service charges that these requirements necessitate. Demanding that shared tenure entrances must be provided, could therefore result in affordable housing providers not acquiring the affordable units, or could compromise the standard of fit-out and management of the communal areas, with adverse impact to the saleability private residential accommodation. In either scenario, the viability of development could be severely compromised as a consequence.

Draft Policy P13 is considered to be unsound as currently worded, on the basis that it is not sufficiently flexible to allow for the practical difficulties that can mean that it is not viable to provide shared tenure entrances to apartment blocks, so cannot therefore be ‘justified’ as the most appropriate strategy, when considered against reasonable alternatives.

Change sought – It is requested that paragraph 1.5 of draft Policy P13 be amended, as follows:

“Residential development must:

1.5 Share entrances between affordable and market homes in apartment blocks, unless it is demonstrated not to be practical or viable to do so; and...

P13: Residential design

Individual
NSPPSV128.73

Objections to Social regeneration to revitalise neighbourhoods chapter policies
P13: Residential design
Objection 55.

We object to failure to require larger predominantly residential developments to include smaller scale workspace for which there is strong demand and that can realistically be combined with residential, including office, workshop and light industrial, studio and workroom, storage.

NPPF para 14 requires Local Plans to meet objectively assessed needs.

London Plan para 6.3.4 states that The Mayor will encourage the delivery of new workspace for SMEs, the creative industries, artists and the fashion industry within new residential and mixed-use developments. He will also provide assistance to artists and creative businesses through the Mayor's Creative Enterprise Zones and promote schemes that provide linked affordable housing and business space in new housing developments.

Individual
NSPPSV151.9

P13

The policy is focused on residential design. As for the other design, related policies it is quite prescriptive. The word 'must' should be replaced. The policy should align the Mayor of London Housing SPG. The internal space standards ought to be flexibly applied. The wording should acknowledge that there may be instances where single aspect units are unavoidable and a rigid application of Policy P13 (2) which currently states that 'single aspect dwellings are not acceptable if they have two or more bedrooms, are north facing...' is likely to frustrate delivery of housing numbers. The policy should be revised in line with the guidance set out in the Mayor of London Housing SPG.

Delete the word 'must'.

Ensure the policy is not too prescriptive in its wording.

Other policies in the plan include provision for employment floorspace which are also including in specific site allocations.

The policy wording was changed to must to ensure that requirements are stronger in their position. The policy has now been merged with P9.

The policy will ensure that single aspect dwellings are avoided. In exceptional circumstances the policy could be applied with flexibility but residential design quality is a high priority for the council.

P13: Residential design

Royal Mail Pension Trustees Limited.
NSPPSV155.4

Dear Sir/Madam,
New Southwark Plan - Proposed Submission Version (December 2017)
Representations on behalf of Royal Mail Pension Trustees Limited
We write on behalf of our client, Royal Mail Pension Trustees Limited, to submit representations to the New Southwark Plan - Proposed Submission Version – which are provided below.

Our client

Royal Mail Pension Trustees Limited are the freehold owners of the Bricklayers Arms Distribution Centre, Mandela Way which is proposed for allocation as part of 'Site OKR3: Mandela Way in the emerging Old Kent Road Area Action Plan ("AAP") for mixed use redevelopment to include employment (B use class), residential (C3 use class), primary school (D1 use class) development and a new park.

Representations

Policy P13: Residential Design

In respect of residential design, concern is expressed that the requirement of paragraph 1.5 of draft Policy P13 that residential development must "share entrances between affordable and market homes in apartment blocks" is unreasonable on the basis that it is not always practical or viable to achieve this.

Whilst it often the case that private buyer requirements necessitate a relatively high specification for fit-out of entrance lobbies, lifts and staircases and active management and regular maintenance of these areas, registered providers are often unwilling for their affordable housing stock be subject to the high service charges that these requirements necessitate. Demanding that shared tenure entrances must be provided, could therefore result in affordable housing providers not acquiring the affordable units, or could compromise the standard of fit-out and management of the communal areas, with adverse impact to the saleability private residential accommodation. In either scenario, the viability of development could be severely compromised as a consequence.

Draft Policy P13 is considered to be unsound as currently worded, on the basis that it is not sufficiently flexible to allow for the practical difficulties that can mean that it is not viable to provide shared tenure entrances to apartment blocks, so cannot therefore be 'justified' as the most appropriate strategy, when considered against reasonable alternatives.

Shared entrances are encouraged by the council as an inclusive design principle. The policy can be applied flexibly where it is demonstrated that this is not feasible.

P13: Residential design

Change sought – It is requested that paragraph 1.5 of draft Policy P13 be amended, as follows:

“Residential development must:

1.5 Share entrances between affordable and market homes in apartment blocks, unless it is demonstrated not to be practical or viable to do so; and...

Six Bridges Estate
NSPPSV163.8

P13: Residential Design

Some detailed requirements are set out with respect to residential design, e.g. in relation to single aspect dwellings which are more onerous than the standards adopted in the GLA's Housing SPG (2016). Requirements such as shared entrances for affordable and market tenures may not always be possible.

As set out throughout these representations, sites such as the Six Bridges Estate within the Old Kent Road Area Action Plan, are required to innovatively mix industrial with residential development. This will be complex and challenging to deliver in terms of managing servicing, issues or amenity, design, management and phasing. As such the requirements of P13 should be applied flexibility in these circumstances.

Shared entrances are encouraged by the council as an inclusive design principle. The policy can be applied flexibly where it is demonstrated that this is not feasible.

P13: Residential design

Space Studios
NSPPSV169.07

Regarding Social regeneration to revitalise neighbourhoods policy P13: Residential design we object to failure to require larger predominantly residential developments to include smaller scale workspace for which there is strong demand and that can realistically be combined with residential, including office, workshop and light industrial, studio and workroom, storage. And we object to failure to give clarity on policy about workspaces in combination with, or ancillary to, residential.

Workspace provisions are dealt with in the 'Strong local economy' policies in the plan

P13: Residential design

Strathclyde Regional Pension Fund
NSPPSV174.4

In respect of residential design, concern is expressed that the requirement of paragraph 1.5 of draft Policy P13 that residential development must “share entrances between affordable and market homes in apartment blocks” is unreasonable on the basis that it is not always practical or viable to achieve this.

Whilst it often the case that private buyer requirements necessitate a relatively high specification for fit-out of entrance lobbies, lifts and staircases and active management and regular maintenance of these areas, registered providers are often unwilling for their affordable housing stock be subject to the high service charges that these requirements necessitate. Demanding that shared tenure entrances must be provided, could therefore result in affordable housing providers not acquiring the affordable units, or could compromise the standard of fit-out and management of the communal areas, with adverse impact to the saleability private residential accommodation. In either scenario, the viability of development could be severely compromised as a consequence.

Draft Policy P13 is considered to be unsound as currently worded, on the basis that it is not sufficiently flexible to allow for the practical difficulties that can mean that it is not viable to provide shared tenure entrances to apartment blocks, so cannot therefore be ‘justified’ as the most appropriate strategy, when considered against reasonable alternatives.

Change sought – It is requested that paragraph 1.5 of draft Policy P13 be amended, as follows:

“Residential development must:

1.5 Share entrances between affordable and market homes in apartment blocks, unless it is demonstrated not to be practical or viable to do so; and...

Shared entrances are encouraged by the council as an inclusive design principle. The policy can be applied flexibly where it is demonstrated that this is not feasible.

P13: Residential design

Studio Makecreate
NSPPSV175.12

12.

Regarding Social regeneration to revitalise neighbourhoods policy P13: Residential design we object to failure to require larger predominantly residential developments to include smaller scale workspace for which there is strong demand and that can realistically be combined with residential, including office, workshop and light industrial, studio and workroom, storage. And we object to failure to give clarity on policy about workspaces in combination with, or ancillary to, residential.

These inadequacies make the plan unsound as it is not justified, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan.

Workspace provisions are dealt with in the 'Strong local economy' policies in the plan

P13: Residential design

Vital OKR
NSPPSV205.31

Objections to Social regeneration to revitalise neighbourhoods chapter policies
P13: Residential design
Objection 55.

We object to failure to require larger predominantly residential developments to include smaller scale workspace for which there is strong demand and that can realistically be combined with residential, including office, workshop and light industrial, studio and workroom, storage.

NPPF para 14 requires Local Plans to meet objectively assessed needs.

London Plan para 6.3.4 states that The Mayor will encourage the delivery of new workspace for SMEs, the creative industries, artists and the fashion industry within new residential and mixed-use developments. He will also provide assistance to artists and creative businesses through the Mayor's Creative Enterprise Zones and promote schemes that provide linked affordable housing and business space in new housing developments.

Individual
NSPPSV323.10

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Workspace provisions are dealt with in the 'Strong local economy' policies in the plan

P28: Affordable workspace

Alumno Developments
NSPPSV09.2

Policy P28 – Small and Independent Businesses

This policy states that

1) “Development must:

- a. Retain small and independent businesses. Where existing small and independent businesses are at risk of displacement from a development there should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development; and
- b. Incorporate well designed and flexible units suitable for small and independent businesses. These must include a range of unit sizes and types. Opportunities for long term management of small business units by workspace providers should be fully explored. Furthermore there should be consideration of the feasibility of clustering non-residential uses in single use buildings (horizontal mixed use) and a full fit out”.

The supporting text of the policy goes on to define a small and independent business as one that employs less than 50 employees and operating on no more than three sites.

The current wording of this policy is considered to be overly onerous as point (b) of the policy requires all developments to provide space for small and independent businesses. Alumno considers that this policy should be subject to viability testing as well as site appropriateness.

In terms of site appropriateness, this is to ensure that proposed uses are actually placed in areas that require and suit that specific use. Areas constantly change and regenerate over time and the provision of business floor space in some areas may be inappropriate. As such, this policy should not be strictly applied across the board on all development proposals.

As such, it is considered that point (b) of the policy is reworded to state:

- b. Incorporate well designed and flexible units suitable for small and independent businesses subject to viability testing that finds such a provision possible as well as ensuring the site is appropriate in terms of location and does not detract from the character

Our Employment Land Review (ELR) found that small and independent businesses make up the majority of businesses in Southwark. These provide a variety of business models which supplement the traditional corporate office market, for growing numbers of small businesses seeking to have a presence in central London, on terms that suit their business models. Southwark has an important role to play in providing such accommodation. Part 1 of the policy sets out that there should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers where these businesses are at risk of displacement from redevelopment. This is not considered to be onerous as it provides the opportunity for existing businesses to be incorporated in new mixed use developments which are designed to meet business needs. Policy P38 (Business Relocation) is also applicable where businesses cannot be relocated on site. The policy now includes provision for affordable workspace which further supports small and independent businesses to continue to operate. Policy 26 (office and business development) relates to the re provision of employment floorspace along with assessment of market demand.

P28: Affordable workspace

of the area. These must include a range of unit sizes and types. Opportunities for long term management of small business units by workspace providers should be fully explored. Furthermore there should be consideration of the feasibility of clustering non-residential uses in single use buildings (horizontal mixed use) and a full fit out”.

Barkwest and Regent Group
NSPPSV20.6

There may be instances of small businesses choosing to relocate as part of their individual consolidation plans or business needs, rather than being displaced by development. The supporting text should clarify that the need to re-provide existing businesses will not apply in this situation.

The policy requires the full consideration of feasibility of providing space for existing occupiers. Policy P38 (Business Relocation) also contains the criteria for assessment for relocation if accommodating on site is not possible. All developments will be assessed on a site by site basis to ensure an assessment which is bespoke to the site.

P28: Affordable workspace

BizSpace
NSPPSV23.2

BizSpace is one of the UK's leading providers of flexible employment accommodation and manages a portfolio of approximately 100 sites throughout England and Scotland, comprising a mixture of business centres, industrial estates and business parks. BizSpace's business model is based on supporting small and start-up businesses, by providing office, industrial and warehousing facilities on a flexible basis. It also employs approximately 180 in-house staff, based in various locations across the country. BizSpace is an experienced asset management company, continually reviewing its portfolio and seeking to maximise value, through on-going improvement and investment within existing sites, acquisitions of new opportunities and disposals of those sites which, for a variety of reasons, are failing to meet the BizSpace model.

In principle, therefore, BizSpace welcomes the Council's clear commitment to ensuring this type of flexible employment floorspace is provided within the borough, and its recognition of the important role that flexible employment space for small and start-up businesses provides. This is very much the foundation of the BizSpace model.

However, BizSpace nonetheless objects to the terms of the Council's employment policy P28: Small and independent business. As proposed, this represents an onerous policy for landowners such as BizSpace, working within wider opportunities and constraints, particularly in operating and managing a large portfolio of properties around the country. The requirement of Policy P28 to ensure that employment floorspace for small independent business is re-provided as part of any redevelopment of a site prevents BizSpace from taking a more strategic view that may include the disposal of a site for alternative uses and re-investment in existing sites (or new acquisitions) elsewhere, including other sites within the London boroughs, to provide new or improved employment floorspace.

The policy should make it clear that retention of/ re-provision of employment floorspace will only be required where evidence indicates there is a market demand and it will represent a viable use of the site.

Our Employment Land Review (ELR) found that small and independent businesses make up the majority of businesses in Southwark. These provide a variety of business models which supplement the traditional corporate office market, for growing numbers of small businesses seeking to have a presence in central London, on terms that suit their business models. Southwark has an important role to play in providing such accommodation. Part 1 of the policy set out that there should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers where these businesses are at risk of displacement from redevelopment. This is not considered to be onerous as it provides the opportunity for existing businesses to be incorporated in new mixed use developments which are designed to meet business needs. Policy P38 (Business Relocation) is also applicable where businesses cannot be relocated on site. The policy now includes provision for affordable workspace which further supports small and independent businesses to continue to operate. Policy 26 (office and business development) relates to the re-provision of employment floorspace along with assessment of market demand.

P28: Affordable workspace

Capital Industrial
NSPPSV30.5

The policy states that development must retain small and independent businesses at risk of displacement from it, through giving full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development. Our client is experienced in managing a number of industrial estates in London and seeks to ensure that existing businesses are retained wherever possible after redevelopment/refurbishment. However, that is not always practically feasible due to a number of factors and constraints including matters which are outside the landowner's control.

For example, at the point of lease expiring, landowners are not under contractual obligation to extend the lease, and such a control is beyond which the planning system should exercise. Another example is that the retention would mean that existing tenants will need to move to alternative arrangements during the construction period. However, the tenants are unlikely to relocate to a temporary accommodation as they would have to move twice, which results in business interruptions and the associated loss of revenue twice – in other words, the retention of businesses is not entirely in the landowner/applicant's control. Furthermore, the type of new business space in the regeneration sites may not be suitable for some existing tenants, due to servicing arrangements not suitable for their operation or any operational restrictions imposed on business uses in light of the introduction of residential use.

While our client as the landowner embraces the principle of giving consideration to the feasibility of providing affordable and suitable space for existing occupiers, this must be considered in the context of commercial viability of the scheme as a whole. The word "must" means that planning permission will be refused if small and independent businesses are not retained. This disregards commercial factors and viability and has the potential to prevent regeneration schemes, which normally have a number of constraints to address and therefore cost implications, from coming forward.

We therefore object to the wording of the Policy and it should be amended as follows:

Development must:

1 seek to Rretain small and independent businesses, wherever feasible and practically possible.

Where existing small and independent businesses are at risk of displacement from a development

There should be full consideration of the feasibility of providing affordable and suitable space for

Small and independent businesses make up over 90% of Southwark's businesses, which provide jobs for local people; on this basis it is essential that development considers the needs of existing occupiers, as they are vital to Southwark's economy.

In order to consider the needs of Southwark's existing economy, physical layouts of developments should be able to accommodate a range of commercial uses, to ensure a diverse and robust employment base. As found within the ELR, demand grows for SME's within Southwark and development should be able to accommodate the demand. The requirement for affordable workspace has now been incorporated into this policy.

Should a business wish to relocate to a different site, policy P38 Business Relocation will be applied. The difficulty with temporary relocation is noted, and may not be suitable in all instances, due to the need to move operations twice. Hence it is important to have a robust business relocation policy in place to ensure the business can either be relocated on-site in suitable premises, or relocated where the business can continue to operate effectively.

P28: Affordable workspace

existing occupiers in the completed development, subject to viability and deliverability; and 2 Incorporate well designed and flexible units suitable for small and independent businesses. These must include a range of unit sizes and types. Opportunities for long term management of small business units by workspace providers should be fully explored. Furthermore there should be consideration of the feasibility of clustering non-residential uses in single use buildings (horizontal mixed use) and a full fit out.

Dulwich Estate
NSPPSV52.7

Emerging Policy P28 seeks to retain small and independent businesses. Where existing small and independent businesses are at risk of displacement from a development there should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development.

The Estate recognises the importance of small and independent businesses. In their management of their portfolio, they champion small and independent businesses and actively manage their retail centres and commercial properties to uphold the vibrant and individual character of Dulwich.

The Estate is concerned however that this policy fails to recognise the potential scenario where a small and independent businesses intend to relocate elsewhere or to cease operations entirely, outside of the Estate's control and / or apart from their development intentions. The policy does not capture this scenario and should be worded to reflect that this only applies where the occupier intends to remain, and indeed is capable of remaining. The latter is important to ensure that landowners are not prejudiced by policy that requires the retention of an occupier or business who is unable or unwilling to meet requisite rent levels, which may increase if the overall quality of a unit is improved as part of development. As a Charity, we reiterate that the Estate is obliged to achieve best value from its property assets as well as having consideration to improve the quality and vibrancy of the retail centres.

Small and independent businesses make up over 90% of Southwark's businesses, which provide jobs for local people; on this basis it is essential that development considers the needs of existing occupiers, as they are vital to Southwark's economy. Part 1 of the policy set out that there should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers where these businesses are at risk of displacement from redevelopment. This is not considered to be onerous as it provides the opportunity for existing businesses to be incorporated in new mixed use developments which are designed to meet business needs. Policy P38 (Business Relocation) is also applicable where businesses cannot be relocated on site. The policy now includes provision for affordable workspace which further supports small and independent businesses to continue to operate. Policy 26 (office and business development) relates to the re provision of employment floorspace along with

P28: Affordable workspace

The NPPF is clear that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. The proposed policy is not in accordance with the NPPF by adopting a blanket approach to the retention of small and independent businesses via planning policy. We strongly advocate a more holistic approach which takes into account business rates and local business programmes and initiatives that maintain and enhance the supply of small and independent businesses, outside of the planning regime.

The Fact Box accompanying this policy is ineffective and is not justified, with no evidence base setting out how the thresholds of business size have been defined. The size and independence of any business is relative; for example holding more than one premises does not mean that a company is not independent, nor does a shop that exceeds 80 sq.m mean that it is not 'small' relative to other organisations. The character of a business cannot be quantified in such simplistic terms, and we would recommend that the Fact Box is removed and replaced with an evidence based set of criteria to establish what sort of organisations this policy applies to.

assessment of market demand. The fact box has been updated to include more definitions of small business and affordable workspace. The definitions are based on experiences of business models operating within Southwark. An assessment would be made on a site by site basis and the nature of the business and relocation options should be considered early on in the site feasibility and discussed with the council at an early stage.

P28: Affordable workspace

Individual
NSPPSV91.50

Objection 32.

We object to P28 point 2 as it fails to adequately define the range of accommodation that suits the full range of small and small branch business of relevance to Southwark. We suggest that it will be useful to include reference to use types as is done in P26 point 1.2, mentioning inclusion of a range of employment spaces including smaller scale logistics, light industry, co-working, maker spaces, servicing and repair, studios and offices. We also suggest that wording could be added to state that design must pay particular regard to matters including goods access, plan simplicity, floor loading, ceiling heights, natural light, emission management. These adjustments will improve NSP soundness in relation to making every effort to objectively identify and then meet the business needs of the area.

London Plan Policy GG5 regarding growing a good economy requires those involved in planning and development should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

Objection 33.

We object to references in P28 to small and independent businesses as this excludes small branch businesses and expresses a preference relating to business ownership that is inappropriate in planning. We suggest that the legitimate intent here is to recognise the challenges of providing for smaller business units, in which category in Southwark there are many small branches as well as stand alone small businesses. It would also be useful to recognise that a significant range of accommodation size is relevant to such occupiers: an office based business with 50 people could be just a few hundred sq m, whereas for some industrial businesses 50 people would be in accommodation as large as a few thousand sq m. These adjustments will improve NSP soundness in relation to making every effort to objectively identify and then meet the business needs of the area.

The Fact Box could usefully have a definition for Small branch business added: A branch operation of a medium or large enterprise, where the branch operates with 50 employees or

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Small branch businesses are included in the definition for 'independent business' as long as they operate on no more than 3 sites. The requirements of P26 will still be relevant for any development proposals in terms of variety of business spaces. Detailed design considerations are included in relevant area based plans or site allocations. The addition to the policy relating to affordable workspace responds to demand for different types of workspace in different parts of Southwark which provides more clarity.

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Small branch businesses are included in the definition for 'independent business' as long as they operate on no more than 3 sites. Larger branch businesses are less likely to need policy support for relocation or affordable workspace however the council is committed to securing space for these businesses as well where they are at risk of displacement, ensuring they continue to contribute to the economy in Southwark.

Objection 34

The fact box has been amended to include much wider definitions of workspace provider models.

Objection 35

This has been removed. Design specifications should be suitable to the businesses provided and will be determined on a site by site basis.

P28: Affordable workspace

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NPPF para 14 requires Local Plans to meet objectively assessed needs.

Objection 34.

We object to reference to specialist workspace providers without also mentioning the role of less specialist owners who lease premises, and the valuable role of owner occupied premises. Specialist workspace providers are most active in providing higher rent flexible term accommodation, and niche affordable accommodation, of less relevance to many sectors of the economy. The wording should be widened in order to improve NSP soundness in relation to making every effort to objectively identify and then meet the business needs of the area.

Objection 35.

We object to reference to horizontal mixed-use design, and to reference only to residential as the use that might mix with B class uses. The reference to horizontal mixed-use design implies it is the favoured development type, whereas vertical mixed-use types can be a more realistic way to achieve significant quantities of deep industrial accommodation with level access without relying on goods lifts. There should be equal reference to both formats, with encouragement that developers find the most appropriate development type to meet occupier needs. It should also be made clear that mix-use without residential, such as industrial with office, retail or education, can also play an important role. Such wording changes will improve NSP soundness in relation to making every effort to objectively identify and then meet the business needs of the area.

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P28: Affordable workspace

Individual
NSPPSV128.50

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P28: Affordable workspace

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NPPF para 14 requires Local Plans to meet objectively assessed needs.

London Plan Policy GG5 regarding growing a good economy requires those involved in planning and development should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

P28: Affordable workspace

Six Bridges Estate
NSPPSV163.9

P28: Small and independent businesses

The policy states that:

Development must:

1 Retain small and independent businesses. Where existing small and independent businesses are at risk of displacement from a development there should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development; and

2 Incorporate well designed and flexible units suitable for small and independent businesses. These must include a range of unit sizes and types. Opportunities for long term management of small business units by workspace providers should be fully explored. Furthermore there should be consideration of the feasibility of clustering non-residential uses in single use buildings (horizontal mixed use) and a full fit out.

These requirements have the potential to disincentivise certain sites from coming forward which may impact on the delivery of wider planning objectives. For example the redevelopment of the Six Bridges Estate has been identified by Southwark as necessary to facilitate the wider regeneration and to achieve key planning objectives for the Old Kent Road area such as delivery of housing, affordable housing and public realm enhancements. There is a need to ensure no net loss of employment floorspace on this site and for the site to deliver 'innovative mixing' and co-location of industrial and residential uses which hasn't been achieved in London before. This innovation in itself is likely to be challenging to deliver with additional viability, design, management, market uncertainties and phasing considerations when compared with typical sites. Coupled with the requirements of this policy, there is the potential to add additional practical challenges such as management, design and viability issues on the site.

Royal London is supportive of the principle of supporting small and independent businesses and will work collaboratively with its tenants where plans for redevelopment are identified. It is considered that the requirements of the policy go beyond the role of the planning system which is related to Use Class rather than being tied to specific businesses. Policy should therefore not seek to protect the existing occupiers - separate controls on relocation, etc, are provided through the landlord and tenant system and will always have been subject to separate commercial negotiation.

Other policies are already in place which protect B class or employment generating Sui Generis use (e.g. Policy P26: Office and business development and the guidance and policies within the Old Kent Road Area Action Plan).

In order to ensure that the NSP is deliverable and effective, and consistent with national policy which requires Local Plans to respond to market signals and for Local Plans to be deliverable; and to incentivise sites such as the Six Bridges Estate to be redeveloped, we consider that the requirements of

Site specific considerations are noted and the detailed requirements of the site are included in the Old Kent Road AAP. Small and independent businesses make up over 90% of Southwark's businesses, which provide jobs for local people; on this basis it is essential that development considers the needs of existing occupiers, as they are vital to Southwark's economy.

In order to consider the needs of Southwark's existing economy, physical layouts of developments should be able to accommodate a range of commercial uses, to ensure a diverse and robust employment base. As found within the ELR, demand grows for SME's within Southwark and development should be able to accommodate the demand. Part 1 of the policy sets out that there should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers where these businesses are at risk of displacement from redevelopment. This is not considered to be onerous as it provides the opportunity for existing businesses to be

P28: Affordable workspace

Policy P28 should be considered on a site by site basis against the range of planning considerations and contributions that each development will deliver and alongside the requirements of the Old Kent Road Area Action Plan. As planning is related to Use Class rather than specific tenants, we suggest that part 1 of the policy is removed. If it must stay then the policy must be applied flexibly on a site by site basis.

Some suggested amendments are provided below.

Some suggested amendments are made in red below.

1 Retain small and independent businesses where possible. Where existing small and independent businesses are at risk of displacement from a development there should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development. This consideration will need to be balanced against a range of planning objectives including viability and on a site specific basis; and

2 Consider on a site by site basis the potential to incorporate well designed and flexible units suitable for small and independent businesses where possible. These must include a range of unit sizes and types. Opportunities for long term management of small business units by workspace providers should be fully explored. Furthermore there should be consideration of the feasibility of clustering non-residential uses in single use buildings (horizontal mixed use) and a full fit out.

Specific guidance in relation to sites within the Old Kent Road Opportunity Area will be provided within the Area Action Plan.

incorporated in new mixed use developments which are designed to meet business needs. Policy P38 (Business Relocation) is also applicable where businesses cannot be relocated on site. The policy now includes provision for affordable workspace which further supports small and independent businesses to continue to operate.

P28: Affordable workspace

Space Studios
NSPPSV169.04

Small and independent businesses we object to: Point 2 as it fails to adequately define the range of accommodation that suits the full range of small and small branch business of relevance to Southwark;

References in P28 to small and independent businesses as this excludes small branch businesses and expresses a preference relating to business ownership that is inappropriate in planning;

Reference to specialist workspace providers without also mentioning the role of less specialist owners who lease premises, and the valuable role of owner occupied premises;

Reference to favouring horizontal mixed-use types over vertical mixed-use types, without justification, and reference only to residential as the use that might mix with B class uses.

Studio Makecreate
NSPPSV175.5

Regarding Strong, local economy policy P28: Small and independent businesses we object to:

Point 2 as it fails to adequately define the range of accommodation that suits the full range of small and small branch business of relevance to Southwark;

References in P28 to small and independent businesses as this excludes small branch businesses and expresses a preference relating to business ownership that is inappropriate in planning;

Reference to specialist workspace providers without also mentioning the role of less specialist owners who lease premises, and the valuable role of owner occupied premises;

Reference to favouring horizontal mixed-use types over vertical mixed-use types, without justification, and reference only to residential as the use that might mix with B class uses.

These inadequacies make the plan unsound as it is not justified, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan.

Small branch businesses are included in the definition for 'independent business' as long as they operate on no more than 3 sites. The fact box has been amended to include much wider definitions of workspace provider models. The reference to mixed use has been removed. Design specifications and mixed use development should be suitable to the businesses provided and will be determined on a site by site basis.

Small branch businesses are included in the definition for 'independent business' as long as they operate on no more than 3 sites. The fact box has been amended to include much wider definitions of workspace provider models. The reference to mixed use has been removed. Design specifications and mixed use development should be suitable to the businesses provided and will be determined on a site by site basis.

P28: Affordable workspace

Tiger Developments Ltd
NSPPSV191.5

We seek clarification that this draft policy only applies to 'B' Use Classes and not 'A' Use Classes. The current wording of the policy is not clear, though the supporting text would appear to refer to more traditional business (B Class) Uses. We believe a change should be made to specifically refer to B Class Uses within the Policy.

Individual
NSPPSV193.9

(There many examples in Bermondsey)
P27 Fails to designate most areas of railway arch accommodation as SPIL and LSIS;
The scope of P27 is not defined on the Policies Map.

This policy relates to B class uses. The fact box and Policy P29 (small shops) relates to the feasibility of providing affordable and suitable space for existing occupiers (small shops - A class) in new development to suit the requirements of the business. Policy P38 (Business Relocation) relates to both A and B class uses.

This representation does not relate to P28.

P28: Affordable workspace

Vanguard Metropolitan Ltd (VML),
NSPPSV203.1

Our client's site is home to a number of small businesses. We understand the Council's position in wishing to retain small and independent businesses and therefore support this policy. Furthermore, we welcome Policy P28 where it states that in mixed use developments, horizontal mixed use design helps to achieve clustering of employment uses providing essential servicing and separation from residential uses. Whilst it encourages mixed use development, the policy seeks to ensure that there is suitable mix of employment and residential uses provided that can work well together in the same location. This is precisely what VML wants. Consequently, VML wishes to work constructively with the Council to intensify the mixed uses on this site and seek to keep and enhance the existing B1 uses as well as provide additional residential use within the site.

However, it should be noted within the policy that whilst there is a necessity to provide affordable and suitable space for existing and/or new occupiers in any completed development, we urge the policy to understand the financial implications of development and the amount of affordable housing on such mixed use sites should be subject to the viability of the scheme.

Noted. Part 1 of the policy sets out that there should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers where these businesses are at risk of displacement from redevelopment. Policy P38 (Business Relocation) is also applicable where businesses cannot be relocated on site.

P28: Affordable workspace

Vital OKR
NSPPSV205.11

Objection 32.

We object to P28 point 2 as it fails to adequately define the range of accommodation that suits the full range of small and small branch business of relevance to Southwark. We suggest that it will be useful to include reference to use types as is done in P26 point 1.2, mentioning inclusion of a range of employment spaces including smaller scale logistics, light industry, co-working, maker spaces, servicing and repair, studios and offices. We also suggest that wording could be added to state that design must pay particular regard to matters including goods access, plan simplicity, floor loading, ceiling heights, natural light, emission management. These adjustments will improve NSP soundness in relation to making every effort to objectively identify and then meet the business needs of the area.

London Plan Policy GG5 regarding growing a good economy requires those involved in planning and development should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

Objection 33.

We object to references in P28 to small and independent businesses as this excludes small branch businesses and expresses a preference relating to business ownership that is inappropriate in planning. We suggest that the legitimate intent here is to recognise the challenges of providing for smaller business units, in which category in Southwark there are many small branches as well as stand alone small businesses. It would also be useful to recognise that a significant range of accommodation size is relevant to such occupiers: an office based business with 50 people could be just a few hundred sq m, whereas for some industrial businesses 50 people would be in accommodation as large as a few thousand sq m. These adjustments will improve NSP soundness in relation to making every effort to objectively identify and then meet the business needs of the area.

The Fact Box could usefully have a definition for Small branch business added: A branch operation of a medium or large enterprise, where the branch operates with 50 employees or

Objection 32

Small branch businesses are included in the definition for 'independent business' as long as they operate on no more than 3 sites. The requirements of P26 will still be relevant for any development proposals in terms of variety of business spaces. Detailed design considerations are included in relevant area based plans or site allocations. The addition to the policy relating to affordable workspace responds to demand for different types of workspace in different parts of Southwark which provides more clarity.

Objection 33

Small branch businesses are included in the definition for 'independent business' as long as they operate on no more than 3 sites. Larger branch businesses are less likely to need policy support for relocation or affordable workspace however the council is committed to securing space for these businesses as well where they are at risk of displacement, ensuring they continue to contribute to the economy in Southwark.

Objection 34

The fact box has been amended to include much wider definitions of workspace provider models.

Objection 35

This has been removed. Design specifications should be suitable to the businesses provided and will be determined on a site by site basis.

P28: Affordable workspace

less.

NPPF para 14 requires Local Plans to meet objectively assessed needs.

Objection 34.

We object to reference to specialist workspace providers without also mentioning the role of less specialist owners who lease premises, and the valuable role of owner occupied premises. Specialist workspace providers are most active in providing higher rent flexible term accommodation, and niche affordable accommodation, of less relevance to many sectors of the economy. The wording should be widened in order to improve NSP soundness in relation to making every effort to objectively identify and then meet the business needs of the area.

Objection 35.

We object to reference to horizontal mixed-use design, and to reference only to residential as the use that might mix with B class uses. The reference to horizontal mixed-use design implies it is the favoured development type, whereas vertical mixed-use types can be a more realistic way to achieve significant quantities of deep industrial accommodation with level access without relying on goods lifts. There should be equal reference to both formats, with encouragement that developers find the most appropriate development type to meet occupier needs. It should also be made clear that mix-use without residential, such as industrial with office, retail or education, can also play an important role. Such wording changes will improve NSP soundness in relation to making every effort to objectively identify and then meet the business needs of the area.

NPPF para 14 requires Local Plans to meet objectively assessed needs.

London Plan Policy GG5 regarding growing a good economy requires those involved in planning and development should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

P28: Affordable workspace

Individual
NSPPSV210.1

As chair of Southwark's Creative Network I am aware that securing long-term affordable commercial sites is the number one concern for our members in.

Policies P28.1 and P28.2 are not effective as a "consideration of providing affordable spaces" is non-binding and does not address serious issues affecting the creative and cultural sectors' requirements in Southwark.

Policies had identified a need, but set out no plan to strengthen retention or re-provision when addressing displacement, with no requirements for new developments to provide a % of affordable commercial premises.

Site NSP56 had required from its redevelopment to "Provide a new arts hub.... At least 50% of any development floor space must be provided as creative and cultural small business workspace". Since the removal of NSP56 there is no longer a single identified site within the NSP that guarantees the re-provision of affordable space for the creative economy or cultural industries in Southwark.

We also note that NSP76 Blackpool Rd site, which said that that site should "contribute to the thriving small business, creative and cultural employment cluster in Peckham & Camberwell" has been removed from the submission version

We would highly recommended expanding policy P28 or DM39 to include a percentage requirement to multiple NSP sites to include affordable space for the creative and cultural industries, defined within the usage class of sites as they are granted planning permission to redevelop.

The policy now requires at least 10% of affordable workspace to be delivered on site for major developments delivering over 500sqm of employment space.

P28: Affordable workspace

Individual
NSPPSV239.21

NB

Due to circumstances beyond our control as it was envisaged that the deadline for submission would obviously be the last day of the month the 28th February 2018, rather than the actual date of the 27th February. There are a number of responses that will not therefore be submitted until after the closing date. We hope that the local authority will however appreciate and support us by ensuring these additional comments are submitted as evidence for the examination and Inspector's consideration.

Individual
NSPPSV323.4

1. Point 2 as it fails to adequately define the range of accommodation that suits the full range of small and small branch business of relevance to Southwark;
2. References in P28 to small and independent businesses as this excludes small branch businesses and expresses a preference relating to business ownership that is inappropriate in planning;
3. Reference to specialist workspace providers without also mentioning the role of less specialist owners who lease premises, and the valuable role of owner-occupied premises;
4. Reference to favouring horizontal mixed-use types over vertical mixed-use types, without justification, and reference only to residential as the use that might mix with B class uses.

These inadequacies make the plan unsound as it is not justified, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan.

No response to policy provided.

Small branch businesses are included in the definition for 'independent business' as long as they operate on no more than 3 sites. The fact box has been amended to include much wider definitions of workspace provider models. The reference to mixed use has been removed. Design specifications and mixed use development should be suitable to the businesses provided and will be determined on a site by site basis.

P28: Affordable workspace

Individual
NSPPSV324.10

While we welcome the P28's objective to promote small businesses in Camberwell, we note that Southwark has previously struggled to deliver on commitments to independent small traders. For example at the Elephant and Castle shopping centre redevelopment there was originally no provision for affordable retail units. A few of the independent traders have now been offered alternative affordable space by the council in the basement car park at Perronet House. This is an undesirable retail location due to the lack of natural light and its position on the other side of the ring road from the main shopping centre, so there will be no footfall. Camberwell has many independent businesses, including those located in railway arches close to the site of the proposed Camberwell Station. They need protection from sudden rent increases and should be fully involved in any redevelopment plans (unlike the small businesses in Elephant and Castle) neither of which the Camberwell Area Vision mentions. We do not think the plan has been positively prepared with existing small businesses in mind.

At the very least there should be commitments within the NSP and the Camberwell Area Vision to full consultation with all small businesses before any redevelopment plans emerge. The NSP should not be used as a sweeping policy to push out existing small retailers.

The policy now requires at least 10% of affordable workspace to be delivered on site for major developments delivering over 500sqm of employment space. The fact box and Policy P29 (small shops) relates to the feasibility of providing affordable and suitable space for existing occupiers (small shops - A class) in new development to suit the requirements of the business. Policy P38 (Business Relocation) relates to both small shops and small employment businesses.

P36: Hotels and other visitor accommodation

There are no representations submitted.

P70: Local list

Individual
NSPPSV132.5

With regards to the decision not to have a borough wide local list:

- Due to obvious gaps and inconsistencies - see below
 - The policy is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim.
 - No clear audit trail of how the preferred approach was arrived at while the consultation that has taken place has not allowed for effective engagement - see below
- The policy recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but does not provide for a Local List which is the nationally recognised method for giving them protection.

Many other councils have borough wide Local Lists (Camden, Croydon, Tower Hamlets, Lambeth and Hackney...) informed by Historic England guidance:

“Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment. Local lists can be used to identify significant local heritage assets to support the development of Local Plans. Encouraging the use of local lists will strengthen the role of local heritage assets as a material consideration in the planning process...

“Moreover Local Lists are usually made very effectively in partnership with local residents through occasional appraisal and/or a nomination system which recognises and takes advantage of local residents’ knowledge, and highlights community value assets. This is invaluable in engaging the local community in the effective conservation of their neighbourhood’s heritage. “

“At its heart, local listing provides an opportunity for communities to have their views on local heritage heard. It recognises that the importance we place on the historic environment extends beyond the confines of the planning system to recognise those community-based values that contribute to our sense of place.

<https://historicengland.org.uk/listing/what-is-designation/local/local-designations>

The council has reintroduced the Local List policy into the proposed submission version following the concerns from the consultation and from Historic England. This will be accompanied by a heritage SPD.

P70: Local list

This issue was raised with the council by the Forum in September 2017 and many times since including in a Public Question at Council Assembly on Nov 29th and a follow up meeting in January at the planning department where clarifications were promised but not subsequently honoured to make clear the council's position and the process that had been undertaken. It was at least admitted that there are gaps in policy in areas not covered by the combination of AAPs, SPDs, Conservation Areas and Neighbourhood Plans however the question as to what disadvantages there are to having a borough wide local list has been continually avoided. Despite an FOIA request on the subject no audit trail has been made available to explain why members decided to remove policy DM55 "Local List buildings and views" from the Options version from October 2014.

Despite the Peckham and Nunhead AAP 2014 and the adopted version of the Elephant & Castle SPD from March 2012 for example making specific reference to local lists the local list policy has been dropped from the NSP and those officers from whom the audit trail has been requested (the Planning Policy Manager, the Head of Planning and the Cabinet Member for Regeneration and Homes) have variously admitted to not being familiar with key guidance on the subject like "Historic England Advice Note 7" for example which sets out how according to appropriate selection methods and criteria, locally identified assets in the context of Conservation Areas can benefit from an elevated protection - namely the general control over demolition afforded by the Planning (Listed Buildings and Conservation) Act 1990. It would appear that the council have not therefore considered either the disadvantages nor the (full) advantages to having a borough wide local list.

DETAIL / PROPOSED CHANGES

For the plan to be sound a new genuine consultation should be had on the subject of a borough wide local list.

In advance of this the emerging local lists of in neighbourhood plans like that of the OBF should be given their due weight in the planning process and used as front runners to help develop an appropriate community engagement strategy for a borough wide policy of such great potential value in promoting sustainable development.

P70: Local list

Individual
NSPPSV228.3

The policy is not effective because of conflicting NSP policy that seeks high density residential developments.

Currently Conservation Area Appraisals are being ignored when planning applications come up in Conservation Areas, because the pressure to build residential accommodation, even when unaffordable, seems to override. There is nothing new in this policy that would change this status quo. The result of this conflict is that permission is being given for buildings that are out of scale in height and mass with the Conservation Area, eroding its settings, views and compromising historic character and distinctiveness.

Some solution needs to be found to this if this policy P17 is to be made effective and sound. One way for example might be to add something on the following lines.

3.2 When any developments are proposed that breach the prevailing heights, mass and density in a Conservation Area, this should be subject to additional public consultation before any such developments can be determined.

The council has reintroduced the Local List policy into the proposed submission version following the concerns from the consultation and from Historic England. This will be accompanied by a heritage SPD.

P70: Local list

Individual
NSPPSV324.6

Policy 18 is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim. There has been no explanation why the provision for a Local List does not appear in the NSP submission version, despite appearing in the NSP Options version from October 2014 (DM55, DM55.1).

This policy could be made sound by including in it two additional points to achieve the following:

2. Unlisted buildings of townscape merit and undesignated heritage assets identified and gathered in a Local List and allowed the same protection as listed buildings and/or conservation areas.
3. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.

The council has reintroduced the Local List policy into the proposed submission version following the concerns from the consultation and from Historic England. This will be accompanied by a heritage SPD.

P70: Local list

Bankside Residents Forum
NSPPSV19.15

The policy is not effective because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim.

The policy recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but does not provide for a Local List which is the nationally recognised method for giving them protection. These quotes are from Historic England :
<https://historicengland.org.uk/listing/what-is-designation/local/local-designations>

“Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment. Local lists can be used to identify significant local heritage assets to support the development of Local Plans. Encouraging the use of local lists will strengthen the role of local heritage assets as a material consideration in the planning process...

“Moreover Local Lists are usually made very effectively in partnership with local residents through occasional appraisal and/or a nomination system which recognises and takes advantage of local residents’ knowledge, and highlights community value assets. This is invaluable in engaging the local community in the effective conservation of their neighbourhood’s heritage. “

“At its heart, local listing provides an opportunity for communities to have their views on local heritage heard. It recognises that the importance we place on the historic environment extends beyond the confines of the planning system to recognise those community-based values that contribute to our sense of place.

This was recognised in earlier planning policy documents:

* The adopted version of the Elephant & Castle SPD from March 2012 states (4.5.12) that "We (Southwark) will be consulting on our local list in summer 2012. The local list will be established through that process".

* The Peckham and Nunhead AAP 4.7.12 (2014) states "... we have also identified buildings which are worthy of being added to the council's local list. The local list identifies buildings and structures with local value which make a positive contribution to character or appearance due to Buildings on the local list in Peckham & Nunhead include" The Fact Box Page 98 refers to the NPPF definition of heritage assets including locally listed buildings,

The council has reintroduced the Local List policy into the proposed submission version following the concerns from the consultation and from Historic England. This will be accompanied by a heritage SPD.

P70: Local list

and gives English Heritage good practice guidance on the criteria to use to identify buildings and other objects for the Southwark 'Local List'.

* The NSP Options version from October 2014, Draft Policies and area visions states –
“DM55 Local list buildings and views: Southwark will have a list of locally important buildings, structures and views that positively contribute to local character and amenity.
DM55.1 Development must take these locally important buildings, structures and views into account.
Reasons: Locally important buildings and views make a positive contribution to local character and distinctiveness, but they do not benefit from a statutory designation. We will prepare a list of locally important buildings and views, and the criteria for their selection as part of a Heritage SPD.”

There has been no explanation why the provision for a Local List does not appear in the NSP submission version.

This policy could be made sound by including in it two additional points to achieve the following:

2. Unlisted buildings of townscape merit and undesignated heritage assets identified and gathered in a Local List and allowed the same protection as listed buildings and/or conservation areas.
3. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.

P70: Local list

Individual
NSPPSV134.3

The policy is not effective, it recognises the existence of conservation and heritage assets that are not protected under the Planning (Listed Buildings and Conservation Areas) Act 1990 but fails to further explain how these will be protected and enhanced by new development hence not achieving its aim.

To achieve the aims of the policy:

Unlisted buildings of townscape merit and undesignated heritage assets should be identified and gathered in a Local List* and allowed the same protection as listed buildings and/or conservation areas.

*Local Lists can be made in partnership with local residents through occasional appraisal and/or a nomination system which recognises and takes advantage of local residents' knowledge, and highlights community value assets.

The council has reintroduced the Local List policy into the proposed submission version following the concerns from the consultation and from Historic England. This will be accompanied by a heritage SPD.

P70: Local list

Peckham Heritage Regeneration Partnership.
NSPPSV139.3

Not justified

(i) The policy is not sound because of the absence of locally listed buildings from the heritage assets identified.

There has been no recent consultation on whether there should be a local list in Southwark. The PHRP now proposes that a local list for Southwark should be consulted on. There has been no explanation why the provision for a Local List does not appear in the NSP submission version.

(ii) Not consistent with national policy

(ii) The policy is not sound because it is not consistent with national policy as set out in the National Planning Policy Framework

The National Planning Policy Framework frequently refers to 'heritage asset(s)' in Section 12. Conserving and enhancing the historic environment. The NPPF itself defines 'heritage asset' (see Annex 2. Glossary) as: "a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)" (bold text is ours). Given the above definition, it can be argued that the local list is integral to the set of buildings, parks and spaces termed 'heritage asset'.

The NPPF encourages sustainable development, refers to "spirit of place" and aims to reinforce the inclusion of people and communities in decision making and neighbourhood planning. (e.g. see Ministerial foreword, NPPF). Compiling a local list is a way of engaging and supporting community values and interest. Compiling a local list gives local people and communities an opportunity to explore and set out what they value in their built environment.

This policy could be made sound by including in it two additional points to achieve the following:

1. Unlisted buildings of townscape merit and undesignated heritage assets identified and gathered in a Local List. Local listing should be a material consideration in planning decisions.
2. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.

The council has reintroduced the Local List policy into the proposed submission version following the concerns from the consultation and from Historic England. This will be accompanied by a heritage SPD.

P70: Local list

Walworth Society
NSPPSV207.1

I am writing on behalf of the Walworth Society in relation to this policy to state that the policy is unsound because it is inconsistent with national policy in the NPPF which includes heritage assets included on the Local List. It fails to explain how without a Local List, unlisted buildings and heritage assets will be protected and enhanced by new development, and so not able to achieve its aim.

The need for and intention to create a Local List under the umbrella of a Heritage SPD is recognised by Historic England and was recognised in earlier planning policy documents:

* The adopted version of the Elephant & Castle SPD from March 2012 states (4.5.12) that "We (Southwark) will be consulting on our local list in summer 2012. The local list will be established through that process".

* The Peckham and Nunhead AAP 4.7.12 (2014) states "... we have also identified buildings which are worthy of being added to the council's local list. The local list identifies buildings and structures with local value which make a positive contribution to character or appearance due to Buildings on the local list in Peckham & Nunhead include" The Fact Box Page 98 refers to the NPPF definition of heritage assets including locally listed buildings, and gives English Heritage good practice guidance on the criteria to use to identify buildings and other objects for the Southwark 'Local List'.

* The NSP Options version from October 2014, Draft Policies and area visions states –
"DM55 Local list buildings and views: Southwark will have a list of locally important buildings, structures and views that positively contribute to local character and amenity.
DM55.1 Development must take these locally important buildings, structures and views into account.
Reasons: Locally important buildings and views make a positive contribution to local character and distinctiveness, but they do not benefit from a statutory designation. We will prepare a list of locally important buildings and views, and the criteria for their selection as part of a Heritage SPD."

There has been no explanation why the provision for a Local List does not appear in the NSP submission version.

This policy could be made sound by including in it two additional points to achieve the following:

2. Unlisted buildings of townscape merit and undesignated heritage assets identified and gathered in a Local List under the policy umbrella of an adopted Heritage SPD and allowed the same protection as listed buildings and/or

The council has reintroduced the Local List policy into the proposed submission version following the concerns from the consultation and from Historic England. This will be accompanied by a heritage SPD.

P70: Local list

conservation areas.

3. A community engagement policy developed to encourage local neighbourhoods to develop a local process with an existing community group or a new group to nominate buildings for the Local List.

We have a number of instances in the Walworth area of buildings that have been harmed owing to the lack of progress on this matter. These are buildings that are of historic value which should have received recognition in relation to the proposed local list in the E&C SPD which have experienced significant harm in the meanwhile. These include: The Hampton Court Palace Hotel, the Scene Painting warehouse on Penrose St, the Victorian Sorting Office on Penrose St, The Crown PH on Brandon St.

The absence of the local list and the adopted planning policy to bring it into force means that this policy is currently unsound.

I am willing to take part at the oral examination/public hearings.

P71: Homes for Travellers and Gypsies

Individual
NSPPSV333

We want to be put in the planning

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

Individual
NSPPSV334

We would like to stay in the constellation

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

Individual
NSPPSV335

I would like to stay in the constellation thank you

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

Individual
NSPPSV336

We want to stay in all development plans for Old Kent Rd
Changes

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

P71: Homes for Travellers and Gypsies

Individual
NSPPSV337

Stay in Plans for Old Kent Road. We shall not be moved

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

Individual
NSPPSV338

I would like to see travellers included in the plan rather than having a separate plan

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

Individual
NSPPSV339

We Want to stay in the pln Old Kent Road

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

P71: Homes for Travellers and Gypsies

Individual
NSPPSV340

We want to be heard and have a say about where our sites are we need to stay in the plans

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

Individual
NSPPSV341

We need to stay in the consultation as where travellers and have a say

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

Individual
NSPPSV342

As we live in the traveller community we would like to stay in the plans not taken out and left on our own. Include us please

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

Individual
NSPPSV343

Needs to be in the plans. Travellers has rights and wants to be heard

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

P71: Homes for Travellers and Gypsies

Individual
NSPPSV344

We want to stay in the New Southwark plan. Save our sites

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

Individual
NSPPSV345

We don't think there should be a separate plan for travellers - we want to be included in the main New Southwark Plan

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

Individual
NSPPSV346

I want to stay in all development plans for the Old Kent Road changes

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

Individual
NSPPSV347

We want to be put in the planning

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

P71: Homes for Travellers and Gypsies

Individual
NSPPSV348

We want to be put in the planning

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

Individual
NSPPSV349

We want to be put in the planning

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

Individual
NSPPSV350

I wish to be included in the main planning program for the development of Southwark due to the new rail program, and not just be left as an afterthought when all developments are allocated. I have lived on the Ilderton site for 36 years and think we should be included.

A policy relating to 'homes for travellers and gypsies' has been reintroduced to the Plan and will be out to consultation within the Proposed Submission Version amended policies.

P19 and Annex 4: Borough views

Bankside Residents Forum
NSPPSV19.16

While P19 provides some clarity on the key views, there are other views that have failed to be incorporated especially views of Southwark Cathedral. Although the fact box describes the types of protected views, there is clearly more work to be done on this to ensure that the policy is sound. Often it is only when view is lost that people take regard to the significance of having robust policy in place. We would like to see more emphasis placed on producing a supplementary planning document of protected views similar to that produced by the City of London so that there is a clearer understanding of impact for developers.

We would particularly draw your attention to the following section 3 from the City's SPD - Qualitative View Protection – River Prospects

3.3 Other designated strategic views have precisely defined assessment points but are protected by qualitative assessment of the impact of a proposal on the important elements of the view. For the City, most of the relevant views are 'River Prospects' from Thames bridges and the riverside walk.

3.4 The management of River Prospects should ensure that the juxtaposition between elements, including the river frontage and landmarks, is appreciated within a wider London context. Development must ensure that key features of the view can continue to be enjoyed in the context of their surrounding environment, including distant buildings.

3.5 Development in the foreground and middle ground of the River Prospects should enhance the juxtaposition of townscape elements with the riverbanks and the depth and variety of the surrounding London townscape. Interventions into the built fabric should preserve or, where possible, enhance this relationship. Development in the foreground or middle ground that is overly intrusive, unsightly or prominent to the detriment of the view as a whole should be refused.

3.6 Some River Prospects include views of the Tower of London World Heritage Site. New development in the background of a River Prospect should, where relevant, preserve or enhance a viewer's ability to appreciate the Outstanding Universal Value of a World Heritage Site and should be consistent with the objectives of the World Heritage Site Management Plan.

Policy P19 seeks to identify important views in the borough and is in line with the methodology used in the Mayor's LVMF. Views of Listed Buildings such as Southwark Cathedral are not included as their listed designations by default precludes development that would harm their setting

P19 and Annex 4: Borough views

City of London
NSPPSV34.1

Thank you for the opportunity to respond to the submission version of the New Southwark Plan. We understand this is the council's final document for consideration and not an open consultation for discussion and comment.

The City of London notes the borough's proposed submission version (December 2017) in regard to the New Southwark Plan. We were previously consulted on the Preferred Options and responded with comments in February 2016.

We welcome the addition of inclusion of views relating to other boroughs, strategic views and wider views. Including the acknowledgement of the City's St. Paul's Heights as many of the views of the Cathedral protected by the Heights are from Southwark.

The City of London Corporation is keen to maintain strong links with the London Borough of Southwark and to continue to cooperate in the development of our respective Local Plan policies, especially those related to cross boundary issues and the Central Activities Zone. The City of London is currently working on a draft version of a new Local Plan and will be running its own consultation in autumn 2018.

Individual
NSPPSV40.13

This policy is not positively prepared because it does not afford protection to the London panorama as seen when looking north from the rooftops of the Peckham Multi Storey building and the Bussey building in Peckham town centre.

These rooftops have become strongly associated with the now famous panoramic view of London, as described above. They provide significant viewing spaces where thousands of visitors come to visit and experience the views, which are now synonymous with Peckham's social infrastructure and local economy, so

Support noted.

Locations that do not guarantee long-term public access do not meet our requirements to be designated as a borough view.

P19 and Annex 4: Borough views

much so that it needs protection in this policy

Individual
NSPPSV56.11

This policy is not positively prepared because it does not include protection for the London panorama from the rooftops of the Peckham Multi Storey building and the Bussey Building in Peckham town centre.

This view is similar to that from One Tree Hill and Nunhead Cemetery, and both are protected in this policy. The rooftops provide significant viewing spaces for the thousands of visitors who have been visiting Peckham in increasing numbers since 2008 for the leisure facilities in both of these buildings which are at the heart of the growing cultural economy in Peckham.

The NSP recognises the importance of the rooftop view from the Bussey Building in the Design and accessibility guidance for the Aylesham centre site NSP 75: "Development massing ... should minimise impact on the view to the City from the Bussey Building rooftop."

The view from the Peckham Multi Storey building also needs to be protected. At the time of the consultation on the Preferred Options the NSP allocated the Peckham Multi Storey site and building for redevelopment. Since then the Council has removed the site from the NSP and offered 15 year extensions to the leases for the operators in the building, taking its life until at least 2038 which is beyond the life of the NSP.

The Peckham Multi Storey is a Council owned building and so is publically accessible. The Bussey Building is privately owned but the PNAAP4 designation is that the building is identified as heritage value and should continue to be used for creative and cultural enterprises. This means the rooftop is also publically accessible.

Policy P14 2.11 provides a planning precedent for this kind of requirement when it requires private buildings to deliver publically accessible space at the top of buildings. This view is of such importance to Peckham social infrastructure and local economy that it needs protection in this policy.

Proposed changes to make the NSP sound

Locations that do not guarantee long-term public access do not meet our requirements to be designated as a borough view.

P19 and Annex 4: Borough views

This Peckham town centre rooftop view should be added as a protected view in P19.



P19 and Annex 4: Borough views

Firmdale Holdings
NSPPSV59.5

Whilst the redevelopment of the former car pound site is to be predominately guided by the emerging Old Kent Road Area Policy Action Plan, it is a significant concern that the redevelopment potential of the site is compromised by the proposed 'Borough View' from Nunhead Cemetery to St Pauls Cathedral under draft Policy P19.

The views of St Pauls from Nunhead Cemetery have little historical significance and the cemetery has very low numbers of visitors. The specific viewpoint identified (which has already been compromised by Guy's Cancer Centre following its completion in 2016) also has no spatial significance (as the location is not at the highest point of the cemetery and St Paul's is visible only through carefully trimmed foliage, from a bench along one of the Cemetery paths).

Objection has previously been raised in representations to the New Southwark Plan Preferred Option – New and Amended Policies that Southwark's Development Plan policies should not be applied to secure the protection of long-distance views to points of interest outside of the Borough boundaries, given the Mayor of London's London View Management Framework (LVMF) (2012) provides protection of important cross-boundary views within the city.

The potential impact of formally protecting this largely unseen view under draft Policy under draft Policy P19 of the NSP PSV, with an apparently arbitrary identified viewpoint on the delivery of redevelopment across Southwark, in particular within the Old Kent Road Opportunity Area, is huge.

Allowing the 'linear view of St Pauls Cathedral from Nunhead Cemetery' to protect views of the dome and peristyle to St Paul's Cathedral (as is proposed by the identification of the defining point to set the viewing plane threshold height of 52.1m AOD) would place a limit on height of development of 14-15 storeys, which would be likely to affect circa 16.3 hectares of the Old Kent Road Opportunity Area - of which 7.5 hectares (including the Former Car Pound on Mandela Way) is identified for redevelopment. This would be likely to compromise the delivery of housing on affected these sites and thus compromise the regeneration of the Opportunity Area as a consequence.

In proposing to protect "Borough views", it is also unclear why the landmark viewing corridor from Nunhead Cemetery sets the defining point at St Paul's Cathedral at 52.1m AOD to protect views of both the dome and peristyle to St Paul's Cathedral, when the landmark viewing corridor for the (much closer) view from

The council seeks to secure views such the view from One Tree Hill which is an exemplary panorama from a high point in the South of the Borough. The view of St Paul's Cathedral from One Tree Hill offers an exemplary linear view from a historic vantage point from the south of the borough for which the council seeks to ensure its protection. Design and capacity studies have previously been carried out for the Old Kent Road Opportunity Area that indicate that while some sites will be limited by the height of the view's threshold plane, the quantum of development anticipated and required for the Opportunity Area can still be accommodated. As such the proposed borough view will not impact the ability to reach the target quantum of development. The changes proposed at this stage are considered to be minor.

P19 and Annex 4: Borough views

Camberwell Road (across the Elephant and Castle Opportunity Area) is set some 6m higher (at 58.1m AOD) to protect views of the dome, but not the peristyle. This differentiation is made all the more unclear by the description of the view from Camberwell Road at Annex 4 of the NSP PSV, which identifies “The Cathedral’s dome and peristyle are clearly visible above the existing middle ground townscape and create a distinctive silhouette with clear sky on both sides.”

Significant concern is expressed as to the specific viewpoint is somewhat arbitrary, with the potential for views of St Paul’s from several other locations within Nunhead Cemetery to be enhanced in a similar manner by managing the cutting of grass and pruning of trees, especially given the imposition of special protection for this view will significantly restrict the height of development that can be achieved within the Old Kent Road Opportunity Area.

Draft Policy P19 is considered to be unsound on the basis that there is not a robust and credible evidence base to for the protection of the proposed ‘linear view of St Pauls Cathedral from Nunhead Cemetery’ to be adequately ‘justified’. In its current form the protection of the view from Nunhead Cemetery to St Paul’s Cathedral will have significant impact on the ability to realise the vision for the Old Kent Road Opportunity Area to create a new Central London community with 10,000 new jobs and 20,000 new homes. As simply picking a slightly different viewpoint for protection could have significantly less impact on development potential of site across the borough, serious doubt is raised to whether draft Policy P19’s proposed protection of the ‘linear view of St Pauls Cathedral from Nunhead Cemetery’ in its current form represents the most appropriate strategy, when considered against reasonable alternatives.

Change sought – If an existing view of St Paul’s Cathedral from Nunhead Cemetery is to be sought under Policy P19, then alternative viewpoint locations must be considered, informed by a recognition that the existing viewpoint is arbitrary and artificially maintained, together with an understanding that slight change in location could have a significantly reduced impact on development potential on site across the borough, in particular within the Old Kent Road Opportunity Area.

P19 and Annex 4: Borough views

GLA
NSPPSV66.6

The area the draft NSP covers falls within the background of a number of Protected Vistas as illustrated in the image below which shows part of Southwark.

The Mayor wrote to every London local planning authority in March 2017 asking them to consult the Mayor where buildings were proposed that fell within the background of a Protected Vista even where the site was beyond the area currently designated as a wider consultation area in the Mayor's 2012 London Views Management Framework Supplementary Planning Guidance.

Local Plans, and any relevant AAPs, OAPFs and masterplans should be in line with London Plan Policy 7.12 C which states that:

'Development proposals in the background of a view should give context to the landmarks and not harm the composition of the view as a whole.'

Development proposals should carefully assess any impacts the development may have on Protected Vistas to ensure no harm would result to their composition.

The London Views Management Framework Supplementary Planning Guidance 2012 (LVMF SPG) provides detailed guidance on each of the management plans for assessing development in the background of a strategic view. In addition, paragraphs 63, 67, and 77-79 provide an overview of how development should be managed in the background of different types of strategic views and can be downloaded from this webpage: <https://london.gov.uk/what-we-do/planning/implementinglondon-plan/supplementary-planning-guidance/london-view-management>.

The background to these strategic views includes areas covered by the Old Kent Road Opportunity Area. The location identified as suitable for tall buildings in the Local Plan and area strategies must consider the location of the background area of the strategic views as well as the area covered by Southwark's local views. Policy and planning guidance in respect of appropriate building heights for locations must not adversely impact on local or strategic views in accordance with London Plan Policy 7.7-part A, D. b and E. Further information on the geography of the background areas can be found here: <https://data.london.gov.uk/dataset/london-views-management-framework-lvmf-extendedbackground-vistas>.

In the consultation document titled - New Southwark Plan - Annex 4. Borough Views, covers the location and management for the Borough's local views. The Mayor welcomes the clear identification of the Borough's local

Noted – We have revised the geometry of the views following the recommendations where appropriate.

P19 and Annex 4: Borough views

views and application of the LVMF principles in accordance with London Plan Policy 7.12-part J. Further refinement of the view coordinates could be undertaken to more closely apply the LVMF approach and my officers can provide advice in this regard if required. It is noted that Local views 1 and 2 have clear views of the main body of St Paul's Cathedral below the lower drum and the dome. The Borough should consider lowering the height of the threshold plane of the viewing corridor and consultation area for these views to help preserve these exceptional local views of one of London's most significant heritage assets in accordance with London Plan Policy 7.8-part F and G, which requires local polices to maintain and enhance and improve access to heritage assets and the contribution the asset make to London's cultural identity.

P19 and Annex 4: Borough views

Individual
NSPPSV101.2

P19 Borough Views
Page 46

Not positively prepared
P19 Borough views

This policy is not positively prepared because it does not include protection for the London panorama from the rooftops of the Peckham Multi Storey building and the Bussey Building in Peckham town centre.

This view is similar to that from One Tree Hill and Nunhead Cemetery, and both are protected in this policy.

The rooftops provide significant viewing spaces for the thousands of visitors who have been visiting in increasing numbers Peckham since 2008 for the leisure facilities in both of these buildings which are at the heart of the growing cultural economy in Peckham.

The NSP recognises the importance of the rooftop view from the Bussey Building in the Design and accessibility guidance for the Aylesham centre site NSP 75: "Development massing ... should minimise impact on the view to the City from the Bussey Building rooftop."

The view from the Peckham Multi Storey building also needs to be protected. At the time of the consultation on the Preferred Options the NSP allocated the Peckham Multi Storey site and building for redevelopment. Since then the Council has removed the site from redevelopment within the NSP. The view is integral to the economic importance of the Multi- Storey Building and has been featured in many media productions, resulting in an influx of thousands of visitors and new businesses to serve them. The view has been a focal point for regeneration in Peckham town centre.

The Peckham Multi Storey is a Council owned building and so is publically accessible. The Bussey Building is privately owned but the PNAAP4 designation is that the building is identified as heritage value and should continue to be used for creative and cultural enterprises. This means the rooftop is also publically accessible. Policy P14 2.11 provides a planning precedent for this kind of requirement when it requires private buildings to deliver publically accessible space at the top of buildings.

This view is of such importance to Peckham social infrastructure and local economy that it needs protection in this policy.

Proposed changes to make the NSP sound

This Peckham town centre rooftop view should be added as a protected view in P19.

Locations that do not guarantee long –term public access do not meet our requirements to be designated as a borough view.

P19 and Annex 4: Borough views

London School of Economics and Political Science (LSE)
NSPPSV113.3

Representations by London School of Economics and Political Science on
The draft New Southwark Plan: Regulation 19 Consultation

These representations have been prepared on behalf of The London School of Economics and Political Science (LSE) regarding the draft New Southwark Plan Proposed Submission Version (NSP) consultation. LSE broadly supports the Council in its objectives to deliver new homes and jobs in the Borough. However to assist the Council in these objectives we set out a series of amendments aimed at ensuring the NSP is both legal and sound in order to promote good growth throughout the Borough.

Where suggestions are put forward these are designed to help guide the Council on the deliverability of the policies as well as their compliance with the London Plan and other strategic guidance. The Draft London Plan (DLP) was issued by the Mayor of London on 1st December 2017 and is subject to consultation up to the start of March 2018. Many of the key policies within the NSP reflect the wording of the Draft London Plan (DLP) 2017 which will maintain consistency across the policy framework. We have included references where appropriate to the DLP as well as the current adopted London Plan. LSE will be making representations on the Draft London Plan.

The London School of Economics and Political Science (LSE)

LSE ranks second on the world for social sciences (QS World University Rankings 2016-2017) and is classed as world leading for research. The School has a distinct student population, relative to its competitors, with a high proportion of one year Masters students, and a particularly international student body. There were 11,885 students in 2016-2017; 5082 undergraduates and 5,990 graduates. Over 8000 students were from overseas with a majority from non EU countries. The total number of students is set to increase and LSE's investment plans in its campus and student residences reflect its ambition to maintain its place and ranking as a world class university located at the heart of London.

Data shows that LSE postgraduate student demand for accommodation significantly surpasses supply. The School wishes to move to a position where it can guarantee an offer of accommodation to all new first year students. Currently LSE's guarantee is for first year undergraduate students only, while applications for appropriate accommodation from students with disabilities continue to be prioritised. On current projections on student numbers, this amounts to a required capacity of between 6,000 - 7,000 bed spaces in the next eight

Where there is no possibility of enhancing the view, the policy may be applied flexibly alongside other policies in the development plan with weight afforded to policies by decision makers.

P19 and Annex 4: Borough views

years. Bed space numbers total 4,669 in 2017/18.

The overarching objective of LSE's Student Bed Space Strategy (SBSS) is to continue to attract the brightest students from around the world and enhance the student experience through the provision of a competitive residential offer. This is underpinned by several evidence-based principles including: wishing to make guaranteed offers for all first-year students; having a significant proportion of economy priced bed spaces to meet the demand for affordable accommodation; a location model that meets student demand for sustainable and accessible accommodation; and increasing the number of LSE owned and managed bed spaces.

The unique selling point of LSE residences is that they are within walking distance to the School which is firmly established, and will remain, in the heart of London. LSE therefore seeks growth in accommodation capacity in close proximity to the School campus. This location supports the business model of LSE's renowned Summer School and other student group lettings and also the commercial lettings outside of term time which allows for shorter student contracts and therefore a lower annual cost to students. LSE is keen to work in partnership with local authorities whose policies recognise the School's unique position and contribution.

Representations on behalf of the LSE

The principal area of concern for LSE is the impact the NSP will have on the opportunities to develop the LSE's property at Bankside House. Bankside House currently provides approximately 600 student beds in a converted office building behind Tate Modern. The LSE has a strategic plan to replace the current Bankside House with a substantially improved and larger facility which will cater for the strong demand for places at LSE. The importance of this site is the number of beds it provides and the close proximity to the main LSE campus at Aldwych which is a short walk away.

Please note where paragraph numbers are given, these have been counted down from the relevant section referenced.

Policy P19 – Borough Views (and Annex 4)

There is support for the objectives of the Policy however it is considered that the Council should reword the Policy to remove reference to 'positively enhance significant landmarks and townscape'. The borough has a diverse and complex townscape which these new views are being fitted into. The context of the views is often adjacent or within major regeneration areas such as the Elephant and Castle or Old Kent Road Opportunity

P19 and Annex 4: Borough views

Areas. The objectives of the frameworks for these areas are the delivery of new homes, new education facilities, new jobs etc. As such a balance has to be struck between the objectives of the policy related to regeneration and policy related to protecting views. Seeking to 'positively enhance views' suggests reducing or limiting development which will not have a significant effect on views, such as to the wider setting. Greater flexibility has to be applied to the policies to deliver this balance.

Miller Hare Limited
NSPPSV121.1

TEXT, ANALYSIS AND DIAGRAMS COULD NOT BE COPIED FROM .PDF FILE - PLEASE SEE ORIGINAL DOCUMENT. Recommendations included revising the proposed view geometry so it is consistent with the approach taken in the London View Management Framework and to better protect the view of the entire length of St Paul's Cathedral's balustrade above the screen walls to the Nave and Chancel.

Port of London Authority
NSPPSV143.5

5. Policy P19: Borough Views

The PLA support the reference to river prospect views in the policy, and the need to ensure development takes these into account, which aligns with London Plan policy regarding strategic views.

Noted – We have revised the geometry of the views following the recommendations where appropriate.

Support noted.

P19 and Annex 4: Borough views

Individual
NSPPSV151.13
P19

As for other policies, the word 'must' should be removed. The draft policy should reference and reflect the advice that is set out in the London View Management Framework prepared by the Mayor of London. Delete the word 'must'.

Royal Mail Pension Trustees Limited
NSPPSV155.6

Dear Sir/Madam,
New Southwark Plan - Proposed Submission Version (December 2017)
Representations on behalf of Royal Mail Pension Trustees Limited
We write on behalf of our client, Royal Mail Pension Trustees Limited, to submit representations to the New Southwark Plan - Proposed Submission Version – which are provided below.

Our client

Royal Mail Pension Trustees Limited are the freehold owners of the Bricklayers Arms Distribution Centre, Mandela Way which is proposed for allocation as part of 'Site OKR3: Mandela Way in the emerging Old Kent Road Area Action Plan ("AAP") for mixed use redevelopment to include employment (B use class), residential (C3 use class), primary school (D1 use class) development and a new park.

Representations

Policy P19: Borough views

Whilst the redevelopment of the Bricklayers Arms Distribution Centre is to be predominately guided by the emerging Old Kent Road Area Policy Action Plan, it is a significant concern that the redevelopment potential of the site is in part compromised by the proposed 'Borough View' from Nunhead Cemetery to St Pauls Cathedral under draft Policy P19.

The council has been reviewing the proposed geometry to further align with the LVMF methodology. The council considers that development must deliver on the policy points to ensure the protection of those exemplary views.

The view of St Paul's Cathedral from Nunhead Cemetery offers an exemplary linear view from a historic vantage point from the south of the borough for which the council seeks to ensure its protection. Design and capacity studies have previously been carried out for the Old Kent Road Opportunity Area that indicate that while some sites will be limited by the height of the view's threshold plane, the quantum of development anticipated and required for the Opportunity Area can still be accommodated. As

P19 and Annex 4: Borough views

The views of St Pauls from Nunhead Cemetery have little historical significance and the cemetery has very low numbers of visitors. The specific viewpoint identified (which has already been compromised by Guy's Cancer Centre following its completion in 2016) also has no spatial significance (as the location is not at the highest point of the cemetery and St Paul's is visible only through carefully trimmed foliage, from a bench along one of the Cemetery paths).

Objection has previously been raised in representations to the New Southwark Plan Preferred Option – New and Amended Policies that Southwark's Development Plan policies should not be applied to secure the protection of long-distance views to points of interest outside of the Borough boundaries, given the Mayor of London's London View Management Framework (LVMF) (2012) provides protection of important cross-boundary views within the city.

The potential impact of formally protecting this largely unseen view under draft Policy under draft Policy P19 of the NSP PSV, with an apparently arbitrary identified viewpoint on the delivery of redevelopment across Southwark, in particular within the Old Kent Road Opportunity Area, is huge.

Allowing the 'linear view of St Pauls Cathedral from Nunhead Cemetery' to protect views of the dome and peristyle to St Paul's Cathedral (as is proposed by the identification of the defining point to set the viewing plane threshold height of 52.1m AOD) would place a limit on height of development of 14-15 storeys, which would be likely to affect circa 16.3 hectares of the Old Kent Road Opportunity Area - of which 7.5 hectares (including the Bricklayers Arms Distribution Centre) is identified for redevelopment. This would be likely to compromise the delivery of housing on affected these sites and thus compromise the regeneration of the Opportunity Area as a consequence.

In proposing to protect "Borough views", it is also unclear why the landmark viewing corridor from Nunhead Cemetery sets the defining point at St Paul's Cathedral at 52.1m AOD to protect views of both the dome and peristyle to St Paul's Cathedral, when the landmark viewing corridor for the (much closer) view from Camberwell Road (across the Elephant and Castle Opportunity Area) is set some 6m higher (at 58.1m AOD) to protect views of the dome, but not the peristyle. This differentiation is made all the more unclear by the description of the view from Camberwell Road at Annex 4 of the NSP PSV, which identifies "The Cathedral's dome and peristyle are clearly visible above the existing middle ground townscape and create a distinctive silhouette with clear sky on both sides."

Significant concern is expressed as to the specific viewpoint is somewhat arbitrary, with the potential for views of St Paul's from several other locations within Nunhead Cemetery to be enhanced in a similar manner by managing the cutting of grass and pruning of trees, especially given the imposition of special protection for this

such the proposed borough view will not impact the ability to reach the target quantum of development. The changes proposed at this stage are considered to be minor.

P19 and Annex 4: Borough views

view will significantly restrict the height of development that can be achieved within the Old Kent Road Opportunity Area.

Draft Policy P19 is considered to be unsound on the basis that there is not a robust and credible evidence base to for the protection of the proposed 'linear view of St Pauls Cathedral from Nunhead Cemetery' to be adequately 'justified'. In its current form the protection of the view from Nunhead Cemetery to St Paul's Cathedral will have significant impact on the ability to realise the vision for the Old Kent Road Opportunity Area to create a new Central London community with 10,000 new jobs and 20,000 new homes. As simply picking a slightly different viewpoint for protection could have significantly less impact on development potential of site across the borough, serious doubt is raised to whether draft Policy P19's proposed protection of the 'linear view of St Pauls Cathedral from Nunhead Cemetery' in its current form represents the most appropriate strategy, when considered against reasonable alternatives.

Change sought – If an existing view of St Paul's Cathedral from Nunhead Cemetery is to be sought under Policy P19, then alternative viewpoint locations must be considered, informed by a recognition that the existing viewpoint is arbitrary and artificially maintained, together with an understanding that slight change in location could have a significantly reduced impact on development potential on site across the borough, in particular within the Old Kent Road Opportunity Area.

P19 and Annex 4: Borough views

Strathclyde Regional Pension Fund
NSPPSV174.6

Whilst the redevelopment of the Southernwood Retail Park is to be predominately guided by the emerging Old Kent Road Area Policy Action Plan, it is a significant concern that the redevelopment potential of the site is in part compromised by the proposed 'Borough View' from Nunhead Cemetery to St Pauls Cathedral under draft Policy P19.

The views of St Pauls from Nunhead Cemetery have little historical significance and the cemetery has very low numbers of visitors. The specific viewpoint identified (which has already been compromised by Guy's Cancer Centre following its completion in 2016) also has no spatial significance (as the location is not at the highest point of the cemetery and St Paul's is visible only through carefully trimmed foliage, from a bench along one of the Cemetery paths).

Objection has previously been raised in representations to the New Southwark Plan Preferred Option – New and Amended Policies that Southwark's Development Plan policies should not be applied to secure the protection of long-distance views to points of interest outside of the Borough boundaries, given the Mayor of London's London View Management Framework (LVMF) (2012) provides protection of important cross-boundary views within the city.

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In proposing to protect "Borough views", it is also unclear why the landmark viewing corridor from Nunhead Cemetery sets the defining point at St Paul's Cathedral at 52.1m AOD to protect views of both the dome and peristyle to St Paul's Cathedral, when the landmark viewing corridor for the (much closer) view from Camberwell Road (across the Elephant and Castle Opportunity Area) is set some 6m higher (at 58.1m AOD) to protect views of the dome, but not the peristyle. This differentiation is made all the more unclear by the description of the view from Camberwell Road at Annex 4 of the NSP PSV, which identifies "The Cathedral's dome and peristyle are clearly visible above the existing middle ground townscape and create a distinctive silhouette with clear sky on both sides."

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P19 and Annex 4: Borough views

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Change sought – If an existing view of St Paul's Cathedral from Nunhead Cemetery is to be sought under Policy P19, then alternative viewpoint locations must be considered, informed by a recognition that the existing viewpoint is arbitrary and artificially maintained, together with an understanding that slight change in location could have a significantly reduced impact on development potential on site across the borough, in particular within the Old Kent Road Opportunity Area

P19 and Annex 4: Borough views

Team London Bridge
NSPPSV179.7

20. We commend the positive approach to the importance of Southwark's historic environment and key views in the suite of Policies P16, 17, 18, 19, 20 and 21. We also support recognition of the importance of "placemarks" in the London Bridge Area Vision.

21. Team London Bridge is working with Shad Thames Area Management Partnership and Bermondsey Street Area Partnership to identify valued views and other placemarks that shape the character of our areas. This includes an online mapping survey in which people are identifying the Placemarks (<https://placemarks.commonplace.is/>) that matter to them. This review has shown that people value not only views but also important buildings, open spaces, trees, public art, street furniture, rights of way, signs, names and many other things that contribute to local character. A majority of these are not recognised in planning or heritage policy or legislation.

22. We believe the value of placemarks as recognised in the London Bridge Area Vision needs to be delivered through the inclusion of placemarks in the list of assets acknowledged in Policy P18, a strengthening of Policy P19 and preparation of a Supplementary Planning Document to provide clarity on the purpose and role of placemarks.

Recommendations

- Amend Policy P18 to include "placemarks" in the list of assets in section 1.1
- Amend Policy P19 to include views of "placemarks" alongside "significant landmarks and townscape" as being views that must be enhanced by development
- Support preparation of a Supplementary Planning Document on placemarks

Tiger Developments Ltd
NSPPSV191.3

Notwithstanding our comments above of the cross referral of Policy P19 within Site Allocation NSP75, the following change is strongly encouraged. The policy requires that all relevant development:

"must ... positively enhance the Borough views of significant landmarks and townscape".

For the policy to be effective, it is encouraged the use of the phrase "maintain or" should be included to Sub-section 1 before "positively enhance" to add an appropriate degree of flexibility. It will not always be possible for relevant developments that appear within these long distance views to positively enhance existing views,

Noted. However, placemarks do not meet our requirement to be designated as a borough view.

The suggested wording is not considered necessary as the policy can be applied flexibly where it is demonstrated there are no opportunities to enhance the views.

P19 and Annex 4: Borough views

and therefore the modification would allow for at least the preservation of these important aspects. The tests of long distance views that follow the Policy appear to provide for this flexibility (for example 2.1 – “maintain” and 2.2 “not compromise”

Individual
NSPPSV211.2

This policy is not positively prepared because it does not include protection for the London panorama from the rooftops of the Peckham Multi Storey building and the Bussey Building in Peckham town centre. This view is similar to that from One Tree Hill and Nunhead Cemetery, and both are protected in this policy. The rooftops provide significant viewing spaces for the thousands of visitors who have been visiting in increasing numbers Peckham since 2008 for the leisure facilities in both of these buildings which are at the heart of the growing cultural economy in Peckham. The NSP recognises the importance of the rooftop view from the Bussey Building in the Design and accessibility guidance for the Aylesham centre site NSP 75: “Development massing ... should minimise impact on the view to the City from the Bussey Building rooftop.” The view from the Peckham Multi Storey building also needs to be protected. At the time of the consultation on the Preferred Options the NSP allocated the Peckham Multi Storey site and building for redevelopment. Since then the Council has removed the site from the NSP and offered 15 year extensions to the leases for the operators in the building, taking its life until at least 2038 which is beyond the life of the NSP. The Peckham Multi Storey is a Council owned building and so is publically accessible. The Bussey Building is privately owned but the PNAAP4 designation is that the building is identified as heritage value and should continue to be used for creative and cultural enterprises. This means the rooftop is also publically accessible. Policy P14 2.11 provides a planning precedent for this kind of requirement when it requires private buildings to deliver publically accessible space at the top of buildings. This view is of such importance to Peckham social infrastructure and local economy that it needs protection in this policy. Proposed changes to make the NSP sound
This Peckham town centre rooftop view should be added as a protected view in P19.

Locations that do not guarantee long-term public access do not meet our requirements to be designated as a borough view.

P19 and Annex 4: Borough views

Individual
NSPPSV239.16

While P19 provides some clarity on the key views, there are other views that have failed to be incorporated especially views of Southwark Cathedral. Although the fact box describes the types of protected views, there is clearly more work to be done on this to ensure that the policy is sound. Often it is only when view is lost that people take regard to the significance of having robust policy in place. We would like to see more emphasis placed on producing a supplementary planning document of protected views similar to that produced by the City of London so that there is a clearer understanding of impact for developers.

We would particularly draw your attention to the following section 3 from the City's SPD - Qualitative View Protection – River Prospects

3.3 Other designated strategic views have precisely defined assessment points but are protected by qualitative assessment of the impact of a proposal on the important elements of the view. For the City, most of the relevant views are 'River Prospects' from Thames bridges and the riverside walk.

3.4 The management of River Prospects should ensure that the juxtaposition between elements, including the river frontage and landmarks, is appreciated within a wider London context. Development must ensure that key features of the view can continue to be enjoyed in the context of their surrounding environment, including distant buildings.

3.5 Development in the foreground and middle ground of the River Prospects should enhance the juxtaposition of townscape elements with the riverbanks and the depth and variety of the surrounding London townscape. Interventions into the built fabric should preserve or, where possible, enhance this relationship. Development in the foreground or middle ground that is overly intrusive, unsightly or prominent to the detriment of the view as a whole should be refused.

3.6 Some River Prospects include views of the Tower of London World Heritage Site. New development in the background of a River Prospect should, where relevant, preserve or enhance a viewer's ability to appreciate the Outstanding Universal Value of a World Heritage Site and should be consistent with the objectives of the World Heritage Site Management Plan.

Policy P19 seeks to identify important views in the borough and is in line with the methodology used in the Mayor's LVMF. Views of Listed Buildings such as Southwark Cathedral are not included, as their designations by default preclude development that would harm their setting.

Aylesbury Area Vision

There are no representations associated with the Aylesbury Area Vision as it is newly formulated.

NSP13: Old Jamaica Road Industrial Estate

Individual
NSPPSV40.19

The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.

Individual
NSPPSV91.16

We object to the failure to define requirements for industrial accommodation within mixed-development site allocations for the following Non-Designated industrial Sites. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the allocation policies for each be revised to include requirements for a defined minimum quantum of industrial accommodation.

NPPF para 14 requires Local Plans to meet objectively assessed needs.

London Plan para 6.2.1 emphasises that smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. Hence it is stated that to deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole, and that ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

London Plan para 6.2.4 requires that where there there is demand for workspace or viable

This site is no longer proposed as a site allocation, it is now proposed as a Strategic Protected Industrial Location (SPIL)

This site is no longer proposed as a site allocation, it is now proposed as a Strategic Protected Industrial Location (SPIL)

NSP13: Old Jamaica Road Industrial Estate

existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the intensification or reconfiguration of space. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to accommodate replacement workspace and existing businesses on-site through intensification or reconfiguration. What constitutes a reasonable proximity should be determined on the circumstances of each case having regard to the impact on business supply chains and access to labour supply. Relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.

London Plan Policy E2 regarding low-cost business space requires that the provision, and where appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand. Hence development proposals that involve the loss of existing B1 space in areas where there is an identified shortage of lower-cost space should demonstrate that there is no reasonable prospect of the site being used for business purposes, or ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.

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Individual
NSPPSV128.16

We object to the failure to define requirements for industrial accommodation within mixed-development site allocations for the following Non-Designated industrial Sites. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the allocation policies for each be revised to include requirements for a defined minimum quantum of industrial accommodation.

NPPF para 14 requires Local Plans to meet objectively assessed needs.

London Plan para 6.2.1 emphasises that smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. Hence it is stated that to deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole, and that ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

London Plan para 6.2.4 requires that where there is demand for workspace or viable existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the intensification or reconfiguration of space. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to accommodate replacement workspace and existing businesses on-site through intensification or reconfiguration. What constitutes a reasonable proximity should be determined on the circumstances of each case having regard to the impact on business supply chains and access to labour supply. Relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.

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This site is no longer proposed as a site allocation, it is now proposed as a Strategic Protected Industrial Location (SPIL)

NSP13: Old Jamaica Road Industrial Estate

demonstrate that there is no reasonable prospect of the site being used for business purposes, or ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.

Individual
NSPPSV133.1

1. Introduction

1.1. Walbrook Planning Consultants have been appointed to represent the occupants of the Old Jamaica Road Business Estate. This includes the main occupants:

- Grosvenor Contracts
- Netwise Hosting, and
- Selby Contract Flooring

1.2. The businesses received notice on 15 January 2018 that the Old Jamaica Road Business Estate was to be included as a site allocation within the Proposed Submission Version of the New Southwark Plan (Appendix 1). They had received no prior notice regarding these plans.

1.3. The site is included in the Proposed Submission New Southwark Plan as site allocation NSP13.

1.4. The Site Vision for NSP13 states that:

“Redevelopment of the site must:

- Provide business and industrial space (B Class) of at least the existing level of provision

Redevelopment of the site may:

- Provide new homes (C3)”

1.5. The current use of the site is as a successful business estate with full occupancy. The Old Jamaica Road Business Estate plays a vital role to the local and wider London economy. The businesses on the site employ a substantial number of people in a range of jobs.

Redevelopment would put jobs at risk and the future of the location critical businesses.

1.6. It is considered that the Council have not evidenced that the site allocation is deliverable or developable. The Old Jamaica Road Business Estate is already densely developed. The incorporation of residential development on the Business Estate would not be practical and

Concerns noted. The proposal to include Old Jamaica Road Industrial Estate as a site allocation was included in the Proposed Submission version of the NSP in response to previous concerns raised in relation to this site with regard to protecting the existing employment space. Consultation took place between December 2017 and February 2018 in relation to the inclusion of the site. The council also met with businesses on the site and responded to written communication. In the Amended Policies version of the NSP this site is no longer proposed as a site allocation, it is now proposed as a Strategic Protected Industrial Location (SPIL). The

NSP13: Old Jamaica Road Industrial Estate

would lead to clear conflict with existing business operations. The Council also appear to have failed to give appropriate consideration to the fact that the Jubilee Line runs directly underneath the Business Estate, which would likely severely restrict any redevelopment.

1.7. Policy P38 Business Relocation takes no account of the location critical nature of the businesses nor the fact that occupiers have made substantial fixed financial investments into their current locations. The Policy is also unrealistic to assume that businesses could be moved to alternative sites when there is an extreme lack of space in Southwark and surrounding Boroughs for this type of employment use.

1.8. The Southwark Industrial and Warehousing Land Study was completed by GVA for the Council in April 2014 (extract relating to the Old Jamaica Road Business Estate is included as Appendix 2 to these representations). The study is included as part of the New Southwark Plan supporting evidence. In relation to the Old Jamaica Road Business Estate the study is clear in its recommendation that the site be retained in its current use due to its local importance (paragraph 3.173).

1.9. It is considered that the production of the plan has not met the legal requirements and is also 'unsound' when considered against the tests of soundness.

1.10. Therefore, it is requested that the Council put forward an immediate main modification to remove the site from the New Southwark Plan. The site should be retained in its current use as recommended by the Council's own evidence.

2. Legality of the Plan

2.1. Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 states that in preparation of a local plan a local planning authority must:

- (a) Notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
- (b) Invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

The bodies or persons set out in paragraph (2) are:

- (a) Such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
- (b) Such of the general consultation bodies as the local planning authority consider appropriate; and
- (c) Such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

In preparing the local plan, the local planning authority must take into account any

requirements of Policy P25 (SPIL) would be applicable to the site.

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representations made to them in response to invitations made.

2.2. The businesses at Old Jamaica Business Estate clearly have an interest in the proposed Local Plan and should have been notified and asked for comment at Regulation 18 stage of the plan production.

2.3. The New Southwark Plan Area Visions and Site Allocations Preferred Option consultation (February 2017) identified the following sites in Bermondsey:

NSP08: Biscuit Factory and Campus

NSP09: Tower Workshops

NSP10: Land between West Lane, Jamaica Road and Marigold Street

NSP11: Chambers Wharf

NSP12: 21 and 25-29 Harper Road

2.4. There was no reference to the Old Jamaica Road Business Estate in the February 2017 Preferred Option document.

2.5. A further document titled New Southwark Plan: New and Amended Preferred Options Policies was published in June 2017. This document includes new and deleted site allocations following on from the February 2017 publication. Councillor Mark Williams states in his foreword:

“This document sets out new ‘preferred option’ policies alongside significant amended policies. These new and revised policies have been prepared in response to the previous consultation and to reflect changes in national and regional planning policy. This consultation ensures all our residents and visitors have an opportunity to consult on all our emerging policies before the formal ‘proposed submission’ stage of consultation towards the end of 2017”.

2.6. Again, there is no reference to the Old Jamaica Road Business Estate allocation in this document. There has been a failure to consult on the allocation of this site throughout the whole Regulation 18 process.

2.7. Moreover, the Council’s Statement of Community Involvement was adopted in January 2008 and states that 6-week consultation will be given on site allocations in line with legislation. This has not occurred for site NSP13 at Old Jamaica Business Estate, which has not been consulted on before.

2.8. Therefore, it is considered that the Council has not followed the appropriate legislation in regard to the inclusion of Old Jamaica Business Estate as a site allocation. The Council has also failed to accord with its own Statement of Community Involvement. No reason is given by the Council for the late inclusion of the site in the plan making process. The process has been fundamentally unfair on our clients, with the first opportunity to comment on the site

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allocation being at this the pre-submission stage – with the Council extremely keen to make clear that they are only interested in hearing comments relating to legality and soundness. It is clear that a total disregard has been given to these local businesses who employ people and pay rates and have as much an interest in this plan as anyone.

The Integrated Impact Assessment (IIA)

2.9. The law requires local authorities to undertake a Sustainability Appraisal when preparing new plans. The role of a sustainability appraisal is to promote sustainable development promoting the roles of social, economic and environmental dimensions to planning. Local authorities are also required to undertake a Strategic Environmental Assessment (SEA) to meet European Legislation to protect the environment. The council is also required to consider the impact of new plans on equalities and health of residents in the borough. The Council state that the Integrated Impact Assessment (IIA) of the New Southwark Plan (NSP) Site Allocations and Area Visions preferred option incorporates the sustainability appraisal, SEA and equalities and health impacts in one document.

2.10. The lack of detail in the IIA is of great concern given the large social, economic and environmental consequences of site allocations in the New Southwark Plan. Very little detail is given to the consequences of site allocations such as NSP13. Proposals which could lead to the loss of many jobs and impact substantially on people's lives should be scrutinised to the highest degree and that clearly has not been the case here.

3. Assessment against the 'Tests of Soundness'

3.1. Legislation regarding Local Plan production is set out in the Planning and Compulsory Purchase Act 2004. This sets out at section 20 (2) ... "the authority must not submit such a document unless – (a) they have complied with any relevant requirements contained in regulations under this Part, and (b) they think the document is ready for independent examination".

3.2. As set out in the preceding chapter we consider that the local planning authority has failed to comply with requirements contained in the regulations regarding consultation. In addition, it is considered that the inclusion of site NSP13 is an "unsound" decision when assessed against the tests set out in the National Planning Policy Framework (NPPF).

3.3. The NPPF sets out at paragraph 182 that a local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable

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to do so and consistent with achieving sustainable development;

- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Justified

3.4. A sound plan needs to be justified, that is – the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

3.5. The New Southwark Plan Evidence Base: Site Allocations Methodology Report (Ref EB41), sets out the methodology pertaining to site selection and development of Site Allocation policies in the Proposed Submission Version of the NSP.

3.6. With regards to the Old Jamaica Road Business Estate under Appendix 2: Site Allocation indicative development capacities the following is stated:

Site Ref: NSP13

Site Name: Old Jamaica Road Business Estate

Site Area m2: 10,550

Capacity Note: The indicative site capacity assumes the re-provision of existing uses Employment (B Class) m2: 6,877

3.7. No figure is given for residential floorspace capacity for the site and yet the site allocation sets out that redevelopment may provide new homes. The lack of detail regarding the site and the inconsistency in what may be acceptable both in the Site Allocations Methodology Report and in the New Southwark Plan appear to illustrate a lack of detailed knowledge of the site. This appears consistent with its inclusion at the last moment of the plan making process.

3.8. The current use of the site is as a successful business estate with full occupancy. The Old Jamaica Road Business Estate plays a vital role to the local and wider London economy. The businesses on the site employ a substantial number of people in a range of jobs (over 100 jobs). Redevelopment would put jobs at risk and the future of the location critical businesses.

3.9. We have carried out a survey of the three main businesses on the estate and this is included in Appendix 4. What comes through strongly from the survey is the vital role that the SME's present on the estate provide to the local economy. The businesses provide a substantial level of employment across a range of different job roles, with many roles being filled by

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local residents. Over 65 of these concerned employees have submitted separate representations objecting to the site allocation. It is clear from the responses to the survey that the Old Jamaica Road Business Estate location is critical to their success. This is reflected in the substantial fixed capital expenditure they have made.

3.10. The Southwark Industrial and Warehousing Land Study was completed by GVA for the Council in April 2014 (extract relating to the Old Jamaica Road Business Estate is included as

Appendix 2 to these representations). The study is included as part of the New Southwark Plan supporting evidence. In relation to the Old Jamaica Road Business Estate the study is clear in its recommendation that the site be retained in its current use due to its local importance (paragraph 3.173).

3.11. It is of great concern that the Council is seeking to allocate the site for mixed development which would go against the conclusions of its own evidence base.

Effective

3.12. The plan should be deliverable over its period and based on effective joint working on crossboundary strategic priorities.

3.13. The New Southwark Plan allocation of the Old Jamaica Road Business Estate and details in the supporting evidence for the plan illustrate how little information the Council appear to have on the Business Estate. In terms of deliverability a number of factors are of direct relevance.

3.14. It is considered that the Council have not evidenced that the site allocation is deliverable or developable. The Old Jamaica Road Business Estate is already densely developed. The incorporation of residential development on the Business Estate would not be practical and would lead to clear conflict with existing business operations (See Survey of Businesses on the Estate at Appendix 4). The Council also appear to have failed to give appropriate consideration to the fact that the Jubilee Line runs directly underneath the Business Estate, which would likely severely restrict any redevelopment. Some of the businesses also benefit from long leases (including one with a 20-year lease), which the Council may not be aware of.

3.15. Policy P38 Business Relocation takes no account of the location critical nature of the businesses nor the fact that occupiers have made substantial fixed financial investments into their current locations. This level of investment between the three main businesses totals in excess of £3million (more details are provided in Appendix 3). The Policy is also unrealistic to assume that businesses could be moved to alternative sites when there is an

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extreme lack of space in Southwark and surrounding Boroughs for this type of employment use.

Consistent with National Policy

3.16. The plan should enable the delivery of sustainable development in accordance with the policies in the Framework. It can be seen that the inclusion of the Old Jamaica Road Business Estate in the New Southwark Plan is inconsistent with national policy in a number of respects.

3.17. The NPPF sets out at paragraph 155 that “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential.” As set out earlier in this report there has been no meaningful engagement with the businesses present on Old Jamaica Business Estate.

3.18. The NPPF sets out at paragraph 7 that there are three dimensions to sustainable development: economic, social and environmental. Careful consideration of all three dimensions is required in order to plan effectively. With regards to the inclusion of site NSP13 as a site allocation it is considered that insufficient consideration has been given to the social and economic implications. These have not been considered in the required detail through the IIA.

4. Conclusions

4.1. It is considered that the production of the plan has not met the legal requirements and is also ‘unsound’ when considered against the tests of soundness.

4.2. Therefore, it is requested that the Council put forward an immediate main modification to remove the site from the New Southwark Plan. The site should be retained in its current use as recommended by the Council’s own evidence.

NSP13: Old Jamaica Road Industrial Estate

Safestore Plc (Safestore)
NSPPSV157.2

Dear Sir/Madam,

New Southwark Plan: Proposed Submission Version (December 2017)

Representations Submitted On Behalf of Safestore

We write on behalf of our client, Safestore Plc (Safestore), to submit representations to your consultation on the New Southwark Plan Proposed Submission Version December 2017 (NSP).

At a national level, the NPPF supports a presumption in favour of sustainable development, and it is noted that local plans are prepared positively and are instructed to not be onerous or place restrictive requirements that could stifle investment and regeneration opportunities. With this in mind, we have the following comments relating to the proposed policies within the NSP which are discussed in detail below. We look forward to engaging with you further in relation to the proposed NSP in the future.

Background

Safestore are the UK's largest provider of self-storage solutions and operate two employment sites within the London Borough of Southwark (LBS) :

- 737 Old Kent Road
- 24 Old Jamaica Road

This letter of representation focuses on the specific site allocations which include the Safestore self-storage facilities which are located at 737 Old Kent Road, and under the railway arches at 24 Old Jamaica Road.

Safestore operates over 100 stores across the UK, with 40 located within the M25. Safestore self-storage provides an essential service to local and national businesses plus residents. Many businesses rely on Safestore as a viable and cost effective place from which to operate and/or use for storage. Safestore suggest given the importance of the

Noted. The Old Jamaica Road site is no longer proposed as a site allocation, it is now proposed as a Strategic Protected Industrial Location (SPIL)

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product to the local business and residential population LBS should be seeking to retain or re-provide such uses in their existing locations. Our Client's priority is to retain the operation of their existing use at their sites, they are however willing to consider the possibility of mixed use development where appropriate, subject to their existing use being retained or re-provided.

On behalf of Safestore, we have engaged continually in the Old Kent Road AAP consultation process with LBS, and look forward to the opportunity to submit further representations in March to the revised Old Kent Road Area Action Plan Proposed New and Amended AAP Policies June 2017 (OKR AAP).

The representation letter below focuses specifically on the proposed NSP.
Proposed Site Allocation NSP68: Devon Street and Sylvan Grove

Safestore's self-storage facilities at 737 Old Kent Road are located within part of the proposed Old Kent Road Site Allocation NSP68: Devon Street and Sylvan Grove on pages 294 and 295 of the proposed NSP.

We note that the proposed site allocation states that:

"The site falls within the Old Kent Road Opportunity Area. Further details regarding development of this area will be provided through the Old Kent Road Area Action Plan. Development in the opportunity area will need to demonstrate that the site responds positively to the objectives of the AAP and provides the appropriate facilities for health care, education and leisure facilities as well as community, energy and transport infrastructure." In response to the proposed site allocation NSP68 which notes further details will be provided through the Old Kent Road Area Action Plan which is currently out for consultation, we will provide a detailed response to the proposals for the site and wider area through representations to the OKR AAP.

In relation to these NSP representations, we note that the 'design and accessibility guidance' section of the proposed site allocation NSP68 states that:

"Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape."

As we have previously discussed with LBS, our client is willing to consider exploring Southwark's vision for comprehensive mixed use redevelopment at the site including the potential for tall buildings. The store has been an essential service in the area for 30 years and has consistently performed well, underlining its importance to the local population, and

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therefore as part of any redevelopment proposals Safestore would seek to continue their existing operation.

Proposed Site Allocation NSP13: Old Jamaica Road Business Estate

Safestore's operational business at 24 Old Jamaica Road is located under the railway arches within part of the proposed Bermondsey Site Allocation NSP13: Old Jamaica Road Business Estate detailed on pages 134 and 135 of the proposed NSP.

The site vision sets out that:

“Redevelopment of the site must:

- Provide business and industrial space (B class) of at least the existing level of provision.

Redevelopment of the site may:

- Provide new homes (C3)”

The Bermondsey Area Vision notes Jamaica Road as an employment cluster, and our client supports Southwark's proposals within NSP13 to ensure that at least existing levels of business and industrial space (B class uses) are re-provided as part of any redevelopment proposals, incorporating existing businesses where possible.

Railway Arches

We note that proposed policy P27:Railway Arches states that:

“development within railway arches must provide commercial activities including business uses (B Use Classes), town centre uses (A1, A2, A3 and A4 Use Classes) and community facilities (D Use Classes and sui generis).”

Safestore support the ambition of this proposed policy to provide continued active and viable use of railway arches for commercial purposes, incorporating existing uses where possible.

Employment

We note that proposed policy SP4: Strong Local Economy seeks to ensure that Southwark retain the industrial premises London needs, and Safestore support the retention of the

NSP13: Old Jamaica Road Industrial Estate

existing B8 uses as part of the Old Jamaica Road Business Estate.

Proposed policy P25: Office and business development notes that:

“...where specified in site allocations development must:

1.1 Retain or increase the amount of employment floorspace (GIA) on-site (B class use or sui generis employment generating uses); and

1.2 Promote the successful integration of homes and employment space in physical layout and servicing in areas that will accommodate mixed use development. This will include a range of employment spaces including freight, logistics, light industry, co-working, maker spaces and offices...”

Safestore support Southwark’s ambition to retain or increase employment floorspace including B class uses to contribute to a strong local economy.

LBS seek the promotion of successful integration between homes and employment space, and to achieve this aim, we note that provisions need to be made to ensure existing employment uses retain the ability to function efficiently.

We note that the proposed NSP13 states that residential uses may be provided as part of redevelopment of the site. The successful integration of existing employment space with residential uses requires considered design and management to ensure that the existing employment functions can continue to operate efficiently and viably, and would not be comprised by the introduction of residential uses.

Examination in Public

On behalf of our client we request that we attend and speak at the oral section of the Examination in Public. We would be grateful if you can provide written acknowledgment of receipt of these representations, and if you could keep us updated on the anticipated date for the Examination in Public, and on the progress of the New Southwark Plan.

We look forward to future opportunities to engage with you

NSP13: Old Jamaica Road Industrial Estate

Thames Water Utilities Ltd
NSPPSV184.29

The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

Thames Water Utilities Ltd
NSPPSV184.30

Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the water infrastructure needs relating to the Local Plan.

Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet Southwark Council to discuss the wastewater infrastructure needs relating to the Local Plan.

No objections have been raised in regards to NSP14

The site is no longer proposed as a site allocation, it is now proposed as a Strategic Protected Industrial Location (SPIL).

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Occupiers of the Old Jamaica Road
Business Estate
NSPPSV206.1

Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 states

that in preparation of a local plan a local planning authority must:

(a) Notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
(b) Invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain. The bodies or persons set out in paragraph (2) are:

(a) Such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
(b) Such of the general consultation bodies as the local planning authority consider appropriate; and
(c) Such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations. In preparing the local plan, the local planning authority must take into account any representations made to them in response to invitations made. The businesses at Old Jamaica Business Estate clearly have an interest in the proposed local Plan and should have been notified and asked for comment at Regulation 18 stage of the plan production.

The New Southwark Plan Area Visions and Site Allocations Preferred Option consultation (February 2017) identified the following sites in Bermondsey:

- NSP08: Biscuit factory and campus
- NSP09: Tower Workshops
- NSP10: land between West lane, Jamaica Road and Marigold Street
- NSP11: Chambers Wharf
- NSP12: 21 and 25-29 Harper Road

There was no reference to the Old Jamaica Business Estate in the February 2017 Preferred Option document. A further document titled New Southwark Plan: New and Amended Preferred Options Policies was published in June 2017. This document includes new and deleted site allocations following

The proposal to include Old Jamaica Road Industrial Estate as a site allocation was included in the Proposed Submission version of the NSP in response to previous concerns raised in relation to this site with regard to protecting the existing employment space. Consultation took place between December 2017 and February 2018 in relation to the inclusion of the site. The council also met with businesses on the site and responded to written communication. In the Amended Policies version of the NSP this site is no longer proposed as a site allocation, it is now proposed as a Strategic Protected Industrial Location (SPIL). The requirements of Policy P25 (SPIL) would be applicable to the site.

NSP13: Old Jamaica Road Industrial Estate

on from the February 2017 publication. In your foreword you state: "This document sets out new 'preferred option' policies alongside significant amended policies. These new and revised policies have been prepared in response to the previous consultation and to reflect changes in national and regional planning policy. This consultation ensures all our residents and visitors have an opportunity to consult on all our emerging policies before the formal 'proposed submission' stage of consultation towards the end of 2017". Again, there is no reference to the Old Jamaica Business Estate allocation in this document. There has been a failure to consult on the allocation of this site throughout the whole Regulation 18 process. Moreover, the Council's Statement of Community Involvement was adopted in January 2008 and states that 6-week consultation will be given on site allocations in line with legislation. This has not occurred for site NSP13 at Old Jamaica Business Estate, which has not been consulted on before. Therefore, it is considered that the Council has not followed the appropriate legislation in regard to the inclusion of Old Jamaica Business Estate as a site allocation. The Council has also failed to accord with its own Statement of Community Involvement.

Southwark Industrial and Warehousing land Study

The above study was completed by GVA for the Council in April 2014. The study is included as part of the New Southwark Plan supporting evidence. In relation to the Old Jamaica Road Business Estate the study is clear in its recommendation that the site be retained in its current use due to its local importance (Para 3.173).

We consider that the inclusion of the Old Jamaica Business Estate in the New Southwark Plan as a site allocation is a decision which has failed to comply with legislation on local plan production and is also an 'unsound' decision based upon appropriate evidence. We therefore suggest that the site is removed as an allocation from the plan before it is submitted to the Government for examination.

NSP46: Skipton House

Elephant Amenity Network
NSPPSV57.21

The site visions and uses are unsound because they fail to meet evidenced need. To be sound they should be amended as follows:

- When referring to new homes, a significant proportion should be social rented housing.
- Where retail is provided, a proportion of these should be replacement units for traders relocated from site 47.
- Where open space is referred to, this should be described as green space unless there will be hard standing, in which this should be open and transparent
- All sites should include small business space.
- All sites should include community facilities.

In accordance with the Site Allocations methodology paper, we asked for meetings with the Council officers (at preferred options stage) to discuss how these changes to the site allocations could be achieved. We received no response from the Council, which is a further example of consultation failings under the legal requirements.

This site is no longer proposed as a site allocation. As the site is in two separate land ownerships an approved scheme is unlikely to be delivered. It is anticipated that development will come forward as separate parcels of land and will be subject to all development management policies.

Historic England
NSPPSV83.19

We welcome the identification of the site as being within the viewing corridor from the Bridge over the Serpentine towards the Palace of Westminster. However, the text should indicate how development proposals should respond to this constraint.

This site is no longer proposed as a site allocation. As the site is in two separate land ownerships an approved scheme is unlikely to be delivered. It is anticipated that development will come forward as separate parcels of land and will be subject to all development management policies.

NSP46: Skipton House

Thames Water Utilities Ltd
NSPPSV184.60

The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered.

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

This site is no longer proposed as a site allocation. As the site is in two separate land ownerships an approved scheme is unlikely to be delivered. It is anticipated that development will come forward as separate parcels of land and will be subject to all development management policies.

NSP57: Mandela Way

Individual
NSPPSV40.26

The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.

Elephant Amenity Network
NSPPSV57.27

The following sites have industrial accommodation as an existing use, but this is not included in the site allocation. For the Plan to be sound, these sites should include a defined minimum amount of industrial accommodation. Where these sites include Strategic Protected Industrial Land and Locally Significant Industrial Sites, this use should be retained.

Individual
NSPPSV91.6

Objection 10.

We object to the failure to define requirements for industrial accommodation within mixed-development on the following sites that are currently SPIL and LSIS. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the site allocation policies for each of these be revised to include requirements for a defined minimum quantum of industrial accommodation.

As part of developing the proposed local plan we have held numerous consultations to gain a better understanding and hear the voices of the local community, including Old Kent Road community forums and meetings with residents living adjacent to this site on Page's Walk.

The site allocation has been updated to include the site as Locally Significant Industrial Site (LSIS) and now includes specific reference to providing industrial uses.

The site allocation has been updated to include the site as Locally Significant Industrial Site (LSIS) and now includes specific reference to providing industrial uses.

NSP57: Mandela Way

Individual
NSPPSV128.6

Objection 10.

We object to the failure to define requirements for industrial accommodation within mixed-development on the following sites that are currently SPIL and LSIS. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the site allocation policies for each of these be revised to include requirements for a defined minimum quantum of industrial accommodation.

TfL City Planning
NSPPSV181.25

Specific mention should be made of the need to protect the existing bus garage/parking, in line with other sites that have a similar use i.e. wording from the Blackpool Road Business Park 'Retain or re-provide bus garage (sui generis), subject to need'.

The possibility that this is a potential site for a Bakerloo line extension station (laundry site) should be acknowledged, as this was identified in last year's public consultation. (see also general comments on site allocations, above)

The site allocation has been updated to include the site as Locally Significant Industrial Site (LSIS) and now includes specific reference to providing industrial uses.

The site allocation in the Old Kent Road AAP and NSP plans for provision of larger scale industrial sheds and depots which could be accommodated as part of mixed use developments. TFL has now published preferred locations for the Bakerloo Line stations.

NSP57: Mandela Way

Thames Water Utilities Ltd
NSPPSV184.71

The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered.

The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water at an early stage to review infrastructure requirements taking account of the scale of development and timing of delivery.

During the planning permission process developers will be encouraged to liaise with Thames Water to meet the needs of the developer; the Council will also seek advice from Thames Water on matters which may affect delivery. Consultation of Thames Water is integral to major planning applications.

NSP57: Mandela Way

John Lyon's Charity
NSPPSV214.7

The following sets out the constructive suggestions as to specific modifications that could be made to the wording of the site allocation.

Required Uses: -

- Provide New Homes (C3);
- Replace existing employment floorspace (B use Class) and provide a range of employment spaces
- Provide Community Uses (D Use Class);
- Provide Strategic public open space;
- Create a new link from Hendre Way to Quietway 1 on Willow Walk
- Provide onsite servicing and management of vehicle movements across the site

Other alternative Uses: -

- Provide retail (A1, A2,A3,A4)

The Charity would be keen to continue to engage Council officers on these matters in advance of the submission of the Plan and examination. Please do not hesitate to contact me if you require further information.

The re provision of employment floorspace requirements and servicing arrangements is set out in development management policies in both the NSP and the Old Kent Road AAP in more detail.

NSP65: Land bounded by Glengall Road, Latona Road and Old Kent Road

Berkeley Homes (South East London)
NSPPSV21.14

Noted.

We strongly support the designation of land bounded by Glengall Road, Latona Road and Old Kent Road as a site allocation (NSP65) with the aim of delivering thousands of new homes, thousands of new jobs and a range of new community, retail and leisure uses.

Site Allocation NSP65 in the NSP is broadly identical to Site Allocation OKR10 in the DOKR AAP. This site allocation has been the subject of extensive consultation for a number of years by the Council in the preparation of its evidence base for both the NSP and DOKR AAP. Berkeley has been a major stakeholder in this process given its landholdings at Malt Street, at the heart of NSP65 (and OKR10).

This dialogue with the Council and coordination with other major stakeholders in the area led to the development of the application scheme for Malt Street. A key component of the application scheme has been the creation of places and spaces and the need to ensure the scheme did not just work successfully for the site but demonstrate the scheme is part of a cohesive wider masterplan for NSP65.

NSP65: Land bounded by Glengall Road, Latona Road and Old Kent Road

Individual
NSPPSV31.7

Internal inconsistency and inconsistent with New London Plan Policy HC1 Heritage conservation and growth

Design guidance should include reference to:

existing estates (e.g. Friary Estate) regarding respecting local character and building heights, massing etc. See P11, 1.1 to 1.3

Views from Trafalgar Avenue conservation area and from Asylum Road conservation area

Missing from the list of historical structures to be conserved are: a Victorian chimney and a Grand Surrey Canal loading shed which represent some of the few examples left of the industrial heritage of the area. See London Plan Policy HC1.

Individual
NSPPSV40.34

The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.

More detailed design considerations for this site are outlined in the Old Kent Road AAP, including features that include retained buildings and industrial land including the chimney.

As part of developing the proposed local plan we have held numerous consultations to gain a better understanding and hear the voices of the local community, including Old Kent Road community forums and meetings with residents living adjacent to this site e.g. Glengall Road and the Unwin and Friary Estate residents TRA.

NSP65: Land bounded by Glengall Road, Latona Road and Old Kent Road

GLA
NSPPSV66.23

The extent of SIL release in this site is not supported. The Mayor feels strongly that the area between the retained SIL and Ossory Road should remain as SIL. This would provide a more substantial industrial area with the potential for intensification that would not be easily achieved on the site proposed for retention.

Individual
NSPPSV91.13

Objection 10.

We object to the failure to define requirements for industrial accommodation within mixed-development on the following sites that are currently SPIL and LSIS. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the site allocation policies for each of these be revised to include requirements for a defined minimum quantum of industrial accommodation.

Part of this site between the SPIL and Ossory Road is now included as LSIS as agreed with the GLA.

The site allocation has been updated to include part of the site as Locally Significant Industrial Site (LSIS) and now includes specific reference to providing industrial uses.

NSP65: Land bounded by Glengall Road, Latona Road and Old Kent Road

Individual
NSPPSV92.4

The NSP Annexe states that the number of storeys and locations of tall buildings will be monitored and ‘a selection will be reviewed’ to make sure that they ‘avoid unacceptable harm to heritage assets and their settings’ but they have not demonstrated how this will be overseen and what positive action the Council will take to make sure heritage assets are protected.

Adjacent sites to Canal Grove are NSP 65, 66 and 68 all of which can consider the inclusion of tall buildings subject to consideration of impacts on existing character, heritage and townscape. There is no evidence of how the cumulative impact of such developments on Canal Grove will be monitored.

To make this policy sound, an additional point should be added at P16:

3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The cumulative impact of adjoining developments (massing, density and height) on listed buildings must be taken into account when individual planning applications are considered.

The consideration of tall buildings on this site has been included in the preparation of the Old Kent Road AAP and detailed design criteria contained in the plan. Policies and design criteria in both the NSP (heritage, conservation and listed buildings policies) and the AAP (heritage and sub area site allocation policies) ensure that these are carefully considered in planning decision making.

NSP65: Land bounded by Glengall Road, Latona Road and Old Kent Road

National Grid
NSPPSV123.1

Southwark Council: New Southwark Plan Proposed Submission Version
SUBMISSION ON BEHALF OF NATIONAL GRID

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operates the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

Specific Comments - Proposed sites crossed or in close proximity to National Grid infrastructure:

Electricity Transmission

- Land bounded by Glengall Road, Latona Road and Old Kent Road (NSP65) (our reference ET174)
- Sandgate Street and Verney Road (NSP67) (our reference ET174)
- Hatcham Road and Penarth Street (NSP69) (our reference ET174)
- Ilderton Road (NSP70) (our reference ET174)

Please see enclosed plan referenced ET174 at Appendix 1. The proposed Residential and Employment sites are crossed by a National Grid underground cables.

National Grid prefers that buildings are not built directly above underground cables. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy

access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as

part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to underground cables.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive

During the planning permission process developers will be encouraged to liaise with National Grid to meet the needs of the developer. The Council will also seek advice from National Grid on matters which may affect delivery. Consultation of National Grid is integral to major planning applications.

NSP65: Land bounded by Glengall Road, Latona Road and Old Kent Road

contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines

and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high

voltage overhead lines.

Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government.

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

'A Sense of Place' is available from National Grid and can be viewed at:

<http://www.nationalgrid.com/uk/Senseofplace/Download/>

Further information regarding development near overhead lines and substations is available here:

http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm

General information:

Electricity Transmission

National Grid has five high voltage underground cables (listed below) within Southwark LBC's administrative area. These form an essential part of the electricity transmission network in England and Wales.

Line Ref. Description

Underground

cable

265886

Underground

cable

265670

Underground

cable

270540

Underground

NSP65: Land bounded by Glengall Road, Latona Road and Old Kent Road

cable
262792

Underground
cable
270530

National Grid has provided information in relation to electricity transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

The following substation is also located within the administrative area of Southwark LBC's NewX2B substation – 275kV

National Grid has provided information in relation to gas transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

National Grid requests that any High Pressure Major Accident Hazard Pipelines (MAHP) are taken into account when site options are developed in more detail. These pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to retain our existing transmission pipelines in situ.

National Grid may have a Deed of Easement for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the easement. In the first instance please consider checking with the Land Registry for the development area. If further information is required in relation to an easement please contact Spencer Jefferies, Development Liaison Officer, box.landandacquisitions@nationalgrid.com

If you require any further information in relation to the above please contact National Grid's Plant Protection team

via plantprotection@cadentgas.com

Electricity Distribution

UK Power Networks owns and operates the local electricity distribution network in Southwark LBC.

Contact details can be found at www.energynetworks.org.uk.

Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides maps of the sites referenced above in relation to the affected National Grid Transmission assets outlined above.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please

NSP65: Land bounded by Glengall Road, Latona Road and Old Kent Road

do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:

- National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy;
- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and
- A sense of place - design guidelines for development near high voltage overhead lines.
- T/SP/SSW22 – Specification for safe working in the vicinity of National Grid high pressure gas pipelines and associated installations – requirements for third parties.
<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968>
- IGE/SR/18 – Safe working practices to ensure the integrity of gas pipelines and associated installations.
- HS(G)47 – Avoiding Danger from Underground Services.

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours faithfully

NSP65: Land bounded by Glengall Road, Latona Road and Old Kent Road

Individual
NSPPSV128.13

Objection 10.

We object to the failure to define requirements for industrial accommodation within mixed-development on the following sites that are currently SPIL and LSIS. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the site allocation policies for each of these be revised to include requirements for a defined minimum quantum of industrial accommodation.

Peckham Society
NSPPSV140.13

NSP 65

PS believes existing level of retail should be retained
REASONS To enable policy P26 to be met

TfL City Planning
NSPPSV181.27

A statement on the approach to future car parking provision could be made here, given the high level of current surface car parking and the possibility of a future BLE station in the vicinity.
No pedestrian/cycle routes are shown on the 'site vision' plan e.g. the 'Surrey Canal route' which is proposed to cross the site – is this conscious decision ?

The site allocation has been updated to include part of the site as Locally Significant Industrial Site (LSIS) and now includes specific reference to providing industrial uses.

Policy AAP7 requires development on the Old Kent Road to retain or increase the amount of retail uses (A1). It is also a requirement in the site allocation to provide retail on this site. TFL have announced the preferred options for the Bakerloo Line stations. The Surrey Canal route has now been indicatively shown on the map. Further details on the park is contained in the Old Kent Road AAP.

NSP65: Land bounded by Glengall Road, Latona Road and Old Kent Road

Thames Water Utilities Ltd
NSPPSV184.9

Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the water infrastructure needs relating to the Local Plan.

Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet Southwark Council to discuss the wastewater infrastructure needs relating to the Local Plan.

Twenty Twenty Glengall Limited and 180 Ilderton Road Limited
NSPPSV196.2

We fully support the proposed revisions to the boundaries of Strategic Protected Industrial Land (SIL) as illustrated on the draft Proposals Map. We consider this to be a proactive and positive decision by the Council to assist in meeting its development needs, and one that is in full conformity with the draft New London Plan's approach to "intensification, co-location and substitution" through a Local Plan process as identified in draft Policies E5, E6 and E7.

During the planning permission process developers will be encouraged to liaise with Thames Water to meet the needs of the developer. The Council will also seek advice from Thames Water on matters which may affect delivery. Consultation of Thames Water is integral to major planning applications.

Noted.

NSP65: Land bounded by Glengall Road, Latona Road and Old Kent Road

Individual
NSPPSV287.4

Noted.

Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant
No

Do you consider that the New Southwark Plan is sound? - Soundness
No

Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not:
Justified

Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not:
Effective

NSP69 and 70: Hatcham and Ilderton Road

Aitch Group
NSPPSV01.1

These representations are made on behalf of Aitch Group, who currently have a number of land interests within the area covered by the Old Kent Road Area Action Plan (AAP) including at 62 Hatcham Road and 140 Ilderton Road. These comments should be read in conjunction with previous representations submitted on earlier versions of the New Southwark Plan. They should also be read in conjunction with representations made on the latest version of the AAP.

My client has no further comments to make on most the content of the NSP PSV. Their only comments are in relation to the boundary for Strategic Industrial Land, which has changed since the previous version of the plan, specifically relating to site designation NSP 69: Hatcham Road and Penarth Street.

We note that the boundary for the Strategic Industrial Land (SIL) shown on Annex 9 of the NSP PSV has changed to include the Penarth Centre, which is directly west to the land owned by my client.

My client is alarmed that changes are still being made to the SIL boundary, particularly after investing significantly within the area and have submitted an application for the development of their land. It had been assumed that such fundamental issues had been settled in earlier iterations of the NSP and the AAP.

It is understood that the Penarth Centre has been included within the SIL because of its fragmented ownership and that there is very little prospect of it coming forward for redevelopment. Whilst this is understood and is a reasonable amendment, my client is concerned about potential further changes that could affect the land that they own or other nearby sites. They would resist such changes should they be proposed and would reserve the right to make further representations if this becomes a reality.

My client endorses the current allocation for NSP 69 and request that no further changes are made to it or the SIL boundary.

Amendments to the plan including SPIL boundaries are an iterative process and in response to consultation received on draft documents. The amendment in this round of consultation includes a proposal for part of the site to be included as LSIS and relevant updates to the policy wording are also included.

NSP69 and 70: Hatcham and Ilderton Road

Capital Industrial
NSPPSV30.9

With regard to the Proposals Map, we consider that properties on the western side of Ormside Street (including our client's site Unit 137) should be de-designated from the SIL for inclusion within NSP69 allocation, as it directly adjoins the regeneration area which will include residential use. The row of premises between the existing recycling centre (which is not identified as a development opportunity area) and NSP69 offers a development opportunity which would contribute significantly to economic growth and the regeneration objective of the OKROA. However, if they are excluded from the development allocation as part of the regeneration of the wider area, there is a significant risk that the row of the premises may not come forward for redevelopment/ regeneration due to the lack of coordinated delivery of the wider regeneration and infrastructure requirements. Therefore, for the effectiveness of the Plan, we consider that the properties on the western side of Ormside Street should be de-designated from the SIL and included in NSP69.

Individual
NSPPSV40.38

The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.

Recommendations noted, however it is considered appropriate that the properties to the west of Ormside Street remain as SPIL due to the relationship and proximity to the IWMF and electricity substation. Proposals for intensification of SPIL is a possible development opportunity.

As part of developing the proposed local plan we have held numerous consultations to gain a better understanding and hear the voices of the local community, including Old Kent Road community forums and meetings with residents and businesses in this area.

NSP69 and 70: Hatcham and Ilderton Road

GLA
NSPPSV66.24

The Mayor provided detailed comments on this site in response to the consultation on the OKR AAP in our letter of 13 September 2017. We continue to object to the loss of this SIL site and believe that its industrial uses should be retained. We do not envisage mixed use or co-location working successfully in this area. The site has potential for intensification which would help towards ensuring Southwark retains industrial capacity and can reprovide industrial floorspace. Hatcham Road is home to several SME and creative businesses and it should continue to support these types business. There is also scope for providing low-cost and affordable workspace, particularly for the creative industries and to provide space for B1c, B2, B8 businesses relocating from other areas within the OKR.

Individual
NSPPSV91.10
Objection 10.

We object to the failure to define requirements for industrial accommodation within mixed-development on the following sites that are currently SPIL and LSIS. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the site allocation policies for each of these be revised to include requirements for a defined minimum quantum of industrial accommodation.

The site allocation has been amended to ensure that development provides industrial uses considering the existing industrial use of the sites. Part of the site has a proposed designation of Locally Significant Industrial Land following consultation and agreement with the GLA.

The site allocation has been amended to include part of the site as Locally Significant Industrial Site (LSIS) and now includes specific reference to providing industrial uses.

NSP69 and 70: Hatcham and Ilderton Road

National Grid
NSPPSV123.3

Southwark Council: New Southwark Plan Proposed Submission Version
SUBMISSION ON BEHALF OF NATIONAL GRID

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To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

Specific Comments - Proposed sites crossed or in close proximity to National Grid infrastructure:

Electricity Transmission

- Land bounded by Glengall Road, Latona Road and Old Kent Road (NSP65) (our reference ET174)
- Sandgate Street and Verney Road (NSP67) (our reference ET174)
- Hatcham Road and Penarth Street (NSP69) (our reference ET174)

During the planning permission process developers will be encouraged to liaise with National Grid to meet the needs of the developer. The Council will also seek advice from National Grid on matters which may affect delivery. Consultation of National Grid is integral to major planning applications.

NSP69 and 70: Hatcham and Ilderton Road

- Ilderton Road (NSP70) (our reference ET174)

Please see enclosed plan referenced ET174 at Appendix 1. The proposed Residential and Employment sites

are crossed by a National Grid underground cables.

National Grid prefers that buildings are not built directly above underground cables. This is for two reasons, the

amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy

access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as

part of the national transmission system. Such access can be difficult to obtain without inconveniencing and

disturbing occupiers and residents, particularly where properties are in close proximity to underground cables.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage

overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive

contribution to the development of the site and can for example be used for nature conservation, open space,

landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has

produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines

and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high

voltage overhead lines.

Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead

lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of

national importance which has been identified as such by central government.

The statutory safety clearances between overhead lines, the ground, and built structures must not be

infringed. To comply with statutory safety clearances the live electricity conductors of National

NSP69 and 70: Hatcham and Ilderton Road

Grid's

overhead power lines are designed to be a minimum height above ground. Where changes are proposed

to ground levels beneath an existing line then it is important that changes in ground levels do not result

in safety clearances being infringed. National Grid can, on request, provide to developers detailed line

profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

'A Sense of Place' is available from National Grid and can be viewed at:

<http://www.nationalgrid.com/uk/Senseofplace/Download/>

Further information regarding development near overhead lines and substations is available here:

http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm

General information:

Electricity Transmission

National Grid has five high voltage underground cables (listed below) within Southwark LBC's administrative

area. These form an essential part of the electricity transmission network in England and Wales.

Line Ref. Description

Underground

cable

265886

Underground

cable

265670

Underground

cable

270540

Underground

cable

262792

Underground

cable

270530

NSP69 and 70: Hatcham and Ilderton Road

National Grid has provided information in relation to electricity transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

The following substation is also located within the administrative area of Southwark LBC's NewX2B substation – 275kV

National Grid has provided information in relation to gas transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

National Grid requests that any High Pressure Major Accident Hazard Pipelines (MAHP) are taken into

account when site options are developed in more detail. These pipelines form an essential part of the national

gas transmission system and National Grid's approach is always to seek to retain our existing transmission

pipelines in situ.

National Grid may have a Deed of Easement for each asset which prevents the erection of permanent/

temporary buildings, or structures, changes to existing ground levels, storage of materials etc.

Additionally

written permission will be required before any works commence within the National Grid easement strip, and a

deed of consent is required for any crossing of the easement. In the first instance please consider checking with

the Land Registry for the development area. If further information is required in relation to an easement please

contact Spencer Jefferies, Development Liaison Officer,

box.landandacquisitions@nationalgrid.com

If you require any further information in relation to the above please contact National Grid's

Plant Protection team

via plantprotection@cadentgas.com

Electricity Distribution

UK Power Networks owns and operates the local electricity distribution network in Southwark LBC.

Contact details can be found at www.energynetworks.org.uk.

NSP69 and 70: Hatcham and Ilderton Road

Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides maps of the sites referenced above in relation to the affected National Grid

Transmission assets outlined above.

Further Advice

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

If we can be

of any assistance to you in providing informal comments in confidence during your policy development, please

do not hesitate to contact us. In addition the following publications are available from the National Grid

website or by contacting us at the address overleaf:

- National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy;
- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and

Associated Installations - Requirements for Third Parties; and

- A sense of place - design guidelines for development near high voltage overhead lines.
- T/SP/SSW22 – Specification for safe working in the vicinity of National Grid high pressure gas pipelines and associated installations – requirements for third parties.

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968>

- IGE/SR/18 – Safe working practices to ensure the integrity of gas pipelines and associated installations.
- HS(G)47 – Avoiding Danger from Underground Services.

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific

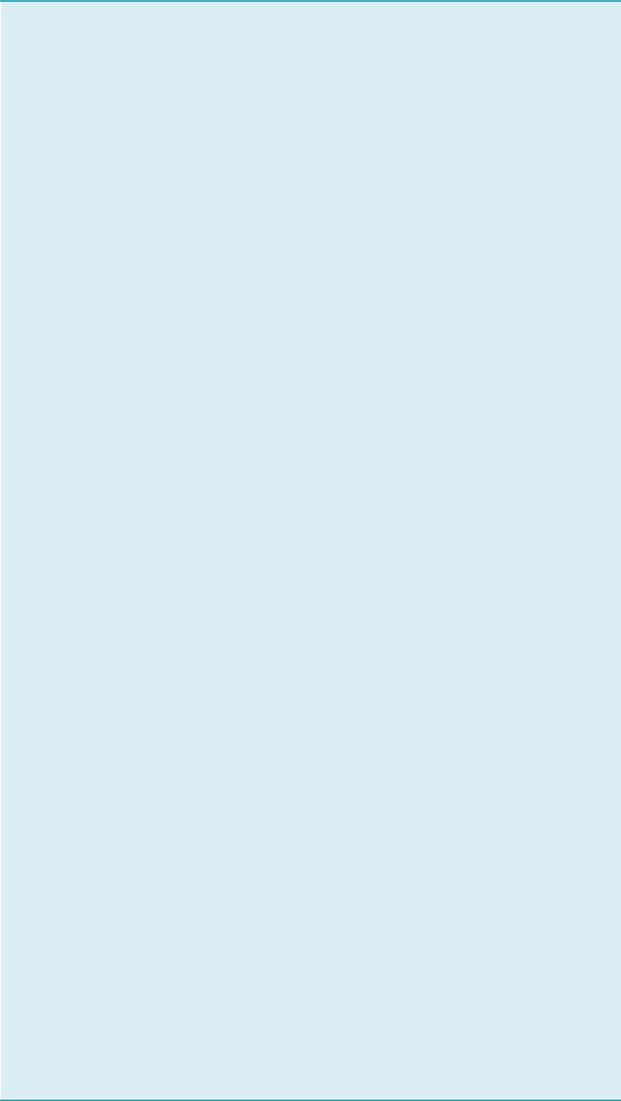
proposals that could affect our infrastructure. We would be grateful if you could add our details shown below

to your consultation database:

I hope the above information is useful. If you require any further information please do not hesitate to contact

NSP69 and 70: Hatcham and Ilderton Road

me.
Yours faithfully



NSP69 and 70: Hatcham and Ilderton Road

Individual
NSPPSV128.10

Objection 10.

We object to the failure to define requirements for industrial accommodation within mixed-development on the following sites that are currently SPIL and LSIS. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the site allocation policies for each of these be revised to include requirements for a defined minimum quantum of industrial accommodation.

Thames Water Utilities Ltd
NSPPSV184.11

Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the water infrastructure needs relating to the Local Plan.

Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet Southwark Council to discuss the wastewater infrastructure needs relating to the Local Plan.

The site allocation has been amended to include part of the site as Locally Significant Industrial Site (LSIS) and now includes specific reference to providing industrial uses.

During the planning permission process developers will be encouraged to liaise with Thames Water to meet the needs of the developer. The Council will also seek advice from Thames Water on matters which may affect delivery. Consultation of Thames Water is integral to major planning applications.

NSP69 and 70: Hatcham and Ilderton Road

Twenty Twenty Glengall Limited and 180 Ilderton Road Limited
NSPPSV196.3

Allocations NSP65 and NSP69, which include the Sites, are also supported. However, it should be emphasised that allocations both cover extensive areas and contain a number of potential development sites, each with their own site-specific considerations. We therefore feel that it is necessary for the requirements of NSP65 and NSP69 to be applied flexibly to account for such circumstances.

Elephant Amenity Network
NSPPSV57.32

The following sites have industrial accommodation as an existing use, but this is not included in the site allocation. For the Plan to be sound, these sites should include a defined minimum amount of industrial accommodation. Where these sites include Strategic Protected Industrial Land and Locally Significant Industrial Sites, this use should be retained.

GLA
NSPPSV66.25

This site, or the majority of it should be retained as SIL. Much of this site is unsuitable for housing and should retain its industrial businesses. Some areas in the wider, middle section of the site could support mixed-use development however as the site sits between a railway line and road, it is unlikely to provide the sort of quality and amenity expected of any new housing element as set out in the draft London Plan Policy D4 Housing quality and standard

Noted

The site allocation has been amended to include part of the site as Locally Significant Industrial Site (LSIS) and now includes specific reference to providing industrial uses.

The site allocation has been amended to ensure that development provides industrial uses considering the existing industrial use of the sites. Part of the site has a proposed designation of Locally Significant Industrial Land following consultation and agreement with the GLA. Relevant policies which relates to amenity and quality of new housing will be applied upon assessment

NSP69 and 70: Hatcham and Ilderton Road

313-349 Ilderton Road LLP
NSPPSV217.12

The Old Kent Road site allocation 'NSP70 Ilderton Road' sets out that redevelopment of the site must: provide new homes (Use Class C3); and provide employment uses (Use Class B). The site falls within the Old Kent Road Opportunity Area. Further details regarding development of this area will be provided through the Old Kent Road Area Action Plan. Development in the opportunity area will need to demonstrate that the site responds positively to the objectives of the AAP and provides the appropriate facilities for health care, education and leisure facilities as well as community, energy and transport infrastructure. Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.

We support the Old Kent Road site allocation 'NSP70 Ilderton Road' to deliver comprehensive new mixed-use developments comprising both homes (Use Class C3) and new employment floorspace (Use Class B) in accordance with the definition in the National Planning Policy Framework (Paragraph 14).

The submitted application has been developed through extensive pre-application negotiations with senior Planning Officers at the Council and as a result is in compliance with the draft Old Kent Road Area Action Plan published for consultation on 13 December 2017. The development will make a significant contribution to the delivery of much needed homes in the Borough and provide a significant uplift in employment floorspace, as well as a considerable intensification of the employment use of the site. The scale of the development proposed reflects both the context of the relatively small site, the emerging character of the Opportunity Area, and is also cognisant of the established and significant need for new housing in London.

Noted

NSP80:St Olav's Business Park, Lower Road

Hazelville
NSPPSV78.1

Noted.

We thank you for your recent letter of 15th January 2018 and for including us within this second stage consultation.

Hazelville is a long leaseholder on three separate units within City Business Centre which is part of the site identified by Southwark for future development.

Last year you wrote to us inviting our comments on the inclusion of the site in which our unit is located as a possible site for future development and we responded to the initial consultation.

We made representations on the first consultation and in particular we commented on the initial proposal of an arbitrary inflexible requirement for 50% of any new space built on the site to be for commercial purposes. We are pleased to note that the Council have now dropped this and the new requirement is that at least the same amount of commercial space must be included in any new development. We also note that your latest draft includes for the provision of high quality public realm space linking to protected open spaces to the south and this is something that we also welcome. Finally your site vision also includes for the provision of new homes (C3) again this is supported, especially as the previous fixed number of new homes of 73 has been removed, thereby increasing the chances of this site coming forward for development for the benefit of the community.

To summarise we fully support the proposed submission version of the new Southwark plan.

NSP80:St Olav's Business Park, Lower Road

Individual
NSPPSV135.1

I am a long leaseholder on 3 units within City Business Centre which is part of the site identified by Southwark for future development.

Last year you wrote to me inviting my comments on the inclusion of the site in which my unit is located as a possible site for future development and I responded to the initial consultation.

I made representations on the first consultation and in particular I commented on the intimal proposal of an arbitrary inflexible requirement for 50% of any new space built on the site to be for commercial purposes. I am pleased to note that the Council have now dropped this and the new requirement is that at least the same amount of commercial space must be included in any new development. I also note that your latest draft includes for the provision of high quality public realm space linking to protected open spaces to the south and this is something that I also welcome. Finally your site vision also includes for the provision of new homes (C3) again this is supported, especially as the previous fixed number of new homes of 73 has been removed, thereby increasing the chances of this site coming forward for development for the benefit of the community.

To summarise I fully support the proposed submission version of the new Southwark plan.

St Olav's Court Ltd
NSPPSV171

St Olav's Court Ltd is the freehold owner of St Olav's Court, a 3-storey brick building containing (Use Class B1) serviced offices within a site which extends to some 0.22 ha. The property is located to the western side of the St Olav's Business Park and is bordered by Rotherhithe Roundabout to the North and North West, Lower Road to the South-West, an open car park to the South-East and Albion Street/Lower Road to the West.

The premises have been let and managed for 20 years under the 'City Business Centre' brand as part of a wider portfolio of serviced offices, which provide some 80,000 sq ft of floorspace in Southwark and Lewisham. However, as the premises are inefficient and outdated, proposals for mixed use redevelopment of the site have been developed and are the subject of initial consultation with planning, design and regeneration officers at the London Borough of Southwark ('LBS').

A location plan with the site outlined in red is attached for reference.

Background to the representations

Noted.

Noted.

NSP80: St Olav's Business Park, Lower Road

St Olav's Court is identified in the New Southwark Plan - Proposed Submission Version (NSP PSV) as part of draft allocation "NSP80: St Olav's Business Park, Lower Road" (which includes St Olav's Court and the adjoining City Business Centre). Objections were raised to the proposed allocation as previously drafted, in representations submitted to the New Southwark Plan - Area Visions and Site Allocations - Preferred Option (in April 2017) (when the draft allocation was identified as "NSP60"); and to the New Southwark Plan Preferred Option - New and Amended Policies (in September 2017).

The objections were made on the basis that the proposed fixing of a minimum level of (Class B1) employment floorspace at least 50% of the floorspace on site (in conflict with draft Policy 24); the low indicative development capacity of 73 dwellings; and the acceptable uses being limited to (Class B1) office and (Class C3) residential use, were unduly restrictive and would be likely to limit the potential benefits that might otherwise be gained from redevelopment.

The revised draft Policy "NSP80: St Olav's Business Park, Lower Road" within the NSP PSV has now removed the requirement for (Class B1) employment floorspace to comprise at least 50% of the floorspace developed on site, in favour of re-provision of at least the amount of employment floorspace (B class) as existing, which is consistent with the approach to all existing employment sites within opportunity areas proposed (under draft Policy P26). Reference to "required uses" and "other acceptable uses" has been deleted, to provide scope for other uses, such as (Class A1) shops or (Class A3) cafés/restaurants, to come forward as part of a viable mixed use redevelopment of the site and there is no longer any identification of an indicative development capacity.

These changes are all welcomed as they respond to the concerns raised previously to the proposed allocation of the site. It is considered that the proposed allocation now provides the certainty and flexibility required to facilitate mixed use redevelopment of the site in a manner that allows for the development potential to be fully realised - with suitable re-provision of office floorspace and the introduction of other commercial uses able to deliver an uplift in employment on-site, alongside the delivery of a significant number of new homes (including affordable housing) and associated public realm enhancement. Accordingly, strong support is expressed to Draft Policy NSP80: St Olav's Business Park, Lower Road as being sound on the basis that it has been 'positively prepared' to meet objectively assessed development and infrastructure requirements in a manner 'consistent with National policy'; and is considered to be 'justified' in providing the most appropriate strategy for development of the site to be 'effective' in facilitating redevelopment within the plan period.

NSP86: Croft Street Depot

British Land Fixed Uplift Fund
NSPPSV27.1

Background

As you will be aware, British Land hold substantial land interests in Southwark, most notably in Canada Water, including Surrey Quays Shopping Centre, the former Harmsworth Quays Printworks and Surrey Quays Leisure Park sites as well as the former Dock Offices.

British Land has a long-term interest in the Croft Street Depot. As detailed in our previous representations to the London Borough of Southwark (LBS), it is important that the Plan and the Site Allocations documents, reflect the prospective development aspirations for the Site. To this end, representatives from DP9 and British Land met with officers at LBS to discuss the content of the Site Allocations Documents in July 2017. The purpose of these discussions was to agree the existing uses and outline the prospective options for the Site which could contribute towards the long-term aspirations of the Plan.

Site Allocation

Removal from the New Southwark Plan

As previously highlighted to officers, the proposed Site Allocation for the Croft Street site (Previous Ref: NSP68) has been removed from the Proposed Submission Version of the New Southwark Plan. This follows the Cabinet Report on the Proposed Submission Version of the New Southwark Plan in November 2017, which stated that:

“The owners confirmed that there is no prospect of redevelopment within the NSP timeframe as the site houses telecoms equipment that cannot be relocated”

The removal of the site is confirmed in the Council’s Consultation Report on the New Southwark Plan Preferred Options: New and Amended Policies, which states that the Site had not been taken forward into the proposed submission version of the Plan. As previously highlighted in our correspondence with LBS on this matter, the Site has been removed in error from the New Southwark Plan. To confirm, the Site is suitable for redevelopment during the plan period, and should therefore be re-included. Currently, only part of the site is used by the current occupant and therefore a significant part or comprehensive redevelopment of the Site could realistically come forward during the lifetime of the Plan.

DP9 has subsequently been in correspondence with Philip Waters at LBS and it has been agreed that options for the Site will be reviewed following this round of consultation in the context of the Examination in Public.

In light of the above, we attach our previous representations on the Preferred Options: New and

Noted. The site allocation of Croft Street Depot has been reinstated in the New Southwark Plan Amended Policies January 2019.

NSP86: Croft Street Depot

Amended Policies (June 2017) submitted to LBS in September 2017. We trust that our proposed amendments agreed with LBS officers will be considered in full as part of the inclusion of this Site in the New Southwark Plan.

We ask that officers keep us informed of progress on the New Southwark Plan and in the context of this stage in the plan-making process, agree a timetable at the earliest opportunity in order to review the Site Allocation for inclusion in the New Southwark Plan.

P14: Tall buildings

Individual
NSPPSV07.6

6. P14 - Tall buildings. This policy is unsound because it makes no reference to or use of the evidence contained within, Historic England Advice Note 4 (2015) which has superseded the Historic England/CABE guidance from 2007 referred to in the text. This can be remedied by including reference to HE Advice Note 4 in the text and by incorporating its recommendations into the plan.

Individual
NSPPSV11.1

This policy is not justified because It introduces a fundamental policy change on tall buildings with no evidence to support or justify the change.

- The 2011 Core Strategy identifies specific locations in the borough where tall buildings would be appropriate. This is underpinned by a research paper produced in March 2010. I am not aware of any subsequent research which justifies or explains the reasons for changing the policy.

This policy is not sound because it is not consistent with the Mayor's current London Plan (2016) or the new Draft London Plan

Policy 7.7 of the Mayor's current London Plan (2016) says:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

The New Southwark Plan:

- suggests tall buildings could be located anywhere in the borough unless there is a harmful impact on strategic views.

See my example below of why this aspect of the NSP would be unsound.

Noted. Policy P14 has been amended to make reference to Historic England Advice Note 4 (2015).

Representation has been noted, including comments on impacts of tall buildings in Camberwell.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall

P14: Tall buildings

Policy D8 of the new Draft London Plan says:

- “Development Plans should define what is considered a tall building, the height of which may vary in different parts of London”.
- “Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate”.

The New Southwark Plan:

- does not define a tall building other than to say it is “significantly higher than surrounding buildings or their context” (and it does not define “significantly”)
- does not mention a plan-led approach
- does not identify on maps the locations where tall buildings would be appropriate
- does not identify the general building heights that would be appropriate.

See my example below of why this aspect of the NSP would be unsound.

This policy is not positively prepared as some elements are vague or unclear:

- It does not make it clear that there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- It does not define “a point of townscape significance” or what is “proportionate”.
- It does not define what a tall building is, nor does it clarify what “significantly taller than their surroundings” means.
- On page 42, the second paragraph under the heading ‘Reasons’ includes a sentence that makes no sense grammatically: “Strategic locations that have a regional or borough important and the scale of the existing or planned townscape that is defined in our Area Action Plans and Supplementary Plans Documents.”
- The final paragraph of Policy 14 says “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications. We will continue to use this approach...” The ‘consistent approach’ to date has been defined and constrained by the current Southwark Plan. It is disingenuous to say they will continue to use the same approach when the New Southwark Plan would remove those constraints. “We...use a number of criteria to determine applications” is a meaningless phrase unless it specifies or at least gives examples of those criteria.

See my example below of why this aspect of the NSP would be unsound.

This policy is not effective because

- It is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.

In my neighbourhood, there is a planning application for a major private development called ‘Camberwell Union’ on the site of the current Burgess Business Park

buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

The application is for 505 residential units in 13 blocks, with heights varying from 3 to 14 storeys. Most of the blocks are 10 storeys or more. The current site is mainly low-rise light industrial units, and the housing stock in the immediate area is mainly 2-storey Victorian properties.

Recent decisions about new-builds in the area have been based on the current Southwark plan, and developments have generally only one storey higher than the existing housing stock.

If the new Southwark plan is adopted, because it is not consistent with the current London plan or the new draft London plan:

- There would be no plan-led approach to changing this low-rise light-industrial area to mixed-use high rise
- There would be no overarching planning policy to prevent the construction of 10-14-storey buildings in the midst of an area of low-rise dwellings
- There would be no definition about what is “significantly higher than surrounding buildings or their context”.

The Camberwell Union plans have a 14-storey block at the centre; each block alongside it steps down slightly in height. There is a small terrace of 2-storey Victorian properties in the midst of the site that would be immediately surrounded on 3 sides by new buildings which are either 3, 4 or 5 storeys, and then by taller buildings stepping up to 14 storeys.

Because the NSP is not consistent with the current London plan, there would be no consideration as to whether this area is appropriate, sensitive or inappropriate for tall and large buildings.

Because the NSP is not positively prepared, there is no clear definition about the ‘context’ of the existing Victorian residential buildings, which of the 14 blocks would be classed as the ‘surrounding buildings’ or how it would be assessed whether the proposed new buildings are ‘significantly higher’.

Because the NSP is not effective, private developers could get the green light to build 505 residential units, 35% of which should be ‘affordable’, even if their financial viability statement says there is a risk that 35% affordable housing (is not deliverable in viability terms, and says the scheme should be amended to allow it to be deliverable. So from the outset, a private development can declare it is unable to meet the target of 35% affordable housing, and the NSP is not effective enough to give the council the authority to reject the development on that basis. There is no shortage of unaffordable homes in Southwark. We need an NSP that enables the council to deliver affordable housing, not simply add to the supply of unaffordable housing.

To make the policy sound, the NSP should

- provide evidence to justify its policy change about tall buildings
- Identify specific sites in the borough where tall buildings are appropriate (and consult local residents and business about the suggested locations and indicative heights).
- show those locations on area vision maps and within site allocations
- give indicative heights for tall buildings.
- make it clear that tall buildings will be considered inappropriate in all other locations.

P14: Tall buildings

- clarify all vague or unspecified sections, including
 - o defining or giving examples of ‘a point of townscape significance’ (for example, is ‘significance’ based on architectural, historical, industrial or social factors?)
 - o explaining what “criteria” are used when making decisions. .

Peckham Citizens
NSPPSV16.2
Section 2

There is a second item in particular that the following section refers to – the height of buildings across Southwark as a whole. Please see the comments below:

Policy P14: Tall Buildings (pgs 42-43) is unsound because:

- it is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that “Tall buildings should be part of a plan-led approach to changing or developing an area”, yet all restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we “use a number of criteria to determine applications”.

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”.

However, it has become clear through the petitions (referred to above) and the public consultation work that Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

This policy is therefore not consistent with national and regional planning policy.

-it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed Submission Version (apart from in the site specific policies) which will open the door to the argument of precedence

The locations of tall buildings were previously distinguished in the design guidance of each appropriate site location. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. The general height of tall buildings accepted on each appropriate site location as part of LBS plan lead approach will be specified within our AAP's and SPD's.

Impacts derived from tall buildings are currently addressed in our policies and reasons which have been amended to make policy P14 more effective.

P14: Tall buildings

alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station site.

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of ‘sky’ for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that “The main reason that the Committee held an inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use schemes and they can encourage the use of public transport where there is spare capacity, but so can other types

P14: Tall buildings

of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than efficient development.”

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).

-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

The statement “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy.

This policy therefore does not meet the test for being positively prepared.

Changes that would make the policy sound include:

- The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on.
- Revise the policy in line with recent research that challenges the principle that tall buildings increase density and help regeneration, or justify why this has not been done/is not appropriate.
- All other areas should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case by case basis.

P14: Tall buildings

- Define what a 'tall building' is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.
- Publish the "range of views" on tall buildings that have been gathered in the council's consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.

Aviva and Galliard
NSPPSV18.8

Policy P14 states that new tall buildings over 60m in height must provide a publically accessible space at or near to the top of the building for users and residents.

It is noted that the Old Kent Road Opportunity Area will include a number of buildings over 60m and therefore the Council must apply a degree of common sense to the application of this policy requirement.

The 60m threshold is no longer reflective of the form and scale of development which is anticipated to be delivered by the Old Kent Road Area Action Plan.

It is requested that part 2.11 of Policy be removed as currently drafted and that the Council instead identify appropriate locations for the delivery of any publically accessible space at or near the top of tall buildings.

In addition, the management of fully publically accessible space within tall buildings can be problematic and therefore it is requested that reference to this accept the provision of managed access schemes.

It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

Bankside Residents Forum
NSPPSV19.11

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Locations of tall buildings were previously distinguished in the design guidance of each appropriate site location. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location as part of LBS plan lead approach will be specified within our AAP's and SPD's.

The criteria for determining applications specific to tall buildings have been included in our design guidance of appropriate site locations.

P14: Tall buildings

- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

This policy is not positively prepared as some aspects of the policy are vague or unclear on the topic of massing:

Aside for reducing energy use and enabling passive design strategies, successful massing and orientation can take advantage of site conditions, such as rainwater harvesting, and can help the building contribute to the health and vitality of the surrounding ecological, social, and economic communities. For instance, it can be massed and oriented to connect its social spaces with street life, or avoid shading nearby wild lands, or could steer foot traffic away from ecologically sensitive areas. These issues are not covered by the policy and yet the impacts of poor massing can be seen on over three developments in Bankside that have been built this last year.

The claim that the local authority have consistently had a clear criteria to determine applications is not justified, and could be challenged not to be consistent with national policy, given past decisions and poor resulting buildings that are out of character with their site locations. Such tall buildings have also created wind shear, over shadowing, and solar glare that have affected neighbouring properties.

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
- Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
- References to “criteria” should make clear exactly what those criteria are.

P14: Tall buildings

- A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

Berkeley Homes (South East London) NSPPSV21.5

We support the objectives of the policy and the desire to ensure the highest design quality is achieved when taller buildings are proposed. They make good use of scarce development land; reduce pressure on the green belt, and can simply be the right architectural solution. Done well, tall buildings are one part of the answer to London's housing challenge.

As supported by paragraph 3.30 of the adopted London Plan future development across London should be linked to existing and future public transport infrastructure. We consider that it would be helpful for the Policy to specifically make reference to planned public transport connectivity and capacity improvements to determine the appropriateness of a location. Without this approach the Council risks under-delivering new homes and missing key regenerative benefits which tall buildings can provide.

In addition we consider that Part 2.11 should be deleted. Part 2.11 requires developers provide new publically accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m. Southwark has a significant number of existing buildings above 60m in height and a number of taller buildings are proposed to be built in the near future. It is not reasonable or nor necessary to expect public access to the uppermost floor of all future tall buildings.

The addition of publicly accessible areas at the top of a taller building adds significantly to construction cost and long term operational management costs of a building. This is through the need for additional lifts, additional capacity for means of escape from upper floors and additional security & facilities management. These costs will impact on the viability of a scheme and could reduce the provision of affordable housing and other major planning benefits delivered on a site.

It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

Other than in a specific location and an exceptional building (e.g. The Shard) publicly accessible areas are unnecessary and harm other benefits. The provision of public access to specific buildings should be sought in exceptional circumstances through S106 obligations and not be a requirement of policy. The provision of communal areas within tall buildings for occupiers and residents is often provided by developers but should be a commercial consideration and not a requirement of policy.

Bermondsey Village Action Group
NSPPSV29.1

In various respects we consider that the proposed submission of the New Southwark Plan is unsound.

'Site allocation - NSP53' and 'Tall buildings – P14' policies are clearly intended to facilitate High-Rise buildings on St Thomas St. The former in particular aims to drive a high-rise wedge between the listed arches in St Thomas St and the Bermondsey St Conservation area, the heritage assets of the Vinegar Yard warehouse and the Horseshoe pub.

...

The Council has not considered or consulted upon tall buildings policy. Instead it is operating a make-it-up-as-we-go-along strategy driven by aspirations to obtain money from developers.

This is not compliant with the London Plan, nor is it the product of any proper consideration or consultation. In particular, there is no specification of locations in which tall buildings will be acceptable, less still any reasons why. Consequently, there

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. The locations of tall buildings were previously distinguished in the design guidance of each appropriate site location. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background

P14: Tall buildings

is also no specification of any maximum heights that may be acceptable where highrise is.

Complying with the London Plan by identifying any locations where high-rise will be considered and specifying the maximum heights that may be acceptable is a clear way to make the New Southwark Plan sound.

Individual
NSPPSV31.1

Height Specification

Inconsistent with Tall Buildings Historic England Advice Note 4 and New London Plan

The heights P14 mentions are: 30m, or 25m in the Thames Policy Area, would require extra green space, and “new publicly accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m”

but it does not indicate its actual standards for high rise buildings.

However, HEA Note 4 states:

“What might be considered a tall building will vary according to the nature of the local area.”

NLP D8 points out “...the height of [a tall building] may vary in different parts of London but it should be defined.

P14 is so vague that this allows any height to be acceptable.

Quantity of tall buildings permitted in an area

Not positively prepared

In the NSP there is no indication of the number of tall buildings which would be permitted.

Density

Inconsistent with Tall Buildings Historic England Advice Note 4 and New London Plan 3.6.10

Note 4 states:

“There may be good planning reasons to seek an increased development density in an area, but tall buildings represent only one possible model for delivering higher density development. Alternative forms may relate more

research paper, and will be a part of our evidence base. The general height of tall buildings accepted on each appropriate site location as part of LBS plan lead approach will be specified within our AAP's and SPD's. Policy P14 has been amended to make reference to Historic England Advice Note 4 (2015). Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. The locations of tall buildings were previously distinguished in the design guidance of each appropriate site location. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on

P14: Tall buildings

successfully to the local context.”

NLP 3.81: “... high density does not need to imply high rise, “ however, P14 only indicates: “Tall buildings, ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, ...”. There is no indication of alternative options for increasing density..

Inconsistent with Mayor of London’s Policy D1 and not positively prepared

Mayor’s statement

Policy D1 London’s form and characteristics

Development Plans, area-based strategies and development proposals should address the following:

B. Development design should:

1 respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions

However, in the area-based strategy for the Old Kent Road, there is no mention of proposed or acceptable heights for taller buildings. Taller buildings currently in the area are: Bird in Bush Road: 14 storeys; Rotherhithe New Road: 19 storeys; Avondale Square 20/21 storeys; Leyton Square: 4/6 storeys, but these are not mentioned in the NSP. No examples are given of current best practice..

Inconsistent with Ministry of Housing, Communities & Local Government

Part of: Planning practice guidance and Planning system

6 March 2014

“Some forms pose specific design challenges, for example how taller buildings meet the ground and how they affect local wind and sunlight patterns should be carefully considered. The length of some lower blocks can mean they disrupt local access and movement routes. Stand alone buildings can create ill defined spaces around them and terraces can appear monotonous and soulless if poorly designed.”

Paragraph: 025 Reference ID: 26-025-20140306

Revision date: 06 03 2014

“Decisions on building size and mass, and the scale of open spaces around and between them, will influence the character, functioning and efficiency of an area. In general terms too much building mass compared with open

each appropriate site location as part of LBS plan lead approach will be specified within our AAP’s and SPD’s.

The criteria for determining applications specific to tall buildings have been included in our design guidance of appropriate site locations.

P14: Tall buildings

space may feel overly cramped and oppressive, with access and amenity spaces being asked to do more than they feasibly can. ...

The scale of building elements should be both attractive and functional when viewed and used from neighbouring streets, gardens and parks. ...

any adverse visual impact of rooftop servicing minimised.

Account should be taken of local climatic conditions, including daylight and sunlight, wind, temperature and frost pockets.”

Paragraph: 026 Reference ID: 26-026-20140306

Revision date: 06 03 2014

P14 inadequately states:

2.1 Be located at a point of townscape significance and have a height that is proportionate to the significance of the proposed location and size of the site ...

2.7 Avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing and solar glare.

...

2.9 Have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience, and

2.10 Provide a new, functional public space that is commensurate to the height and size of the proposed building when above a height of 30m, or 25m in the Thames Policy Area, and widened footways and routes to accommodate increased footfall; and

2.11 Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m.

It does not include providing a positive visual impact on existing surrounding areas, nor the effect of large buildings on access routes, nor take into account all of the possible climactic effects for humans and wildlife.

Individual
NSPPSV33.1

Noted, policy will be amended accordingly.

This policy is unsound because tall buildings are not the historical norm in Southwark. Southwark is meant to be leading a historical regeneration and tall buildings do not align with these values.

There is a conflict in that there is no definition of a tall building in regards to it's surroundings. This is open to

P14: Tall buildings

exploitation and deliberate misinterpretation. It needs clarity.



P14: Tall buildings

Bermondsey Street Area Partnership
NSPPSV35.5

BSAP is a member organisation of local residents and businesses working together to make our area as good as it can be for people who live here, work here and come to visit.

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

This policy is not positively prepared as some aspects of the policy are vague or unclear:

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. The locations of tall buildings were previously distinguished in the design guidance of each appropriate site location. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location as part of LBS plan lead approach will be specified within our AAP's and SPD's.

It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and

P14: Tall buildings

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
 - o References to “criteria” should make clear exactly what those criteria are.
 - o A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

across London and to provide publically accessible space.

P14: Tall buildings

Copleston Church and Community centre
NSPPSV39.3

Section 2

There is a second item in particular that the following section refers to – the height of buildings across Southwark as a whole. Please see the comments below:

Policy P14: Tall Buildings (pgs 42-43) is unsound because:

- it is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that “Tall buildings should be part of a plan-led approach to changing or developing an area”, yet all restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we “use a number of criteria to determine applications”.

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”. However, it has become clear through the petitions (referred to above) and the public consultation work that Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

This policy is therefore not consistent with national and regional planning policy.

-it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed Submission Version (apart from in the site specific policies) which will open the door to the argument of precedence alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

site.

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of ‘sky’ for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that “The main reason that the Committee held an inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use schemes and they can encourage the use of public transport where there is spare capacity, but so can other types of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than efficient development.”

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the

P14: Tall buildings

research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).

-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

The statement “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy.

This policy therefore does not meet the test for being positively prepared.

Changes that would make the policy sound include:

- The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on.
- Revise the policy in line with recent research that challenges the principle that tall buildings increase density and help regeneration, or justify why this has not been done/is not appropriate.
- All other areas should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case by case basis.
- Define what a ‘tall building’ is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.

P14: Tall buildings

- Publish the “range of views” on tall buildings that have been gathered in the council’s consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.

Individual
NSPPSV40.11

This policy is not consistent with National Planning Policy because it fails to comply with the London Plan.

Policy D8 in the London Plan requires that developments plans define what is considered a tall building, identify their appropriate location and general heights on a map while also requiring boroughs to work with the mayor to identify strategic locations.

Policy P14 of the NSP does not do this. It gives no definition of a tall building and includes no maps or corresponding heights and there is no evidence of working with the Mayor.

This policy is not justified because it involves a significant policy change from the previous tall buildings policy and there is no substantive evidence base to support this policy change.

The evidence base for this policy is not up to date:

The 2011 Core strategy identified particular locations in the borough where tall buildings were appropriate, and this was supported by a Tall Buildings Research Paper (March 2010). No similar study has been undertaken to support the significantly different new policy that tall buildings may effectively be appropriate anywhere in the borough.

Not positively prepared as some aspects of the policy are vague or unclear

The plan fails to properly define what would constitute a “tall building” while the phrase “significantly taller than the surroundings” is too vague to be in any way useful.

Noted. We are currently preparing our Tall Buildings background paper, and the policy will be amended accordingly.

P14: Tall buildings

This policy is not justified because there is sound and compelling evidence, both social, ecological and environmental to contradict the reasons Southwark Council have given for encouraging tall buildings in the NSP.

I would like to give more details in my further statement in advance of the oral examination.

Individual
NSPPSV42.2

Not Consistent with National Planning Policy by failing to comply with the London Plan

London Plan policy D8 requires that developments plans should define what is considered a tall building, identify their appropriate location and general heights on a map while also requiring boroughs to work with the mayor to identify strategic locations

By contrast policy P14 of the NSP gives no definition of a tall building and includes no maps and/or corresponding heights while also showing no evidence of working with the Mayor.

Not Justified because it is not based on a robust and credible evidence base.

This policy's evidence base is not up to date:

The 2011 Core strategy identified particular locations in the borough where tall buildings were appropriate, and this

Noted. We are currently preparing our Tall Buildings background paper, and the policy will be amended accordingly.

P14: Tall buildings

was supported by a Tall Buildings Research Paper (March 2010). No similar study has been undertaken to support the significantly different new policy that tall buildings may effectively be appropriate anywhere in the borough.

Not positively prepared as some aspects of the policy are vague or unclear

The plan fails to properly define what would constitute a “tall building” while the phrase “significantly taller than the surroundings” is too vague to be in any way useful.

Individual
NSPPSV47.3

So-called towers are in the spotlight following the Grenfell disaster. Their location is particularly sensitive. The 2016 London Plan recognises a need to identify appropriate, sensitive and inappropriate locations. The latest draft plan also calls for definition of what height is considered tall in relation to location. Consultation is an essential pre-requisite.

Individual
NSPPSV50.5

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer

Noted, this will be taken into consideration when amending the policy.

Noted. Policy P14 has been amended to comply with Policy 7.7 of the Mayor’s current London Plan (2016) & Policy D8 of the new Draft London Plan.

P14: Tall buildings

identified.

- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

This policy is not sound because it is not consistent with:

1. The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

2. The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

3. National Planning Policy Framework, through failure to comply with: the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications. 2 P14 Tall Buildings Plan pages 42 & 43 Not Effective
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is "a point of townscape significance" or what is "proportionate" in making decisions.
- Not defining what a tall building is and not clarifying what "significantly taller than their surroundings" means.
- Not explaining what "new publicly accessible space at the top of the building" refers to.

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.

P14: Tall buildings

- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

Individual
NSPPSV56.7

This policy is not justified as it involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).

Moreover, the policy for tall buildings being sited in Peckham town centre has never been consulted on. It is likely that this is the case with most if not all neighbourhoods in the borough which have been designated as locations for tall buildings.

The designation of Peckham apparently first appeared as a plan in the Core Strategy in 2010. I was very involved in the consultations at the time on the Peckham & Nunhead Area Action Plan (PNAAP) and there was no mention in those of a plan to designate Peckham for tall buildings. They first appeared in the PNAAP consultations only in the submission version in 2012. That was very late in the process which had been proceeding for several years, but those who had the stamina to still be involved objected that tall buildings were not appropriate for Peckham town centre as the low to medium rise buildings are an essential part of its heritage, nature and character. We were told that the case against tall buildings could not be considered at the Examination in Public as they were already mentioned in the Core Strategy. 2018 is the first time that the policy on siting tall buildings in Peckham can be questioned in the formal planning policy process. There is ample evidence since 2012 that the local population does not agree that tall buildings enhance Peckham for existing residents and indeed will ruin the distinctive nature and character of the area. This is an example from one neighbourhood of the damaging impacts of a tall buildings policy being rolled out over the borough without justification and evidence that this furthers the health and wellbeing of existing residents. So this policy is not consistent with the new policy SP2 on 'social regeneration to revitalise neighbourhoods'. The policy will in effect do the opposite for existing residents and devitalize them.

This policy is not consistent either with the National Planning Policy Framework, through failure to comply with the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision". There is definitely no collective vision in Peckham neighbourhood that supports tall buildings being imposed. We know this is also the case in other neighbourhoods across the borough.

The tall buildings background paper is currently being prepared, and will be a part of our evidence base before the final submission this year. Noted. Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Policies which should be implemented alongside strategic policies, and the Plan should be read collectively.

P14: Tall buildings

This policy is not positively prepared as some aspects of the policy are vague or unclear, for example

- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough, potentially negatively affecting all existing residents.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents, especially existing residents.
- Is unclear how it can deliver the identified net increase of ‘affordable’ housing by 799 homes per year.
- Fails to take account of the fact and much evidence that increasing density can be achieved also by lower rise buildings.
- Gives insufficient consideration to other more effective ways of combating the housing need without introducing negative effects of tall buildings.

To make the policy sound:

- there should be a borough-wide co-production exercise to engage residents effectively in each neighbourhood on the role of tall buildings in their neighbourhood, and to clarify where tall buildings might be appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
 - o References to “criteria” should make clear exactly what those criteria are.

A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

P14: Tall buildings

NSPPSV67.3

The policy directs tall buildings towards areas with highest levels of public transport and the greatest opportunity for regeneration, such as in the designated Town Centres, Opportunity Areas and the CAZ which is supported.

The requirement for tall buildings to provide publicly accessible space “at or near to the top” of the building however is overly prescriptive and does not recognise the value that publicly accessible space at lower levels of a building or at ground floor can provide.

The need for tall buildings to be located at a point of townscape significance does not recognise the role that tall buildings can play in creating new areas of townscape significance and stimulating regeneration. In addition, the height of tall buildings need not necessarily be linked to the size of a site as Policy P12 sufficiently ensures development, of any height, will be of a high standard of design.

The proposed wording should therefore be revised as follows:

“Tall buildings are significantly higher than surrounding buildings or their context. The highest tall buildings will be located in areas that benefit from the highest levels of public transport access where there is the greatest opportunity for regeneration. Typically, this will be in our major town centres, Opportunity Areas and the Central Activities Zone.

New tall buildings must:

- 2.1 Be located at a point of townscape significance and have a height that is proportionate to the significance of the proposed location and the size of the site; and
- 2.2 Respond positively to local character and townscape; and
- 2.3 Be of exemplary architectural design and residential quality; and
- 2.4 Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
- 2.5 Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough Views; and
- 2.6 Avoid unacceptable harm to the significance of designated heritage assets or their settings; and
- 2.7 Avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing and solar glare. Detailed modelling and analysis will be required to assess these impacts; and

It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space. Suggested revisions to the policy are noted.

P14: Tall buildings

- 2.8 Maximise energy efficiency and prioritise the use of sustainable materials; and
- 2.9 Have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience; and
- 2.10 Provide a new, functional public space that is commensurate to the height and size of the proposed building when above a height of 30m, or 25m in the Thames Policy Area, and widened footways and routes to accommodate increased footfall; and
- 2.11 Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m.”

P14: Tall buildings

Individual
NSPPSV70.1

I have concerns about how new high-rise buildings interface with low rise existing buildings. Choosing to build in this way, under pressure to provide new homes quickly and cheaply, can swell and disfigure existing neighbourhoods to the detriment of current residents. The New Southwark Plan appears to do little to require easement of this conflict. I would have thought that the wish to create high-rise, high capacity solutions were over and medium rise mansion-style buildings with communal green spaces (without attendant winds that beset all tall buildings) offer much more flexibility and variety of tenure, to reflect the mixed needs and preferences of tomorrow. I thus think the NSP fails to address these points usefully and seems to employ an outdated urban response to the known frictions which new high-rise often causes, driven by the need to build quickly and cheaply. Thus in non-central locations, intelligent low rise has, surely, all the right benefits to sustain communities into the future.

Current London Plan

This policy is not sound because it is not consistent with the Mayor's current London Plan 2016 (Policy 7.7 pages 293-295):

- 7.7 Part A Strategic "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations"; which is the opposite of the NSP which indicates that tall buildings could be located anywhere in the Borough, unless they interfere with a strategic protected view.
- 7.7 Part E LDF preparation "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks"; but the NSP does not indicate any attempt to identify locations in conjunction with the Mayor. Consequently, the NSP does not comply with or reflect:
 - 7.25: Tall buildings should be resisted in areas that will be particularly sensitive to their impacts and only be considered if they are the most appropriate way to achieve the optimum density in highly accessible locations
 - 7.28: The Mayor will work with boroughs to identify locations where tall and large buildings might be appropriate, sensitive or inappropriate. This policy is not effective as it is unlikely to achieve its stated aims of contributing to physical regeneration, raising population density, and increasing the activities and life opportunities on offer for nearby residents: it is also unclear how it can deliver the identified net increase of affordable housing by 799 homes per year. Insufficient consideration is given to other more effective ways of combatting the housing need without introducing negative effects of tall buildings (overshadowing, wind, microclimates) such as increasing density of

The tall buildings background paper is currently being prepared, and will be a part of our evidence base before the final submission this year. Noted. Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

lower-level buildings (e.g. 5-6 stories high); which also offer greater sustainability.

It does not provide specific guidance on how tall buildings will increase the activities and life opportunities on offer for nearby residents, so leaving open the possibility that developers will design properties solely to benefit the building's residents and users. Tall buildings are inappropriate for family households and those requiring affordable accommodation for the reasons listed above.

Housing families, those with specialist accommodation needs and those requiring affordable accommodation in the lower levels of tower blocks can increase the perception of social stratification with wealthier residents occupying the topmost luxurious "penthouse" flats.

There are serious fire risk concerns associated with tall buildings following the Grenfell disaster – perceived risks may have significant negative impacts on the mental health and wellbeing of tower block residents, even if unjustified.

Greenpruce GP
NSPPSV72.7

This policy is welcomed in its presumption that tall buildings are most appropriately located at points of townscape significance in areas, in areas with excellent PT AL ratings and in opportunity areas where there is the greatest

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan.

P14: Tall buildings

scope for regeneration. The criteria for tall buildings are mostly supported. The only exception is criterion 2.11. This requires a new publically accessible space at, or near, the top of the building and communal facilities for users and residents when above a height of 60m. The reality is that not every building above 60m will merit a new publicly accessible space either by virtue of its use or its location. The requirement for facilities for residents or users is arguably appropriate, however it is suggested that the wording for this criterion should be amended to only require publically accessible space "where considered appropriate".

Whilst Part 1 of this policy promotes taller buildings in Opportunity Areas, it is suggested that the proposed definition of 'townscape significance', provided in the supporting 'Reasons' for the policy should be amended to reflect this, as follows:

"We define the significance of a location by its proximity to the meeting of strategic routes, major public transport stations, and public transport provision, and position within areas identified for significant intensification and regeneration, including Opportunity Areas."

Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

Grove Lane Area Residents Association
NSPPSV75.1

This policy is not justified as it fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP, involves a significant policy change on tall buildings with no new evidence to support the change and leaves each of the Area Visions nebulous as the locations proposed for Tall Buildings are unknown.

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

"Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations" and "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

"Development Plans should define what is considered a tall building, the height of which may vary in different parts of London", "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate" and "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

This policy is not positively prepared as some aspects of the policy are vague or unclear as it does not indicate the approach or criteria to determine planning applications, define "a point of townscape significance" what is "a tall building " or clarify what "significantly taller than their surroundings" means. Nor does it explain what is meant by "new publicly accessible space at the top of the building".

This policy is not effective as it does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents or show how it can deliver the identified net increase of affordable

Noted. The representation will be taken into consideration when amending the policy and area visions. The tall buildings background paper is currently being prepared, and will be a part of our evidence base before the final submission this year. Noted. Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Policies which should be implemented alongside strategic policies, and the Plan should be read collectively.

P14: Tall buildings

housing. It gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

To make the policy sound, the NSP should

Identify specific sites in the borough where Tall Buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.

Make clear that Tall Buildings will be considered inappropriate in all other locations.

Clarify all vague or unspecified sections, including:

Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.

References to “criteria” should make clear exactly what those criteria are.

A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

In particular, in order to comply with the policy in the current London Plan that consideration should be given to which areas are appropriate, sensitive or inappropriate for Tall Buildings; and the policy in the New Draft London Plan that Boroughs should identify areas where Tall Buildings will be an appropriate form of development in principle, consideration should be given to the potential impact of Tall Buildings on conservation areas in the Borough.

By way of example, NSP24 (Butterfly Walk, Morrisons Car Park and Police Station) is surrounded by the Camberwell Green and Camberwell Grove Conservation Areas and the impact on these areas of any Tall Building should be a vital part of the consideration of any development plan at NSP24. The Council's Camberwell Green Conservation Area Appraisal emphasises (5.2.2) that the overall form of any development should remain in keeping with the morphological characteristics of the area, which (3.3.1) it states is distinguished by 3 or 4 storey blocks, though it accepts (3.4.3) that 6 storey blocks are in keeping with the Green itself. The Appraisal singles out among the worst of the "negative elements" the 1960s developments north east of the Green (including the – former – Magistrates Court), which it says are rightly excluded from the Conservation Area but "still have an impact on it"(3.4.14). Similarly, the Camberwell Grove Conservation Area Appraisal regards (3.5.11) the (now demolished) Maudsley Hospital tower block (fig.39) as insensitive and a particularly intrusive negative element in that

P14: Tall buildings

Conservation Area.

The NSP should be reformulated in a way that minimises the chances of those types of planning errors being repeated.

Guys and St Thomas' Charity
NSPPSV76.2

In addition to the above, our client fully supports the Emerging Policy P14 (Tall Buildings) of the proposed plan which sets out that tall buildings will be located in areas that benefit from the highest levels of public transport access, typically major town centres, Opportunity Areas and the CAZ i.e. in which the London Bridge site is located, and consider that the principle of tall buildings can be accommodated on site allocation NSP51.

Individual
NSPPSV79.4

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.

Noted.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. The locations of tall buildings were previously distinguished in the

P14: Tall buildings

- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is "a point of townscape significance" or what is "proportionate" in making decisions.
- Not defining what a tall building is and not clarifying what "significantly taller than their surroundings" means.
- Not explaining what "new publicly accessible space at the top of the building" refers to.

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing

design guidance of each appropriate site location. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location as part of LBS plan lead approach will be specified within our AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

negative effects of tall buildings.

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
 - o References to “criteria” should make clear exactly what those criteria are.
 - o A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

P14: Tall buildings

Historic England
NSPPSV83.6

Policy P14 on Tall Buildings gives us some cause for concern. As set out in our previous consultation responses to the Plan, we remain concerned that this does not constitute a strategic or plan-led approach to development (as per paragraph 157 of the NPPF) that may have significant impacts on local character. Tall buildings, when appropriately sited and designed, can be a highly effective way of delivering development at high densities. However, such development needs to be properly plan-led, having been tested against the effects on relevant heritage assets and local character. This approach should be underpinned by an appropriately rigorous evidence base, including a borough-wide tall buildings study. This would help provide a local and contextually based definition of what is meant by tall, as well as understanding potential locations which are (and are not) suitable for such buildings.

Identifying potential locations for tall buildings would also align with emerging policy in the draft London Plan. We would encourage the use of Historic England's advice on tall buildings in developing relevant plan content (<https://www.historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>). Please also note that this document (published Dec 2015) replaced the previous tall buildings document published in partnership with CABE.

Beyond the concerns of lack of height definition and the identification of locations, we consider that the policy as set out is potentially open to interpretation in some further respects. Clause 2.6 indicates that new tall buildings must 'avoid unacceptable harm to the significance of designated heritage assets'. The NPPF is clear that the avoidance of harm to heritage assets through new development is the starting point for planning policy. Notwithstanding related policies in the Plan covering design principles and quality, we consider that the existing text overlooks the staged approach set out by the NPPF. We therefore recommend that P14 2.4 be amended to 'Conserve and enhance the significance of designated heritage assets and their settings. Where proposals will have an impact on significance, the tests set out in paragraphs 132-136 in the NPPF will be applied'.

As indicated in the Historic England advice note, we further consider that the policy should contain text that will enable the Council to address issues created by existing tall buildings as part of redevelopment proposals. Offering a mechanism for promoters to demonstrate they have properly explored other ways of delivering high-density development would also be helpful. This could be achieved by adding a new paragraph to the supporting text on page 43:

Policies which should be implemented alongside strategic policies, and the Plan should be read collectively. The tall buildings background paper is currently being prepared, and will be a part of our evidence base before the final submission this year. In addition to amending this policy, a map will be included to illustrate the location of tall buildings which was previously distinguished in the design guidance of each appropriate site location. Policy P14 will be amended to make reference to Historic England Advice Note 4 (2015).

P14: Tall buildings

Evidence shows that tall buildings are not the only way of delivering high density new development. Proposals for tall buildings should be accompanied by adequate supporting information, including a visual representation, which demonstrate likely impacts and that alternative built forms to deliver similar density of use have been explored for the site in question. The presence of an existing tall building on the site will not in itself be regarded as adequate justification for its replacement with another tall building.

P14: Tall buildings

Individual
NSPPSV85.1

I wish the inspector to rule the current Southwark Plan unsound due to its provisions on maximising housing units for all applications in most of the area visions and its abolition of the existing height restrictions in the current Southwark Plan.

Combined these two provisions make almost all the rest of national and regional planning policy redundant.

If any developer wishes to develop any site across the borough, no matter how inappropriately over-developed or how high the development, the local community will have no clear planning grounds to object.

The existing national planning policy on a presumption in favour of development has clear policy caveats laid out in various policy documents nationally and in the London Plan.

The provisions in the new Southwark Plan spelling out in clear terms that all developments will be expected to maximise number of residential units provided means all other planning policies would be neutered and any decisions made by the planning committee rejecting very dense and very tall skyscrapers across the borough, could be immediately legally challenged and due to costs incurred by the council in such appeals, would severely disable the planning committee from carrying out its legal functions laid out in national and regional planning policies.

The removal of the 8 and 10 storey height restrictions for residential and commercial tall buildings across the borough, outside of the exempted core action areas, again limits the ability of the planning committee to carry out its legal functions to ensure all applications adhere to national and regional planning policies.

The Camberwell Area Action Plan and the Burgess Business Park exemplifies these problems. This is a largely urban residential community and the removal of all height restrictions and the requirement to maximise housing units in all plans, will radically alter the area, without any real knowledge in the community or in the Southwark Plan consultation process that such a radical change was proposed in the new plan, to change the character of the community, into one that mirrors that of the high rise, very high densities of the redeveloped Elephant & Castle.

The Burgess Business Park is located within a neighbourhood of 2 story Victorian terraced housing. To introduce very high density, tall buildings that reflect the Elephant and not Camberwell deeply damages the established

Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

character of the area.

In addition, as Burgess Park is covered by the CAAP and is immediately to the north of the Burgess Business Park, changing the planning policies as outlined, means the park will be overshadowed from the south and the New Church Road wildlife site which is immediately adjacent to the proposals site, will have its wildlife potential destroyed.

This is just one key example of why the plan's proposed policies make it unsound.

The council needs to remove these provisions before the plan can be considered to be sound.

Individual
NSPPSV86.5

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. The locations of tall buildings were previously distinguished in the design guidance of each appropriate site location. Sites and locations for tall buildings have been identified and incorporated within our

P14: Tall buildings

identification of appropriate, sensitive and inappropriate locations”.

- “Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks”.

B/ The Mayor’s New Draft London Plan, through failure to comply with:

- “Development Plans should define what is considered a tall building, the height of which may vary in distinct parts of London”.
- “Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate”.
- “Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter”.

C/ National Planning Policy Framework, through failure to comply with:

the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” so that Local Plans reflect a “collective vision”.

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Considers other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

Suggested improvements:

The NSP should be reviewed to:

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative

area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location as part of LBS plan lead approach will be specified within our AAP’s and SPD’s. Policies which should be implemented alongside strategic policies, and the Plan should be read collectively. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

heights should be put out for consultation with residents and businesses.

- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
 - o References to “criteria” should make clear exactly what those criteria are.
 - o A clearer definition of tall buildings be provided, as indicated by New Draft London Plan Policy D8 part A.

Individual
NSPPSV93.7

I feel that this policy is not justified as it is not aligned with the following

A/ The Mayor’s Current London Plan (2016), through failure to comply with:

- “Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations”.
- “Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks”.

•

B/ The Mayor’s New Draft London Plan, through failure to comply with:

- “Development Plans should define what is considered a tall building, the height of which may vary in different parts of London”.
- “Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate”.
- “Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter”.

C/ National Planning Policy Framework, through failure to comply with:

The need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and

Policy P14 has been amended to comply with Policy 7.7 of the Mayor’s current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP’s and SPD’s. It is considered that tall buildings over 60m

P14: Tall buildings

businesses” so that Local Plans reflect a “collective vision”.

Proposed Development ‘Camberwell Union’ – Burgess Business Park, Camberwell

- The proposed development suggests 4-6 storey buildings on Wells Way and Parkhouse Street, where the tallest buildings opposite are two storeys. This height difference of the 4+ storeys opposite not to mention the 10 and 14 storey buildings in the middle of the development will affect daylight (the current houses facing west therefore if the proposed development goes forward will be dark by midday) and creating wind tunnels and micro climates.

- Unprecedented to have this level discrepancy in any of the new builds in the area: to name a few examples, new developments on Southampton Way, Benhill Road and Commercial Way have a one storey difference at most.

- The tallest proposed element is 14 storeys. At a height of 50 metres, this is 39 metres taller than the closest housing stock. (can provide illustration to show this)

- The local housing stock is two storey Georgian and Victorian mews cottages and includes listed buildings. The proposed development site is between 4-14 storeys tall, and will be similar to sites at Elephant and Castle and Peckham, which while not unattractive, are not sensitive to the character and historical buildings in the borough.

This is neither proportionate to the significance of the proposed location and does not respond positively to local character and townscape as the wording on pages 42-43 of the NSP would suggest. The development is in direct conflict with the Mayors current London Plan, and the Mayors New Draft Plan (see above).

The policy isn't acceptable. It involves policy changes from the previous policy on tall buildings. There is nothing in the proposal to support these changes.

- . • The 2011 Core strategy identified particular locations in the borough where tall buildings were appropriate, and this was supported by a Tall Buildings Research Paper (March 2010). No similar study

- . has been undertaken to support the new policy that tall buildings may be appropriate anywhere in the borough.

Camberwell Union and proposed developments like it are too dense and tall to be appropriate

- . for the area, which is residential, and 2-3 storeys in the main.

- . • Without specific locations that are identified in Area Visions and maps (pages 94 – 336) and

- . detailed in site allocations; local people cannot contribute to the decision of where such buildings will be situated, either in their borough or local area. Similarly, it renders all Area Visions meaningless and

- . places communities vulnerable to all Tall Buildings proposals affecting their area to be developer-led.

- . (It is understood that locations for tall buildings will instead be reviewed by the Southwark Design

- . Review Panel, whose reports are not made public until a planning application is published, too late in the process for local residents and businesses to influence decision-making.)

Existing local residents must have a say in developments of hundreds of units which mean significant changes/ pressures on infrastructure, rights to light, noise pollution, light pollution, parking, and local amenities.

- The policy has not properly taken account of, or responded to, consultation responses to the proposed change of

should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

Policies which should be implemented alongside strategic policies, and the Plan should be read collectively.

P14: Tall buildings

policy as identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings should be defined in the NSP: The Council response states a need for “flexibility”, but again does not back this up with evidence. Local residents were invited to two workshops several months apart by the developers working on Camberwell Union. We were offered one satisfaction survey. Homes affected (such as those on Parkhouse Street) did not receive notification of the consultation.

The policy isn't positive as some elements of the policy are unclear and ambiguous.

- Not setting out the approach or criteria to determine planning applications, hence developments such as Camberwell Union utilising this vague policy language to push through inappropriately dense and tall buildings.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions. This allows developers, like those responsible for Camberwell Union to dwarf local housing stock with inappropriate proposals (505 flats with little or no parking).
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means, therefore developments such as Camberwell Union putting forward 14 storey buildings in a residential area epitomised by two storey mews cottages and Victorian two bed homes.
- Not explaining what “new publicly accessible space at the top of the building” refers to, or to whom this space will be available.

The policy is not effective as it:

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents. Camberwell Union is flats with no parking or green spaces provided, and no provision for increased pressure on existing infrastructure
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year. Camberwell Union is 505 'luxury' flats with a proportion (35%) said to be affordable, with no information about what affordable means. There is no shortage of unaffordable homes in the borough.)
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings. Density increases of up to 500% can be achieved with human scale streetscape such as terraced apartment buildings.
- Insufficient consideration is given to other more effective ways of combatting the housing need without introducing negative effects of tall buildings (overshadowing, wind, microclimates) such as increasing density of lower-level buildings (e.g. 2-3 stories high); which also offer greater sustainability,
- It does not provide specific guidance on how tall buildings will increase the activities and life opportunities on offer for nearby residents, so leaving open the possibility that developers will design properties solely to benefit the building's residents and users.

P14: Tall buildings

In order to make the policy sound i would need to see the NSP-

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for proper consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
 - References to “criteria” should make clear exactly what those criteria are.
 - A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

P14: Tall buildings

Individual
NSPPSV95.2
Not Justified

Not Justified

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

Not Consistent with National Planning Policy

Not Consistent with National Planning Policy

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

businesses” so that Local Plans reflect a “collective vision”.

Not Positively prepared

Not Positively prepared

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

Not Effective

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

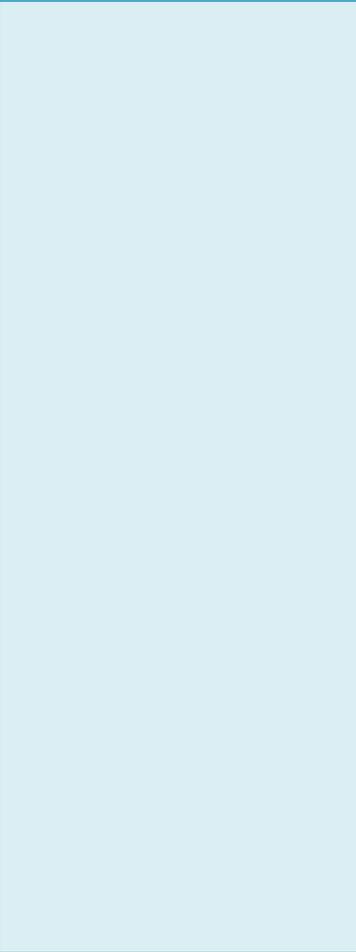
Suggested changes to P14

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.

P14: Tall buildings

o References to “criteria” should make clear exactly what those criteria are.
A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.



P14: Tall buildings

Individual
NSPPSV96.2
Not Justified

Not Justified

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

Not Consistent with National Planning Policy

Not Consistent with National Planning Policy

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

businesses” so that Local Plans reflect a “collective vision”.

Not Positively prepared

Not Positively prepared

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

Not Effective

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

Suggested changes to P14

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.

P14: Tall buildings

o References to “criteria” should make clear exactly what those criteria are.
A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

Individual
NSPPSV97.1

Policy P14: Tall Buildings (pgs 42-43) is unsound because:

- it is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that “Tall buildings should be part of a plan-led approach to changing or developing an area”, yet all restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we “use a number of criteria to determine applications”.

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”. However, it has become clear through the petitions (referred to above) and the public consultation work that Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

The Mayor has also stated that “higher densities can be achieved through a range of building design, including courtyard blocks and mid-rise building” and that development should respond to character and context. The Local Plans Expert Group which reported to the Government last year recommended the use of “propositional planning” methods which give greater three dimensional information about the form of new developments and help to explain “the consequences of proposed plans in order to stimulate easier engagement”. The latest Housing White Paper says that it is important “that people have a say over where new homes go and what they look like through the planning process”. Responding to this, New London Architecture’s London Tall Buildings Survey states “If people are to have a say, then they need to be given a clear idea of what is proposed and the impact it will have on the places where they live and work.” This policy is not consistent with national and regional planning policy.

Noted. Policy P14 will be amended to comply with Policy 7.7 of the Mayor’s current London Plan (2016) & Policy D8 of the new Draft London Plan.

P14: Tall buildings

-it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed Submission Version (apart from in the site specific policies) which will open the door to the argument of precedence alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station site.

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of ‘sky’ for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that “The main reason that the Committee held an inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found

P14: Tall buildings

that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use schemes and they can encourage the use of public transport where there is spare capacity, but so can other types of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than efficient development.”

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).

-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

The statement “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy.

This policy therefore does not meet the test for being positively prepared.

Changes that would make the policy sound include:

- The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on.

P14: Tall buildings

- Revise the policy in line with recent research that challenges the principle that tall buildings increase density and help regeneration, or justify why this has not been done/is not appropriate.
 - All other areas should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case by case basis.
 - Define what a 'tall building' is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.
 - Publish the "range of views" on tall buildings that have been gathered in the council's consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.
-

P14: Tall buildings

Individual
NSPPSV99.2

Not Justified

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

Not Consistent with National Planning Policy

Not Consistent with National Planning Policy

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies, and the Plan should be read collectively. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” so that Local Plans reflect a “collective vision”.

Not Positively prepared

Not Positively prepared

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

Not Effective

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

Suggested changes to P14

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly

P14: Tall buildings

accessible, for example through a free viewing gallery.

o References to “criteria” should make clear exactly what those criteria are.

A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

P14: Tall buildings

Individual
NSPPSV100.1

Not Justified

This policy is not justified because it introduces a fundamental policy change on tall buildings with no evidence to support or justify the change.

- The 2011 Core Strategy identifies specific locations in the borough where tall buildings would be appropriate. This is underpinned by a research paper produced in March 2010. Subsequent detailed research, which takes account of the successes/challenges/issues of recent high-rise developments, has not been drawn on to produce this plan.

This policy is not sound because it is not consistent with the Mayor's current London Plan (2016) or the new Draft London Plan

Policy 7.7 of the Mayor's current London Plan (2016) says:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

The New Southwark Plan:

- suggests tall buildings could be located anywhere in the borough unless there is a harmful impact on strategic views. This removes important protections in the planning process and will leave Southwark vulnerable to legal challenges from developers wishing to build high, even if there is argument that this is significantly detrimental to the local neighbourhood.

Policy D8 of the new Draft London Plan says:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".

The New Southwark Plan:

- does not define a tall building other than to say it is "significantly higher than surrounding buildings or their

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space..

P14: Tall buildings

context” (and it does not define “significantly”)

- does not mention a plan-led approach
- does not identify on maps the locations where tall buildings would be appropriate
- does not identify the general building heights that would be appropriate.

This policy is not positively prepared as some elements are vague or unclear:

- It does not make it clear that there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- It does not define “a point of townscape significance” or what is “proportionate”.
- It does not define what a tall building is, nor does it clarify what “significantly taller than their surroundings” means.
- More rigorous and accurate language is necessary in order to give the NSP legal credibility. The final paragraph of Policy 14 says “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications. We will continue to use this approach...” The ‘consistent approach’ to date has been defined and constrained by the current Southwark Plan. It is disingenuous to say they will continue to use the same approach when the New Southwark Plan would remove those constraints. “We...use a number of criteria to determine applications” is a meaningless phrase unless it specifies or at least gives examples of those criteria.

This policy is not effective because

- The failure to use rigorous and specific language and to provide clear and bounded examples removes many protections and leaves the NSP open to exploitation by developers who have a financial interest in building high-density high-rise buildings.
- It is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.
- Housing families, those with specialist accommodation needs and those requiring affordable accommodation in the lower levels of tower blocks can increase the perception of social stratification with wealthier residents occupying the topmost luxurious “penthouse” flats.
- There are serious fire risk concerns associated with tall buildings following the Grenfell disaster – perceived risks may have significant negative impacts on the mental health and wellbeing of tower block residents, even if unjustified.
- Expensive flats in luxury towers may be less likely to sell in the current climate, as identified in recent Guardian article (Ghost towers: half of all new-build luxury London flats fail to sell, Friday 26 January 2018).
- The number of empty and under-occupied properties in new high-rise buildings in London is an indication of ongoing policy failure in terms of high-rise, high-density housing delivering genuinely affordable homes.

Suggested changes to P14

P14: Tall buildings

To make the policy sound, the NSP should:

- Remove all references in all the area plans that require maximising number of residential units
- provide evidence to justify its policy change about tall buildings
- Identify specific sites in the borough where tall buildings are appropriate (and consult local residents and business about the suggested locations and indicative heights).
- show those locations on area vision maps and within site allocations
- give indicative heights for tall buildings.
- make it clear that tall buildings will be considered inappropriate in all other locations.
- Insert provision stating that parks and wild-life sites will be protected from over-shadowing from new building restrictions across the borough
- clarify all vague or unspecified sections, including
 - o defining or giving examples of 'a point of townscape significance' (for example, is 'significance' based on architectural, historical, industrial or social factors?)
 - o explaining what "criteria" are used when making decisions. .

Individual
NSPPSV101.1

P14 Tall Buildings
Plan pages 42 & 43

Not Justified

This policy is not justified as it involves a significant policy change from the previous policy on tall buildings and there is no evidence to support this policy change:

Without specific locations that are identified in Area Visions and maps (pages 94 – 336) and detailed in site allocations; local people cannot contribute to the decision of where such buildings will be situated, either in their borough or local area. Similarly, it renders all Area Visions meaningless and places communities vulnerable to all Tall Buildings proposals affecting their area to be developer-led. (It is understood that locations for tall buildings will instead be reviewed by the Southwark Design Review Panel, whose reports are not made public until a planning

The locations of tall buildings were previously distinguished in the design guidance of each appropriate site location. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on

P14: Tall buildings

application is published, too late in the process for local residents and businesses to influence decision-making

Not Consistent with National Policy

New Draft London Plan

The NSP fails to meet tall building planning criteria outlined in New London Plan draft November 2017

Namely on the following three stipulations- 1. Visual impacts Mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality- my objection refers to Peckham and Nunhead Action plan proposals affecting Peckham Town Centre.

2. Immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street.

3. Proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area- this is particularly applicable to Peckham and Nunhead Action Plan in relation to Peckham town centre – The Aylesham Centre NSP75, PNAAP 1 to 7, 14, PNAAP 18 to 32

Not Positively prepared

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- This policy is not sound because it is not consistent with the National Planning Policy Framework, where paragraph 155 emphasises the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” so that Local Plans reflect a “collective vision”.
- Insufficient consideration is given to other more effective ways of combating the housing need without introducing negative effects of tall buildings (overshadowing, wind, micro-climates) such as increasing density of lower-level buildings (e.g. 5-6 stories high); which also offer greater sustainability.

It does not provide specific guidance on how tall buildings will increase the activities and life opportunities on offer for nearby residents, so leaving open the possibility that developers will design properties solely to benefit the building's residents and users.

Not Effective

This policy is not effective as the inclusion of tall buildings reduces the probability of the stated aims of combining physical regeneration, raising population density, with increasing the activities and life opportunities on offer for nearby residents:

each appropriate site location as part of LBS plan lead approach will be specified within our AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

Suggested changes to P14

The NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
 - Make clear that tall buildings will be considered inappropriate in all other locations.
 - Require bids for alternative planning proposals which do not include tall buildings.
-

P14: Tall buildings

King's College Hospital NHS Foundation Trust.

NSPPSV102.1

The new Proposed Submission Version (NSP Dec 2017), has introduced a borough wide policy dedicated to Tall Buildings (Policy P14):

Tall buildings are significantly higher than surrounding buildings or their context. The highest tall buildings will be located in areas that benefit from the highest levels of public transport access where there is the greatest opportunity for regeneration. Typically, this will be in our major town centres, Opportunity Areas and the Central Activities Zone.

New tall buildings must:

- Be located at a point of townscape significance and have a height that is proportionate to the significance of the proposed location and size of the site; and
- Respond positively to local character and townscape; and
- Be of exemplary architectural design and residential quality; and
- Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
- Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough Views; and
- Avoid unacceptable harm to the significance of designated heritage assets or their setting; and
- Avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing and solar glare. Detailed modelling and analysis will be required to assess these impacts; and
- Maximise energy efficiency and prioritise the use of sustainable materials; and
- Have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience; and
- Provide a new, functional public space that is commensurate to the height and the size of the proposed building when above a height of 30m, or 25m in the Thames Policy Area, and widened footways and routes to accommodate increased footfall; and
- Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m.

Although KCH is not within the boundaries of Southwark, its proximity to a number of listed buildings and the historical Ruskin Park is likely to cause an impact on these heritage assets or their setting. We agree that tall buildings should avoid unacceptable harm to the significance of the designated heritage assets or their setting, but believe this should not impede future development potential of surrounding sites, especially those that operate for

Noted. Policies which should be implemented alongside strategic policies and the Plan should be read collectively. Policies 16, 17, 18 of the Plan are there to safeguard heritage assets from negative impacts from tall buildings.

P14: Tall buildings

the benefit of the public

We would propose the following wording to soften the policy:

“Avoid unacceptable harm to the significance of designated heritage assets or their setting unless public benefits clearly outweigh any harm caused.”

P14: Tall buildings

L&G
NSPPSV104.6

LAND AT 585-589 OLD KENT ROAD, LONDON, SE15 1LA

We submit on behalf of our client, Legal & General Assurance Society Ltd ('L&G' hereafter), a representation in response to your consultation on the representations in response to your consultation on the New Southwark Plan (Proposed Submission Version published November 2017), herein referred as the NSP.

Consultation closes on 27 February 2018. CBRE Limited ('CBRE' hereafter) act as planning advisors with respect to land on the corner of Old Kent Road and Rotherhithe New Road (referred to as 'The Site' hereafter) shown within the Location Plan attached in Appendix A.

The Site currently comprises a modern retail warehouse unit (Use Class A1) currently occupied by Currys PC World with associated car parking, which fronts Old Kent Road.

L&G welcomes the opportunity to engage with Southwark Council in respect of its emerging policies in the Old Kent Road Opportunity Area and specifically the publication of the New Southwark Plan with respect to their site. In addition to these representations, representations will be issued as part of the Draft Old Kent Road Area Action Plan consultation which closes on the 21st March 2018.

As you will be aware, we have already met with Officers to discuss the emerging Old Kent Road Area Action Plan and to discuss the emerging development plans and principles surrounding the redevelopment of the site. We would welcome further engagement with the Council regarding the future of the site.

Site Location and Description

The Site currently comprises modern retail warehouse units and associated car parking as shown in the enclosed site location plan. The site area comprises 0.55 hectare. The site fronts Old Kent Road, with modern industrial warehouse buildings and hardstanding located to the north.

The adjoining sites, consist of a modern warehouse building used for storage with associated hardstanding service yard to the north, a small 3 storey building currently used as a dentist surgery and a modern retail warehouse with associated car parking to the east. To the west are parking areas and the Selco builders warehouse.

In addition to the north is a large electrical substation building situated on Verney Road. At 399 Rotherhithe New Road to the north of the site a residential led mixed use scheme is under construction. This consists of a part 6, part 19 storey building comprising of a primary school and 158 residential dwellings. A planning application has also been submitted for 6-10 Verney Road for mixed use redevelopment which comprises three tall buildings of 23, 18 and 17 storeys as well as lower elements comprising 340 residential units, A1

Noted. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

retail use (197.18 m2 GEA), B1 office use/workspace (4435 m2 GEA), D1 community use (394 m2 GEA) as well as a section of the Surrey Canal Linear Park.

Whilst the area as a whole is currently characterised by large retail and industrial sheds with parcels of land dominated by areas of hard standing in the form of surface car parking and service yards, there is a changing emerging context. Strategic masterplans as part of the emerging Old Kent Road Area Action Plan will see much of the surrounding area coming forward for mixed use redevelopment including masterplan OKR 10 to the south and masterplan OKR 11 to the west. A number of planning applications are now coming forward within these masterplan areas.

Draft Old Kent Road Area Action Plan (2017) Requirements

The site falls within the allocation OKR 13 within the Draft AAP within Sub Area 3 Sandgate Street, Verney Road and Old Kent Road. Within the Draft AAP for OKR 13 indicative capacity is identified for 3,680 homes and 2,820 jobs.

Key requirements set out for the site within OKR 13 that relate to the site are as follows:

$\frac{3}{4}$ Replace existing retail space (A class use) and activate frontages on Old Kent Road through provision of retail (A use class), business (B use class) or community uses (D use class); and

$\frac{3}{4}$ Provide housing; and

$\frac{3}{4}$ Provide a new park on the alignment of the former Surrey Canal.

Within the tall buildings strategy within the AAP (Figure 9) a Tier 1 tall building is identified for the site (above 30 storeys). In terms of land use the site is identified for mixed use redevelopment within the 'high street' typology where new retail use is to be provided below residential flats or office uses.

The masterplan shows the Surrey Canal Linear Park cutting through the centre of the site which reduces to the developable area to approximately 75% of the site area and restricts the potential building footprints of any redevelopment proposal.

REPRESENTATIONS

Policy P14: Tall Buildings

L&G strongly supports the principle of tall buildings as set out within Policy P14 and supports the detailed design guidance that is provided in order to ensure that tall buildings are of the highest quality. There is a requirement at Policy P14, 2.11 to "Provide a new publically accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m". This requirement is likely to be challenging to commit to due to a range of factors including security issues, management and access considerations. To address this we suggest the following amendments:

"Consider the provision of a new publically accessible space at or near to the top of the building and

P14: Tall buildings

communal facilities for users and residents when above a height of 60m. This consideration should take into account management and security issues together with the range of other planning contributions delivered by the proposals”.



P14: Tall buildings

London School of Economics and Political Science (LSE)
NSPPSV113.2

Noted.

Representations by London School of Economics and Political Science on
The draft New Southwark Plan: Regulation 19 Consultation

These representations have been prepared on behalf of The London School of Economics and Political Science (LSE) regarding the draft New Southwark Plan Proposed Submission Version (NSP) consultation. LSE broadly supports the Council in its objectives to deliver new homes and jobs in the Borough. However to assist the Council in these objectives we set out a series of amendments aimed at ensuring the NSP is both legal and sound in order to promote good growth throughout the Borough.

Where suggestions are put forward these are designed to help guide the Council on the deliverability of the policies as well as their compliance with the London Plan and other strategic guidance. The Draft London Plan (DLP) was issued by the Mayor of London on 1st December 2017 and is subject to consultation up to the start of March 2018. Many of the key policies within the NSP reflect the wording of the Draft London Plan (DLP) 2017 which will maintain consistency across the policy framework. We have included references where appropriate to the DLP as well as the current adopted London Plan. LSE will be making representations on the Draft London Plan.

The London School of Economics and Political Science (LSE)

LSE ranks second on the world for social sciences (QS World University Rankings 2016-2017) and is classed as world leading for research. The School has a distinct student population, relative to its competitors, with a high proportion of one year Masters students, and a particularly international student body. There were 11,885 students in 2016-2017; 5082 undergraduates and 5,990 graduates. Over 8000 students were from overseas with a majority from non EU countries. The total number of students is set to increase and LSE's investment plans in its campus and student residences reflect its ambition to maintain its place and ranking as a world class university located at the heart of London.

Data shows that LSE postgraduate student demand for accommodation significantly surpasses supply. The School wishes to move to a position where it can guarantee an offer of accommodation to all new first year students. Currently LSE's guarantee is for first year undergraduate students only, while applications for appropriate accommodation from students with disabilities continue to be prioritised. On current projections on student numbers, this amounts to a required capacity of between 6,000 - 7,000 bed spaces in the next eight years. Bed space numbers total 4,669 in 2017/18.

P14: Tall buildings

The overarching objective of LSE's Student Bed Space Strategy (SBSS) is to continue to attract the brightest students from around the world and enhance the student experience through the provision of a competitive residential offer. This is underpinned by several evidence-based principles including: wishing to make guaranteed offers for all first-year students; having a significant proportion of economy priced bed spaces to meet the demand for affordable accommodation; a location model that meets student demand for sustainable and accessible accommodation; and increasing the number of LSE owned and managed bed spaces.

The unique selling point of LSE residences is that they are within walking distance to the School which is firmly established, and will remain, in the heart of London. LSE therefore seeks growth in accommodation capacity in close proximity to the School campus. This location supports the business model of LSE's renowned Summer School and other student group lettings and also the commercial lettings outside of term time which allows for shorter student contracts and therefore a lower annual cost to students. LSE is keen to work in partnership with local authorities whose policies recognise the School's unique position and contribution.

Representations on behalf of the LSE

The principal area of concern for LSE is the impact the NSP will have on the opportunities to develop the LSE's property at Bankside House. Bankside House currently provides approximately 600 student beds in a converted office building behind Tate Modern. The LSE has a strategic plan to replace the current Bankside House with a substantially improved and larger facility which will cater for the strong demand for places at LSE. The importance of this site is the number of beds it provides and the close proximity to the main LSE campus at Aldwych which is a short walk away.

Please note where paragraph numbers are given, these have been counted down from the relevant section referenced.

Policy P14 – Tall Buildings

We support the objectives of the policy and the desire to ensure the highest design quality is achieved when taller buildings are proposed. As supported by paragraph 3.30 of the adopted London Plan and DLP Policy SD1 (Growth Corridors and Opportunity Areas) future development across London should be linked to existing and future public transport infrastructure. We consider that the Council should specifically consider planned public transport connectivity and capacity improvements when determining the accessibility of a location. Without this approach the Council risks under-delivering new housing including student homes and missing key regenerative benefits which

P14: Tall buildings

tall buildings can provide.

Individual
NSPPSV115.1

Not Justified

This policy is not justified because it introduces a fundamental policy change on tall buildings with no evidence to support or justify the change.

- The 2011 Core Strategy identifies specific locations in the borough where tall buildings would be appropriate. This is underpinned by a research paper produced in March 2010. I am not aware of any subsequent research which justifies or explains the reasons for changing the policy.

Not Consistent with National Planning Policy

This policy is not sound because it is not consistent with the Mayor's current London Plan (2016) or the new Draft London Plan

Policy 7.7 of the Mayor's current London Plan (2016) says:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified

P14: Tall buildings

- “Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks”.

The New Southwark Plan:

- suggests tall buildings could be located anywhere in the borough unless there is a harmful impact on strategic views.

See my example below of why this aspect of the NSP would be unsound.

Policy D8 of the new Draft London Plan says:

- “Development Plans should define what is considered a tall building, the height of which may vary in different parts of London”.
- “Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate”.

The New Southwark Plan:

- does not define a tall building other than to say it is “significantly higher than surrounding buildings or their context” (and it does not define “significantly”)
- does not mention a plan-led approach
- does not identify on maps the locations where tall buildings would be appropriate
- does not identify the general building heights that would be appropriate.

See my example below of why this aspect of the NSP would be unsound.

Not Positively prepared

This policy is not positively prepared as some elements are vague or unclear:

- It does not make it clear that there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- It does not define “a point of townscape significance” or what is “proportionate”.
- It does not define what a tall building is, nor does it clarify what “significantly taller than their surroundings” means.
- On page 42, the second paragraph under the heading ‘Reasons’ includes a sentence that makes no sense grammatically: “Strategic locations that have a regional or borough important and the scale of the existing or planned townscape that is defined in our Area Action Plans and Supplementary Plans Documents.”
- The final paragraph of Policy 14 says “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications. We will continue to use this approach...” The ‘consistent approach’ to date has been defined and constrained by the current Southwark Plan. It is disingenuous to say they

within AAP's and SPD's.

P14: Tall buildings

will continue to use the same approach when the New Southwark Plan would remove those constraints. “We...use a number of criteria to determine applications” is a meaningless phrase unless it specifies or at least gives examples of those criteria.

See my example below of why this aspect of the NSP would be unsound.

Not effective

This policy is not effective because

- It is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.

Examples of why the NSP is not sound

In my neighbourhood, there is a planning application for a major private development called ‘Camberwell Union’ on the site of the current Burgess Business Park. This location is covered by an area action plan in the NSP, which states that developments will be expected to maximise the number of residential units. (Many of the area action plans include a similar expectation.) This, combined with the removal of restrictions on where tall buildings would be appropriate, effectively gives private developers a green light to fundamentally change the nature of an area by introducing tall, high density buildings, even where that area is ecologically sensitive (Burgess Business Park is directly next to Burgess Park, an in an area. The NSP is not sound because it limits the grounds on which local residents could object.

The application is for 505 residential units in 13 blocks, with heights varying from 3 to 14 storeys. Most of the blocks are 10 storeys or more. The current site is mainly low-rise light industrial units, and the housing stock in the immediate area is mainly 2-storey Victorian properties.

Recent decisions about new-builds in the area have been based on the current Southwark plan, and developments have generally only one storey higher than the existing housing stock.

If the new Southwark plan is adopted, because it is not consistent with the current London plan or the new draft London plan:

- There would be no plan-led approach to changing this low-rise light-industrial area to mixed-use high rise
- There would be no overarching planning policy to prevent the construction of 10-14-storey buildings in the midst of an area of low-rise dwellings
- There would be no definition about what is “significantly higher than surrounding buildings or their context”.

The Camberwell Union plans have a 14-storey block at the centre; each block alongside it steps down slightly in height. There is a small terrace of 2-storey Victorian properties in the midst of the site that would be immediately surrounded on 3 sides by new buildings which are either 3, 4 or 5 storeys, and then by taller buildings stepping up to 14 storeys.

Because the NSP is not consistent with the current London plan, there would be no consideration as to whether this area is appropriate, sensitive or inappropriate for tall and large buildings.

P14: Tall buildings

Because the NSP is not positively prepared, there is no clear definition about the 'context' of the existing Victorian residential buildings, which of the 14 blocks would be classed as the 'surrounding buildings' or how it would be assessed whether the proposed new buildings are 'significantly higher'.

Because the NSP is not effective, private developers could get the green light to build 505 residential units, 35% of which should be 'affordable', even if their financial viability statement says there is a risk that 35% affordable housing (is not deliverable in viability terms, and says the scheme should be amended to allow it to be deliverable. So from the outset, a private development can declare it is unable to meet the target of 35% affordable housing, and the NSP is not effective enough to give the council the authority to reject the development on that basis. There is no shortage of unaffordable homes in Southwark. We need an NSP that enables the council to deliver affordable housing, not simply add to the supply of unaffordable housing.

Suggested changes to P14

To make the policy sound, the NSP should

- provide evidence to justify its policy change about tall buildings
- Identify specific sites in the borough where tall buildings are appropriate (and consult local residents and business about the suggested locations and indicative heights).
- show those locations on area vision maps and within site allocations
- give indicative heights for tall buildings.
- make it clear that tall buildings will be considered inappropriate in all other locations.
- clarify all vague or unspecified sections, including
 - o defining or giving examples of 'a point of townscape significance' (for example, is 'significance' based on architectural, historical, industrial or social factors?)
 - o explaining what "criteria" are used when making decisions. .

P14: Tall buildings

Individual
NSPPSV116.2

Not Justified

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

Not Consistent with National Planning Policy

Not Consistent with National Planning Policy

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

Not Positively prepared

Not Positively prepared

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

Not Effective

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

Suggested changes to P14

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
 - o References to “criteria” should make clear exactly what those criteria are.

P14: Tall buildings

A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

Individual
NSPPSV119.2

My name is [REDACTED] and I write as a member of the Dulwich Society. My comments relate to the Development Management Policies covering aspects of the historic environment.

At the outset, I am bound to suggest that the Plan is basically unsound because it fails to take on the emerging policies and proposals contained in the Draft London Plan. This is a matter of timing, and in no sense represents an error of judgement on the part of Southwark. Ideally therefore, we suggest that the Plan be withdrawn pending the outcome of the EIP into the London Plan. Failure to do so, will mean that the Plan will subsequently require substantial amendment, because the approach adopted in the new London Plan differs markedly from that of its predecessor.

The Society's comments on the Development Management policies are as follows:

P14 Tall buildings.

2.6 The requirement to 'avoid unacceptable harm to the significance of designated heritage assets and their settings' employs a somewhat misleading double negative, which could perversely be interpreted as a suggestion to seek out acceptable harm. Far better to rule out development causing harm, but to set out the particular circumstances that might justify an exception to normal policies

Noted. Policy P14 will be amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan.

P14: Tall buildings

Individual
NSPPSV122.1

P14 Tall Buildings

Not Consistent with National Planning Policy

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

The need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

Example/illustration

of problems the vague wording of the NSP could create:

Proposed Development 'Camberwell Union' – Burgess Business Park, Camberwell

- The proposed development suggests 4-6 storey buildings on Wells Way and Parkhouse Street, where the tallest buildings opposite are two storeys. This height difference of 4+ storeys opposite and 10 and 14 storey buildings in the middle of the development will affect daylight: The houses across the street to the east face west. Therefore if

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

the proposed development goes forward, these houses be in shadow from midday (in the winter), and will lose afternoon light in other seasons. These tall buildings will create wind tunnels and micro climates.

- In this area, it is unprecedented to have this level discrepancy in between the new builds in the area and the Victorian houses: to name a few examples, new developments on Southampton Way, Benhill Road and Commercial Way have a one storey difference at most.
- The tallest proposed element is 14 storeys.
- The local housing stock is two story Georgian and Victorian mews cottages and includes listed buildings. The proposed development site is between 4-14 storeys tall, and will be similar to sites at Elephant and Castle and Peckham, which while not unattractive, are not sensitive to the character and historical buildings in the borough. This is neither proportionate to the significance of the proposed location and does not respond positively to local character and townscape as the wording on pages 42-43 of the NSP would suggest. The development is in direct conflict with the Mayors current London Plan, and the Mayors New Draft Plan (see above).

Not Justified

This policy is not justified as it involves a significant policy change from the previous policy on tall buildings and there is no evidence to support this policy change:

- The 2011 Core strategy identified particular locations in the borough where tall buildings were appropriate, and this was supported by a Tall Buildings Research Paper (March 2010). No similar study has been undertaken to support the new policy that tall buildings may be appropriate anywhere in the borough. Camberwell Union and proposed developments like it are too dense and tall to be appropriate for the area, which is residential, and 2-3 storeys in the main.
- Without specific locations that are identified in Area Visions and maps (pages 94 – 336) and detailed in site allocations; local people cannot contribute to the decision of where such buildings will be situated, either in their borough or local area. Similarly, it renders all Area Visions meaningless and places communities vulnerable to all Tall Buildings proposals affecting their area to be developer-led. (It is understood that locations for tall buildings will instead be reviewed by the Southwark Design Review Panel, whose reports are not made public until a planning application is published, too late in the process for local residents and businesses to influence decision-making.) Existing local residents must have a say in developments of hundreds of units which mean significant changes/ pressures on infrastructure, rights to light, noise pollution, light pollution, parking, and local amenities.
- The policy has not properly taken account of, or responded to, consultation responses to the proposed change of policy as identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings should be defined in the NSP: The Council response states a need for “flexibility”, but again does not back this up with evidence. Local residents were invited to two workshops, at very short notice, several months apart by the developers working on Camberwell Union. We were offered one satisfaction survey. The attitude towards residents

P14: Tall buildings

at these meetings was both dismissive and was selective about the kind of information shared to gloss over some of the aspects which residents would be likely to find troubling, even towards questions which could have been supportive of the plans. Homes affected (such as those on Parkhouse Street) did not receive notification of the consultation.

Not Positively prepared

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications, hence developments such as Camberwell Union utilising this vague policy language to push through inappropriately dense and tall buildings.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions. This allows developers, like those responsible for Camberwell Union to dwarf local housing stock with inappropriate proposals (505 luxury flats with no parking).
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means, therefore developments such as Camberwell Union putting forward 14 storey buildings in a residential area epitomised by two storey mews cottages and Victorian two bed homes.
- Not explaining what “new publicly accessible space at the top of the building” refers to, or to whom this space will be available.

Not Effective

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents. Camberwell Union is luxury flats with no parking or green spaces provided, and no provision for increased pressure on existing infrastructure. Already public transport along Southampton Way and Wells Way is strained at busy times due to need vs. regularity of service.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year. Camberwell Union is 505 luxury flats with a proportion (35%) said to be affordable, with no information about what affordable means either in terms of size, quality or price.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings. Density increases of up to 500% can be achieved with human scale streetscape such as terraced apartment buildings.
- Insufficient consideration is given to other more effective ways of combatting the housing need without introducing negative effects of tall buildings (overshadowing, wind, microclimates) such as increasing density of lower-level buildings (e.g. 2-3 stories high); which also offer greater sustainability,

P14: Tall buildings

- It does not provide specific guidance on how tall buildings will increase the activities and life opportunities on offer for nearby residents, so leaving open the possibility that developers will design properties solely to benefit the building's residents and users.

Suggested changes to P14

To make the policy sound, the NSP MUST

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for proper consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
 - o References to "criteria" should make clear exactly what those criteria are.
 - o A clearer definition of tall buildings, as indicated by New Draft London Plan Policy D8 part A.
- Remove all references in all the area plans that require maximising number of residential units.
- Restore full section in current Southwark Plan that sets out height limits of 8 and 10 storeys for residential and commercial buildings outside of core action areas.
- Insert provision stating that parks and wild-life sites will be protected from over-shadowing from new buildings and developments across the borough.

Individual
NSPPSV125.2

New Southwark Plan

Draft Future Steering Board Response to Proposed Submission Version Feb 2018

Noted. The policy will be amended accordingly. Policies which should be implemented alongside strategic policies and the Plan should be read

P14: Tall buildings

Background

The Southwark Future Steering Board (FSB) is a consultative body with membership drawn from the Council's Tenants Council, and Home Ownership Council. The terms of reference of the FSB set out its role to provide a formal, resident-led mechanism to work with Southwark Council on its Asset Management, New Build Homes and investment plan. The FSB has considered and commented on 2 previous drafts of the New Southwark Plan. These are the comments of the FSB on the Submission Draft of the New Southwark Plan in February 2018. P9 Optimising Delivery of New Homes.

Density is related to PTAL. Public transport is provided where there are people. This is a circular relationship which means that where there is more population density, more public transport is provided, and then the planning process requires more density in new development. This means that density gets concentrated in areas with existing dense population. The New Southwark Plan reflects this, with lower densities, and no areas zoned as opportunity areas in the South of the borough. This is despite the provision of railway stations at East Dulwich, North Dulwich and West Dulwich and nearby railway stations at Denmark Hill, Herne Hill, Tulse Hill and Sydenham Hill. The plan could more evenly distribute new residential development to take advantage of these railway stations.

Wind Tunnel Effects

The increase in tall buildings in some areas of the borough has increased the wind shear effect. This particularly affects pedestrians and cyclists. Tall buildings are zoned in areas where there is an expectation of high street development. In the sections on Design Quality (p.39) and Tall Buildings (p.42) there is mention of; 'reduce...adverse local climatic conditions (e.g. wind shear)', and ;'Avoid harmful and uncomfortable environmental impacts including wind shear'. There is no mention of what standards will be applied to achieve this. The NSP needs to identify the relevant standards that these policies will be measured against, or explain how such standards will be developed. Wind shear not only has an impact on pedestrian and cyclists safety, but also has an impact on the 'pedestrian experience', and can be a contributory factor in the spread and intensity of fires.

collectively.

P14: Tall buildings

Individual
NSPPSV126.2

Not Justified

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

Not Consistent with National Planning Policy

Not Consistent with National Planning Policy

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and

Noted. Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

businesses” so that Local Plans reflect a “collective vision”.

Not Positively prepared

Not Positively prepared

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

Not Effective

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

Suggested changes to P14

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.

P14: Tall buildings

o References to “criteria” should make clear exactly what those criteria are.
A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

P14: Tall buildings

Individual
NSPPSV130.2

Not Justified

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

Not Consistent with National Planning Policy

Not Consistent with National Planning Policy

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

Not Positively prepared

Not Positively prepared

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

Not Effective

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

Suggested changes to P14

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
 - o References to “criteria” should make clear exactly what those criteria are.

A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

P14: Tall buildings

Individual
NSPPSV131.2

Not Justified

Not Justified

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

Not Consistent with National Planning Policy

Not Consistent with National Planning Policy

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” so that Local Plans reflect a “collective vision”.

Not Positively prepared

Not Positively prepared

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

Not Effective

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

Suggested changes to P14

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly

P14: Tall buildings

accessible, for example through a free viewing gallery.

o References to “criteria” should make clear exactly what those criteria are.

A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

Individual
NSPPSV132.2

P14 Tall Buildings

Not Consistent with National Policy

P14 is not compliant with the current 2016 consolidation Plan Policy 7.7 which states:

“Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations”.

“Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks”.

By contrast the NSP effectively indicates that tall buildings can be located anywhere in the Borough, (unless they interfere with strategic / borough views) and does not indicate any attempt to identify locations in conjunction with the Mayor.

Not Consistent with National Policy

similarly P14 is not compliant with the New Draft London Plan 2017 Policy

Policy P14 has been amended to comply with Policy 7.7 of the Mayor’s current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall

P14: Tall buildings

D8 which states:

Part A: "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".

By contrast the NSP gives no definition of a tall building in terms of height either generally or in location specific terms

Not Consistent with National Policy

Part B "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".

The NSP however includes no maps and/or corresponding heights thus failing to take a plan led approach.

DETAIL / PROPOSED CHANGES

The NSP should clearly identify specific sites in the borough where tall buildings are appropriate giving indicative heights and work

This strategy should be worked on with the mayor and crucially these locations and indicative heights should be put out for appropriate consultation with local residents and businesses. This could form the core of an evidence base to update the study of 2010.

Not Justified or not positively prepared

Evidence of participation of the local community is poor or entirely lacking / the consultation that has taken place has not allowed for effective engagement of all interested parties and there are gaps in the policy and the evidence base is not up to date:

The interplay of this policy with the site allocations policies which are too vague on this subject to be meaningful - referring only to "taller buildings" leave a significant gap in the policy (any commitment to actual heights) whereby the consultation responses on one are dismissed by the other: P180 of the consultation report dismisses in one stroke many informed local responses about a heritage setting (NSP53) with "Applications for tall buildings will be assessed against borough-wide policy. This will ensure that applications for tall buildings are assessed against all relevant considerations given the detailed design, location and context." Thus the tall buildings policy makes it impossible for local opinion to be registered about site allocations on the subject of tall buildings.

The policy is not positively prepared as some aspects of the policy are vague or unclear, failing to properly define what would constitute a "tall building" while the phrase "significantly taller than the surroundings" is too vague to be in any way useful. Furthermore it creates the potential for a domino effect in tall building because once one exists it defines the 'surroundings' for the next.

buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

DETAIL / PROPOSED CHANGES

It should be made clear that tall buildings will otherwise/elsewhere be deemed inappropriate and a definition given for what would constitute a “tall building” - as per the London Plan requirement in D8 Part A

Not Positively Prepared

The 2011 Core strategy identified particular locations in the borough where tall buildings were appropriate, and this was supported by a Tall Buildings Research Paper (March 2010). No similar study has been undertaken to support the significantly different new policy that tall buildings may effectively be appropriate anywhere in the borough.

Individual
NSPPSV136.15

The proposed Policy 14 on Tall buildings is unsound because it is inconsistent with the Mayor of London's draft London Plan. The Mayor's Plan rightly recognises that what is considered a tall building may vary in different parts of London. Consequently, the draft London Plan states that, “Development Plans should define what is considered a tall building, the height of which may vary in different parts of London”. This definition is absent from the NSP. The NSP also fails to define where tall buildings might be allowed and where they should not be allowed. Again, this is in contradiction to the draft London Plan which argues that, “Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate”.

Proposed changes

The NSP should be modified to establish clearly where tall buildings could be permitted and all areas where this will be not be permitted.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. The locations of tall buildings were previously distinguished in the design guidance of each appropriate site location. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall

P14: Tall buildings

Peckham Society
NSPPSV140.6

1 Tall buildings are significantly higher than surrounding buildings or their context. The highest tall buildings will be located in areas that benefit from the highest levels of public transport access where there is the greatest opportunity for regeneration. Typically this will be in our major town centres, Opportunity Areas and the Central Activities Zone.

This is unsound. This permits tall buildings (anywhere,) without providing a rationale. The widespread provision of tall buildings must be justified.

buildings accepted on each appropriate site location as part of LBS plan lead approach will be specified within our AAP's and SPD's.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

Peckham Society
NSPPSV140.16

Page 320

NSP 78

'Site provides opportunity for a taller landmark building of 15 storeys'

PS suggests this is omitted

REASON There is a general policy on tall buildings P14, and any specific proposal should be measured against this.

Port of London Authority
NSPPSV143.3

3. Policy P14: Tall Buildings

The PLA broadly support this policy, including the reference to the need to consider the Thames Policy Area and Strategic Views in the policy wording.

Individual
NSPPSV145.2

Section 2

There is a second item in particular that the following section refers to – the height of buildings across Southwark as a whole. Please see the comments below:

Policy P14: Tall Buildings (pgs 42-43) is unsound because:

Noted. Reference will be amended.

Noted.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown

P14: Tall buildings

- it is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that “Tall buildings should be part of a plan-led approach to changing or developing an area”, yet all restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we “use a number of criteria to determine applications”.

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”. However, it has become clear through the petitions (referred to above) and the public consultation work that Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

This policy is therefore not consistent with national and regional planning policy.

-it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed Submission Version (apart from in the site specific policies) which will open the door to the argument of precedence alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station site.

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,

now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and 'doorstep play' areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of 'sky' for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that "The main reason that the Committee held an inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use schemes and they can encourage the use of public transport where there is spare capacity, but so can other types of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than efficient development."

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).

-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

P14: Tall buildings

The statement “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy.

This policy therefore does not meet the test for being positively prepared.

Changes that would make the policy sound include:

- The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on.
 - Revise the policy in line with recent research that challenges the principle that tall buildings increase density and help regeneration, or justify why this has not been done/is not appropriate.
 - All other areas should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case by case basis.
 - Define what a ‘tall building’ is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.
 - Publish the “range of views” on tall buildings that have been gathered in the council’s consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.
-

P14: Tall buildings

Individual
NSPPSV146.2

Section 2

There is a second item in particular that the following section refers to – the height of buildings across Southwark as a whole. Please see the comments below:

Policy P14: Tall Buildings (pgs 42-43) is unsound because:

- it is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that “Tall buildings should be part of a plan-led approach to changing or developing an area”, yet all restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we “use a number of criteria to determine applications”.

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”. However, it has become clear through the petitions (referred to above) and the public consultation work that Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

This policy is therefore not consistent with national and regional planning policy.

-it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed Submission Version (apart from in the site specific policies) which will open the door to the argument of precedence alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station site.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor’s current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP’s and SPD’s.

P14: Tall buildings

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of ‘sky’ for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that “The main reason that the Committee held an inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use schemes and they can encourage the use of public transport where there is spare capacity, but so can other types of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than efficient development.”

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).

P14: Tall buildings

-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

The statement “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy.

This policy therefore does not meet the test for being positively prepared.

Changes that would make the policy sound include:

- The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on.
 - Revise the policy in line with recent research that challenges the principle that tall buildings increase density and help regeneration, or justify why this has not been done/is not appropriate.
 - All other areas should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case by case basis.
 - Define what a ‘tall building’ is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.
-

P14: Tall buildings

- Publish the “range of views” on tall buildings that have been gathered in the council’s consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.

Individual
NSPPSV149.1

Not Justified

This policy is not justified because it introduces a fundamental policy change on tall buildings with no evidence to support or justify the change.

- The 2011 Strategy identifies specific locations in the borough where tall buildings would be appropriate. This is underpinned by a research paper produced in March 2010. There is no subsequent research which justifies or explains the reasons for changing the policy.

Not Consistent with National Planning Policy

This policy is not sound because it is not consistent with the Mayor’s current London Plan (2016) or the new Draft London Plan

Policy 7.7 of the Mayor’s current London Plan (2016) says:

- “Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations”.
- “Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks”.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor’s current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP’s and SPD’s.

P14: Tall buildings

The New Southwark Plan:

- suggests tall buildings could be located anywhere in the borough unless there is a harmful impact on strategic views.

See my example below of why this aspect of the NSP would be unsound.

Policy D8 of the new Draft London Plan says:

- “Development Plans should define what is considered a tall building, the height of which may vary in different parts of London”.
- “Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate”.

The New Southwark Plan:

- does not define a tall building other than to say it is “significantly higher than surrounding buildings or their context” (and it does not define “significantly”)
- does not mention a plan-led approach
- does not identify on maps the locations where tall buildings would be appropriate so there is no way of knowing where these buildings will pop up
- does not identify the general building heights that would be appropriate.

See my example below of why this aspect of the NSP would be unsound.

Not Positively prepared

This policy is not positively prepared as some elements are vague or unclear:

- It does not make it clear that there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough, even though this is obviously implied.
- It does not define “a point of townscape significance” or what is “proportionate”.
- It does not define what a tall building is, nor does it clarify what “significantly taller than their surroundings” means.
- On page 42, the second paragraph under the heading ‘Reasons’ includes a sentence that makes no sense grammatically: “Strategic locations that have a regional or borough important and the scale of the existing or planned townscape that is defined in our Area Action Plans and Supplementary Plans Documents.”
- The final paragraph of Policy 14 says “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications. We will continue to use this approach...” The ‘consistent approach’ to date has been defined and constrained by the current Southwark Plan. It is disingenuous to say they

It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

will continue to use the same approach when the New Southwark Plan would remove those constraints. “We...use a number of criteria to determine applications” is a meaningless phrase unless it specifies or at least gives examples of those criteria.

See my example below of why this aspect of the NSP would be unsound.

Not effective

This policy is not effective because

- It is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.

Examples of why the NSP is not sound

In our neighbourhood, there is a planning application for a major private development called ‘Camberwell Union’ on the site of the current Burgess Business Park

The application is for 505 residential units in 13 blocks, with heights varying from 3 to 14 storeys. Most of the blocks are 10 storeys or more. The current site is mainly low-rise light industrial units, and the housing stock in the immediate area is mainly 2-storey Victorian properties.

Recent decisions about new-builds in the area have been based on the current Southwark plan, and developments have generally only one storey higher than the existing housing stock.

If the new Southwark plan is adopted, because it is not consistent with the current London plan or the new draft London plan:

- There would be no plan-led approach to changing this low-rise light-industrial area to mixed-use high rise
- There would be no overarching planning policy to prevent the construction of 10-14-storey buildings in the midst of an area of low-rise dwellings
- There would be no definition about what is “significantly higher than surrounding buildings or their context”.

The Camberwell Union plans have a 14-storey block at the centre; each block alongside it steps down slightly in height. There is a small terrace of 2-storey Victorian properties in the midst of the site that would be immediately surrounded on 3 sides by new buildings which are either 3, 4 or 5 storeys, and then by taller buildings stepping up to 14 storeys.

Because the NSP is not consistent with the current London plan, there would be no consideration as to whether this area is appropriate, sensitive or inappropriate for tall and large buildings.

Because the NSP is not positively prepared, there is no clear definition about the ‘context’ of the existing Victorian residential buildings, which of the 14 blocks would be classed as the ‘surrounding buildings’ or how it would be assessed whether the proposed new buildings are ‘significantly higher’.

Because the NSP is not effective, private developers could get the green light to build 505 residential units, 35% of which should be ‘affordable’, even if their financial viability statement says there is a risk that 35% affordable housing (is not deliverable in viability terms, and says the scheme should be amended to allow it to be deliverable.

P14: Tall buildings

So from the outset, a private development can declare it is unable to meet the target of 35% affordable housing, and the NSP is not effective enough to give the council the authority to reject the development on that basis. There is no shortage of unaffordable homes in Southwark. We need an NSP that enables the council to deliver affordable housing, not simply add to the supply of unaffordable housing.

Suggested changes to P14

To make the policy sound, the NSP should

- provide evidence to justify its policy change about tall buildings
- Identify specific sites in the borough where tall buildings are appropriate (and consult local residents and business about the suggested locations and indicative heights).
- show those locations on area vision maps and within site allocations
- give indicative heights for tall buildings.
- make it clear that tall buildings will be considered inappropriate in all other locations.
- clarify all vague or unspecified sections, including
 - o defining or giving examples of 'a point of townscape significance' (for example, is 'significance' based on architectural, historical, industrial or social factors?)explaining what "criteria" are used when making decisions. .

Individual
NSPPSV150.2

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised

P14: Tall buildings

- “Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations”.
 - “Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks”.
- B/ The Mayor’s New Draft London Plan, through failure to comply with:
- “Development Plans should define what is considered a tall building, the height of which may vary in different parts of London”.
 - “Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate”.
 - “Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter”.
- C/ National Planning Policy Framework, through failure to comply with:
the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” so that Local Plans reflect a “collective vision”.

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

Suggested changes to P14

To make the policy sound, the NSP should

tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

Policies which should be implemented alongside strategic policies, and the Plan should be read collectively.

P14: Tall buildings

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
 - o References to “criteria” should make clear exactly what those criteria are.A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

Individual
NSPPSV151.10

P14

The policy needs to be proportionate in its approach. It should reflect the general CABE/HE advice regarding tall buildings. The various criteria that are stated need to be applied flexibly. In the first instance ‘must’ should be replaced. For example, it will not be appropriate or possible for every tall building to provide ‘new, functional public space...’

Delete the word ‘must’.

Noted.

P14: Tall buildings

Individual
NSPPSV152.1

Not Justified

This policy is not justified as it:

- I. The 2011 Core strategy identified particular locations in the borough where tall buildings were appropriate, and this was supported by a Tall Buildings Research Paper (March 2010). No similar study has been undertaken to support the new policy that tall buildings may be appropriate anywhere in the borough.
- II. Without specific locations that are identified in Area Visions and maps (pages 94–336) and detailed in site allocations; local people cannot contribute to the decision of where such buildings will be situated, either in their borough or local area. Similarly, it renders all Area Visions meaningless and places communities vulnerable to all Tall Buildings proposals affecting their area to be developer-led. (It is understood that locations for tall buildings will instead be reviewed by the Southwark Design Review Panel, whose reports are not made public until a planning application is published, too late in the process for local residents and businesses to influence decision-making).
- III. The policy has not properly taken account of, or responded to, consultation responses to the proposed change of policy as identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings should be defined in the NSP: the Council response states a need for “flexibility”, but again does not back this up with evidence.
- IV. Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

Not Consistent with National Planning Policy

This policy is not sound because it is not consistent with:

- I. The Mayor’s Current London Plan (2016), through failure to comply with:
 - “Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations”.
 - “Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall

Policy P14 has been amended to comply with Policy 7.7 of the Mayor’s current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP’s and SPD’s. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

and large buildings and identify them in their Local Development Frameworks”; but the NSP does not indicate any attempt to identify locations in conjunction with the Mayor.

- Consequently, the NSP does not comply with or reflect:

- a. 7.25 Tall buildings should be resisted in areas that will be particularly sensitive to their impacts and only be considered if they are the most appropriate way to achieve the optimum density in highly accessible locations.
- b. 7.28 The Mayor will work with boroughs to identify locations where tall and large buildings might be appropriate, sensitive or inappropriate.

II. The Mayor’s New Draft London Plan, through failure to comply with:

- “Development Plans should define what is considered a tall building, the height of which may vary in different parts of London”.
- “Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate”.
- “Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter”.

III. National Planning Policy Framework, through failure to comply with:

- This policy is not sound because it is not consistent with the National Planning Policy Framework, where paragraph 155 emphasises the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” so that Local Plans reflect a “collective vision”. However, the concerns identified in the Consultation Report regarding lack of identification of where tall buildings are located (and which have not been properly taken into account); show no collective vision, with many local residents and businesses disagreeing with the view that tall buildings are an effective way to carry out regeneration and so solve the housing crisis

Not Positively prepared

This policy is not positively prepared as some aspects of the policy are vague or unclear:

I. Not setting out the approach or criteria to determine planning applications.

P14: Tall buildings

- II. Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- III. Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- IV. Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- V. Not explaining what “new publicly accessible space at the top of the building” refers to.

Not Effective

This policy is not effective as it:

- I. Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- II. Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- III. Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

1. Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Suggested changes to P14

To make the policy sound, the NSP should:

- I. Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- II. Make clear that tall buildings will be considered inappropriate in all other locations.
- III. Clarify all vague or unspecified sections, including
 - Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
 - References to “criteria” should make clear exactly what those criteria are.
 - A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

P14: Tall buildings

Individual
NSPPSV154.2

Introduction

The following are comments I wish to make on the proposed version of the New Southwark Plan on behalf of my organisation. I wish to appear at any public hearing/oral examination of these issues.

Firstly, I recognise the inclusion of Community Land Trust homes in the New Southwark Plan as a recognised 'Low cost home ownership product' (pg 24) and as part of the Site vision for site NSP75, saying 'Redevelopment of the site must:... Provide new intermediate affordable housing through a community land trust.' (pg 312). I would also like to commend Southwark Council's ambitious target to deliver 11,000 new council homes by 2043 with the first 1,600 complete or underway by the end of 2018. (pg 8).

This letter is largely in order to comment on one particular site – NSP75: Aylesham Centre and Peckham Bus Garage. After speaking to over 1,000 local people, attending all the public consultation workshop held by Tiger, running our own workshops on issues related to the site, canvassing local residents, shoppers and traders, Peckham Citizens has produced our Citizens Charter, a full copy of which is submitted along side this letter. Our headline proposal in the Charter is for the following to be delivered on the Aylesham site:

1. Affordable Homes

35% - 50% genuinely and permanently affordable, high quality homes for local people, priced according to local incomes, including social housing and a Community Land Trust.

2. Good Jobs

1 in 3 jobs for local people at all levels of seniority, a fully-resourced, targeted training strategy and all employees on site to be paid at least the London Living Wage.

3. Celebrating Peckham

An open, street-based design that includes a significant public space, protects key, local retailers and reinforces the existing culture, economy and built environment of Peckham, with no building on site at more than 9 stories tall.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Policies which should be implemented alongside strategic policies, and the Plan should be read collectively.

P14: Tall buildings

4. Community Engagement

A commitment to meaningful community engagement with residents, traders and community organisations throughout the design, construction and management of the project. This should include local stakeholders being part of determining how any Section 106, Community Infrastructure Levy or overage agreement funds might be allocated.

Section 2

There is a second item in particular that the following section refers to – the height of buildings across Southwark as a whole. Please see the comments below:

Policy P14: Tall Buildings (pgs 42-43) is unsound because:

- it is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that “Tall buildings should be part of a plan-led approach to changing or developing an area”, yet all restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we “use a number of criteria to determine applications”.

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”. However, it has become clear through the petitions (referred to above) and the public consultation work that Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

This policy is therefore not consistent with national and regional planning policy.

-it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed Submission Version (apart from in the site specific policies) which will open the door to the argument of precedence alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall

P14: Tall buildings

buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station site.

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of ‘sky’ for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that “The main reason that the Committee held an inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use schemes and they can encourage the use of public transport where there is spare capacity, but so can other types of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than

P14: Tall buildings

efficient development.”

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).

-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

The statement “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy.

This policy therefore does not meet the test for being positively prepared.

Changes that would make the policy sound include:

- The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on.
- Revise the policy in line with recent research that challenges the principle that tall buildings increase density and help regeneration, or justify why this has not been done/is not appropriate.
- All other areas should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case by case basis.

P14: Tall buildings

- Define what a 'tall building' is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.
- Publish the "range of views" on tall buildings that have been gathered in the council's consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.

P14: Tall buildings

Royal Mail Pension Trustees Limited.
NSPPSV155.5

Dear Sir/Madam,
New Southwark Plan - Proposed Submission Version (December 2017)
Representations on behalf of Royal Mail Pension Trustees Limited
We write on behalf of our client, Royal Mail Pension Trustees Limited, to submit representations to the New Southwark Plan - Proposed Submission Version – which are provided below.

Our client

Royal Mail Pension Trustees Limited are the freehold owners of the Bricklayers Arms Distribution Centre, Mandela Way which is proposed for allocation as part of 'Site OKR3: Mandela Way in the emerging Old Kent Road Area Action Plan ("AAP") for mixed use redevelopment to include employment (B use class), residential (C3 use class), primary school (D1 use class) development and a new park.

Representations

Policy P14: Residential Design

Whilst it is acknowledged that there can be the opportunity to provide public viewing accessible viewing platforms to appropriate tall buildings in suitable locations, the blanket requirement of paragraph 2.11 of draft Policy P14 that all buildings over 60m must 'provide a new publically accessible space at or near to the top of the building...' is considered to be completely inappropriate.

It is inevitable that not every tower over 60m to be developed in the borough will have a view that significant numbers of the general public will be keen to see, so requiring public access in every case would result in unused areas of new towers. Furthermore, there are clearly significant safety and security concerns for providing public access into residential towers in particular, which are likely to necessitate the provision of a separate entrance and lifts to the residential accommodation, with the employment also of staff also needed to manage access and the use of this public space. These requirements would be likely to have significant impact on the viability of the development of residential towers, in turn compromising the delivery of housing in the key locations such as the Opportunity Area Cores.

Draft policy P14 is therefore considered to be unsound as currently worded, on the basis that it is not sufficiently flexible to allow for practical difficulties which are likely to mean that it is not practical or viable to accommodate public viewing areas in residential towers, so the policy cannot therefore be 'justified' as the most appropriate strategy, when considered against reasonable alternatives.

It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

Change sought – It is requested that paragraph 2.11 of draft Policy P14 be amended as follows to promote the creation publically-accessible viewing area for tall buildings as appropriate:

New tall buildings must:

“Seek to incorporate new publically accessible space at or near to the top of the building when above a height of 60m unless it is demonstrated not to be practical or viable to do so.”

Individual
NSPPSV156.2

Name: [REDACTED]

Organisation: Hidayah Women's Association
[REDACTED]

Introduction

The following are comments I wish to make on the proposed version of the New Southwark Plan on behalf of my organisation. I wish to appear at any public hearing/oral examination of these issues.

Firstly, I recognise the inclusion of Community Land Trust homes in the New Southwark Plan as a recognised ‘Low cost home ownership product’ (pg 24) and as part of the Site vision for site NSP75, saying ‘Redevelopment of the site must:... Provide new intermediate affordable housing through a community land trust.’ (pg 312). I would also like to commend Southwark Council’s ambitious target to deliver 11,000 new council homes by 2043 with the first 1,600 complete or underway by the end of 2018. (pg 8).

This letter is largely in order to comment on one particular site – NSP75: Aylesham Centre and Peckham Bus Garage. After speaking to over 1,000 local people, attending all the public consultation workshop held by Tiger, running our own workshops on issues related to the site, canvassing local residents, shoppers and traders,

Policy P14 has been amended to comply with Policy 7.7 of the Mayor’s current London Plan (2016) & Policy D8 of the new Draft London Plan. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

Peckham Citizens has produced our Citizens Charter, a full copy of which is submitted along side this letter. Our headline proposal in the Charter is for the following to be delivered on the Aylesham site:

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35% - 50% genuinely and permanently affordable, high quality homes for local people, priced according to local incomes, including social housing and a Community Land Trust.

2. Good Jobs

1 in 3 jobs for local people at all levels of seniority, a fully-resourced, targeted training strategy and all employees on site to be paid at least the London Living Wage.

3. Celebrating Peckham

An open, street-based design that includes a significant public space, protects key, local retailers and reinforces the existing culture, economy and built environment of Peckham, with no building on site at more than 9 stories tall.

4. Community Engagement

A commitment to meaningful community engagement with residents, traders and community organisations throughout the design, construction and management of the project. This should include local stakeholders being part of determining how any Section 106, Community Infrastructure Levy or overage agreement funds might be allocated.

Section 1

There is one item in particular that the following section refers to – the height of buildings on the Aylesham site.

Please see the comments below:

Site Specific Policy NSP75: Aylesham Centre and Peckham Bus Station (pg 312-314) is unsound because:

- it is not consistent with the National Planning Policy Framework and has not been positively prepared.

The National Planning Policy Framework states that there is the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” in order to make a “collective vision”.

Peckham Citizens have set up a petition calling for no towers on the Aylesham site but instead “an open, street-based design that reinforces the existing culture, economy and built environment, celebrating Peckham as it already exists and with no building more than 9 stories tall”. At the time of writing, the petition has gained nearly 5000 signatures, and this is without any media coverage other than the ‘hyper-local’ newspaper The Peckham Peculiar. In addition to the online petition, signatures have been collected on Rye Lane, at Peckham Bus Station, from the residents on surrounding streets

and in local businesses, churches and schools. Almost without exception, people are unaware of the plans for a tall building on this site, and when informed of them, do not support them.

This policy has not been positively prepared because it was not effectively publicised and consulted on. It has been prepared contrary to the prevailing local opinion.

The large numbers of people who have signed this petition show that a tall building is not wanted by the vast majority of people who know, live in and love Peckham. It therefore does not form part of a “collective vision” for the

P14: Tall buildings

site and is not consistent with National Planning Policy.

The Current London Plan (2016) states in point 7.28 that “The Mayor will work with boroughs to identify locations where tall and large buildings might be appropriate, sensitive or inappropriate” and the New Draft London Plan states in 3.8.3 that the “Mayor will work with boroughs to provide a strategic overview of tall building locations across London”. However there is no evidence to suggest that Southwark Council have worked with the Mayor’s office to determine if the Aylesham Centre and Peckham Bus Station site is appropriate for tall building(s).

Therefore the policy is not consistent with regional planning policy or the National Planning Policy Framework.

The Aylesham site is within the setting of two conservation areas, many listed buildings including the 200 year old Rye Lane Chapel and key unlisted but much loved buildings such as the Jones and Higgins clocktower. The Current London Plan 7.25 requires that “Tall buildings be resisted in areas that will be particularly sensitive to their impacts and only be considered if they are the most appropriate way to achieve the optimum density in highly accessible locations”. Therefore the proposed policy is not consistent with regional planning policy.

-it is not justified and has not been prepared positively.

Tall buildings have a number of detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of ‘sky’ for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

Recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached).

A medium rise development would be more in keeping with the character of the area and would not have the same, far reaching, negative impact of a 20 storey tower. Therefore the proposed policy is not justified as it has not been shown that an equivalent amount of housing could not be created on this site by other forms of development that has less negative impact.

While the New Southwark Plan Preferred Version Consultation Report refers to the Peckham and Nunhead Area Action Plan (PNAAP) finding the principle of a tall building acceptable on the site, this is based on an outdated urban design study. Public attitudes to high-rise development have shifted significantly in recent years and are

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supported by the growing body of research that exposes their negative impacts.

As the research behind the principles in the PNAAP is now outdated and they are contrary to national and regional planning policy, they are not justified and should not be used at the basis for further planning policy.

This policy is not justified as the significant harms that would be caused by a tall building on this site have not been identified and the evidence that tall buildings are necessary to achieve increased density and regeneration has not been presented. See also the comments on Policy P14: Tall Buildings, (below).

There is a wealth of evidence indicating that tall buildings are not the ideal form of housing for the majority of people, particularly those who are vulnerable, families, those with many health issues or disabilities and those on low incomes. These include a comprehensive literature review by Professor Gifford of the University of Victoria that sought to answer the question ‘are high-rise buildings a net benefit or cost to their residents?’ that concluded “high-rises are less satisfactory than other housing forms for most people, that they are not optimal for children, that social relations are more impersonal and helping behaviour is less than in other housing forms,”.

The forms of housing identified as most in need in the Strategic Housing Market Assessment (Chapter 6, Tables 6.11, 6.14 and 6.15; Chapter 7, Tables 7.1, 7.2, 7.11 and 7.13); and the NSP Proposed Submission Version Policy P1: Affordable homes (pg 21-25); P2: New Family Homes (pg 26); P5: housing for older people (pg 30); P6: Homes for Households with Specialist Needs (pg 31-32); and P13: Residential Design (pg 39-41) are those least suitable for high-rise development. Therefore this policy is not effective or positively prepared as it does not address this issue.

The NSP Proposed Submission Version has removed the requirement for any meaningful open or public space. The Consultation Report indicates this in response to a respondent who requests that an area equivalent to at least 15% of the site be put aside as open space. This has not been prepared positively and is not justified as it does not explain why the open space requirement has been removed.

-it is not effective.

The proposed policy states that “the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.” and that “Careful consideration would also need to be given to the neighbouring residential areas and important local heritage buildings.” This is not effective because it does not identify what the criteria or methods for assessing the negative impact of a 20 storey tower will be, or what mitigating factors would be expected, effective or acceptable.

The proposed policy does not state what level of harm or benefit for the community would be acceptable considering the negative impacts caused by tall buildings over a wide area and therefore is not effective.

The proposed policy is not effective because it does not identify and define what type and degree of environmental harm would be acceptable or how it should be mitigated on this site.

Changes that would make the policy sound include:

- Revising the policy to reflect current research into the effects of tall buildings.

P14: Tall buildings

- Requiring greater public consultation for the aspects of this policy that involve a significant change from the prevailing conditions. This should include leaflets widely distributed including to all residences and businesses in the surrounding area, on-site/street displays that are held in prominent local locations, publishing in local newspapers, and meetings with local groups, churches, schools, etc., that highlight that this site has been identified as suitable for a tower of 20 storeys and inviting comment.
- Preparing the policy in line with the feedback from an extensive and well-advertised consultation with local residents, businesses and community groups, or justifying why it should not be done.
- Related policy P17: Conservation areas (pg 44-45) could be strengthened by changing the wording to include the need for more extensive advertising of and public consultation on proposals that are brought forward that are higher than the prevailing existing townscape.
- Requiring that any proposals on this site must prove that the local housing need (in numbers and type, especially family housing) can only be met by including tall buildings rather than other forms that have less negative impact such as medium-rise developments.
- There should be a presumption stated that forms of building that achieve a similar level of benefit/accommodation but have a lesser negative impact on the surrounding area should be proven to be unachievable before a tall building (with a high level of negative impact) is allowed.
- In order to prevent segregation of the local community and the resultant harm to community cohesion, the policy should require that any development and all the major individual elements (eg buildings) of a development should comply with the relevant assessed housing need in the area, or justify why it cannot.
- Many of the issues that are important are in/we spoke to over 1000 local people to develop a Charter for the aylesham site that calls for a number of the above...attached. This should be included in the consultation document. Propose changes as per our charter and the letter from the leaders, attached. Those named/I would welcome the opportunity to appear at a public hearing or oral examination of this policy.

Section 2

There is a second item in particular that the following section refers to – the height of buildings across Southwark as a whole. Please see the comments below:

Policy P14: Tall Buildings (pgs 42-43) is unsound because:

- it is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that “Tall buildings should be part of a plan-led approach to changing or developing an area”, yet all restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we “use a number of criteria to determine applications”.

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”.

However, it has become clear through the petitions (referred to above) and the public consultation work that

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Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

This policy is therefore not consistent with national and regional planning policy.

-it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed Submission Version (apart from in the site specific policies) which will open the door to the argument of precedence alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station site.

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of ‘sky’ for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that “The main reason that the Committee held an inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in

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some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use schemes and they can encourage the use of public transport where there is spare capacity, but so can other types of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than efficient development.”

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).
-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

The statement “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy. This policy therefore does not meet the test for being positively prepared.

Changes that would make the policy sound include:

- The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on.
- Revise the policy in line with recent research that challenges the principle that tall buildings increase density and help regeneration, or justify why this has not been done/is not appropriate.
- All other areas should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case by case basis.
- Define what a ‘tall building’ is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.
- Publish the “range of views” on tall buildings that have been gathered in the council’s consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.

P14: Tall buildings

Individual
NSPPSV162.1

Not Consistent with National Planning Policy

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".
-

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

The need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

Example/illustration

of problems the vague wording of the NSP could create:

Proposed Development 'Camberwell Union' – Burgess Business Park, Camberwell

- The proposed development suggests 4-6 storey buildings on Wells Way and Parkhouse Street, where the tallest buildings opposite are two storeys. This height difference of the 4+ storeys opposite not to mention the 10 and 14 storey buildings in the middle of the development will affect daylight (the current houses facing west therefore if the proposed development goes forward will be dark by midday) and creating wind tunnels and micro climates.
- Unprecedented to have this level discrepancy in any of the new builds in the area: to name a few examples, new

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Policies which should be implemented alongside strategic policies and the Plan should be read collectively. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

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developments on Southampton Way, Benhill Road and Commercial Way have a one storey difference at most.

- The tallest proposed element is 14 storeys. At a height of 50 metres, this is 39 metres taller than the closest housing stock. (can provide illustration to show this)
- The local housing stock is two storey Georgian and Victorian mews cottages and includes listed buildings. The proposed development site is between 4-14 storeys tall, and will be similar to sites at Elephant and Castle and Peckham, which while not unattractive, are not sensitive to the character and historical buildings in the borough. This is neither proportionate to the significance of the proposed location and does not respond positively to local character and townscape as the wording on pages 42-43 of the NSP would suggest. The development is in direct conflict with the Mayors current London Plan, and the Mayors New Draft Plan (see above).

Not Justified

This policy is not justified as it involves a significant policy change from the previous policy on tall buildings and there is no evidence to support this policy change:

- . • The 2011 Core strategy identified particular locations in the borough where tall buildings were appropriate, and this was supported by a Tall Buildings Research Paper (March 2010). No similar study
- . has been undertaken to support the new policy that tall buildings may be appropriate anywhere in the borough. Camberwell Union and proposed developments like it are too dense and tall to be appropriate
- . for the area, which is residential, and 2-3 storeys in the main.
- . • Without specific locations that are identified in Area Visions and maps (pages 94 – 336) and
- . detailed in site allocations; local people cannot contribute to the decision of where such buildings will be situated, either in their borough or local area. Similarly, it renders all Area Visions meaningless and
- . places communities vulnerable to all Tall Buildings proposals affecting their area to be developer-led.
- . (It is understood that locations for tall buildings will instead be reviewed by the Southwark Design
- . Review Panel, whose reports are not made public until a planning application is published, too late in the process for local residents and businesses to influence decision-making.)

Existing local residents must have a say in developments of hundreds of units which mean significant changes/ pressures on infrastructure, rights to light, noise pollution, light pollution, parking, and local amenities.

- The policy has not properly taken account of, or responded to, consultation responses to the proposed change of policy as identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings should be defined in the NSP: The Council response states a need for “flexibility”, but again does not back this up with evidence. Local residents were invited to two workshops several months apart by the developers working on Camberwell Union. We were offered one satisfaction survey. Homes affected (such as those on Parkhouse Street) did not receive notification of the consultation.

Not Positively prepared

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This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications, hence developments such as Camberwell Union utilising this vague policy language to push through inappropriately dense and tall buildings.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions. This allows developers, like those responsible for Camberwell Union to dwarf local housing stock with inappropriate proposals (505 flats with little or no parking).
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means, therefore developments such as Camberwell Union putting forward 14 storey buildings in a residential area epitomised by two storey mews cottages and Victorian two bed homes.
- Not explaining what “new publicly accessible space at the top of the building” refers to, or to whom this space will be available.

This policy is not effective as it:

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents. Camberwell Union is flats with no parking or green spaces provided, and no provision for increased pressure on existing infrastructure
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year. Camberwell Union is 505 ‘luxury’ flats with a proportion (35%) said to be affordable, with no information about what affordable means. There is no shortage of unaffordable homes in the borough.)
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings. Density increases of up to 500% can be achieved with human scale streetscape such as terraced apartment buildings.
- Insufficient consideration is given to other more effective ways of combatting the housing need without introducing negative effects of tall buildings (overshadowing, wind, microclimates) such as increasing density of lower-level buildings (e.g. 2-3 stories high); which also offer greater sustainability,
- It does not provide specific guidance on how tall buildings will increase the activities and life opportunities on offer for nearby residents, so leaving open the possibility that developers will design properties solely to benefit the building’s residents and users.

Suggested changes to P14

To make the policy sound, the NSP MUST

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative

P14: Tall buildings

heights should be put out for proper consultation with local residents and businesses.

- Make clear that tall buildings will be considered inappropriate in all other locations.

- Clarify all vague or unspecified sections, including

- o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.

- o References to “criteria” should make clear exactly what those criteria are.

A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

P14: Tall buildings

Six Bridges Estate
NSPPSV163.3

Policy P14: Tall Buildings

Royal London strongly supports the principle of tall buildings as set out within Policy P14 and supports the detailed design guidance that is provided in order to ensure that tall buildings are of the highest quality. There is a requirement at Policy P14, 2.11 to “Provide a new publically accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m”. This requirement is likely to be challenging to commit to due to a range of factors including security issues, management and access considerations. To address this we suggest the following amendments:

“Consider the provision of a new publically accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m. This consideration should take into account management and security issues together with the range of other planning contributions delivered by the proposals”.

Southwark Friends of the Earth
NSPPSV165.3

P14- Tall Buildings:-

- We strongly object to the proliferation of tall buildings as they are completely out of scale with the local context and have very adverse effects on the size and scale of the local streetscape. Tall buildings give the local neighbourhood a very graph-style, uneven and unkempt appearance. We also very strongly object to the fact that the height restriction limited has been deleted, e.g. Strata Tower at Elephant & Castle, next to a very short building dwarfed and overshadowed by Draper's House not very tidy planning!
- It now means that it's a free-for-all and applications are approved whatever the height and scale which most become detrimental in scale to the local environment. There are also many extremely ugly glass buildings where it's been claimed that they're innovative and will add a new dimension but are ill-fitting with current and tasteful, elegant and harmonious architecture.
- They contribute nothing significant in terms of local economy because many prospective residents will seek jobs in the city rather than their local environment thus perpetuating the

It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

Noted.

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need to travel.

- Yes they also create their own micro-climate: they become unbearable when the sun streams in and the glass and rooms become overheated. It is unfortunate when architects design dark windows to combat the rays of the sun then compensating by great consumption of energy by keeping the lights on instead of investigating ways of harnessing the sun's free energy.
- We entirely agree with your statement that: ' ... however, tall buildings can look out of place in their surroundings, harm the setting of historic buildings and cause unpleasant environmental effects, especially on the location's micro-climate .. .', there are some extremely ugly buildings along to the top of Blackfriar's Road just before the Bridge.
- We're also very pleased to note that you've deleted the term 'landmark' building, how long does it take for a 'landmark' building to become as common as the current proliferation of tall buildings.

Strathclyde Regional Pension Fund
NSPPSV174.5

Whilst it is acknowledged that there can be the opportunity to provide public viewing accessible viewing platforms to appropriate tall buildings in suitable locations, the blanket requirement of paragraph 2.11 of draft Policy P14 that all buildings over 60m must 'provide a new publically accessible space at or near to the top of the building...' is considered to be completely inappropriate.

It is inevitable that not every tower over 60m to be developed in the borough will have a view that significant numbers of the general public will be keen to see, so requiring public access in every case would result in unused areas of new towers. Furthermore, there are clearly significant safety and security concerns for providing public access into residential towers in particular, which are likely to necessitate the provision of a separate entrance and lifts to the residential accommodation, with the employment also of staff also needed to manage access and the use of this public

space. These requirements would be likely to have significant impact on the viability of the development of residential towers, in turn compromising the delivery of housing in the key locations such as the Opportunity Area Cores.

Draft policy P14 is therefore considered to be unsound as currently worded, on the basis that it is not sufficiently flexible to allow for practical difficulties which are likely to mean that it is not practical or viable to accommodate

It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

public viewing areas in residential towers, so the policy cannot therefore be 'justified' as the most appropriate strategy, when considered against reasonable alternatives.

Change sought – It is requested that paragraph 2.11 of draft Policy P14 be amended as follows to promote the creation publically-accessible viewing area for tall buildings as appropriate:

New tall buildings must:

“Provide Seek to incorporate a new publically accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m unless it is demonstrated not to be practical or viable to do so.”

Individual
NSPPSV178.2

- it is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that “Tall buildings should be part of a plan-led approach to changing or developing an area”, yet all restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we “use a number of criteria to determine applications”.

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”. However, it has become clear through the petitions (referred to above) and the public consultation work that Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

This policy is therefore not consistent with national and regional planning policy.

-it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed Submission Version (apart from in the site specific policies) which will open the door to the argument of precedence alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies, and

P14: Tall buildings

buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station site.

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of ‘sky’ for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that “The main reason that the Committee held an inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use schemes and they can encourage the use of public transport where there is spare capacity, but so can other types of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than

the Plan should be read collectively.

P14: Tall buildings

efficient development.”

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).

-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

The statement “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy.

This policy therefore does not meet the test for being positively prepared.

Changes that would make the policy sound include:

- The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on.
- Revise the policy in line with recent research that challenges the principle that tall buildings increase density and help regeneration, or justify why this has not been done/is not appropriate.
- All other areas should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case by case basis.

P14: Tall buildings

- Define what a 'tall building' is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.
- Publish the "range of views" on tall buildings that have been gathered in the council's consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.

The Grove Lane Area Residents' Association
NSPPSV187.1

This policy is not justified as it fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP, involves a significant policy change on tall buildings with no new evidence to support the change and leaves each of the Area Visions nebulous as the locations proposed for Tall Buildings are unknown.

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

"Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations" and "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

"Development Plans should define what is considered a tall building, the height of which may vary in different parts of London", "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate" and "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Policies which should be implemented alongside strategic policies, and the Plan should be read collectively. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

reflect a “collective vision”.

This policy is not positively prepared as some aspects of the policy are vague or unclear as it does not indicate the approach or criteria to determine planning applications, define “a point of townscape significance” what is “a tall building ” or clarify what “significantly taller than their surroundings” means. Nor does it explain what is meant by “new publicly accessible space at the top of the building”.

This policy is not effective as it does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents or show how it can deliver the identified net increase of affordable housing. It gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

To make the policy sound, the NSP should

Identify specific sites in the borough where Tall Buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.

Make clear that Tall Buildings will be considered inappropriate in all other locations.

Clarify all vague or unspecified sections, including:

Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.

References to “criteria” should make clear exactly what those criteria are.

A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

In particular, in order to comply with the policy in the current London Plan that consideration should be given to which areas are appropriate, sensitive or inappropriate for Tall Buildings; and the policy in the New Draft London Plan that Boroughs should identify areas where Tall Buildings will be an appropriate form of development in principle, consideration should be given to the potential impact of Tall Buildings on conservation areas in the Borough.

By way of example, NSP24 (Butterfly Walk, Morrisons Car Park and Police Station) is surrounded by the Camberwell Green and Camberwell Grove Conservation Areas and the impact on these areas of any Tall Building should be a vital part of the consideration of any development plan at NSP24. The Council's Camberwell Green Conservation Area Appraisal emphasises (5.2.2) that the overall form of any development should remain in keeping with the morphological characteristics of the area, which (3.3.1) it states is distinguished by 3 or 4 storey blocks, though it accepts (3.4.3) that 6 storey blocks are in keeping with the Green itself. The Appraisal singles out among the worst of the “negative elements” the 1960s developments north east of the Green (including the – former – Magistrates Court), which it says are rightly excluded from the Conservation Area but “still have an impact on it”(3.4.14). Similarly, the Camberwell Grove Conservation Area Appraisal regards (3.5.11) the (now demolished) Maudsley Hospital tower block (fig.39) as insensitive and a particularly intrusive negative element in that

P14: Tall buildings

Conservation Area.

The NSP should be reformulated in a way that minimises the chances of those types of planning errors being repeated.

Individual NSPPSV193.1

The proposal for redevelopment of this site is not justified because the existing uses and other alternatives for the site's development have not been discussed with business or community stakeholders. It does not consider the benefits of retaining existing uses or potential alternative uses that might be developed on this site to meet the needs of the local economy and community. There are several existing uses on the site which are viable and meet important needs.

The plan is not effective because it does not state whether Southwark would develop and ensure the use and provision for tenants and residents. The local community has a number of ideas for the site which have not been considered at all, and we should have the opportunity to discuss them and develop a different plan.

- The Old Mill Building is a spacious sturdy Victorian industrial building, and a significant local heritage asset that should be preserved. Sustaining this building would give local residents a sense of belonging and can help to integrate social inclusion. Presently it is run by Community Outreach Ministries, operating as a local community centre, a place to visit and a moderate setting to socialise maintain community development and community cohesion with families and residents. Having organising community events for locals has been a great benefit for myself and others having somewhere to go and meet new people, make friends.

The site vision proposal for redevelopment is not effective because it does not state the enhancement of green space or redevelopment floor place for local community use.

- Part of this site could be developed into e.g. a garden centre this will help to tie in with having a healthy environment here again local resident can benefit i.e. plant and grow your own as a community development programme ideally healthy organic vegetables food.
- There is no mention of outdoor play area I would suggest re: football / basketball / netball / tennis pitch: open space. I consider this because a lot of families living in the area and living in isolation places are too far to allow their children out to play as well as to engage with others. The site is surrounded with several estates and block of flats.

Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

- Considering our health and well-being, clean air, open space, this small plot of land would not be able to subdue developments on a large or high scale.

The plan does not clearly state the use of the commercial business that would support education and training purposes.

- Abbey Rose BuildBase, owners Graffton Merchanting Ltd, is an important local business used by many people. If they would work with local people to develop skills in their trade by supporting local residents and offer community space for work experience/training both children and adults can learn skills in gardening/woodwork.

Requesting this idea would be beneficial for the area to help support our physical, mental health and well-being. I would really like to say that these unnecessary redevelopment plans cause health issues from the impact of anxiety that develops. It is unfair that people who live in these development areas don't have a real say in what happens in these areas. I do not believe they understand the long-term effects this has on people and if we are supposed to consider support and protecting vulnerable people and children from abuse this is a major abuse of human life and they should stop all developments and concentrate on repairing housing that they do have already in the Borough for local people that live in the area. So, I think the site should be taken out of the Plan.

Alternatively, I will be willing to take part in council consultations with the local community about the future uses of this site to develop plans to include in the New Southwark Plan. These should provide for the existing viable uses of the site and create opportunities for new uses that are compatible with the surrounding residential area.

Overall, the area itself has a lot of historical value to the past which resonates a value of realness the bridge that lies over consort should be seen and given the exhibition it needs it is an icon bridge built with manual resources and with artistic skills, a fine workmanship and it looks like a picture, this bridge should be viewed from afar as it would resurrect the historical feature of Peckham - linking it with the Bussey Building and having a clear view from Bournemouth Road. I suggest the housing development should be revised and should not include any tall buildings or housing blocks not only because of the historical value of Peckham but because the area is already suffocating the people that live locally and there are too many flats surrounding the site as it is. They have already spoilt the sentiments of the area by building that congregated iron block that does not fit well with the feature of the area or blends in with any of the other buildings.

P14: Tall buildings

Individual
NSPPSV199.1

This policy is not justified as it:

- It involves a significant policy change on tall buildings with no new evidence to support the change
- This policy change renders all Area Visions meaningless, because locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that has stated that specific locations for tall buildings needed defining in the NSP.

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

A need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria properly to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what defines "a point of townscape significance" or what is "proportionate" in making decisions.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies and the plan should be read collectively.

P14: Tall buildings

- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should then be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o References to “criteria” should make clear exactly what those criteria are.
 - o A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

P14: Tall buildings

Individual
NSPPSV202.1

1. The “policy” is unsound because of lack of clarity in defining:
 - a. what constitutes a “tall building”: the expression “significantly higher than surrounding buildings or their context” provides insufficient guidance /limitation.
 - b. where “tall buildings” may be permitted: the expression “Typically this will be in our major town centres, Opportunity Areas and the Central Activities Zone.” is insufficiently limiting when paired with “areas that benefit from the highest levels of public transport access ...where there is the greatest opportunity for regeneration.” This is unsound because the “definition” effectively permits “tall buildings” in virtually every part of Southwark.
2. The primary “policy” that “tall buildings” must “be located at a point of townscape significance” is unsound, since buildings at such locations are likely, almost by definition, to “look out of place in their surroundings, harm the setting of historic buildings and cause unpleasant environmental effects, especially on the location’s micro-climate” - which are, ostensibly, subsidiary aims.
3. Subjective (un testable) concepts such as “respond positively to local character and townscape...be of exemplary architectural design and residential quality ...make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings” are intrinsically unsound.
4. The mindless concept/policy of , “raising population density” at the expense of the environment, maintenance of the streetscape and retention of low rise industrial and office accommodation is undesirable and essentially unsound.
5. A major attraction of Southwark is the relative absence of high rise buildings dominating the townscape and the ability of those at street level in most areas to see a wide sweep of the sky. This is precious: and to change Southwark’s character and the environment by the construction of tall buildings would be to affect the mental and physical health of those living and working in the borough and as such, objectionable and an unsound policy.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor’s current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP’s and SPD’s. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

WWTRA- Wells Way Triangle Residents Association
NSPPSV209

Policy P14 has been amended to comply with

P14: Tall buildings

This policy is not justified because it introduces a fundamental policy change on tall buildings with no evidence to support or justify the change.

- The 2011 Core Strategy identifies specific locations in the borough where tall buildings would be appropriate. This is underpinned by a research paper produced in March 2010. I am not aware of any subsequent research which justifies or explains the reasons for changing the policy.

This policy is not sound because it is not consistent with the Mayor's current London Plan (2016) or the new Draft London Plan

Policy 7.7 of the Mayor's current London Plan (2016) says:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

The New Southwark Plan:

- suggests tall buildings could be located anywhere in the borough unless there is a harmful impact on strategic views.

See my example below of why this aspect of the NSP would be unsound.

Policy D8 of the new Draft London Plan says:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".

The New Southwark Plan:

- does not define a tall building other than to say it is "significantly higher than surrounding buildings or their context" (and it does not define "significantly")
- does not mention a plan-led approach
- does not identify on maps the locations where tall buildings would be appropriate
- does not identify the general building heights that would be appropriate.

See my example below of why this aspect of the NSP would be unsound.

Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

This policy is not positively prepared as some elements are vague or unclear:

- It does not make it clear that there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- It does not define “a point of townscape significance” or what is “proportionate”.
- It does not define what a tall building is, nor does it clarify what “significantly taller than their surroundings” means.
- On page 42, the second paragraph under the heading ‘Reasons’ includes a sentence that makes no sense grammatically: “Strategic locations that have a regional or borough important and the scale of the existing or planned townscape that is defined in our Area Action Plans and Supplementary Plans Documents.”
- The final paragraph of Policy 14 says “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications. We will continue to use this approach...” The ‘consistent approach’ to date has been defined and constrained by the current Southwark Plan. It is disingenuous to say they will continue to use the same approach when the New Southwark Plan would remove those constraints. “We...use a number of criteria to determine applications” is a meaningless phrase unless it specifies or at least gives examples of those criteria.

See my example below of why this aspect of the NSP would be unsound.

This policy is not effective because

- It is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.

In my neighbourhood, there is a planning application for a major private development called ‘Camberwell Union’ on the site of the current Burgess Business Park

The application is for 505 residential units in 13 blocks, with heights varying from 3 to 14 storeys. Most of the blocks are 10 storeys or more. The current site is mainly low-rise light industrial units, and the housing stock in the immediate area is mainly 2-storey Victorian properties.

Recent decisions about new-builds in the area have been based on the current Southwark plan, and developments have generally only one storey higher than the existing housing stock.

If the new Southwark plan is adopted, because it is not consistent with the current London plan or the new draft London plan:

- There would be no plan-led approach to changing this low-rise light-industrial area to mixed-use high rise
- There would be no overarching planning policy to prevent the construction of 10-14-storey buildings in the midst of an area of low-rise dwellings
- There would be no definition about what is “significantly higher than surrounding buildings or their context”.

The Camberwell Union plans have a 14-storey block at the centre; each block alongside it steps down slightly in height. There is a small terrace of 2-storey Victorian properties in the midst of the site that would be immediately surrounded on 3 sides by new buildings which are either 3, 4 or 5 storeys, and then by taller buildings stepping up to 14 storeys.

P14: Tall buildings

Because the NSP is not consistent with the current London plan, there would be no consideration as to whether this area is appropriate, sensitive or inappropriate for tall and large buildings.

Because the NSP is not positively prepared, there is no clear definition about the 'context' of the existing Victorian residential buildings, which of the 14 blocks would be classed as the 'surrounding buildings' or how it would be assessed whether the proposed new buildings are 'significantly higher'.

Because the NSP is not effective, private developers could get the green light to build 505 residential units, 35% of which should be 'affordable', even if their financial viability statement says there is a risk that 35% affordable housing (is not deliverable in viability terms, and says the scheme should be amended to allow it to be deliverable. So from the outset, a private development can declare it is unable to meet the target of 35% affordable housing, and the NSP is not effective enough to give the council the authority to reject the development on that basis. There is no shortage of unaffordable homes in Southwark. We need an NSP that enables the council to deliver affordable housing, not simply add to the supply of unaffordable housing.

To make the policy sound, the NSP should

- provide evidence to justify its policy change about tall buildings
- Identify specific sites in the borough where tall buildings are appropriate (and consult local residents and business about the suggested locations and indicative heights).
- show those locations on area vision maps and within site allocations
- give indicative heights for tall buildings.
- make it clear that tall buildings will be considered inappropriate in all other locations.
- clarify all vague or unspecified sections, including
 - o defining or giving examples of 'a point of townscape significance' (for example, is 'significance' based on architectural, historical, industrial or social factors?)
 - o explaining what "criteria" are used when making decisions. .

Individual
NSPPSV211.1

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for

P14: Tall buildings

- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is "a point of townscape significance" or what is "proportionate" in making decisions.
- Not defining what a tall building is and not clarifying what "significantly taller than their surroundings" means.
- Not explaining what "new publicly accessible space at the top of the building" refers to.

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing

tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

negative effects of tall buildings.

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
 - o References to “criteria” should make clear exactly what those criteria are.
 - o A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

Individual
NSPPSV212.2

t is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that “Tall buildings should be part of a plan-led approach to changing or developing an area”, yet all restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we “use a number of criteria to determine applications”.

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”. However, it has become clear through the petitions (referred to above) and the public consultation work that Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

This policy is therefore not consistent with national and regional planning policy.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor’s current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on

P14: Tall buildings

-it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed Submission Version (apart from in the site specific policies) which will open the door to the argument of precedence alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station site.

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of ‘sky’ for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that “The main reason that the Committee held an inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found

each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use schemes and they can encourage the use of public transport where there is spare capacity, but so can other types of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than efficient development.”

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).

-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

The statement “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy.

This policy therefore does not meet the test for being positively prepared.

Changes that would make the policy sound include:

- The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on.
- Revise the policy in line with recent research that challenges the principle that tall buildings increase density and

P14: Tall buildings

help regeneration, or justify why this has not been done/is not appropriate.

- All other areas should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case by case basis.
- Define what a 'tall building' is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.
- Publish the "range of views" on tall buildings that have been gathered in the council's consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.

Woodgate
NSPPSV213

Noted.

Woodgate have a number of landholdings in London and they are keen to maximise the delivery of housing through residential development. Most notably, our client is seeking to develop a tall building at 1 Lomond Grove. A site location plan is attached at Appendix A. The site represents a key corner location which can act as a pivotal node for a well-designed scheme adjacent to an area of open green space. It is considered there should be an expansion of the tall buildings parameters set out in P14 to ensure the plan is as 'effective' as possible in the context of 'soundness'.

Representations

My client supports the Tall Buildings Policy P14 but considers it could offer further opportunity for the development of tall buildings, ensuring the policy is as 'effective' as it could be in accordance with the 'soundness' of the Local Plan. There are a number of restrictions within the policy and there should be further opportunities to expand the Local Plans' effectiveness in delivering tall buildings in accordance with the NPPF and London Plan. 1 Lomond Grove is situated on a corner plot adjacent to a large expanse of open green space. Paragraph 65 of the NPPF states that

P14: Tall buildings

local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).

The NPPF makes it clear that if tall building development schemes propose buildings with high quality design and good levels of sustainability, this can supersede the requirement for buildings

to visually adhere to existing townscapes and applications should not be refused on this basis. Where paragraph 2.2 of Policy P14 of the New Southwark Local Plan requires tall buildings to respond positively to local character and townscape, it must be noted that, in accordance with the NPPF, high quality design and sustainability levels can outweigh this policy point and thus tall buildings can be approved in appropriate nodal locations over and above local townscape importance. Where a scheme does not respond to the existing character of an area it can still make an important contribution to housing delivery through a high density, tall building residential development and the policy should not be restrictive in this way. There should be added text within the supporting paragraphs for the policy which states: "where exemplary design and good levels of sustainability are demonstrated, this could justify proposals for tall buildings which would normally be considered incompatible with existing townscape as long as they accord with the other points within policy P14".

Furthermore, the Draft London Plan (2017) advocates for tall buildings as part of a plan-led approach to changing or developing an area. Whilst 1 Lomond Grove is in an undesignated area on the proposals map it is close to a tall tower block building and also a district centre. It borders Burgess Park which is a Site of Importance for Nature Conservation and it also does not fall within a strategic London view, thus there is significant potential to create a tall exemplary building in this location despite the general low lying nature of the existing buildings. The opportunity for developmental change in this area is high and tall buildings must not only be restricted to major town centres, opportunity areas and the central activities zone when existing tall buildings are present elsewhere. Urban land is a vital, finite resource that must be efficiently used to reduce pressure on rural land and open spaces and positivity must be projected by the proposed tall building policy in this respect. It is therefore considered scope should be added to the policy, and the following wording considered for exceptions: "where a tall building is proposed outside a Major Centre, Opportunity Area and CAZ – they will be considered exceptions and only appropriate in circumstances where there is good public transport access, where they can contribute to legibility, place-making and sustainable communities and also form a key nodal location for the local area".

P14: Tall buildings

Tall Buildings studies within the evidence base date back to 2009 with the Visual Impact Assessment and 2010 with the borough-wide tall buildings research paper. It is acknowledged that these documents are somewhat dated and the policy should therefore reflect national policy rather than being tailored to an identified local need. This being said, it is argued that cases for individual sites appropriate for tall buildings cannot fully be made and the opportunity should not be ignored for tall buildings outside key centres where it can be proven that these areas are appropriate. Where a positive case can be made, the policy should incentivise this and the Local Authority should encourage the opportunity for dense development in accordance with Draft London Plan Policy H2 'Small Sites'.

Conclusion

The New Southwark Plan goes some way to ensuring that effective tall building development can take place within Southwark, however it must take care to not promote the refusal of applications that are have exemplary design and efficiently utilise key sites outside major centres because they do not reflect the overall form and massing of an area. It should be recognised that tall buildings can ignite the regeneration of an area, can provide an important waypoint and also add legibility, in accordance with Draft London Plan Policy D8. Especially in well-connected sites such as 1 Lomond Grove which has a PTAL of 5 and also a large area of open green space adjacent, there should be a prescribed positivity towards tall buildings which are consistent with regional and national planning policy.

Yours sincerely,

John Lyon's Charity
NSPPSV214.4

Tall buildings should be directed towards Opportunity Areas where the delivery of significant numbers of new homes is being promoted by both the Borough and the Mayor to form part of a strategic approach to contributing toward new homes and meeting regeneration and economic development objectives.

The appropriateness of tall buildings should be considered on the site-specific merits for example high quality design, access to transport links and wayfinding. Additionally, to achieve the aspirations of the proposed site allocation and the wider Local Plan in delivering the quantum of social infrastructure and affordable housing, will only be achieved through higher density development.

Noted

P14: Tall buildings

The policy wording reflects these requirements and as such it is considered that Policy 14 has been positively prepared, justified, effective and consistent with national policy.

Zurich Assurance Ltd c/o Threadneedle Portfolio
Services Ltd ('Threadneedle')
NSPPSV216.2

We welcome the recognition in draft Policy P14 that the highest tall buildings will be located in areas that benefit from the highest levels of public transport access where there is the greatest opportunity for regeneration. The policy then goes onto identifying Opportunity Areas and the Central Activities Zone

Noted.

P14: Tall buildings

313-349 Ilderton Road LLP
NSPPSV217.4

Tall buildings states that tall buildings are significantly higher than surrounding buildings or their context. The highest tall buildings will be located in areas that benefit from the highest levels of public transport access where there is the greatest opportunity for regeneration. Typically this will be in our major town centres, Opportunity Areas and the Central Activities Zone.

We support the development of tall buildings in sustainable locations, for instance, within Opportunity Areas with a high public transport accessibility. The plan should make clear however that the development of tall buildings is not limited to Opportunity Areas but also to areas within the borough which can identify in townscape terms the ability to deliver a tall building.

Individual
NSPPSV218.2

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

The need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

Noted.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Policies which should be implemented alongside strategic policies, and the Plan should be read collectively. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

Proposed Development 'Camberwell Union' – Burgess Business Park, Camberwell

- The proposed development suggests 4-6 storey buildings on Wells Way and Parkhouse Street, where the tallest buildings opposite are two storeys. This height difference of the 4+ storeys opposite not to mention the 10 and 14 storey buildings in the middle of the development will affect daylight (the current houses facing west therefore if the proposed development goes forward will be dark by midday) and creating wind tunnels and micro climates.
- Unprecedented to have this level discrepancy in any of the new builds in the area: to name a few examples, new developments on Southampton Way, Benhill Road, Elmington Road and Commercial Way have a one storey difference at most.
- The tallest proposed element is 14 storeys. At a height of 50+ metres, this is 39 metres taller than the closest housing stock. (can provide illustration to show this)
- The local housing stock is two storey Georgian and Victorian mews cottages and includes listed buildings. The proposed development site is between 4-14 storeys tall, and will be similar to sites at Elephant and Castle and Peckham, which while not unattractive, are not sensitive to the character and historical buildings in the borough. This is neither proportionate to the significance of the proposed location and does not respond positively to local character and townscape as the wording on pages 42-43 of the NSP would suggest. The development is in direct conflict with the Mayors current London Plan, and the Mayors New Draft Plan (see above).

This policy is not justified as it involves a significant policy change from the previous policy on tall buildings and there is no evidence to support this policy change:

- . • The 2011 Core strategy identified particular locations in the borough where tall buildings were appropriate, and this was supported by a Tall Buildings Research Paper (March 2010). No similar study . has been undertaken to support the new policy that tall buildings may be appropriate anywhere in the borough. Camberwell Union and proposed developments like it are too dense and tall to be appropriate . for the area, which is residential, and 2-3 storeys in the main.
 - . • Without specific locations that are identified in Area Visions and maps (pages 94 – 336) and . detailed in site allocations; local people cannot contribute to the decision of where such buildings will be situated, either in their borough or local area. Similarly, it renders all Area Visions meaningless and . places communities vulnerable to all Tall Buildings proposals affecting their area to be developer-led. . (It is understood that locations for tall buildings will instead be reviewed by the Southwark Design . Review Panel, whose reports are not made public until a planning application is published, too late in the process for local residents and businesses to influence decision-making.)
- Existing local residents must have a say in developments of hundreds of units which mean significant changes/ pressures on infrastructure, rights to light, noise pollution, light pollution, parking, and local amenities.

P14: Tall buildings

- The policy has not properly taken account of, or responded to, consultation responses to the proposed change of policy as identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings should be defined in the NSP: The Council response states a need for “flexibility”, but again does not back this up with evidence. Local residents were invited to two workshops several months apart by the developers working on Camberwell Union. We were offered one satisfaction survey. Homes affected (such as those on Parkhouse Street) did not receive notification of the consultation.

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications, hence developments such as Camberwell Union utilising this vague policy language to push through inappropriately dense and tall buildings.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions. This allows developers, like those responsible for Camberwell Union to dwarf local housing stock with inappropriate proposals (505 luxury flats with no parking)
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means, therefore developments such as Camberwell Union putting forward 14 storey buildings in a residential area epitomised by two storey mews cottages and Victorian two bed homes.
- Not explaining what “new publicly accessible space at the top of the building” refers to, or to whom this space will be available.

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents. Camberwell Union is luxury flats with no parking or green spaces provided, and no provision for increased pressure on existing infrastructure
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year. Camberwell Union is 505 luxury flats with a proportion (35%) said to be affordable, with no information about what affordable means. There is no shortage of unaffordable homes in the borough.)
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings. Density increases of up to 500% can be achieved with human scale streetscape such as terraced apartment buildings.
- Insufficient consideration is given to other more effective ways of combatting the housing need without introducing negative effects of tall buildings (overshadowing, wind, microclimates) such as increasing density of lower-level buildings (e.g. 2-3 stories high); which also offer greater sustainability,
- It does not provide specific guidance on how tall buildings will increase the activities and life opportunities on offer

P14: Tall buildings

for nearby residents, so leaving open the possibility that developers will design properties solely to benefit the building's residents and users.

To make the policy sound, the NSP MUST

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for proper consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
 - o References to "criteria" should make clear exactly what those criteria are.
 - o A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

The existing national planning policy on development has clear policy caveats laid out in various policy documents nationally and in the London Plan.

However, the NSP combine these two provisions make almost all the rest of national and regional planning policy redundant.

The language within the NSP means that if any developer wishes to develop any site across the borough, no matter how inappropriately over-developed or how high the development, the local community will have no clear planning grounds to object.

The New Southwark Plan says that all developments will be expected to maximise the number of residential units provided. This means all other planning policies would be neutered. Any decisions made by the planning committee rejecting very dense and very tall skyscrapers across the borough, could be immediately legally challenged and therefore severely disable the planning committee from carrying out its legal functions laid out in national and regional planning policies. Therefore the policy is unsound and unjustified due to the resulting curtailing of previous planning policies.

The NSP removes 8 and 10 storey height restrictions for residential and commercial tall buildings outside of the

P14: Tall buildings

exempted core action areas. This again limits the ability of the planning committee to carry out its legal functions to ensure all applications adhere to national and regional planning policies. Therefore this policy point is unsound, due to insufficient consultation process being possible.

Examples: Burgess Business Park and Camberwell Action Plan. This is a largely residential community and the removal of all height restrictions and the requirement to maximise housing units in all plans, will radically alter the character of the area, without significant consultation process that such a radical change was proposed in the new plan.

The Burgess Business Park is located within a neighbourhood of 2 story Victorian terraced and William iv Mews cottages, which are even less tall than usual two storey dwellings. By introducing high density, 14 storey buildings damages the established character of the area, as well as blatant disregard for existing infrastructure, rights to light, noise and light pollution and strain on insufficient green areas.

In addition, as Burgess Park is covered by the CAAP and is immediately to the north of the Burgess Business Park, changing the planning policies will mean the park will be overshadowed from the south and the New Church Road wildlife site, causing significant damage to this habitat. This is another key example of why the plan's proposed policies make it unsound.

The council must to remove these provisions before the plan can be considered to be sound.

Changes I consider necessary to make the New Southwark Plan legally compliant or sound.

Remove all references in all the area plans that require maximising number of residential units. Restore full section in current Southwark Plan that sets out height limits of 8 and 10 storeys for residential and commercial buildings outside of core action areas. Insert provision stating that parks and wild-life sites will be protected from overshadowing from new buildings across the borough.

P14: Tall buildings

Individual
NSPPSV219.5

This policy is not positively prepared as some aspects of the policy are vague or unclear. This policy is not sound because the definition of a tall building is unclear: tall buildings are those which are significantly taller than their surroundings. Need for clarity on what “significantly” means and in which situations. Camberwell is a historic area of Georgian and Victorian heritage. Tall buildings will have a negative impact on the townscape.

This policy is not justified because it is a significant policy change from the previous policy on tall buildings and there is no evidence to support this policy change. It has not properly taken into account and responded to consultation responses to the proposed change of policy. Consultation Report p31-32, comments that specific locations for tall buildings should be defined in the NSP. The Council’s response states a need for “flexibility” but there is no evidence of this.

This policy is not effective as insufficient consideration is given to other more effective ways of combating housing need without introducing negative effects of tall buildings such as overshadowing, microclimates and wind. Heritage wise lower-level buildings are more appropriate in Camberwell and offer greater sustainability, offering appropriate housing for families, seniors and households with special needs.

This policy is not sound as it is not consistent with the Mayor’s London plan. The London plan emphasises 7.7 Part E “Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks”. The NSP does not attempt to identify any locations in conjunction with The Mayor.

Individual
NSPPSV220.2

it is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that “Tall buildings should be part of a plan-led

Policy P14 has been amended to comply with Policy 7.7 of the Mayor’s current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP’s and SPD’s. Policies which should be implemented alongside strategic policies and the Plan should be read collectively. Policies 16, 17, 18 within the plan seek to ensure that tall building will have no negative impact. Policy P14 has been amended to comply with Policy 7.7 of the Mayor’s current London Plan (2016) & Policy D8 of the

P14: Tall buildings

approach to changing or developing an area”, yet all restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we “use a number of criteria to determine applications”.

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”. However, it has become clear through the petitions (referred to above) and the public consultation work that Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

This policy is therefore not consistent with national and regional planning policy.

-it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed Submission Version (apart from in the site specific policies) which will open the door to the argument of precedence alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station site.

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,

new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of 'sky' for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that "The main reason that the Committee held an inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use schemes and they can encourage the use of public transport where there is spare capacity, but so can other types of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than efficient development."

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).

-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

The statement "We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications" in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for

P14: Tall buildings

when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy.

This policy therefore does not meet the test for being positively prepared.

Changes that would make the policy sound include:

- The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on.
- Revise the policy in line with recent research that challenges the principle that tall buildings increase density and help regeneration, or justify why this has not been done/is not appropriate.
- All other areas should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case by case basis.
- Define what a 'tall building' is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.
- Publish the "range of views" on tall buildings that have been gathered in the council's consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.

Individual
NSPPSV222.2

it is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that "Tall buildings should be part of a plan-led approach to changing or developing an area", yet all restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we "use a number of criteria to determine applications".

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and

P14: Tall buildings

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”. However, it has become clear through the petitions (referred to above) and the public consultation work that Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

This policy is therefore not consistent with national and regional planning policy.

-it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed Submission Version (apart from in the site specific policies) which will open the door to the argument of precedence alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station site.

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of ‘sky’ for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being

incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

loomed over can significantly degrade the experience of the public realm and quality of place,

- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that “The main reason that the Committee held an inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use schemes and they can encourage the use of public transport where there is spare capacity, but so can other types of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than efficient development.”

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).

-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

The statement “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy.

This policy therefore does not meet the test for being positively prepared.

P14: Tall buildings

Changes that would make the policy sound include:

- The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on.
 - Revise the policy in line with recent research that challenges the principle that tall buildings increase density and help regeneration, or justify why this has not been done/is not appropriate.
 - All other areas should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case by case basis.
 - Define what a 'tall building' is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.
 - Publish the "range of views" on tall buildings that have been gathered in the council's consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.
-

P14: Tall buildings

Individual
NSPPSV223

I wish the inspector to rule the current Southwark Plan unsound due to its provisions on maximising housing units for all applications in most of the area visions and its abolition of the existing height restrictions in the current Southwark Plan.

Combined these two provisions make almost all the rest of national and regional planning policy redundant.

If any developer wishes to develop any site across the borough, no matter how inappropriately over-developed or how high the development, the local community will have no clear planning grounds to object.

The existing national planning policy on a presumption in favour of development has clear policy caveats laid out in various policy documents nationally and in the London Plan.

The provisions in the new Southwark Plan spelling out in clear terms that all developments will be expected to maximise number of residential units provided means all other planning policies would be neutered and any decisions made by the planning committee rejecting very dense and very tall skyscrapers across the borough, could be immediately legally challenged and due to costs incurred by the council in such appeals, would severely disable the planning committee from carrying out its legal functions laid out in national and regional planning policies.

The removal of the 8 and 10 storey height restrictions for residential and commercial tall buildings across the borough, outside of the exempted core action areas, again limits the ability of the planning committee to carry out its legal functions to ensure all applications adhere to national and regional planning policies.

The Camberwell Area Action Plan and the Burgess Business Park exemplifies these problems. This is a largely urban residential community and the removal of all height restrictions and the requirement to maximise housing units in all plans, will radically alter the area, without any real knowledge in the community or in the Southwark Plan consultation process that such a radical change was proposed in the new plan, to change the character of the community, into one that mirrors that of the high rise, very high densities of the redeveloped Elephant & Castle. The Burgess Business Park is located within a neighbourhood of 2 story Victorian terraced housing. To introduce very high density, tall buildings that reflect the Elephant and not Camberwell deeply damages the established character of the area.

In addition, as Burgess Park is covered by the CAAP and is immediately to the north of the Burgess Business Park, changing the planning policies as outlined, means the park will be overshadowed from the south and the New Church Road wildlife site which is immediately adjacent to the proposals site, will have its wildlife potential destroyed.

This is just one key example of why the plan's proposed policies make it unsound.

The council needs to remove these provisions before the plan can be considered to be sound.

Noted. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. : Remove all references in all the area plans that require maximising number of residential units. Restore full section in current Southwark Plan that sets out height limits of 8 and 10 storeys for residential and commercial buildings outside of core action areas. Insert provision stating that parks and wild-life sites will be protected from over-shadowing from new buildings restrictions across the borough.

Individual
NSPPSV226.2

here is a second item in particular that the following section refers to – the height of buildings across Southwark as a whole. Please see the comments below:

Policy P14: Tall Buildings (pgs 42-43) is unsound because:

- it is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that “Tall buildings should be part of a plan-led approach to changing or developing an area”, yet all restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we “use a number of criteria to determine applications”.

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”. However, it has become clear through the petitions (referred to above) and the public consultation work that Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

This policy is therefore not consistent with national and regional planning policy.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

-it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed Submission Version (apart from in the site specific policies) which will open the door to the argument of precedence alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station site.

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of ‘sky’ for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that “The main reason that the Committee held an

P14: Tall buildings

inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use schemes and they can encourage the use of public transport where there is spare capacity, but so can other types of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than efficient development.”

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).

-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

The statement “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy.

This policy therefore does not meet the test for being positively prepared.

Changes that would make the policy sound include:

- The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on.

P14: Tall buildings

- Revise the policy in line with recent research that challenges the principle that tall buildings increase density and help regeneration, or justify why this has not been done/is not appropriate.
- All other areas should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case by case basis.
- Define what a 'tall building' is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.
- Publish the "range of views" on tall buildings that have been gathered in the council's consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.

Individual
NSPPSV227.1

The existing national planning policy on development has clear policy caveats laid out in various policy documents nationally and in the London Plan. However, the NSP remove guidelines such as those mentioned below to make almost all the rest of national and regional planning policy redundant. The language within the NSP means that if any developer wishes to develop any site across the borough, no matter how inappropriately over-developed or how high the development, the local community will have no clear planning grounds to object.

The New Southwark Plan says that all developments will be expected to maximise the number of residential units provided. This means all other planning policies would be neutered. Any decisions made by the planning committee rejecting very dense and very tall skyscrapers across the borough, could be immediately legally challenged and therefore severely disable the planning committee from carrying out its legal functions, laid out in national and regional planning policies. Therefore the policy is unsound and unjustified due to the resultant curtailing of previous planning policies.

Noted. Policies which should be implemented alongside strategic policies, and the Plan should be read collectively.

P14: Tall buildings

The NSP removes 8 and 10 storey height restrictions for residential and commercial tall buildings outside of the exempted core action areas. This again limits the ability of the planning committee to carry out its legal functions to ensure all applications adhere to national and regional planning policies. Therefore this policy point is unsound, due to insufficient consultation process being possible.

Examples: Burgess Business Park and Camberwell Action Plan. This is a largely residential community and the removal of all height restrictions and the requirement to maximise housing units in all plans, will radically alter the character of the area. It was without proper consultation processes that such a radical change was proposed in the new plan.

The Burgess Business Park is located within a neighbourhood of 2 story Victorian terraced houses. Introducing high density, 14 storey buildings damages the established character of the area, as well as showing blatant disregard for struggling existing infrastructure, rights to light, noise and light pollution and strain on insufficient green areas.

In addition, as Burgess Park is covered by the CAAP and is immediately to the north of the Burgess Business Park, changing the planning policies will mean the park will be overshadowed from the south causing significant damage to the New Church Road wildlife site. This is another key example of why the plan's proposed policies make it unsound.

The council must remove these provisions before the plan can be considered to be sound. Changes I consider necessary to make the New Southwark Plan legally compliant or sound:

Remove all references in all the area plans that require maximising number of residential units. Restore full section in current Southwark Plan that sets out height limits of 8 and 10 storeys for residential and commercial buildings outside of core action areas. Insert provision stating that parks and wild-life sites will be protected from overshadowing from new buildings across the borough.

P14: Tall buildings

Individual
NSPPSV228.1

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.
- Not determining what is "a point of townscape significance" or what is "proportionate" in making decisions.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Policies which should be implemented alongside strategic policies and the Plan should be read collectively. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
 - o Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
 - o References to “criteria” should make clear exactly what those criteria are.
 - o A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

P14: Tall buildings

Individual
NSPPSV239.11

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings needed defining in the NSP.

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.
- Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Policies which should be implemented alongside strategic policies, and the Plan should be read collectively. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

- Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.
- Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.
- Not explaining what “new publicly accessible space at the top of the building” refers to.

This policy is not positively prepared as some aspects of the policy are vague or unclear on the topic of massing:

Aside for reducing energy use and enabling passive design strategies, successful massing and orientation can take advantage of site conditions, such as rainwater harvesting, and can help the building contribute to the health and vitality of the surrounding ecological, social, and economic communities. For instance, it can be massed and oriented to connect its social spaces with street life, or avoid shading nearby wild lands, or could steer foot traffic away from ecologically sensitive areas. These issues are not covered by the policy and yet the impacts of poor massing can be seen on over three developments in Bankside that have been built this last year.

The claim that the local authority have consistently had a clear criteria to determine applications is not justified, and could be challenged not to be consistent with national policy, given past decisions and poor resulting buildings that are out of character with their site locations. Such tall buildings have also created wind shear, over shadowing, and solar glare that have affected neighbouring properties.

This policy is not effective as it

- Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.
- Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.
- Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

To make the policy sound, the NSP should

- Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.
- Make clear that tall buildings will be considered inappropriate in all other locations.
- Clarify all vague or unspecified sections, including
- Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.
- References to “criteria” should make clear exactly what those criteria are.

P14: Tall buildings

- A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

Peckham Citizens
NSPPSV286.2

There is a second item in particular that the following section refers to – the height of buildings across Southwark as a whole. Please see the comments below:

Policy P14: Tall Buildings (pgs 42-43) is unsound because:

- it is not consistent with national and regional planning policy.

The Current London Plan (2016) and Draft London Plan require that “Tall buildings should be part of a plan-led approach to changing or developing an area”, yet all restrictions on the height and location of tall buildings have been removed from the NSP and replaced with vague sentences such as we “use a number of criteria to determine applications”.

The National Planning Policy Framework paragraph 155 states the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” to reflect a “collective vision”. However, it has become clear through the petitions (referred to above) and the public consultation work that Peckham Citizens has undertaken that the vast majority of local people are unaware of this policy, and when made aware, do not agree with it. Hence it does not reflect the prevailing local opinion or a “collective vision”.

This policy is therefore not consistent with national and regional planning policy.

- it is not justified.

All specific restrictions on the location and height of tall buildings have been removed from the NSP Proposed

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

Submission Version (apart from in the site specific policies) which will open the door to the argument of precedence alongside existing or proposed tall buildings covered by site specific policies. The effect will be that clusters of tall buildings can be developed around a site with a site specific policy that had intended to allow just one tall building. There is a significant danger that this will happen on and around the Aylesham Centre and Peckham Bus Station site.

If clusters are to be encouraged around existing tall buildings then this is a significant change in policy and has not been widely publicised or consulted on therefore it is not justified.

The NSP states (pg 42) that “Tall buildings ... can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.” This is not proven, in fact a growing body of recent research is summarised in the White Paper on The Impacts of Tall Buildings: A Research Summary, 2015, by Michael Mehaffy, Sustasis Foundation, Delft University of Technology (attached). It shows tall buildings have detrimental effects on the surrounding area and the environment through:

- shading,
- creating wind tunnels and ‘shadows’ that are notoriously hard to predict or mitigate once in place,
- higher energy use, embodied energy and maintenance costs,
- a detrimental impact on small-scale entrepreneurial activity,
- lack of external amenity space and ‘doorstep play’ areas which make them unsuitable for families,
- overlooking and loss of privacy for the existing surrounding buildings, including several streets of two and three storey houses that will be directly adjacent and their private outdoor space easily visible,
- a loss of ‘sky’ for pedestrians, loss of views for the users of nearby buildings and the creation of a feeling of being loomed over can significantly degrade the experience of the public realm and quality of place,
- isolation from the ground making the surrounding area feel less safe and enlivened,
- segregating the wider community by income; essentially becoming a gated community in the sky which limits interaction and social capital across socio-economic groups.

The House of Commons (2001) report: Tall Buildings: Report and Proceedings of the house of Commons Transport, Local Government and the Regions Committee found that “The main reason that the Committee held an inquiry into tall buildings was to identify the contribution which they can make to the urban renaissance. We found that contribution to be very limited. The proposition that tall buildings are necessary to prevent suburban sprawl is impossible to sustain. They do not necessarily achieve higher densities than mid or low-rise development and in some cases are a less-efficient use of space than alternatives. They have, for the most part, the advantages and disadvantages of other high density buildings. They can be energy efficient*, they can be part of mixed-use

P14: Tall buildings

schemes and they can encourage the use of public transport where there is spare capacity, but so can other types of high density developments. Tall buildings are more often about power, prestige, status and aesthetics than efficient development.”

*Note: more recent research is showing that this is not correct in the London climate, for example refer to the research by Philip Steadman (Emeritus Professor of Urban and Built form Studies and Research Fellow UCL).

-it is not effective.

If clusters of tall buildings are not intended to be allowed alongside existing or proposed tall buildings covered by site specific policies then this policy is not effective as it does not have any specific measures to control this possibility.

As the guidance for the location and height of tall buildings has been removed from the NSP, there is now no effective guidance to how the height and location of tall buildings should be assessed.

-it is not positively prepared.

The statement “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” in policy P14 is unfit for purpose as it is too vague to form a meaningful guidance for when tall buildings will be appropriate and does not reflect that this is a significant change to the existing policy.

This policy therefore does not meet the test for being positively prepared.

Changes that would make the policy sound include:

- The specific sites where tall buildings might be appropriate should be identified with a full description of the height, massing and type of building that would be acceptable, and this should be widely and extensively publicly consulted on.
- Revise the policy in line with recent research that challenges the principle that tall buildings increase density and help regeneration, or justify why this has not been done/is not appropriate.
- All other areas should be specified as not appropriate for tall buildings, unless separate, extensive public consultation that makes the scale of the change clear, is undertaken and widely publicised by the council on a case

P14: Tall buildings

by case basis.

- Define what a 'tall building' is in line with the National Planning Policy Framework including the New Draft London Plan Policy D8 part A.
- Publish the "range of views" on tall buildings that have been gathered in the council's consultation process (referred to in the Consultation Report) and quantify the numbers of people for, neutral, and against. This should be considered alongside the petitions that have recently gained thousands of signatures against towers.

Individual
NSPPSV291.2

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

The New Southwark Plan has outweighed the need to build new homes against the unmet community need to protect and enhance existing housing stock and heritage assets. This allows tall buildings, in particular, to be pushed through on the basis of housing density as opposed to looking after the living spaces of existing communities.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put

Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

forward your suggested revised wording of any policy or text. Please be as precise as possible.

The New Southwark Plan needs to make provisions which protect the unmet needs of communities with regards to quality of housing of existing communities in order to be positively prepared. In particular, these provisions should be made with regard to tall buildings, which could adversely affect the character, quality and heritage of existing buildings and communities. The current plan is unsustainable in seeking to protect the unmet need of existing community character, with regards to the potential for buildings which fail to match the character of a surrounding area.

Individual
NSPPSV295.2

Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant
No

Do you consider that the New Southwark Plan is sound? - Soundness
No

Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not:
Justified

Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not:
Effective

Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not: Consistent with national policy and the London Plan

Do you consider that the New Southwark Plan is unsound because it is not:
Positively Prepared

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Policies which should be implemented alongside strategic policies, and the Plan should be read collectively. It is considered that tall buildings over 60m should contribute to public access including the enjoyment of views across the borough and across London and to provide publically accessible space.

P14: Tall buildings

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

Not Consistent with National Planning Policy

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

"Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".

"Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

"Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".

"Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".

"Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

The need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

Example/illustration of problems the vague wording of the NSP could create:

Proposed Development 'Camberwell Union' - Burgess Business Park, Camberwell

-The proposed development suggests 4-6 storey buildings on Wells Way and Parkhouse Street, where the tallest buildings opposite are two storeys. This height difference of the 4+ storeys opposite not to mention the 10 and 14 storey buildings in the middle of the development will affect daylight (the current houses facing west therefore if the proposed development goes forward will be dark by midday) and creating wind tunnels and micro climates.

-Unprecedented to have this level discrepancy in any of the new builds in the area: to name a few examples, new developments on Southampton Way, Benhill Road, Elmington Road and Commercial Way have a one storey difference at most.

-The tallest proposed element is 14 storeys. At a height of 50+ metres, this is 39 metres taller than the closest

P14: Tall buildings

housing stock. (can provide illustration to show this)

-The local housing stock is two storey Georgian and Victorian mews cottages and includes listed buildings. The proposed development site is between 4-14 storeys tall, and will be similar to sites at Elephant and Castle and Peckham, which while not unattractive, are not sensitive to the character and historical buildings in the borough. This is neither proportionate to the significance of the proposed location and does not respond positively to local character and townscape as the wording on pages 42-43 of the NSP would suggest. The development is in direct conflict with the Mayors current London Plan, and the Mayors New Draft Plan (see above).

Not Justified

This policy is not justified as it involves a significant policy change from the previous policy on tall buildings and there is no evidence to support this policy change:

-The 2011 Core strategy identified particular locations in the borough where tall buildings were appropriate, and this was supported by a Tall Buildings Research Paper (March 2010). No similar study has been undertaken to support the new policy that tall buildings may be appropriate anywhere in the borough. Camberwell Union and proposed developments like it are too dense and tall to be appropriate for the area, which is residential, and 2-3 storeys in the main.

-Without specific locations that are identified in Area Visions and maps (pages 94 - 336) and detailed in site allocations; local people cannot contribute to the decision of where such buildings will be situated, either in their borough or local area. Similarly, it renders all Area Visions meaningless and places communities vulnerable to all Tall Buildings proposals affecting their area to be developer-led.

(It is understood that locations for tall buildings will instead be reviewed by the Southwark Design Review Panel, whose reports are not made public until a planning application is published, too late in the process for local residents and businesses to influence decision-making.)

Existing local residents must have a say in developments of hundreds of units which mean significant changes/ pressures on infrastructure, rights to light, noise pollution, light pollution, parking, and local amenities.

-The policy has not properly taken account of, or responded to, consultation responses to the proposed change of policy as identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings should be defined in the NSP: The Council response states a need for "flexibility", but again does not back this up with evidence.

Local residents were invited to two workshops several months apart by the developers working on Camberwell Union. We were offered one satisfaction survey. Homes affected (such as those on Parkhouse Street) did not receive notification of the consultation.

Not Positively prepared

This policy is not positively prepared as some aspects of the policy are vague or unclear:

-Not setting out the approach or criteria to determine planning applications, hence developments such as

P14: Tall buildings

Camberwell Union utilising this vague policy language to push through inappropriately dense and tall buildings.

-Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.

-Not determining what is "a point of townscape significance" or what is "proportionate" in making decisions. This allows developers, like those responsible for Camberwell Union to dwarf local housing stock with inappropriate proposals (505 luxury flats with no parking)

-Not defining what a tall building is and not clarifying what "significantly taller than their surroundings" means, therefore developments such as Camberwell Union putting forward 14 storey buildings in a residential area epitomised by two storey mews cottages and Victorian two bed homes.

-Not explaining what "new publicly accessible space at the top of the building" refers to, or to whom this space will be available.

Not Effective

This policy is not effective as it

-Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents. Camberwell Union is luxury flats with no parking or green spaces provided, and no provision for increased pressure on existing infrastructure

-Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year. Camberwell Union is 505 luxury flats with a proportion (35%) said to be affordable, with no information about what affordable means. There is no shortage of unaffordable homes in the borough.

-Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings. Density increases of up to 500% can be achieved with human scale streetscape such as terraced apartment buildings.

-Insufficient consideration is given to other more effective ways of combatting the housing need without introducing negative effects of tall buildings (overshadowing, wind, microclimates) such as increasing density of lower-level buildings (e.g. 2-3 stories high); which also offer greater sustainability.

-It does not provide specific guidance on how tall buildings will increase the activities and life opportunities on offer for nearby residents, so leaving open the possibility that developers will design properties solely to benefit the building's residents and users.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

P14: Tall buildings

Suggested changes to P14

To make the policy sound, the NSP MUST

-Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for proper consultation with local residents and businesses.

-Make clear that tall buildings will be considered inappropriate in all other locations.

-Clarify all vague or unspecified sections, including

Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.

References to "criteria" should make clear exactly what those criteria are.

A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.

Individual
NSPPSV296.2

Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant

No

Do you consider that the New Southwark Plan is sound? - Soundness

No

Do you consider that the New Southwark Plan is unsound because it is not:
Justified

Do you consider that the New Southwark Plan is unsound because it is not:
Effective

Do you consider that the New Southwark Plan is unsound because it is not:
Consistent with national policy and the London Plan

Do you consider that the New Southwark Plan is unsound because it is not:

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

Positively Prepared

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

Not Justified

This policy is not justified because it introduces a major policy change on tall buildings with no evidence to justify that alteration.

The 2011 Core Strategy identifies specific locations in the borough where tall buildings would be appropriate. This is underpinned by a paper produced in March '10. Are there any reasons for changing the policy? I am unaware of a new paper that shows the plausibility.

Not sound

This policy is not sound because it is not consistent with the Mayor's current London Plan (2016) or the new Draft London Plan

Policy 7.7 of the Mayor's current London Plan (2016) says:

"Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".

"Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

However, the New Southwark Plan (henceforth referred to as NSP) suggests tall buildings could be located ANYWHERE in the borough unless there is a harmful impact on strategic views.

Therefore this aspect of the NSP would be unsound.

Policy D8 of the New Draft London Plan says:

"Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".

"Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".

However, The New Southwark Plan:

does not define a tall building other than to say it is "significantly higher than surrounding buildings or their context" (and it does not define "significantly" in terms of height, density, or in relation to nearby housing stock)

does not mention a plan-led approach

does not identify on maps the locations where tall buildings would be appropriate

P14: Tall buildings

does not identify the general building heights that would be appropriate.

Not Positively Prepared

This policy is not positively prepared as wording is vague or unclear:

It does not make it clear that there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.

It does not define “a point of townscape significance” or what is “proportionate”.

It does not define what a tall building is, nor does it clarify what “significantly taller than their surroundings” means.

Included in page 42, a sentence in the plan makes no grammatical sense: “Strategic locations that have a regional or borough important and the scale of the existing or planned townscape that is defined in our Area Action Plans and Supplementary Plans Documents.” Worryingly this makes no sense, what does this mean for tall building policy?

The final paragraph of Policy 14 says “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications. We will continue to use this approach...” The ‘consistent approach’ to date has been defined and constrained by the current Southwark Plan. However, the New Southwark Plan seeks to remove constraints, so why is saying it will make the same approach? It also claims “We...use a number of criteria to determine applications”..This is a meaningless phrase unless it specifies or at least gives examples of those criteria.

Not effective

This policy is not effective because it is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.

Example

In my neighbourhood, there is a planning application for a major private development called ‘Camberwell Union’ on the site of the current Burgess Business Park

The application is for 505 residential units in 13 blocks, with heights varying from 3 to 14 storeys. Most of the blocks are 10 storeys or more. The current site is mainly low-rise light industrial units, and the housing stock in the immediate area is mainly 2-storey Victorian and William IV properties and includes listed buildings giving the residential area a specific character.

Recent decisions about new-builds in the area have been based on the current Southwark plan, and developments have generally only one storey higher than the existing housing stock. (Examples include Benhill Road, Commercial Way and Southampton Way.

If the new Southwark plan is adopted, because it is not consistent with the current London plan or the new draft London plan:

There would be no plan-led approach to changing this low-rise light-industrial area to mixed-use high rise

There would be no overarching planning policy to prevent the construction of 10-14-storey buildings in the midst of an area of low-rise dwellings

P14: Tall buildings

There would be no definition about what is “significantly higher than surrounding buildings or their context”. The Camberwell Union plans have a 14-storey block at the centre; each block alongside it steps down slightly in height. There is a small terrace of 2-storey Victorian properties in the midst of the site that would be immediately surrounded on 3 sides by new buildings which are either 3, 4 or 5 storeys, and then by taller buildings stepping up to 14 storeys.

The small mews cottages on Wells Way will be faced by 4-6 storey blocks, totally out of character with the local area and dwarfing the two storey dwellings, with the added concern of significantly affecting the amount of daylight post mid morning any house facing the development (on wells way or within the wells way triangle) could access. Because the NSP is not consistent with the current London plan, there would be no consideration as to whether this area is appropriate, sensitive or inappropriate for tall and large buildings.

Because the NSP is not positively prepared, there is no clear definition about the ‘context’ of the existing Victorian residential buildings, which of the 14 blocks would be classed as the ‘surrounding buildings’ or how it would be assessed whether the proposed new buildings are ‘significantly higher’.

Because the NSP is not effective, private developers could get the green light to build 505 residential units, 35% of which should be ‘affordable’, even if their financial viability statement says there is a risk that 35% affordable housing (is not deliverable in viability terms, and says the scheme should be amended to allow it to be deliverable. So from the outset, a private development can declare it is unable to meet the target of 35% affordable housing, and the NSP is not effective enough to give the council the authority to reject the development on that basis. There is no shortage of unaffordable homes in Southwark. We need an NSP that enables the council to deliver affordable housing, not simply add to the supply of unaffordable housing.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- Provide evidence to justify its policy change about tall buildings.
- Identify specific sites in the borough where tall buildings are appropriate (and consult local residents and business about the suggested locations and indicative heights). Show those locations on area vision maps and within site allocations.
- give indicative heights for tall buildings.
- make it clear that tall buildings will be considered inappropriate in all other locations.
- clarify all vague or unspecified sections, including:
 - Defining or giving examples of ‘a point of townscape significance’ (for example, is ‘significance’ based on architectural, historical, industrial or social factors?)

P14: Tall buildings

- Explaining what “criteria” are used when making decisions.
- Give clear definition of the benefits to the local environment and amenities.
- Show that the impact on local services and infrastructure has been considered.

Shiva Ltd
NSPPSV297.2

Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? Legally compliant

No

Do you consider that the New Southwark Plan is sound? - Soundness

No

Do you consider that the New Southwark Plan is unsound because it is not:

Justified

Do you consider that the New Southwark Plan is unsound because it is not:

Effective

Do you consider that the New Southwark Plan is unsound because it is not:

Consistent with national policy and the London Plan

Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

Do you consider that the New Southwark Plan is unsound because it is not:
Positively Prepared

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

The Council has no considered or consulted-upon tall buildings policy. Instead it is operating a make-it-up-as-we-go-along strategy driven by aspirations to obtain money from developers. This is not compliant with the London Plan, nor is it the product of any proper consideration or consultation. In particular, there is no specification of locations in which tall buildings will be acceptable, less still any reasons why. Consequently, there is also no specification of any maximum heights that may be acceptable where high-rise is.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Comply with the London Plan by identifying any locations where high-rise will be considered and specify the maximum heights which may be acceptable.

Individual
NSPPSV305.1

Do you consider that the New Southwark Plan is sound? - Soundness
No

Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not:
Effective

Noted. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall

P14: Tall buildings

Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not:
Consistent with national policy and the London Plan

Do you consider that the New Southwark Plan is unsound because it is not:
Positively Prepared

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

This policy is not effective as it does not: demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents; and gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.

It is not consistent with The Mayor's New Draft London Plan, through failure to comply with: "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".

This policy is not positively prepared as it: does not define what a "tall building" is, and does not clarify what "significantly taller than their surroundings" means.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.

Make clear that tall buildings will be considered inappropriate in all other locations.

buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

Individual
NSPPSV306.2

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

There has been no consultation on a tall buildings policy. There is no specification of locations in which tall buildings will be acceptable, nor any reasons why. Consequently, there is also no specification of any maximum heights that may be acceptable where high-rise is.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

P14: Tall buildings

Individual
NSPPSV307.1

Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

The removal of the 8 and 10 storey height restrictions for residential and commercial tall buildings across the borough, outside of the exempted core action areas, again limits the ability of the planning committee to carry out its legal functions to ensure all applications adhere to national and regional planning policies.

The Camberwell Area Action Plan and the Burgess Business Park exemplifies these problems. This is a largely urban residential community and the removal of all height restrictions and the requirement to maximise housing units in all plans, will radically alter the area, without any real knowledge in the community or in the Southwark Plan consultation process that such a radical change was proposed in the new plan, to change the character of the community, into one that mirrors that of the high rise, very high densities of the redeveloped Elephant & Castle.

The Burgess Business Park is located within a neighbourhood of 2 story Victorian terraced housing. To introduce very high density, tall buildings that reflect the Elephant and not Camberwell deeply damages the established character of the area.

In addition, as Burgess Park is covered by the CAAP and is immediately to the north of the Burgess Business Park, changing the planning policies as outlined, means the park will be overshadowed from the south and the New Church Road wildlife site which is immediately adjacent to the proposals site, will have its wildlife potential destroyed.

This is just one key example of why the plan's proposed policies make it unsound.

The council needs to remove these provisions before the plan can be considered to be sound.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put

P14: Tall buildings

forward your suggested revised wording of any policy or text. Please be as precise as possible.

Restore full section in current Southwark Plan that sets out height limits of 8 and 10 storeys for residential and commercial buildings outside of core action areas.

Individual
NSPPSV310.2

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

The Council has no considered or consulted-upon tall buildings policy. Instead it is operating a make-it-up-as-we-go-along strategy driven by aspirations to obtain money from developers.

This is not compliant with the London Plan, nor is it the product of any proper consideration or consultation. In particular, there is no specification of locations in which tall buildings will be acceptable, less still any reasons why. Consequently, there is also no specification of any maximum heights that may be acceptable where high-rise is.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall

P14: Tall buildings

consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Comply with the London Plan by identifying any locations where high-rise will be considered and specify the maximum heights which may be acceptable.

Individual
NSPPSV312.2

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

The Council has no considered or consulted-upon tall buildings policy. Instead it is operating a make-it-up-as-we-go-along strategy driven by aspirations to obtain money from developers.

This is not compliant with the London Plan, nor is it the product of any proper consideration or consultation. In particular, there is no specification of locations in which tall buildings will be acceptable, less still any reasons why. Consequently, there is also no specification of any maximum heights that may be acceptable where high-rise is.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Comply with the London Plan by identifying any locations where high-rise will be considered and specify the maximum heights which may be acceptable.

buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

Individual
NSPPSV314.2

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

The Council has not considered or consulted-upon tall buildings policy. Instead it is operating a make-it-up-as-we-go-along strategy driven by aspirations to obtain money from developers.

This is not compliant with the London Plan, nor is it the product of any proper consideration or consultation. In particular, there is no specification of locations in which tall buildings will be acceptable, less still any reasons why. Consequently, there is also no specification of any maximum heights that may be acceptable where high-rise is.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Comply with the London Plan by identifying any locations where high-rise will be considered and specify the maximum heights which may be acceptable.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

Individual
NSPPSV316.6

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

This policy is not justified as it:

- Involves a significant policy change on tall buildings with no new evidence to support the change (last research paper was March 2010).
- The policy change renders all Area Visions meaningless as locations proposed for Tall Buildings are no longer identified.
- Fails to take account of responses identified in the Consultation Report (pages 31-32) that stated specific locations

for tall buildings needed defining in the NSP.

This policy is not sound because it is not consistent with:

A/ The Mayor's Current London Plan (2016), through failure to comply with:

- "Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".
- "Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks".

B/ The Mayor's New Draft London Plan, through failure to comply with:

- "Development Plans should define what is considered a tall building, the height of which may vary in different parts of London".
- "Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate".
- "Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter".

C/ National Planning Policy Framework, through failure to comply with:

the need for "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses" so that Local Plans reflect a "collective vision".

This policy is not positively prepared as some aspects of the policy are vague or unclear:

- Not setting out the approach or criteria to determine planning applications.

Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

Individual
NSPPSV322.2

new London Plan Policy D8

"Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. To ensure tall buildings are sustainably developed in appropriate locations, and are of the required design quality, Development Plans and development proposals must undertake the following:

Definition

Based on local context, Development Plans should define what is considered a tall building, the height of which may vary in different parts of London."

There is no clarity given on the appropriate height in this Conservation Area but the Conservation Area Character Statement gives 8 storeys as the clear norm. The Local Plan should conform or explain.

The Plan needs to state clearly that in a Conservation Area and in the setting of a Conservation Area what the council considers to be the maximum height of building that is acceptable, and support this statement, together with a with clear policy with design criteria to be applied to any prospective development to test and confirm or negate compliance.

Individual
NSPPSV324.7

We do not support tall buildings, or buildings above the height of existing development, in the central Camberwell area, as these would be detrimental to the town centre's Victorian and Edwardian heritage. Despite stating (page 163) that development in Camberwell should "provide as many homes as possible while respecting the local character of the area" and "enhance the local historic environment" the Camberwell plan then goes on to suggest (page 166, 168, 171) that the selected redevelopment sites "could include taller buildings subject to consideration

Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

Policies which should be implemented alongside strategic policies, and the Plan should be read collectively.

Policies which should be implemented alongside strategic policies, and the Plan should be read collectively.

P14: Tall buildings

of impacts on existing character, heritage and townscape". Taller buildings are not achievable alongside the stated goals as they would clearly not be in keeping with the local historic environment or the character of the area. Also 'consideration of impacts' does not commit to full consultation with the local community.

There should be a commitment to a full consultation with all affected parties during the planning process for any tall buildings.

As demonstrated above the Camberwell Area Vision is not internally consistent which needs to be rectified with clearer explanations on what "respecting the local character of the area" and "enhance the local historic environment" actually mean.

Individual
NSPPSV326.2

NSP 53 has not been genuinely consulted upon. The only 'consultation' that the Council engaged in was in relation to a version that was ill-conceived, obsolete, inadequately explained and failed give any coherent account of what it is intended to endorse by way of development.

The site brief presents itself as authorising 'tall buildings' but there is no indication as to how or such buildings could be incorporated on the site, nor any indication of acceptable heights, contrary to the London Plan. Neither is there any explanation of how tall buildings represent considered development potential where the site is interspersed between the listed St Thomas St viaduct arches and the acknowledged unlisted heritage assets of the Horseshoe pub and the Vinegar Yard warehouse, as well as the Bermondsey St conservation area, to the south.

The site brief relates to a site which does not exist as a distinct site, either as to ownership or coherence. It takes in the Vinegar Yard warehouse and other parts of the conservation area. If, as the Council have told us (verbally only), the site brief is intended to be clear that the warehouse is to be preserved then (a) it should say so in terms, and (2) it should be amended to remove the warehouse from the site plan as the land it occupies is not available for

The tall buildings background paper is currently being prepared, and will be a part of our evidence base before the final submission this year. This background paper should be read alongside the Sites Methodology Paper. Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been

P14: Tall buildings

new development in any case. Consequently, the proposed development area and proposed uses are unintelligible and unachievable whilst meeting other stipulations in the brief. i.e. It is internally inconsistent.

Further, the site is shown to include the public thoroughfare of Vinegar Yard. On the other hand, the Council has confirmed to us (again only verbally) that they have no intention of handing over Vinegar Yard to a developer. This should be explicit and without such clarity the brief exhibits further unacceptable ambiguity. It also affects significantly the site area. There is no reasoning or evidence to support the policy of introduction of residential development in this location, which is elsewhere argued by the Council to be exclusively suited to business or other non-residential uses. Certainly there is no consideration shown as to how residential development in this location could contribute to housing other than at the very top end of the price spectrum, alien to local people and contributing nothing to the stock of affordable housing.

The reason that the site brief is unintelligible is clear: There has been no properly considered assessment of the site and its capacity for development or the relationship between feasible density, building heights and the insufficiently particularised, but nevertheless acknowledged, constraints presented by immediate heritage assets and conservation and townscape considerations. The Council has been called upon repeatedly to give a coherent methodology for their arrival at the terms of the site allocation but they have consistently refused to do so. In practice, the only basis for the site allocation as it stands is compliance with demands from developers in disregard of local consultations carried out by OBVNF.

All the defects listed above can be addressed by the Council carrying out proper consultation and not ignoring the results. They must abandon the intentional ambiguity in the site brief and be specific about what is intended and the evidence on which it is based. There should be clear statements on what is to be preserved of the affected heritage assets, that Vinegar Yard is to remain a public road and, if the brief is to endorse tall buildings, specify their height limits and locations to which they are said to be suited.

The Council has no considered or consulted-upon tall buildings policy. Instead it is operating a make-it-up-as-we-go-along strategy driven by aspirations to obtain money from developers.

This is not compliant with the London Plan, nor is it the product of any proper consideration or consultation. In particular, there is no specification of locations in which tall buildings will be acceptable, less still any reasons why. Consequently, there is also no specification of any maximum heights that may be acceptable where high-rise is.

Comply with the London Plan by identifying any locations where high-rise will be considered and specify the maximum heights which may be acceptable.

identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. When amending the policy, a map will be prepared to illustrate the location of tall buildings.

P14: Tall buildings

Individual
NSPPSV327.2

I am concerned about Tall buildings which would destroy the character of the area, place the area in shade and cause distress to existing residents .

Individual
NSPPSV328.2

NSP 53 has not been genuinely consulted upon. The only 'consultation' that the Council engaged in was in relation to a version that was ill-conceived, obsolete, inadequately explained and failed give any coherent account of what it is intended to endorse by way of development.

The site brief presents itself as authorising 'tall buildings' but there is no indication as to how or such buildings could be incorporated on the site, nor any indication of acceptable heights, contrary to the London Plan. Neither is there any explanation of how tall buildings represent considered development potential where the site is interspersed between the listed St Thomas St viaduct arches and the acknowledged unlisted heritage assets of the Horseshoe pub and the Vinegar Yard warehouse, as well as the Bermondsey St conservation area, to the south.

The site brief relates to a site which does not exist as a distinct site, either as to ownership or coherence. It takes in the Vinegar Yard warehouse and other parts of the conservation area. If, as the Council have told us (verbally only), the site brief is intended to be clear that the warehouse is to be preserved then (a) it should say so in terms, and (2) it should be amended to remove the warehouse from the site plan as the land it occupies is not available for new development in any case. Consequently, the proposed development area and proposed uses are unintelligible and unachievable whilst meeting other stipulations in the brief. i.e. It is internally inconsistent.

Further, the site is shown to include the public thoroughfare of Vinegar Yard. On the other hand, the Council has confirmed to us (again only verbally) that they have no intention of handing over Vinegar Yard to a developer. This

Policies which should be implemented alongside strategic policies and the Plan should be read collectively.

The tall buildings background paper is currently being prepared, and will be a part of our evidence base before the final submission this year. This background paper should be read alongside the Sites Methodology Paper. Policy P14 has been amended to comply with Policy 7.7 of the Mayor's current London Plan (2016) & Policy D8 of the new Draft London Plan. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is

P14: Tall buildings

should be explicit and without such clarity the brief exhibits further unacceptable ambiguity. It also affects significantly the site area. There is no reasoning or evidence to support the policy of introduction of residential development in this location, which is elsewhere argued by the Council to be exclusively suited to business or other non-residential uses. Certainly there is no consideration shown as to how residential development in this location could contribute to housing other than at the very top end of the price spectrum, alien to local people and contributing nothing to the stock of affordable housing.

The reason that the site brief is unintelligible is clear: There has been no properly considered assessment of the site and its capacity for development or the relationship between feasible density, building heights and the insufficiently particularised, but nevertheless acknowledged, constraints presented by immediate heritage assets and conservation and townscape considerations. The Council has been called upon repeatedly to give a coherent methodology for their arrival at the terms of the site allocation but they have consistently refused to do so. In practice, the only basis for the site allocation as it stands is compliance with demands from developers in disregard of local consultations carried out by OBVNF.

All the defects listed above can be addressed by the Council carrying out proper consultation and not ignoring the results. They must abandon the intentional ambiguity in the site brief and be specific about what is intended and the evidence on which it is based. There should be clear statements on what is to be preserved of the affected heritage assets, that Vinegar Yard is to remain a public road and, if the brief is to endorse tall buildings, specify their height limits and locations to which they are said to be suited.

The Council has no considered or consulted-upon tall buildings policy. Instead it is operating a make-it-up-as-we-go-along strategy driven by aspirations to obtain money from developers.

This is not compliant with the London Plan, nor is it the product of any proper consideration or consultation. In particular, there is no specification of locations in which tall buildings will be acceptable, less still any reasons why. Consequently, there is also no specification of any maximum heights that may be acceptable where high-rise is.

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supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's.

P14: Tall buildings

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P14: Tall buildings

All the defects listed above can be addressed by the Council carrying out proper consultation and not ignoring the results. They must abandon the intentional ambiguity in the site brief and be specific about what is intended and the evidence on which it is based. There should be clear statements on what is to be preserved of the affected heritage assets, that Vinegar Yard is to remain a public road and, if the brief is to endorse tall buildings, specify their height limits and locations to which they are said to be suited.

The Council has no considered or consulted-upon tall buildings policy. Instead it is operating a make-it-up-as-we-go-along strategy driven by aspirations to obtain money from developers.

This is not compliant with the London Plan, nor is it the product of any proper consideration or consultation. In particular, there is no specification of locations in which tall buildings will be acceptable, less still any reasons why. Consequently, there is also no specification of any maximum heights that may be acceptable where high-rise is.

Comply with the London Plan by identifying any locations where high-rise will be considered and specify the maximum heights which may be acceptable.

Individual
NSPPSV330.5

Despite the NSP's wish for tall buildings to:

2.3 Be of exemplary architectural design and residential quality; and

2.4 Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings;

a number of the recent additions around the borough have fallen pathetically short on both points. One building in particular on Newington Causeway looks like it is still enclosed in an ugly cardboard box that it is waiting to come out of. Sadly it is not.

How can the Council claim to be the arbiters of 'good taste' and know whether a building achieves these two goals? Certainly they have fallen woefully short thus far.

Prescribed characteristics should be made for a 'Southwark' design for tall buildings, to which all buildings greater

Policies which should be implemented alongside strategic policies, and the Plan should be read collectively.

P14: Tall buildings

than 8 storeys can ascribe, and will create consistency across a neighbourhood or even the borough. There could be a handful of template criteria that designs must look to.

Individual
NSPPSV331.4

There is no justification for the removal of the stricter guidance on the location of tall buildings that was in previous versions of the plan. The removal of this guidance has been a source of concern in many responses from the local community, however their views have been ignored.

The plan should return to setting out clearly defined areas where tall buildings are appropriate.

Noted. Sites and locations for tall buildings have been identified and incorporated within our area visions, as shown now in Map 1. This is supported by our revised tall buildings background research paper. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's. When amending the policy, a map will be prepared to illustrate the location of tall buildings.

No.	Title
Appendix A	New Southwark Plan Proposed Submission version: Amended policies 2019
Appendix B	Consultation Plan
Appendix C	Consultation Report (Annex 1 to report)
Appendix D	Integrated Impact Assessment
Appendix E	Equalities Impact Assessment
Appendix F	Habitats Regulations Assessment

New Southwark Plan Proposed Submission Version: Amended Policies 2019

Consultation Report Annex 1 Consultation materials

January 2019

14 November 2017

Dear Sir/Madam,

UPDATE: The council has revised the consultation dates for the New Southwark Plan: Proposed Submission Version. Informal consultation will run until 24 December 2017. Formal consultation, subject to approval at council assembly, will run for 6 weeks from 2 January 2018 to **12 February 2018**.

The plan was published in the run up to the council's cabinet meeting held on 31 October 2017. At this meeting cabinet agreed to launch formal consultation, subject to approval at council assembly on 29 November 2017.

[The plan is available to view and download on the council's website here](#)

[Make representations on the plan's legal compliance and 'soundness' on our consultation hub page here](#)

You can find out more information about what we mean by legal compliance and 'soundness' in the link below and at the front of the plan.

[More information about the consultation can be found here](#), including where to view the plan and other ways to make representations

Information about the New Southwark Plan

Southwark Council is preparing a new borough-wide development plan called the New Southwark Plan. The New Southwark Plan sets out how the Council will deliver further regeneration and wider improvements for the borough in the years to come. Planning decisions must be made in accordance with the development plan, unless other material considerations indicate otherwise.

Following the consultation the Plan will be submitted to Government for an independent examination where an inspector will consider any comments submitted to the Council during the consultation period.

Yours faithfully

Planning Policy Team

Southwark Council

0207 525 5471

Planningpolicy@southwark.gov.uk

You are receiving this email because you have opted in to receive planning policy updates on your [MySouthwark](#) profile. To stop receiving these updates, please opt out by unticking the tick box on your profile settings page

New Southwark Plan

The council is now consulting on the proposed submission version of the
New Southwark Plan

Information about consultation is set out inside the New Southwark Plan.

Copies of the plan are available to view here. Please ask a member of staff who can direct you to where these are located.

Consultation ends 27 February 2018.

Planning policy
Planning Division
Chief Executive's Department
planningpolicy@southwark.gov.uk
Tel: 0207 525 5471

Date: 15 January 2018

Ref: NSP Proposed Submission Version

Dear Sir/Madam

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

Consultation on the Proposed Submission Version

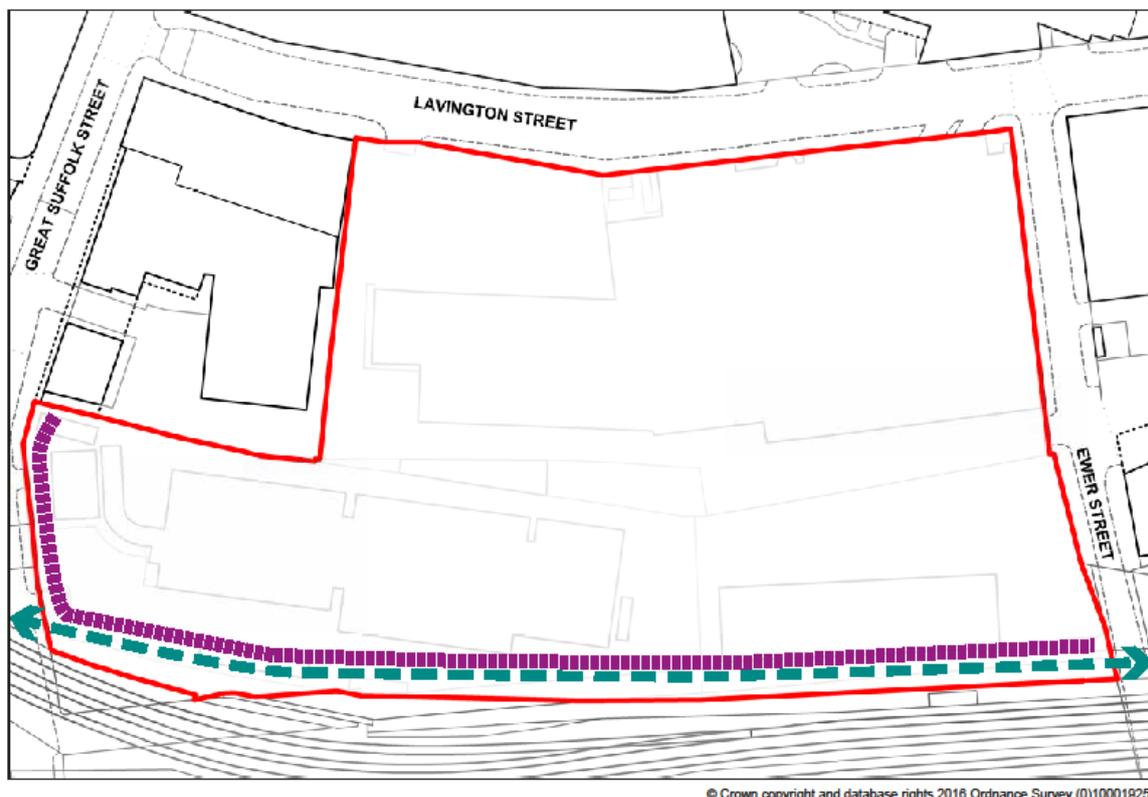
Site allocations comprise a detailed list of potential development sites that the council has identified for future development. Councils are required to identify and allocate development sites in their local plans to help ensure strategic needs for housing, employment, schools and health facilities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

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

We are now consulting on a Proposed Submission Version, which is the council's final document for consideration. This is not an open consultation and unlike previous, we are required to ask two specific questions which gives the opportunity to comment on how the New Southward Plan has been prepared, that its aims are achievable and that the plan is based on robust evidence base.

You have been contacted on the site allocation below as you have been identified as a freeholder or leaseholder with an interest in the land.

NSP01 Site Bordering Great Suffolk Street and Ewer Street



Site vision

Redevelopment of the site must:

- Re-provide at least the amount of employment floorspace (B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater;
- Provide ground floor active frontages with ground floor town centre uses (A1, A2, A3, A4, D1, D2) enhancing the Low Line walking route adjacent to the railway viaduct;
- Provide new open space of at least 15% of the site area.

Redevelopment of the site should:

- Provide new homes (C3);

The Proposed Submission Version of the New Southwark Plan is a formal consultation **ending Monday 26 February 2018**. This will be followed by a public examination by a planning inspector. Comments on the Proposed Submission Version of the plan can be made on our consultation hub page or by email. You may also refer to our website to download a questionnaire which you can send to us using the details at the top of this letter or by email.

You can view the more information about the proposed site allocation in the New Southwark Plan:
Proposed Submission Version online and more information on this stage of consultation at:
<http://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/local-plan?chapter=4>

Yours faithfully

Southwark Council
Planning policy

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

NOTICE OF CONSULTATION FOR:

**NEW SOUTHWARK PLAN: PROPOSED SUBMISSION VERSION
(REGULATION 19 CONSULTATION)**

The Council is consulting on the New Southwark Plan: Proposed Submission Version document **from 13 November 2017 to 12 February 2018**. The New Southwark sets out the overarching planning and regeneration strategy for the whole borough up to 2033. The first stage of consultation was the issues consultation from October 2013 to February 2014 which set out a detailed strategy for regeneration in Southwark. The council then consulted on the New Southwark Plan: Strategic and Development Management policies (part 1 of the preferred option stage) between October 2015 and March 2017. Following this, the council then consulted on part 2 of the preferred option which contained draft Area Visions and Site Allocation and an 'interim' consultation on a set of new and amended policies from February to July 2017. The documents this notification refers to has been prepared following the conclusion of the Preferred Option Consultation and contains the policies, area visions and final list of site allocations.

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

Following this "proposed submission version" stage consultation, the draft plan and any comments received will be sent to the Government's Planning Inspectorate to examine the plan and make a recommendation for adoption.

New Southwark Plan: Proposed Submission version will be consulted on for 12 weeks between 13 November 2017 and 12 February 2018. All comments must be received by **Monday 12 February 2018**.

The New Southwark Plan: Proposed Submission Version and its supporting documents are available to view on the council's website at:

<https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/local-plan>

You can find hard copies of the proposed submission version of the plan and supporting documents at the locations listed below.

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

Email: planningpolicy@southwark.gov.uk.

Consultation hub: <https://consultations.southwark.gov.uk/>

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

LOCATIONS TO VIEW DOCUMENTS

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

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

Libraries (Opening times listed individually below)

- **Blue Anchor Library:** Market Place, Southwark Park Road, SE16 3UQ
(Monday; Tuesday & Thursday 09:00 – 19:00, Friday 10:00 – 18:00, Saturday 09:00 – 17:00)
- **Brandon Library:** Maddock Way, Cooks Road, SE17 3NH
(Monday, Tuesday & Thursday 14:00 – 19:00, Friday 10:00 – 15:00, Saturday 10:00 – 17:00)
- **Camberwell Library:** 48 Camberwell Green, SE5 7AL
(Monday – Friday 09:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **Canada Water Library:** 21 Surrey Quays Road, SE16 7AR
(Monday – Friday 08:00 – 20:00, Saturday 09:00 – 17:00, Sunday 10:00 – 16:00)
- **Dulwich Library:** 368 Lordship Lane, SE22 8NB
(Monday, Wednesday, Thursday & Friday 09:00 – 20:00, Tuesday 10:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **East Street Library:** 168-170 Old Kent Road, SE1 5TY
(Monday, Tuesday & Friday 14:00 – 19:00, Saturday 10:00 – 17:00)
- **Grove Vale Library:** 25-27 Grove Vale, SE22 8EQ
(Monday, Tuesday & Thursday 14:00 – 19:00, Friday 10:00 – 15:00, Saturday 10:00 – 17:00)
- **John Harvard Library:** 211 Borough High Street, SE1 1JA
(Monday – Friday 09:00 – 19:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **Kingswood Library:** Seeley Drive, SE21 8QR
(Monday & Thursday 10:00 – 14:00, Tuesday & Friday 14:00 – 18:00, Saturday 13:00 – 17:00)
- **Newington Temporary Library:** Elephant Artworks – Second Floor, Elephant Road, SE17 1LB
(Monday - Friday 09:00 – 20:00, Saturday 09:00 – 17:00, Sunday 12:00 – 16:00)
- **Nunhead Library:** Gordon Road, SE15 3RW
Monday, Tuesday & Thursday 14:00 – 19:00, Wednesday 10:00 – 15:00, Friday 10:00 – 15:00, Saturday 10:00 – 17:00)
- **Peckham Library:** 122 Peckham Hill Street, SE15 5JR
(Monday, Tuesday, Thursday & Friday 09:00 – 20:00, Wednesday 10:00 – 20:00, Saturday 10:00 – 17:00, Sunday 12:00 – 16:00)

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

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

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

New Southwark Plan Proposed Submission Version representations form

Part A: Contact details

If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in the next section.

1: Personal details

Title:	<input type="text"/>
First Name:	<input type="text"/>
Last Name:	<input type="text"/>
Organisation (Where relevant):	<input type="text"/>
Position (Where relevant):	<input type="text"/>
Address line 1:	<input type="text"/>
Address line 2:	<input type="text"/>
Address line 3:	<input type="text"/>
Postcode:	<input type="text"/>
Email:	<input type="text"/>
Telephone:	<input type="text"/>

2. Agents details (if applicable)

Title:	<input type="text"/>
First Name:	<input type="text"/>
Last Name:	<input type="text"/>
Organisation:	<input type="text"/>
Position:	<input type="text"/>
Address line 1:	<input type="text"/>
Address line 2:	<input type="text"/>
Address line 3:	<input type="text"/>
Postcode:	<input type="text"/>
Email:	<input type="text"/>
Telephone:	<input type="text"/>

Part B: Representation

Please select **one** policy per form to select which part of the plan you wish to make a representation on. The one option you select should be the item you should be commenting on in the subsequent boxes below. If you want to comment on more than one part of the plan, please submit part B again.

1. To which part of the New Southwark Plan does this representation relate to?

Implementation policy:	<input type="text"/>
Development Management policy:	<input type="text"/>
Area Vision:	<input type="text"/>
Site Allocation:	<input type="text"/>
Proposal Map:	<input type="text"/>
Other:	<input type="text"/>

2. Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) Amendment Regulations 2012?

Yes

No

3. Do you consider that the New Southwark Plan is Sound?

Yes

No

4. Do you consider that the New Southwark Plan is unsound because it is not?

Effective

Justified

Consistent with national policy and the London Plan

Positively prepared

5. Please give details of why you consider the New Southwark Plan not to be legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

6. Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Part D: Public Examination (required)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination
- Yes, I wish to participate at the oral examination

It is vital that your contact details are submitted correctly to ensure that you can be contacted if you wish to participate in the public examination. Please tick the checkbox to confirm that the details which have been provided are correct.

- I confirm that all details provided are correct

Part E: Equalities monitoring

Equality and engagement with our diverse communities is central to the day to day delivery of our Southwark Council Services. To deliver on our commitment to a fairer future, we need to collect some equality information about you. This also forms part of our legal responsibilities under the Public Sector Equality Duty of the Equality Act (2010).

We would therefore appreciate it if you could spend a few minutes filling in the details below. This information helps us to measure and analyse how well we are engaging with all those who live and work in the borough. Please do remember that whilst this information is very useful for our work, you are not obliged to answer or complete any or all of this information. Southwark Council is the data controller for the purposes of the Data Protection act.

Age:

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

Sex:

- Male Female

Disability and health:

Are your day-to-day activities limited because of a health problem or disability which has lasted or is expected to last, at least 12 months?

- Yes, limited a little
- Yes, limited a lot
- No, not limited

Please tick the box or boxes below that best describe the nature of your impairments:

- Hearing/Vision (e.g deaf or hard of hearing; blind or partial sight)
- Physical/mobility
- Mental health (lasting more than a year e.g severe depression, schizophrenia etc)
- Learning difficulties (e.g dyslexia, dyspraxia etc.)
- Memory Problems (e.g Alzheimer's etc.)

Please use this box below if you wish to share your impairment:

Nationality:

Ethnicity:

Preferred language:

English

Other

If Other, Please specify:

Religion or belief:

Christian

Sikh

Hindu

Muslim

Jewish

Buddhist

No religion

Other

Marriage or civil partnership:

Married

Divorced

Widowed

Separated

Registered in a civil partnership

Formally in a civil partnership that is now legally dissolved

Surviving member of a civil partnership

Never married or in a civil partnership

Gender reassignment

Is your gender identity the same as the gender you were assigned at birth?

Yes

No

Pregnancy or maternity

Are you currently pregnant and/or on maternity leave?

Yes

No

Sexual orientation

Heterosexual/Straight

Lesbian/ Gay woman

Gay man

Bi-sexual

Please let us know which part of Southwark you live in

Bermondsey and Rotherhithe

Borough Bankside and Walworth

Camberwell

Dulwich

Peckham and Nunhead