

Cabinet: 28 January 2014
Blackfriars Road Supplementary Planning Document

No.	Title	Held at
Appendix A	Blackfriars Road supplementary planning document, 2014	Hard copy provided with the report
Appendix B	Representations received and the officer comments (Appendix J of the consultation report)	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix C	Tracked changed version of the Blackfriars Road supplementary planning document, 2014	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix D	Consultation report including a separate document containing appendices A-I Two separate documents	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix E	Equalities analysis	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix F	Sustainability appraisal	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix G	Sustainability statement	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix H	Appropriate assessment	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix I	Urban design study	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix J	Business and employment background paper	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4

Appendix J of the Blackfriars Road SPD, 2014 Consultation report

REPRESENTATIONS AND OFFICER RESPONSES ON THE DRAFT BLACKFRAIRS ROAD SUPPLEMENTARY PLANNING DOCUMENT, 2013

Rep Ref	Obj Ref	First Name	Surname	Organisation	Details of Representation	Officer Response to Representation
1149	1129	Stephen	Darcy		<p>I am greatly concerned about the proposed developments at the southern end of Blackfriars Rd. While I welcome the badly needed redevelopment of the road I am concerned about the height of the proposed tower at St. George's Circus. It is too high and not in keeping with the other buildings.</p> <p>Also the proposal for the railway sidings at St George's Circus along the back of Gladstone st: attention must be paid to the unique attraction of this street. I suggest a park.</p>	<p>A tall building up to 70m in height provided that it complies with the detailed guidance outlined in SPD 5 and the existing planning policy framework (the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and other planning documents/guidance) could be appropriate at the southern end of Blackfriars Road.</p> <p>The Blackfriars Road SPD urban design study sets out the robust evidence base. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road and should be set back from St George's Circus. The tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table 1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking the local heritage context into account.</p> <p>The SPD states that the list of potential development sites is illustrative of the huge opportunity for change within the area and the need for a coherent framework. It has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for</p>

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						development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. The formal identification of proposals sites within the area will be considered as part of the preparation of the New Southwark Plan. It is recognised that there is a deficiency in open space within the SPD area. However the opportunity for new parks is limited. The SPD cannot designate new open spaces, but does encourage new public space and landscaping within SPD 3.
115 1	114 3	John	Bourne		<p>The two aspects of the SPD that we find most objectionable are:</p> <p>1: Provision for a tower block 70 metres high at St George's Circus</p> <p>2: The designation of the Bakerloo sidings site (which is immediately behind Gladstone Street) as a potential development site</p>	<p>A tall building up to 70m in height provided that it complies with the detailed guidance outlined in SPD 5 and the existing planning policy framework (the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and other planning documents/guidance) could be appropriate at the southern end of Blackfriars Road.</p> <p>The Blackfriars Road SPD urban design study sets out the robust evidence base. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road and should be set back from St George's Circus. The tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table 1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking into account local context. The SPD states that the list of potential development sites are illustrative of the huge opportunity for change within the area and the need for a coherent framework. It has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing</p>

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						buildings or surroundings. The formal identification of development sites within the area will be considered as part of the preparation of the New Southwark Plan.
115 2	114 3	John	Bourne		<p>The SPD proposes that Blackfriars Road be developed solely as a series of tall buildings with infill of significant height.</p> <p>Where is the evidence to support this 'vision' for the area rather than some alternative development plan? Which other plans were considered and rejected? During consultation we have been informed that no particular end use is envisaged for any of the sites designated for development.</p> <p>Where is the justification for ignoring the suitability of particular sites of the designated areas for any particular form of development, given the sensitive nature of the heritage context? It seems clear to us that the role of the Local Authority in connection with the SPD is that of a development enabler rather than a regulator. This throws onto the community the responsibility to act as a regulator.</p>	<p>The emerging vision for the SPD area builds on the adopted visions within the Core Strategy and London Plan and is considered to be consistent with the NPPF (2012), the London Plan (2011), the Core Strategy (2011) and the saved Southwark Plan (2007), taking into account changes in the surrounding context since developing the Core Strategy vision in 2009/2010. The London Plan, Core Strategy and saved Southwark Plan form the development plan for Southwark, with the NPPF setting out national guidance. The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road, and sets out that building heights should be lower away from Blackfriars Road.</p> <p>This approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. SPD 5 sets out clear guidance for the area, and that building heights should be lower away from Blackfriars Road.</p> <p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p>
115 3	114 3	John	Bourne		In including large areas of land that have nothing to do with Blackfriars Road, Southwark Council will undermine Neighbourhood Forums (South Bank and Waterloo Neighbourhood Forum and the Bankside	An explanation of the boundary is set out within the SPD. It includes the whole of the Blackfriars Road and some of the surrounding area. It includes the surrounding area as the surrounding area is also likely to see some development and improvements, particularly possible

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					<p>Neighbourhood Forum) and the Localism Act 2011.</p> <p>Can the council demonstrate that the SPD will give a better outcome than those envisaged by Neighbourhood Forums</p>	<p>improvements to public realm. Wording has been added to the SPD to make it clearer that the character and historic value of much of the surrounding area will continue to be protected and enhanced. It has also been made clear that the areas which are predominantly housing will mostly continue to be so, with residents benefitting from the increased range of activities on the Blackfriars Road.</p> <p>Figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area.</p>
1154	1143	John	Bourne		<p>Development Site 43 The Bakerloo Sidings Any development on this site will interfere with long views into the West Square Conservation Area valued by Southwark Planning. What consideration has been given to these in the preparation of this SPD? What is the evidence to support its suitability as a development site as opposed to educational, open space or other use?</p> <p>Under the Elephant & Castle Enterprise Quarter SPD Southwark should have consulted TfL. Under the Localism Act consultees are duty bound to co-operate so where may we see TfL's response? Any building on this site will adversely affect the setting of heritage assets.</p> <p>The Elephant & Castle Enterprise Area SPD mentioned a landmark building. We find reference to any such building on this site deeply concerning given</p>	<p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table 1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.</p> <p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>TfL, GLA and Network Rail were all consulted as part of the</p>

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					the proximity not only to our own listed houses but also the listed obelisk, St George's RC Cathedral and Imperial War Museum, the latter two being the landmark buildings in this location. How are these proposals affected by the Blackfriars Road SPD?	<p>consultation process. The Blackfriars Road SPD consultation report summarises all the responses received and changes subsequently made to the SPD. The full representations received from these bodies and the council's response to them is included within Appendix J of the Blackfriars Road SPD consultation report.</p> <p>The Elephant and Castle SPD was adopted on 20 March 2012 and replaced the Elephant and Castle Enterprise Quarter SPD (2008) and the Walworth Road SPD (2008). The Blackfriars Road SPD will replace the Elephant and Castle SPD/OAPF guidance for the overlapping areas. The SPD has been updated to make this clearer.</p>
1155	1143	John	Bourne		<p>Strategic views St George's Circus and Tall Buildings St George's Circus is a fine example of Georgian town planning with its focal point at its centre, the Grade 2* listed obelisk. SPD 5 Building Heights proposes "a tall building of height up to 70 metres should provide a focal point at St George's Circus". This statement displays a fundamental ignorance of this circus. A tall building will affect the setting of not only the obelisk, an important heritage asset, but also the listed Georgian terraces in London Road. Please demonstrate under London Plan CDR1 how tall building development, a fundamental change in architecture, will not adversely affect the local character.</p> <p>Where is the comprehensive urban design analysis of the local character and historic context? (CABE and English Heritage Guidance on Tall Buildings CDN25) St George's Circus is stated on page 29 of the SPD to be a transport node. It cannot, by the accepted definition of a transport node, be so described. Development sites 39, 40, 41 and 43 directly affect the Circus and other heritage assets. Council officers have stated that tall buildings at St George's Circus would not be a conflict with the adjoining heritage assets.</p>	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for</p>

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					Where is the evidence that this is not a conflict? In determining tall building height limits within the SPD of 70 metres, where is the assessment of three dimensional modelling to determine the potential effect on the local context? (CABE and English Heritage Guidance on Tall Buildings CDN25	development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. Any development of the potential development sites would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.
1156	1143	John	Bourne		Why are hotels being promoted (SPD 3.10) as viable use when Southwark has already achieved or is close to achieving the requirements. The figures for hotel rooms in the SPD make it clear that, of the 2500 bedrooms required by the GLA's Hotel Demand Study 2006 by 2026, all but 75 have either been built or are in the pipeline.	<p>The London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2031. The estimate of the approximate net and gross hotel rooms required over the period 2007-2026 for Southwark, as set out in the GLA's Hotel Demand Study, is based on assessment of factors including transport links to central London and connections to airports, proximity of tourist attractions/business locations, cafes and restaurants in the area, night time economy, cultural facilities and attractions, and regeneration initiatives and site availability. The forecast for Southwark should be treated as indicative only, and local circumstances should also be factored in.</p> <p>It is important to consider that the SPD area is within the Central Activities Zone, Bankside, Borough and London Bridge Opportunity Area and part of the Elephant and Castle Opportunity Area which are areas promoted in the London Plan to accommodate strategically important hotel provision. Arts, cultural and tourism activities have flourished in Southwark in the last decade, particularly in the Strategic Cultural Area, which is within the CAZ. Bankside, Borough and London Bridge has consequently experienced a growth in the number of hotels to support this increasing visitor economy.</p> <p>The SPD2 provides guidance to support Core Strategy policy 10 'Jobs and business' which sets out the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. Policy 10 and SPD 2 are also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals in the area will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land</p>

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						uses will also be taken into account.
1157	1143	John	Bourne		Travel SPD6 gives no specific information as Blackfriars Road falls under the jurisdiction of TfL. Under the Localism Act both TfL and Southwark Council are duty bound to share any consultation information regarding active travel. What plans have been proposed?	The text within SPD 6 has been updated to clarify that Blackfriars Road falls under the jurisdiction of TfL. A consultation report has been prepared summarising responses to the consultation on the draft Blackfriars Road SPD. All responses to the SPD consultation will be published on the Council's website prior to the SPD being taken to Cabinet for adoption. TfL have now announced that TfL are proposing to introduce a Cycle Superhighway on Blackfriars Road, with consultation proposed for summer 2014. Results of this consultation would be shared on TfL's website.
1158	1143	John	Bourne		General The document refers to shops along the whole of Blackfriars Road but makes no reference to a retail impact study, indicating demand for these or the effect on neighbouring shops	The SPD business and retail background evidence paper sets out further detail to SPD2 and the future retail capacity for the Bankside and Borough district town centre. This detail has been referenced from the Southwark Retail Capacity Study. The study evaluates the vitality and viability of the town centre, in terms of its retail performance and it identified that the focus should be on continuing to meet the needs of workers, tourists and visitors in the town centre. The study concluded that new retail schemes will be supported by an increase in population in the area, through new residents, workers and visitors and these will come forward on an incremental basis.
1159	1143	John	Bourne		No mention is made of environmental impact assessments, wind and daylight modelling, which are fundamental requirements in considering proposals of this nature, particularly considering the difficulties with the Palestra and 'Walkie Talkie' buildings.	These matters would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and other planning guidance. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate.
1160	1143	John	Bourne		The document states that crime will be reduced yet there is no reference to existing or anticipated crime statistics. Has the Metropolitan Police been consulted? If these studies have been obtained and modelling carried out then these should be in the public domain and not withheld. Please advise where these may be seen.	The Metropolitan Police are on the planning policy's mailing list and were consulted as part of the consultation on the Blackfriars Road SPD. The sustainability appraisal and the sustainability appraisal scoping report which both informed the preparation of the SPD provide further information on the possible impact of the SPD on crime. The sustainability appraisal assessed the impact of the SPD guidance on sustainability objective SDO4: To reduce the incidence of crime and fear of crime, and finds that the SPD is likely to overall have a positive

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						<p>impact. The sustainability scoping report also provides further information setting out information on the Indices of Multiple Deprivation which includes crime as one of its six indicators. Both documents are available to view on the council's web site at: www.southwark.gov.uk/blackfriarsroadspd and www.southwark.gov.uk/planningpolicy</p>
1161	1143	John	Bourne		<p>Why has West Square Conservation Area not been mentioned in SPD4 and SPD5? The tall buildings proposed affect the setting of this Conservation Area and its Listed Buildings</p>	<p>The West Square conservation area is situated outside the Blackfriars Road SPD area, but would still be considered within SPD 3, 4 and 5 as a heritage asset. Any development proposal would be assessed at the planning application stage against the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and other planning guidance.</p>
1162	1143	John	Bourne		<p>This SPD has 1 Business Space, 2 Mixed Use Town Centre, 3 Public Realm and Open Space, 4 Built Form and Heritage, 5 Building Heights and 6 Active Travel. It does not have a Strategy or Guidance for Housing. Why not?</p>	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards.</p> <p>The vision already refers to housing development. Housing will be encouraged on appropriate sites. In order to make this clearer, we have updated SPD 2: Mixed use town centre to include residential development as one of the uses to be encouraged alongside the provision of a mixture of new town centre uses.</p> <p>The fact box on town centre uses has also been updated in accordance with the National Planning Policy Framework definition to make it clear that residential development is not a main town centre use but it can play an important role in ensuring the vitality of town centres.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary</p>

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						planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.
1163	1143	John	Bourne		The Council's Core Strategy 2010 does not support tall buildings in Blackfriars Road South, as they do not meet the criteria for 'vision vibrancy and life'. Why does the Council's vision now differ from the Core Strategy?	<p>The policy approach and emerging vision within the SPD is considered to be consistent with the NPPF (2012), the London Plan (2011), the Core Strategy (2011) and the saved Southwark Plan (2007), taking into account changes in the surrounding context since developing the Core Strategy vision in 2009/2010. The London Plan, Core Strategy and saved Southwark Plan form the development plan for Southwark, with the NPPF setting out national guidance. The development plan sets out the policies for tall buildings. Key policies are: London Plan policy 7.7 which identifies that tall and larger buildings should generally be limited to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport.</p> <p>Blackfriars Road lies within the Central Activities Zone, is an opportunity area and a town centre with good access to public transport. Core Strategy strategic policy 12 requires tall buildings to have an exemplary standard of design and identifies locations where tall buildings could go. The Core Strategy vision for Bankside and Borough refers to the council setting out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework. Saved Southwark Plan policy 3.20 sets out criteria for considering applications for tall buildings and applies across the borough.</p>
1164	1143	John	Bourne		In 2012 UNESCO noted in its convention briefing paper that in April 2011 Southwark's Core Strategy "includes an emphasis on heritage assets and revises their approach to tall buildings on the area". Why has the council reneged on this? UNESCO's World Heritage Committee Report June 2012 "notes the intention of Southwark Council to develop a Supplementary Planning document to clarify how and where development can take place and to define	The UNESCO paper relates to the area around London Bridge and the potential impact of tall buildings on the setting of the Tower of London World Heritage Site. The heights proposed in the Blackfriars Road SPD building heights strategy are consistent with Southwark's development plan consisting of the saved Southwark Plan policies, Core Strategy and the London Plan. Our testing shows that the proposed heights would not impact the setting of the Tower of London site. The proposed 70m threshold guidance for the southern end of Blackfriars Road responds to the sensitivity of the Palace of

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					building height thresholds so as to inform the appropriateness of subsequent development proposals". Is this the said SPD?	Westminster World Heritage site.
1165	1146	Kenneth	Hayes	Blackfriars Road Neighbourhood	<p>Thank you for your email dated 23rd August last with the meeting notes of the Consultation Meeting on 17th August. These are an accurate resume of the views expressed at the meeting. However I wonder how many of these views will be taken into account.</p> <p>With the Planning Application approval of the 169 - 172 Blackfriars Road Redevelopment last week, in spite of very strong local objections if this consultation is just cosmetic The local authority owned the Freehold of this site ,but chose to sell out to a Private Developer rather than build affordable homes on this former Council Residential site that has mainly lain derelict since WW 11. This area of Southwark was formerly a mixed Industrial / Residential area and than changed to mainly Office buildings post WW11. Mixed communities work well and ghettos, Rich or Poor do not.. This generation must preserve what is good from the past nurture it and pass it on to future generations. Developers are only interested in their profit margins not the Communities they are in many cases destroying. The 'rape' of Blackfriars Road will continue if our planners and political masters give way to the Developers. Conservation areas mean nothing if they are not enforced, e.g Borough High Street.</p>	<p>A consultation report has prepared alongside the Blackfriars Road SPD. This sets out a summary of the representations received and how we have taken these into account in preparing the final version of the SPD. The appendices also set out all of the representations received and officer comments on how these comments have been taken into account, and whether the SPD has been updated as a result.</p> <p>The Planning Committee report for 169-172 Blackfriars Road sets out the detail in reference to the specific application referred to.</p>
1166	1147	Andrew	Berton		Granted the inevitability of development along Blackfriars Road, it is still alarming to discover the extent to which this involves the wholesale replacement of the existing building stock rather than, at least some, restoration and renewal. Southwark Street is still interesting and attractive because of the mixed age and varying footprint size of its buildings.	The role of the SPD is to provide further guidance for the Blackfriars Road area and on how the existing development plan policies should be implemented. The SPD is consistent with the saved heritage policies of the Southwark Plan, Core Strategy policy 12 and London Plan, as well as national guidance in the National Planning Policy Framework (NPPF). All these policies encourage the reuse of heritage buildings where appropriate, consistent with their significance.

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					Contrast this with Blackfriars Road where almost all surviving structures from the 20th century (and before) are set to be lost and where oversized and actually repellent structures such as "Palestra" (and what's now being built or in planning) hardly reflect the identity of the immediate surroundings. Meanwhile plans for the wholesale redevelopment of the Valentine Place area are a matter of concern as this still an interesting early 20th mixed-use enclave, and the loss of 21 Webber Street would be a real loss.	
1167	220	James	Barber		Reading through the Blackfriars Road SPD I was surprised to see some cycling provision had dropped out. Previously it had been agreed to target re-establishing the Hopton Road through to Upper Ground under Blackfriars Road bridge link. The original tunnel for the Thames Path under Blackfriars Bridge was funded from cycling budgets but due to ballooning of pedestrian numbers is no longer suitable for regular cycling. Re establishing this lost East-West corridor, much of which is still in place physically, would give a practical route for cyclists. The current cycle diversion via Southwark Street isn't practical and is ignored. Page 23 Figure 6 shows pedestrian routes but not East-West through routes and restricted to pedestrians. Ideally indicative cycle link would be clearly marked on figure 6. How can we get this East-West link for cyclists put back into Southwark plans?	The council are committed to improving cycling provision in the area and are working with both TfL and developers to establish a suitable east-west link to the north of Blackfriars Road. Although a feasible option has yet to be identified, the council will continue to work with TfL and developers to identify a suitable a route. The figure has been updated to demonstrate this aspiration.
1168	1145	Janet	Amery		Para 2.1.4 Page 7. Not clear what you mean by "intensification". Does that mean more people? If so, the area around London Bridge and that end of Borough High Street is already a very crowded place and at the very least, the pavements would need to be widened to accommodate this. Improving river passenger transport is something that would be beneficial but the prices would need to be what	The vision referred to in paragraph 2.1.4 is the existing vision in the London Plan. The SPD cannot change the London Plan vision.

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					residents as well as tourists could afford to pay.	
1169	1145	Janet	Amery		Page 9 first para. Recently, residents have lost local facilities; what will Southwark Council be doing to encourage the kind of businesses that are needed in order to allow local people to provide for their day to day lives, locally, eg launderettes (not everyone has washing machines), newsagents, drycleaners, shoemenders, chemists, who are willing to provide a home delivery service of medicine for doctors' patients who cannot get to the chemist?	The SPD encourages the provision of new town centre uses through guidance SPD 2: Mixed use town centre. It encourages space to be designed flexibly to accommodate a range of unit sizes. It is not possible within the planning system to require specific uses such as drycleaners or shoemenders within a development.
1170	1145	Janet	Amery		Para 3. I note that Southwark is pleased to encourage cycling, rather than car use, which is a good thing – But – some cyclists assume that they have a right to be on the pavement and, unless they are a child or a very nervous learner, they should not be there. Does Southwark have any proposals to enforce or instil good road/pavement behaviour in cyclists?	<p>Cycling on the pavement is illegal and is enforceable by the police. The council will pass on complaints received to ensure any hotspots for illegal pavement cycling are targeted. This behaviour is often increased in areas where a cyclist does not feel secure on the carriageway and therefore measures to increase cycle safety on and off street will continue to be prioritised.</p> <p>It has been announced that TfL are proposing to introduce a Cycle Superhighway on Blackfriars Road, including a segregated cycle lane. The council will support TfL and work with their design team to ensure the lane is fit for purpose which should reduce encroachment onto the footway unless sufficient space for shared use facilities are provided. The SPD has been updated to refer to the work being carried out by TfL.</p>
1171	1145	Janet	Amery		I am pleased to see that Southwark are recognising the value of the historic areas around Borough Market and Southwark Cathedral. What will you be doing to ensure that it is not damaged by the railway, or other potentially damaging, works?	Borough Market and Southwark Cathedral and their surroundings falls outside the boundary of the SPD area. Existing development plan policies which incorporates policies from the London Plan, Core Strategy and saved Southwark Plan provide the policy framework for protecting and enhancing our historic environment. A heritage SPD will also be prepared to provide more guidance in 2014.
1172	1145	Janet	Amery		Para 2.2.4 Page 10. I am concerned about the phrase "lively and vibrant" to describe the Council's vision for Blackfriars Road. As a resident of the area, I look forward to a peaceful and restorative home. "Lively and vibrant" so often means "crowded and noisy" –	The guidance in the SPD seeks to ensure that there is a balanced mix of town centre uses. For example guidance in SPD 2 includes information on considering the impact of all proposals for new or expanded food, drink, evening on the overall mix of uses and on local amenity. Similarly policies in the saved Southwark Plan require

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					<p>maybe ok to visit but not pleasant to live n. Currently, the road does feel fairly calm and spacious, without being "dead". Page 11 second para. Why do you think that it is only tall buildings that can provide an obvious "gateway"? The most significant "gateway" in this area is Blackfriars Bridge, which is low and the buildings which have the most impact along the Thames, are those such as Somerset House and the Houses of Parliament, relatively low but designed, or using materials, to catch the eye in a favourable way. Lower floor residents in Union Street, near the Blackfriars Road junction, lost quite a lot of daylight when Palestra was built. Some daylight is still available via the Cut and over the "roof" of Southwark tube station but this will be greatly diminished if a tall structure is permitted above the station.</p>	<p>development to consider its impact on local amenity. The guidance on building heights is set out in SPD 5: Building heights. The urban design study sets out the evidence underpinning the guidance. There are a number of criteria within SPD 5 ensuring a high quality designed tall building including criteria to allow adequate sunlight and daylight and avoid harmful microclimate and shadowing effects or adverse affects on local amenity. There is also existing policy in Southwark Plan policy 3.2 Protection of amenity which seeks to protect neighbour's amenity. This is cross referred to within appendix A.</p>
1173	1145	Janet	Amery		<p>Para 3.6 Page 15. If there is something that this area has plenty of and does not need more of it is cafes and restaurants! Take a walk along the Cut, for example, which has a junction with Blackfriars Road and you will see there are several, next door to each other. Referring back to my comments re Page 9, first para, where are the local shops and facilities for residents and encouragement for independent retailers in your proposals?</p>	<p>SPD2 recognises there is an opportunity to promote a much wider mix of town centre uses as part of the development of the potential opportunity sites. This includes a range of different types and sizes of retailers, to help boost the local economy by generating additional spending and inward investment in other businesses and providing an increased number of employment opportunities. The SPD cannot designate land use on potential development sites, however we will consider the range of uses that would be appropriate for development sites through the preparation of the New Southwark Plan. Further detail on the council's strategy on retail provision is set out in the SPD's business and retail background evidence paper.</p>
1174	1145	Janet	Amery		<p>Page 19. I am pleased to see thoughts for greening streets and reinforcing planting, especially of trees. The trees on the western side of Blackfriars Road, eg, give a very pleasant feel to the road. Parts of the local area can look very barren however and need trees, not just for softening but for shade and to help improve the air quality, depleted by heavy traffic. St George's Circus eg is very barren, on a grey day very</p>	<p>Noted. New street trees, as part of enhanced provision of soft landscaping and green infrastructure are encouraged by the SPD</p>

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					depressing looking and badly needs to be made more attractive.	
1175	1145	Janet	Amery		Page 20. I cannot agree that allowing tall buildings, such as the 27 storey one mooted by Linden, (recently forced by local pressure to be greatly reduced), will do anything to make Blackfriars Road feel comfortable or look attractive. Tall buildings are well known to produce a “concrete canyon” effect, which results in wind speeds being raised to uncomfortable levels, and adversely affecting temperatures, due to being channelled through tighter spaces. This is apart from blocking daylight to both residents and workers.	The emerging vision for Blackfriars Road sets out a range of building heights up to the maximum heights set out in SPD 5, with lower heights away from the road. These matters would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy 12 and the relevant policies of the London Plan and other relevant planning guidance. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate, while SPD3 sets out guidance on landscaping.
1176	1145	Janet	Amery		My general feel of your proposals is that they are designed to bring money, via tourism and prestigious businesses, into the area and that to do this, the Council is prepared to ignore, or only pay lip service to, the everyday needs of the local residents. Residents can help to provide a stable point in an area and it is we who help visitors to the area when they get lost. Visitors to the United Kingdom don't usually come for our “tall” buildings or our sunshine but for our history and to see what we, the British are like.	A consultation report has prepared alongside the Blackfriars Road SPD. This sets out a summary of the representations received and how we have taken these into account in preparing the final version of the SPD. The appendices also set out all of the representations received and officer comments on how these comments have been taken into account, and whether the SPD has been updated as a result. The SPD seeks to meet the needs of existing and new residents and updates have been made to the SPD to make this clearer.
1177	6687	Sebastian	Verney		1: Provision for a tower block 70 metres high at St George's Circus, London SE1 St George's Circus is a fine example of Georgian town planning with its focal point at its centre, the Grade 2* listed obelisk. SPD 5 Building Heights proposes “a tall building of height up to 70 metres should provide a focal point at St George's Circus”. This statement displays a fundamental ignorance of this circus. A tall building will affect the setting of not only the obelisk, an important heritage asset, but also the listed Georgian terraces in London Road.	A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage “Guidance on Tall

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						<p>Buildings”, 2007.</p> <p>In light of consultation responses and to add clarity to the guidance relating to St George’s Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. Any development of the potential development sites would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.</p>
1178	668	Sebastian	Verney		Please demonstrate under London Plan CDR1 how tall building development, a fundamental change in architecture, will not adversely affect the local character.	<p>The building heights guidance for the SPD area is consistent with the existing development plan and its design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy 12 and the relevant policies of the London Plan.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage “Guidance on Tall Buildings”, 2007.</p> <p>In light of consultation responses and to add clarity to the guidance relating to St George’s Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets. The area has a mix of character that represents different periods of development. Any new</p>

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						development would be assessed and determined at the planning application stage, taking local character and heritage context into account.
1179	668	Sebastian	Verney		Where is the comprehensive urban design analysis of the local character and historic context? (CABE and English Heritage Guidance on Tall Buildings CDN25)	The Blackfriars Road SPD urban design study sets out the evidence base. The urban design study utilises a robust methodology that has previously been agreed with English Heritage, and 3D modelling techniques to assess the potential impact on heritage assets.
1180	668	Sebastian	Verney		St George's Circus is stated on page 29 of the SPD to be a transport node. It cannot, by the accepted definition of a transport node, be so described. Development sites 39, 40, 41 and 43 directly affect the Circus and other heritage assets. Council officers have stated that tall buildings at St George's Circus would not be a conflict with the adjoining heritage assets. Where is the evidence that this is not a conflict?	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007.</p> <p>In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. Any</p>

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						development of the potential development sites would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.
1181	668	Sebastian	Verney		In determining tall building height limits within the SPD of 70 metres, where is the assessment of three dimensional modelling to determine the potential effect on the local context? (CABE and English Heritage Guidance on Tall Buildings CDN25)	The Blackfriars Road SPD urban design study sets out the evidence base and justification for this, and also informs the guidance within the SPD. The urban design study utilises a robust methodology that has previously been agreed with English Heritage, and 3D modelling techniques to assess the potential impact on heritage assets.
1182	668	Sebastian	Verney		Why are hotels being promoted (SPD 3.10) as viable use when Southwark has already achieved or is close to achieving the requirements. The figures for hotel rooms in the SPD make it clear that, of the 2500 bedrooms required by the GLA's Hotel Demand Study 2006 by 2026, all but 75 have either been built or are in the pipeline.	<p>The London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2031. The estimate of the approximate net and gross hotel rooms required over the period 2007-2026 for Southwark, as set out in the GLA's Hotel Demand Study, is based on assessment of factors including transport links to central London and connections to airports, proximity of tourist attractions/business locations, cafes and restaurants in the area, night time economy, cultural facilities and attractions, and regeneration initiatives and site availability. The forecast for Southwark should be treated as indicative only, and local circumstances should also be factored in.</p> <p>It is important to consider that the SPD area is within the Central Activities Zone, Bankside, Borough and London Bridge Opportunity Area and part of the Elephant and Castle Opportunity Area which are areas promoted in the London Plan to accommodate strategically important hotel provision. Arts, cultural and tourism activities have flourished in Southwark in the last decade, particularly in the Strategic Cultural Area, which is within the CAZ. Bankside, Borough and London Bridge has consequently experienced a growth in the number of hotels to support this increasing visitor economy. The SPD2 provides guidance to support Core Strategy policy 10 'Jobs and business' which sets out the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. Policy 10 and SPD 2 are also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals in the area will</p>

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						be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account.
1183	668	Sebastian	Verney		2: The designation of the Bakerloo sidings site (which is immediately behind Gladstone Street) as a potential development site (Development Site 43 The Bakerloo Sidings) Any development on this site will interfere with long views into the West Square Conservation Area valued by Southwark Planning. What consideration has been given to these in the preparation of this SPD? What is the evidence to support its suitability as a development site as opposed to educational, open space or other use?	<p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking the local heritage context into account.</p> <p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. Any development of the potential development sites would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets. The impact on setting of heritage assets including listed buildings and the West Square conservation area would be assessed at planning application stage.</p>
118	668	Sebastian	Verney		Any building on this site will adversely affect the	TfL were consulted on the draft SPD as a statutory consultee. TfL's

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5		n			setting of heritage assets. The Elephant & Castle Enterprise Area SPD mentioned a landmark building. We find reference to any such building on this site deeply concerning given the proximity not only to our own listed houses but also the listed obelisk, St George's RC Cathedral and Imperial War Museum, the latter two being the landmark buildings in this location. How are these proposals affected by the Blackfriars Road SPD?	response is published as part of the consultation report on the Blackfriars Road SPD. The impact of the proposed building height thresholds on the setting of heritage assets and the detailed guidance for tall buildings set out in SPD5, was assessed as part of the SPD. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007.
1186	664	Jessica	Kennedy		I am writing to OBJECT to aspects of the draft Blackfriars Road Supplementary Planning Document. I am a resident of Gladstone Street, bordering on the area under discussion, and a member of our residents' association, the Albert Association. The two aspects of the SPD that we find most objectionable are: 1: Provision for a tower block 70 metres high at St George's Circus 2: The designation of the Bakerloo sidings site (which is immediately behind Gladstone Street) as a potential development site.	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.</p> <p>The SPD does not designate proposals sites or provide site specific</p>

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						guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. Any development of the potential development sites would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.
1187	664	Jessica	Kennedy		Boundary In including large areas of land that have nothing to do with Blackfriars Road, Southwark Council will undermine Neighbourhood Forums (South Bank and Waterloo Neighbourhood Forum and the Bankside Neighbourhood Forum) and the Localism Act 2011. Can the council demonstrate that the SPD will give a better outcome than those envisaged by Neighbourhood Forums?	<p>An explanation of the boundary is set out within the SPD. It includes the whole of the Blackfriars Road and some of the surrounding area. It includes the surrounding area as the surrounding area is also likely to see some development and improvements, particularly possible improvements to public realm. Wording has been added to the SPD to make it clearer that the character and historic value of much of the surrounding area will continue to be protected and enhanced. It has also been made clear that the areas which are predominantly housing will mostly continue to be so, with residents benefitting from the increased range of activities on the Blackfriars Road.</p> <p>Figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area.</p>
1188	664	Jessica	Kennedy		Development Site 43 The Bakerloo Sidings Any development on this site will interfere with long views into the West Square Conservation Area valued by	The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table 1 in the updated SPD) has been included as a potential development site, due to its

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					<p>Southwark Planning. What consideration has been given to these in the preparation of this SPD? What is the evidence to support its suitability as a development site as opposed to educational, open space or other use? Under the Elephant & Castle Enterprise Quarter SPD Southwark should have consulted TfL.</p> <p>Under the Localism Act consultees are duty bound to co-operate so where may we see TfL's response? Any building on this site will adversely affect the setting of heritage assets. The Elephant & Castle Enterprise Area SPD mentioned a landmark building. We find reference to any such building on this site deeply concerning given the proximity not only to our own listed houses but also the listed obelisk, St George's RC Cathedral and Imperial War Museum, the latter two being the landmark buildings in this location. How are these proposals affected by the Blackfriars Road SPD?</p>	<p>recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.</p> <p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>TfL, GLA and Network Rail were all consulted as part of the consultation process. The Blackfriars Road SPD consultation report summarises all the responses received and changes subsequently made to the SPD. The full representations received from these bodies and the council's response to them is included within Appendix J of the Blackfriars Road SPD consultation report. The Elephant and Castle SPD was adopted on 20 March 2012 and replaced the Elephant and Castle Enterprise Quarter SPD (2008) and the Walworth Road SPD (2008). The Blackfriars Road SPD will replace the Elephant and Castle SPD/OAPF guidance for the overlapping areas. The SPD has been updated to make this clearer.</p>
1189	664	Jessica	Kennedy		<p>Strategic views St George's Circus and Tall Buildings St George's Circus is a fine example of Georgian town planning with its focal point at its centre, the Grade 2* listed obelisk. SPD 5 Building Heights proposes "a tall building of height up to 70 metres should provide a focal point at St George's Circus". This statement displays a fundamental ignorance of this circus. A tall building will affect the setting of not only the obelisk, an important heritage asset, but also the listed Georgian terraces in London Road. Please demonstrate under London Plan CDR1 how tall</p>	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the</p>

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					<p>building development, a fundamental change in architecture, will not adversely affect the local character. Where is the comprehensive urban design analysis of the local character and historic context? (CABE and English Heritage Guidance on Tall Buildings CDN25) St George's Circus is stated on page 29 of the SPD to be a transport node. It cannot, by the accepted definition of a transport node, be so described. Development sites 39, 40, 41 and 43 directly affect the Circus and other heritage assets. Council officers have stated that tall buildings at St George's Circus would not be a conflict with the adjoining heritage assets.</p> <p>Where is the evidence that this is not a conflict? In determining tall building height limits within the SPD of 70 metres, where is the assessment of three dimensional modelling to determine the potential effect on the local context? (CABE and English Heritage Guidance on Tall Buildings CDN25)</p>	<p>Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The GLA's representation confirms that the Mayor supports the council's approach on tall buildings, but suggests that the SPD should be more flexible in relation to building heights, and that buildings 'in the region' of 70/30m would be appropriate. The council disagrees with this proposed amendment as it could allow buildings that are greater than the 70m/30m threshold, which would be considered inappropriate based on our evidence. As such, the council considers SPD 5 to balance local character and development potential.</p> <p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets. The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. Any development of the potential development sites would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.</p>
119	664	Jessica	Kenned		Why are hotels being promoted (SPD 3.10) as viable	he London Plan seeks to achieve 40,000 net additional hotel

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0			y		use when Southwark has already achieved or is close to achieving the requirements. The figures for hotel rooms in the SPD make it clear that, of the 2500 bedrooms required by the GLA's Hotel Demand Study 2006 by 2026, all but 75 have either been built or are in the pipeline.	<p>bedrooms by 2031. The estimate of the approximate net and gross hotel rooms required over the period 2007-2026 for Southwark, as set out in the GLA's Hotel Demand Study, is based on assessment of factors including transport links to central London and connections to airports, proximity of tourist attractions/business locations, cafes and restaurants in the area, night time economy, cultural facilities and attractions, and regeneration initiatives and site availability. The forecast for Southwark should be treated as indicative only, and local circumstances should also be factored in.</p> <p>It is important to consider that the SPD area is within the Central Activities Zone, Bankside, Borough and London Bridge Opportunity Area and part of the Elephant and Castle Opportunity Area which are areas promoted in the London Plan to accommodate strategically important hotel provision. Arts, cultural and tourism activities have flourished in Southwark in the last decade, particularly in the Strategic Cultural Area, which is within the CAZ. Bankside, Borough and London Bridge has consequently experienced a growth in the number of hotels to support this increasing visitor economy. The SPD2 provides guidance to support Core Strategy policy 10 'Jobs and business' which sets out the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. Policy 10 and SPD 2 are also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals in the area will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account.</p>
1191	664	Jessica	Kennedy		Travel SPD6 gives no specific information as Blackfriars Road falls under the jurisdiction of TfL. Under the Localism Act both TfL and Southwark Council are duty bound to share any consultation information regarding active travel. What plans have been proposed?	The text within SPD 6 has been updated to clarify that Blackfriars Road falls under the jurisdiction of TfL. A consultation report has been prepared summarising responses to the consultation on the draft Blackfriars Road SPD. All responses to the SPD consultation will be published on the Council's website prior to the SPD being taken to Cabinet for adoption. TfL have now announced that TfL are proposing to introduce a Cycle Superhighway on Blackfriars Road, with

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						consultation proposed for summer 2014. Results of this consultation would be shared on TfL's website.
119 2	664	Jessica	Kennedy		General The document refers to shops along the whole of Blackfriars Road but makes no reference to a retail impact study, indicating demand for these or the effect on neighbouring shops.	The SPD business and retail background evidence paper sets out further detail to SPD 2 and the future retail capacity for the Bankside and Borough district town centre. This detail has been referenced from the Southwark Retail Capacity Study. The study evaluates the vitality and viability of the town centre, in terms of its retail performance and it identified that the focus should be on continuing to meet the needs of workers, tourists and visitors in the town centre. The study concluded that new retail schemes will be supported by an increase in population in the area, through new residents, workers and visitors and these will come forward on an incremental basis. New schemes will also be assessed in line with the criteria in the saved Southwark Plan policy 1.7 'Development in town and local centres'.
119 3	664	Jessica	Kennedy		No mention is made of environmental impact assessments, wind and daylight modelling, which are fundamental requirements in considering proposals of this nature, particularly considering the difficulties with the Palestra and 'Walkie Talkie' buildings.	These matters would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy 12 and the relevant policies of the London Plan and other relevant planning guidance. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate.
119 4	664	Jessica	Kennedy		The document states that crime will be reduced yet there is no reference to existing or anticipated crime statistics. Has the Metropolitan Police been consulted? If these studies have been obtained and modelling carried out then these should be in the public domain and not withheld. Please advise where these may be seen.	The Metropolitan Police are on the planning policy's mailing list and were consulted as part of the consultation on the Blackfriars Road SPD. The sustainability appraisal and the sustainability appraisal scoping report which both informed the preparation of the SPD provide further information on the possible impact of the SPD on crime. The sustainability appraisal assessed the impact of the SPD guidance on sustainability objective SDO4: To reduce the incidence of crime and fear of crime, and finds that the SPD is likely to overall have a positive impact. The sustainability scoping report also provides further information setting out information on the Indices of Multiple Deprivation which includes crime as one of its six indicators. Both documents are available to view on the council's web site at: www.southwark.gov.uk/blackfriarsroadspd and www.southwark.gov.uk/planningpolicy

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1195	664	Jessica	Kennedy		Why has West Square Conservation Area not been mentioned in SPD4 and SPD5? The tall buildings proposed affect the setting of this Conservation Area and its Listed Buildings.	The West Square conservation area is situated outside the Blackfriars Road SPD area. It would still be considered as a heritage asset in relation to the guidance set out in SPD 3, 4 and 5. Any development proposal would be assessed at the planning application stage against the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and other planning guidance.
1196	664	Jessica	Kennedy		This SPD has 1 Business Space, 2 Mixed Use Town Centre, 3 Public Realm and Open Space, 4 Built Form and Heritage, 5 Building Heights and 6 Active Travel. It does not have a Strategy or Guidance for Housing. Why not?	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards.</p> <p>The vision already refers to housing development. Housing will be encouraged on appropriate sites. In order to make this clearer, we have updated SPD 2: Mixed use town centre to include residential development as one of the uses to be encouraged alongside the provision of a mixture of new town centre uses. The fact box on town centre uses has also been updated in accordance with the National Planning Policy Framework definition to make it clear that residential development is not a main town centre use but it can play an important role in ensuring the vitality of town centres.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>
1197	664	Jessica	Kennedy		The Council's Core Strategy 2010 does not support tall buildings in Blackfriars Road South, as they do not meet the criteria for 'vision vibrancy and life'. Why does the Council's vision now differ from the Core	The building heights strategy for the SPD area is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan

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					Strategy?	and the NPPF. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. As set out within the SPD the emerging vision will be developed fully through the preparation of the New Southwark Plan.
1198	664	Jessica	Kennedy		In 2012 UNESCO noted in its convention briefing paper that in April 2011 Southwark's Core Strategy "includes an emphasis on heritage assets and revises their approach to tall buildings on the area". Why has the council reneged on this? UNESCO's World Heritage Committee Report June 2012 "notes the intention of Southwark Council to develop a Supplementary Planning document to clarify how and where development can take place and to define building height thresholds so as to inform the appropriateness of subsequent development proposals". Is this the said SPD?	The UNESCO paper relates to the area around London Bridge and the potential impact of tall buildings on the setting of the Tower of London World Heritage Site. The heights proposed in the Blackfriars Road SPD building heights strategy are consistent with Southwark's development plan consisting of the saved Southwark Plan policies, Core Strategy and the London Plan. Our testing shows that the proposed heights would not impact the setting of the Tower of London site. The proposed 70m threshold guidance for the southern of Blackfriars Road responds to the sensitivity of the Palace of Westminster World Heritage site.
1199	1130	Ben	Sanders	on	The guidance set out in draft SPD on tall buildings between The Cut/Union Street and St George's Circus is directly contrary to adopted National, Regional and Local Policies and consequently beyond the remit of a SPD. Accordingly, it is submitted that the draft SPD cannot be legally adopted in its present form. If it were to be adopted in its present form, there is a significant risk that the decision would be challenged in the form of judicial review proceedings.	The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area.
1200	1130	Ben	Sanders	on	Building heights and the special setting of St George's Circus The proposed guidance on tall buildings in the draft SPD is contrary to existing adopted policies regarding preserving the setting of listed buildings and conservation areas, the views in and out of conservation areas and the appropriate location of tall buildings. In accordance with the Core Strategy, it should be noted that a tall building is "any building that	The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity

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					<p>is significantly higher than surrounding buildings even if it is lower than 30 metres”.</p> <p>The proposal for a tall building of up to 70 metres in height adjacent to St George’s Circus shows a profound disregard for the important historic setting and existing policy. The proposal for a tall building, whether situated within or immediately adjacent to the St George’s Circus Conservation Area and the nationally important Grade II* Obelisk shows little regard for the prevailing listed architecture on the Circus itself and the adjoining London Road and Borough Road. The draft guidance that there should also be building heights of 70 metres at Southwark Station and St George’s Circus is contrary to the existing policy on tall buildings, particularly very tall buildings, being restricted to the north of the road. It erodes the concept of separate ‘Town Centre’ areas at the north end of Blackfriars Road and at the Elephant and Castle. It is also contrary to the existing policy that tall buildings should not isolated entities that have no connection with their local context.</p> <p>The Southwark tube station is already defined by the 11 storey, 56 metre Palestra building and although it is accepted that the single storey station needs further development, any new building should be lower than Palestra and respect the setting of the Ring pub and the listed Georgian houses in Blackfriars Road. The proposal to have a 70 metre tower as a focus at or in the vicinity of St George’s Circus shows that planning policy is being driven by commercial aims. The Circus is described by LBS only as a ‘main junction’ which completely underplay its historical significance as the most important surviving example of Georgian town planning in South London, graced by 34 listed</p>	<p>to the guidance relating to St George’s Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>

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					<p>buildings including the nationally important Grade II* Obelisk. It has defined the southern end of Blackfriars Road since 1771 and should continue to do so. If LBS Planning was seriously committed to enhancing the Circus as an important node, rather than satisfying the commercial desires of developers, the SPD should follow the existing guidance in the St George's Circus CAA (2005). It should recommend a building to complete the vacant NE Quadrant that matched the 4-storey Duke of Clarence in height, bulk and mass (whilst respecting the adjacent 2-storey St George the Martyr library).</p> <p>Buildings at the southern end of Blackfriars Road to replace the 1960s Erlang and Hill Houses should satisfy Section 9 (Setting of the Area, Significant Views and Landmarks) and respect the height of the listed Peabody Estate opposite. LBS Planning should also ensure that any development of the TfL Bakerloo sidings preserves and enhances the historic setting of St George's Circus and the rear view of Gladstone Street, which is Grade II listed and within the West Square Conservation Area.</p>	
1201	1130	Ben	Sanders	on	<p>Existing Policy The new guidance for building heights along Blackfriars Road south of The Cut and 70 metre towers at Southwark Station and, at St George's Circus is contrary to the following policies: 1. NPPF 2012 Part 12: Conserving and Enhancing the Historic Environment Sections: 129, 132-135 and 137 2. London Plan 2011 Chapter 7: London's Living Places and Spaces Policies 7.4. A, 7.4.B(a,c,d,e), 7.6.A, B(b,d), 7.7. A, C(b,c,d), D(b), E, 7.8.D, 7.9.B 3. Southwark's Core Strategy 2011 Policies 4.16, 5.114, Figure 12 4. Saved Southwark Plan Policies 2013 Policies 3.11(iii), 3.12(i,ii,iii), 3.15, 3.18(i,ii,iii,iv), 3.20(i,ii,iv,v), 3.22 5. Elephant and Castle SPD/OAPF</p>	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall</p>

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					<p>2012 St George's Circus and Erlang House are within this SPD/OAPF's Enterprise Quarter. Policies 2.3.6, 3.2.9, 5.8.12, 16, SPDs 16, 17 and 51 For example: "St. George's Circus, improvements should focus on reinforcing the character of the circus, increasing the area of usable pedestrian space around the perimeter of the circus and enhancing the setting of listed buildings and the obelisk... Conserve or enhance the significance of the St George's Circus conservation area through:</p> <ul style="list-style-type: none"> • Providing high quality, well designed buildings that complete the built frontage to the circus. • Enhancing views towards the obelisk. • Improving the public realm. • Bringing the listed buildings on the south-east corner of the circus back into active use." <p>(SPD 51 Built Environment) "Tall buildings should: Help define the gateways into the central area shown on Figures 14 and 15. They should diminish in height moving north along Newington Causeway and London Road to manage the transition to surrounding building development." (page 125 under heading Building Heights "There may be opportunities to introduce taller buildings along Newington Causeway, marking the gateway into the central area. These should diminishing in height towards Borough Road to the north and also to integrate with existing heights around Keyworth Street. Key sensitivities in the area are impact on the setting of St George's Circus and the listed buildings around it, Borough High Street and Grade II listed St Thomas' hospital." (paragraph 5.8.16) 6. St George's Circus CAA 2005 Policy 9 Policy 12.4 (should the new guidance apply to the Conservation Area) For example: "McLaren House, however, which occupies the adjacent, north west, quadrant, although its front follows the curve of the Circus, has not been included in the designated area, as its 9/10 storey height and overpowering mass</p>	<p>Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>

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					<p>seriously detract from the character and appearance of the area. This oppressive bulk and mass should on no account be allowed to set a precedent for the conservation area's key vacant site at the Circus's north east quadrant between Blackfriars Road and Borough Road." (Paragraph 10.2) "The setting of the obelisk, the retention of existing building lines and the sensitivity to the existing scale are the primary criteria when assessing new development." (Paragraph 10.4.1) The Guidance included in the SPD for building heights south of The Cut/ Union Street is also contrary to the recommendations in the following relevant, but not formally adopted documents: 7. Draft Bankside, Borough and London Bridge SPD/OAPF 2010 Policies 3.1, 3.2, 4.2.10, 12 8. CDD2 Bankside, Borough and London Bridge Stage 1 Tall Building Study 2010 Sections 4, 5: "The areas that would not support tall building development and therefore not suitable locations for tall buildings are Blackfriars Road South" 9. Bankside, Borough and London Bridge Characterisation Study 2013 Sections 3.2.4, 6, 8, 9 and 10.</p>	
120 2	113 0	Ben	Sanders on		<p>The draft SPD.</p> <p>A SPD comes at the bottom of the planning hierarchy and consequently must conform to existing policies and not introduce guidance that is in conflict with those policies. However, the draft SPD sets out guidance on building heights south of The Cut/Union Street which is in conflict with existing policies as set out above. There is no attempt in the draft SPD to explain or justify this change in position. As the guidance is contrary to all adopted policies, the SPD fails to explain how the local character and historic environment of the St George's Circus Conservation Area. The detailed critique of the draft SPD provided by the St George's Circus Group</p>	<p>The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area.</p>

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					dated 3 September 2013 is adopted and re-stated in its entirety. Conclusion The SPD includes new guidance for building heights between The Cut/Union Street and St George's Circus that appears to have been written solely for, if not by, developers and is directly contrary to existing adopted policies. This is beyond the remit of a SPD and in its present form it cannot be legally adopted and there is a significant risk of legal challenge. Either the SPD must be withdrawn until a new Southwark Plan is adopted and then rewritten to be compatible with that plan, or all new guidance for building heights south of The Cut/Union Street must be removed.	
1203	1132	Andy	Clarke		I was absolutely appalled at your plans for Blackfriars Road. Its nugatory accommodation for safe cycling looks like a utopian motor-centric plan from the 1970s. Do you realize the graphic shows what looks like half a mile of road with maybe 3 or 4 motor vehicles on it – not the seething stinking queues of traffic that infect reality? Given the current zeitgeist and thinking on urban transport, I don't think you can be anything other than completely embarrassed at such an delusional, ill-considered and patently anachronistic scheme. I urge you to reconsider this, because even if you're not embarrassed by it now, you will be by the time it's completed.	<p>The graphic was provided as an indication of the expanse of Blackfriars Road and the potential varying uses of the carriage way. Although the graphic was not included as a proposal and is not to scale it has received complaints and for this reason a different image has now be used for the front cover of the SPD.</p> <p>Any changes to Blackfriars Road layout will be taken forward in consultation with the community. Although no designs have been made available at this stage - TfL have announced that they are proposing a Cycle Superhighway on Blackfriars Road with segregated cycle lanes. The council support this proposal and will work with TfL to ensure designs are fit for purpose and balance the needs of all users, taking into account existing traffic flows. The SPD has been updated to refer to the work being carried out by TfL.</p>
1204	1133	Clint	Seidel		Please ensure segregated cycle lanes are provided on what is a very wide boulevard. It would make it a more pleasant environment for everyone :)	Since the publication of the draft SPD it has been announced that TfL are proposing to introduce a Cycle Superhighway on Blackfriars Road. The council support TfL's proposals to introduce a segregated cycle lane and the SPD has been updated to refer to this work.
1205	1134	Ekene	Ikedife		We need a Charlie Chaplin statue in Elephant!	The SPD covers Blackfriars Road and only a small part of the Elephant and Castle Opportunity Area. It would also not be appropriate to provide that level of detail in a SPD.
120	113	Jack	Gregory		In particular I wish to refer to pages 12-13 which carry	It is appropriate to include site 26 within figure 6 (previously figure 5)

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6	5				<p>an illustrative plan (figure 5) and a table of potential development sites within the SPD area. I note that site 26 is listed among these, and respectfully request that this is removed. This site, 109-115 Blackfriars Road is a block called Bridgehouse Court and I am an owner of property within this. A large majority of the flats are either owner-occupied or let to long term tenants. The freehold owner also owns several properties within the block and neither he nor any of the other property owners have any intention of selling up for redevelopment of what is a very pleasant place to live. Equally, the ground floor retail units are all occupied by established local businesses and provide a large percentage of the otherwise lacking 'active frontage' currently present on the road. Indeed, the cluster of shops here was identified in the recently commissioned Allies and Morrison report as being one of the few hubs of activity along an otherwise sparse road.</p>	<p>and the table of potential development sites as it could potentially be brought forward for development, redevelopment or more minor improvements in the future. The figure and table within the SPD show potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.</p>
1207	1135	Jack	Gregory		<p>A third point which may be of interest is a suggestion to add the new building located at 46-48 Webber Street (Trident House) to the list, as a completed development. This was completed last year and consists of a pair of mixed use blocks which replaced a derelict two-storey light industrial unit with a more appealing brick structure. The estate agents marketing the office section have it listed on their website here: http://www.fieldandsons.biz/Property/Commercial/-/tridenthse.aspx I would be most obliged if you could acknowledge receipt of these comments and advise of</p>	<p>It would not be appropriate to include the suggested site as the figure shows potential development sites rather than completed development sites to highlight the potential for change.</p>

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					their inclusion or otherwise.	
1208	1136	Liz	Almond		As a Walworth resident I would like to comment on the Blackfriars Road plans for redevelopment. I think that the plan identifies some important areas for improvement, as currently Blackfriars Road is an under-used, unwelcoming street to walk or cycle along. There's not much going on at street level and it really feels quite derelict in places. Improvements to the public realm are very much needed here.	Noted. SPD 3 states that the council will seek to work with landowners and TfL to create improved public realm and encourage active uses at street level.
1209	1136	Liz	Almond		<p>I was also encouraged by the way the plan identifies active travel, specifically walking and cycling, as one of the key aims of the redevelopment. As your strategy points out, the road is already very popular with people cycling from South London towards the city, and during the morning peak people on bikes make up 25% of the traffic, equal to the number of cars. Therefore, I was surprised that the artist's impression doesn't show any cycle infrastructure other than a painted bike lane, which I'm sure you understand doesn't provide any real protection to cyclists, and are frequently ignored by drivers parking in them, as shown here.</p> <p>Since a key aim of the redevelopment must be to make it safer and more appealing for people to choose to cycle, I would therefore urge you to consider protected bike lanes on either side of the carriageway, which are wide enough for the large volumes of people who use this route, and which offer a safe, pleasant environment. Camden council are planning to do just this on Royal College Street, which provides a good example of what this kind of bike track can look like. I would also urge you to review the junction of Blackfriars Road at Stamford Street, which currently has no safe pedestrian phase for people walking on</p>	Since the publication of the draft SPD it has been announced that TfL are proposing to introduce a Cycle Superhighway on Blackfriars Road. The council support TfL's proposals to introduce a segregated cycle lane and the SPD has been updated to refer to this. SPD 6 sets out the aspirations to improve junctions along the street specifically Stamford Street and the council will work with TfL to ensure a holistic approach when developing designs for the cycle superhighway that balance the needs of all users and improve conditions and facilities for pedestrians. TfL have advised that a consultation will take place over the summer 2014.

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					the western side of the pavement. It's very unpleasant to have to dash across the road between gaps in traffic, which is what you have to do unless you want to cross the road four times just to continue your journey. If you've got a buggy or have mobility difficulties, the situation is much worse. I understand you'll be working with TfL on these changes and will want to consult with local businesses and community groups. I'd be happy to meet with you to discuss this further and share examples of good (and not so good!) practice in terms of making Southwark a more people-friendly place.	
1210	1137	Patricia	Shepherd-Rogers		1. Please ensure there is a space for a simple playground for young children; this is currently a major lack.	The SPD does not allocate sites for specific land uses. SPD 3: Public realm and open spaces cross refers to the council's Open Spaces Strategy 2012 which looks at different types of open spaces and includes recommendations for improvements. The Strategy will inform the preparation of the New Southwark Plan which can make land use designations. There is also already a requirement through the council's Residential Design Standards SPD to make provision for children's play within new developments.
1211	1137	Patricia	Shepherd-Rogers		2. It would be great to have more support for bicyclists (such as a section of the South Bank walk that is marked as for cyclists' priority)	Southwark Council are committed to improve cycling provision in the area and are working with both TfL and developers to establish a suitable East-west link to the north of Blackfriars Road. Although a feasible option has yet to be identified, the council will continue to work with TfL and developers to identify a suitable route. The figure has been updated to demonstrate this aspiration. Since the publication of the draft SPD it has also been announced that TfL are proposing to introduce a Cycle Superhighway on Blackfriars Road. The council support TfL's proposals to introduce a segregated cycle lane and the SPD has been updated to demonstrate our support.
1212	1137	Patricia	Shepherd-Rogers		3. We need the full range of shops to meet daily living needs. These would include (in addition to the chemist that we already have): - a large supermarket - electrical, building, household supplies - cleaner, shoe	SPD 2 recognises there is an opportunity to promote a much wider mix of town centre uses as part of the development of the potential opportunity sites set out the SPD area. This includes a range of different types and sizes of retailers, to help boost the local economy

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					repair, key maker - haberdashery, newsagents, greetings cards, etc - clothes, especially underclothes (including socks, tights, etc) - bank and cashpoints	by generating additional spending and inward investment in other businesses and providing an increased number of employment opportunities. The SPD cannot designate land use on development sites, however we will consider the range of uses that would be appropriate for allocated development sites through the preparation of the New Southwark Plan and its accompanying proposal sites and adopted policies map.
1213	1138	Craig	Runyon		Today I have received the leaflet "Revitalise Blackfriars Road (SPD) Have Your Say" A large supermarket is needed for the residents of this area. All we have are the over priced limited range of Tesco Metro and Sainsbury's local. Lower Marsh is no longer a market for domestic shopping or groceries. Only a token amount of market stalls are left and us locals leave the area to do serious grocery shopping. Isn't it strange how in central London. Here in an area where the population gets denser and denser with all the new hotels, offices and new apartments. No provision is made for a good large cheap supermarket. When an older building becomes empty its always reoccupied by a restaurant, bar or made into offices. For example the largest business on the Cut is Byron the burger bar or the Fire Station on Waterloo Road is a Bar. The ground floor of one of those large office blocks on Blackfriars Road would make a great Super Market. Please consider my idea.	SPD 2 recognises there is an opportunity to promote a much wider mix of town centre uses as part of the development of the potential opportunity sites set out the SPD area. This includes a range of different types and sizes of retailers, to help boost the local economy by generating additional spending and inward investment in other businesses and providing an increased number of employment opportunities. The SPD cannot designate land use on potential development sites, however we will consider the range of uses that would be appropriate for development sites through the preparation of the New Southwark Plan. Further detail on the council's strategy on retail provision is set out in the SPD's business and retail background evidence paper.
1214	1139	Ian Leighton	Alderson	The St George's Circus Group	On behalf of SGCG, I submit that the new guidance for tall buildings between The Cut/Union Street and St Georges Circus included in the SPD is directly contrary to adopted National, Regional and Local Policies and consequently beyond the remit of a SPD. We contend that the new guidance on tall buildings (remembering that a 'Tall Building' is not only one that is higher than 30 metres, but also one that is 'significantly higher than surrounding buildings') is in	The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area. The area has a mix of character that represents different periods of development. Any new envelopment would be assessed and determined at the planning application stage, taking local character

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					<p>conflict with existing adopted policies regarding preserving the setting of listed buildings and conservation areas, the views in and out of conservation areas and the appropriate location of Tall Buildings. We also believe that the new guidance fails to recognise the distinctive character of southern Blackfriars Road as a mainly low-rise area with many historic listed and non-listed buildings. It is completely different from that north of The Cut/Union Street. It reinforces the gradation in height from the very tall buildings north of Stamford/Southwark Streets, through the transition zone to The Cut/Union Street and on to the Georgian focus of the St George's Circus Conservation Area and the nationally important Grade II* Obelisk. London Road, with its listed Georgian buildings also recognises the significance of the Obelisk as a focal point and continues the low-rise theme in its modern buildings before rising in the south to the tall buildings at the Elephant and Castle.</p>	<p>and heritage context into account. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>
1215	1139	Ian Leighton	Alderson	The St George's Circus Group	<p>The SPD is unclear as to whether its guidance for building heights applies within the St George's Circus Conservation Area. It is included in the SPD (although within the adopted Elephant and Castle SPD/OAPF boundary) yet the guidance is for Blackfriars Road 'between Southwark tube station and St George's Circus.' We have consequently assumed, naively probably as it is known that Barratt London wish to build a tall building there, that this does not include the Conservation Area. Should our assumption be incorrect, all the objections enumerated for Blackfriars Road south of The Cut/Union Street apply with even greater force within the Conservation Area.</p>	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should</p>

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						also sustain, enhance or better reveal the local heritage assets.
1216	1139	Ian Leighton	Alderson	The St George's Circus Group	The guidance that there should also be building heights of 70 metres at Southwark Station and St George's Circus is contrary to the existing policy on tall buildings, particularly very tall buildings, being restricted to the north of the road. It erodes the concept of separate 'Town Centre' areas at the north end of Blackfriars Road and at the Elephant and Castle. It is also contrary to the existing policy that tall buildings should not isolated entities that have no connection with their local context.	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>
1217	1139	Ian Leighton	Alderson	The St George's Circus Group	The Southwark tube station is already defined by the 11 storey, 56 metre Palestra building and although we accept that the single storey station needs further development, any building should be lower than Palestra and respect the setting of the Ring pub and the listed Georgian houses in Blackfriars Road.	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at</p>

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						the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.
1218	1139	Ian Leighton	Alderson	The St George's Circus Group	<p>The proposal to have a 70 metre tower as a focus at, but set back from, St George's Circus (a contradiction) is an act of vandalism that could only have been thought up by a developer. The Circus is described only as a 'main junction' completely ignoring its historical significance as the most important surviving example of Georgian town planning in South London, graced by 34 listed buildings including the nationally important Grade II* Obelisk. It has defined the southern end of Blackfriars Road since 1771 and should continue to do so.</p> <p>If LBS Planning was seriously interested in enhancing the Circus as an important node, rather than satisfying the commercial desires of developers, the SPD should follow the existing guidance in the St George's Circus CAA (2005). It should recommend a building to complete the vacant NE Quadrant that matched the 4-storey Duke of Clarence in height, bulk and mass (whilst respecting the adjacent 2-storey St George the Martyr library). Buildings at the southern end of Blackfriars Road to replace the 1960s Erlang and Hill Houses should satisfy Section 9 (Setting of the Area, Significant Views and Landmarks) and respect the height of the listed Peabody Estate opposite. If the guidance is implemented it will destroy the separation of the two 'Town Centres' and result in a sterile, unwelcoming section of road with the historic, non-listed buildings that now contribute so much to its character demolished and replaced by a 29.9 metre canyon of blocks interrupted only by those listed buildings that cannot be demolished, but whose setting has been destroyed. It will be a section of road where no one will 'want to live, work or visit'.</p>	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>

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1219	1139	Ian Leighton	Alderson	The St George's Circus Group	<p>THE SPD 1.2.2 explains 'The SPD provides further guidance to existing policies in our Core Strategy and saved Southwark Plan' and shows in Figure 3 that a SPD comes at the bottom of the planning hierarchy and consequently must conform to existing policies and not introduce guidance that is in conflict with those policies. However, contrary to this statement the guidance on building heights south of The Cut/Union Street is in conflict with existing policies in both the Core Strategy and the saved Southwark Plan (as well as NPPF and the London Plan). 2.1 describes the current vision, which is consistent with the Core Strategy and the saved Southwark Plan policies (and by requirement PPS [replaced without substantive change by NPPF] and the London Plan). 2.1.5 'Figure 4 illustrates the Core Strategy vision'. This shows that the appropriate area for tall buildings on Blackfriars Road is restricted to the northern end. This is reinforced in the section on Blackfriars Road 'There will be a cluster of tall buildings around the northern end of Blackfriars Road'. There is no suggestion that tall buildings are appropriate in the southern section of the road. The background paper CDD2 Bankside, Borough & London Bridge Stage 1 Tall Building Study 2010 Section 5.1 is clear 'The areas that would not support tall building development and therefore not suitable locations for tall buildings are Blackfriars Road South, ...'</p>	<p>The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area. The area has a mix of character that represents different periods of development. Any new envelopment would be assessed and determined at the planning application stage, taking local character and heritage context into account. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The GLA's representation confirms that the Mayor supports the council's approach on tall buildings, but suggests that the SPD should be more flexible in relation to building heights, and that buildings 'in the region' of 70/30m would be appropriate. The council disagrees with this proposed amendment as it could allow buildings that are greater than the 70m/30m threshold, which would be considered inappropriate based on our evidence base. As such, the council considers SPD 5 to balance local character and development potential.</p>
1220	1139	Ian Leighton	Alderson	The St George's Circus Group	<p>2.2.1 sets out the justifications for creating the SPD. However, the change from PPS to NPPF and the Localism Act introduce no changes that justify new policies regarding building heights. The new developments at the Elephant and Castle, Waterloo and north of the river have been planned for years, are not relevant to the southern part of the road and are compatible with Southwark's policy of high-rise 'Town</p>	<p>The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area.</p> <p>The Blackfriars Road SPD urban design study sets out the evidence</p>

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					Centres' at the Elephant and Castle, London Bridge, North Blackfriars Road and in Lambeth, Waterloo separated and defined, by low-rise areas in between. This leaves only 'New applications have come forward on the Blackfriars Road' or is it just coincidence that Linden Homes, after discussions with LBS Planning, have submitted an application to demolish the historic, C18th, three-storey Imbibe pub and St George's Mansions (both buildings with active frontages at street level serving local needs) to build a 29.9 metre block and that Barratt London, again after discussions with LBS Planning, have a Scoping Opinion application for building heights of 27 storeys (approximately 70 metres) adjacent to the St George's Circus Conservation Area and the listed Peabody Estate? These applications also show, as no doubt LBS Planning intended, what 'up to' 30 or 70 metres really implies	base and justification for SPD 5. The urban design study utilises a robust methodology that has previously been agreed with English Heritage, and 3D modelling techniques to assess the potential impact on heritage assets. The study updates the testing from the previous urban design studies in light of guidance set out in the NPPF, the London Plan that was adopted after the Core Strategy, schemes that already have been consented within the area and existing development pressure that could lead to piecemeal development within the area.
1221	1139	Ian Leighton	Alderson	The St George's Circus Group	2.2.2 suggests that the Core Strategy and the London Plan should be re-examined. Possibly, but for LBS the order should be the Core Strategy/Southwark Plan, which has to be consistent with NPPF and the London Plan, is subject to external Planning Inspectorate examination and consequently has some validity, and then a SPD, where the 'consultation' (except with developers) is no more than a token tick-box exercise where the views of residents are 'considered' and then ignored. The section on building heights south of The Cut/Union Street is a blatant attempt to bring in new policies by the back door and circumvent the independent evaluation that the established democratic process requires. 2.2.3 accepts that 'we cannot formally adopt a vision for an area through a SPD' and represents the SPD as just 'some ideas that we will look at further as we prepare the new Southwark Plan.' Yet you propose to submit the SPD,	<p>The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy 12, the relevant policies of the London Plan and the NPPF. The guidance falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area.</p> <p>In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>

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					<p>which contains new guidance regarding building heights that is in conflict with the NPPF, London Plan, Core Strategy, saved Southwark Plan policies, SPD/OAPFs for the area and the St George's Circus CAA, to the LBS Cabinet for formal adoption (rubber stamping). Just another example of LBS Planning's contempt for local residents (but not big developers) and the democratic process. 2.2.4 creates the new guideline 'There will also be taller buildings at the important locations of Southwark tube station and on the main junction of St George's Circus.' (my emphasis) and makes the ridiculous claim that these 'will enhance the local character, sustaining and enhancing the historic environment.' Unsurprisingly, as the guidance is contrary to all adopted policies, the SPD fails to explain how the local character and historic environment of the St George's Circus Conservation Area consisting of 2-4 storey listed, mainly Georgian buildings including the nationally important Grade II* Obelisk and the listed, 4-5 storey Peabody and Weber Row Estates are sustained or enhanced by a 70 metre (SPD 5) tower in their immediate setting. Unsurprisingly again, the guidance is completely in accordance with Barratt London's policy.</p>	
122 2	113 9	Ian Leighton	Alderson	The St George's Circus Group	<p>SPD 5 correctly proposes development on main routes 'with appropriate heights up to 30 metres depending upon context.' (my emphasis). Then, in direct contradiction, encourages 'Buildings up to 30 metres along Blackfriars Road between Southwark tube station and St George's Circus.' where the prevailing context is 3-5 storeys (only five buildings including Erlang and Hill Houses, which are due for redevelopment, on the east side and only McLaren House on the west are over 5 storeys). Most of the road is also, as shown in Figure 7, within the setting of</p>	<p>The proposed building heights guidance and strategy set in SPD 5 is consistent with the existing planning policy framework of design, heritage and tall building policies (the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF).</p> <p>The guidance is supported by evidence in the urban design study. The urban design study utilises a robust methodology that has previously been agreed with English Heritage, and 3D modelling techniques to assess the potential impact on heritage assets.</p>

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					the listed Georgian terrace in the north, the listed Victorian Peabody Estate and 1906 Weber Row buildings as well as the King's Bench and Valentine Place Conservation Areas in the centre and the listed Georgian and Victorian buildings of the St George's Circus Conservation Area in the south. Once more, the only policies this is consistent with are those of Linden Homes and Barratt London. SPD 5 also quantifies the height of the 'taller buildings' in 2.2.4 as 'up to 70 metres'. Apart from being contrary to National, Regional or Local policies and unacceptable in the local context, Figure 8 shows that, seen from a distance these towers will only bring confusion and diminish the impact of the 'Town Centres' of North Blackfriars Road and the Elephant and Castle. As in Figure 7, Figure 9 (probably unintentionally) demonstrates the local, low-rise context of Blackfriars Road south of The Cut/Union Street with its conservation areas and listed buildings.	
1223	1139	Ian Leighton	Alderson	The St George's Circus Group	It is significant that this SPD, unlike that for the Elephant and Castle (2012) does not have a list of buildings that are or have the potential to be locally listed. Is it that the Ring pub (C19), the Imbibe pub (a C18th historic building), the Crown pub (1883), the Sons of Temperance Friendly Society (1910), St George's Mansions (~ 1900), the Blackfriars Foundry (1819) and the adjacent Laughing Gravy Restaurant building are not worth consideration or is it that as they are all 3-5 storeys (and most have active street level frontages serving local needs) and any impediment to their demolition would interfere with the developers aim of turning Blackfriars Road south of The Cut/Union Street into a blank, unwelcoming canyon of 29.9/70 metre blocks?	Buildings that contribute positively to the character of conservation areas, buildings of townscape merit or heritage value outside of conservation areas are identified on Figure 5 in the updated SPD. Guidance and the identification of buildings will be addressed in a new Heritage SPD that will be prepared alongside the New Southwark Plan.
122	113	Ian	Alderson	The St	EXISTING POLICIES The new guidance for building	The guidance set out within the SPD is consistent with the existing

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4	9	Ian	Leighton	George's Circus Group	heights along Blackfriars Road south of The Cut and 70 metre towers at Southwark Station and St George's Circus is contrary to the following policies. NPPF 2012 Part 12: Conserving and Enhancing the Historic Environment Sections: 129, 132-135 and 137 London Plan 2011 Chapter 7: London's Living Places and Spaces Policies 7.4. A, 7.4.B(a,c,d,e), 7.6.A, B(b,d), 7.7. A, C(b,c,d), D(b), E, 7.8.D, 7.9.B Southwark's Core Strategy 2011 Policies 4.16, 5.114, Figure 12 Saved Southwark Plan Policies 2013 Policies 3.11(iii), 3.12(i,ii,iii), 3.15, 3.18(i,ii,iii,iv), 3.20(i,ii,iv,v), 3.22 Elephant and Castle SPD/OAPF 2012 St George's Circus and Erlang House are within this SPD/OAPF's Enterprise Quarter. Policies 2.3.6, 3.2.9, 5.8.12, 16, SPDs 16, 17 and 51 St George's Circus CAA 2005 Policy 9 Policy 12.4 (should the new guidance apply to the Conservation Area) OTHER DOCUMENTS The Guidance included in the SPD for building heights south of The Cut/ Union Street is also contrary to the recommendations in the following relevant, but not formally adopted documents. Draft Bankside, Borough and London Bridge SPD/OAPF 2010 Policies 3.1, 3.2, 4.2.10, 12 CDD2 Bankside, Borough and London Bridge Stage 1 Tall Building Study 2010 Sections 4, 5 Bankside, Borough and London Bridge Characterisation Study 2013 Sections 3.2.4, 6, 8, 9 and 10.	<p>planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area.</p> <p>The Blackfriars Road SPD urban design study sets out the evidence base and justification for SPD 5 and the building heights strategy for the SPD area. The urban design study utilises a robust methodology that has previously been agreed with English Heritage, and 3D modelling techniques to assess the potential impact on heritage assets.</p> <p>The GLA's representation confirms that the Mayor supports the council's approach on tall buildings, but suggests that the SPD should be more flexible in relation to building heights, and that buildings 'in the region' of 70/30m would be appropriate. The council disagrees with this proposed amendment as it could allow buildings that are greater than the 70m/30m threshold, which would be considered inappropriate. As such, the council considers SPD5 to balance local character and development potential.</p>
1225	1139	Ian	Leighton	Alderson	The St George's Circus Group	<p>SUMMARY The SPD includes new guidance for building heights between The Cut/Union Street and St George's Circus that appears to have been written solely for, if not by, developers and is directly contrary to existing adopted policies. This is beyond the remit of a SPD and in its present form it cannot be legally adopted. Either the SPD must be withdrawn until a new Southwark Plan is adopted and then rewritten to be compatible with that plan, or all new guidance for</p> <p>The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in</p>

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					building heights south of The Cut/Union Street must be removed.	accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.
1226	1140	Cian	McCarthy		I would like to raise my objections to the Draft Blackfriars Road Supplementary Planning Document, in particular the following two points: 1: Provision for a tower block 70 metres high at St George's Circus 2: The designation of the Bakerloo sidings site (which is immediately behind Gladstone Street) as a potential development site. The SPD proposes that Blackfriars Road be developed solely as a series of tall buildings with infill of significant height. Where is the evidence to support this 'vision' for the area rather than some alternative development plan? Which other plans were considered and rejected? During consultation we have been informed that no particular end use is envisaged for any of the sites designated for development. Where is the justification for ignoring the suitability of particular sites of the designated areas for any particular form of development, given the sensitive nature of the heritage context? It seems clear to me that the role of the Local Authority in connection with the SPD is that of a development enabler rather than a regulator. This throws onto the community the responsibility to act as a regulator.	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007.</p> <p>In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking the local heritage context into account. The SPD states that list of potential development sites is illustrative of the huge opportunity for change within the area and the need for a coherent framework. It has also been updated to clarify that the list of sites is not exhaustive and</p>

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						other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. The formal identification of proposals sites within the area will be considered as part of the preparation of the New Southwark Plan.
1227	1140	Cian	McCarthy		In including large areas of land that have nothing to do with Blackfriars Road, Southwark Council will undermine Neighbourhood Forums (South Bank and Waterloo Neighbourhood Forum and the Bankside Neighbourhood Forum) and the Localism Act 2011. Can the council demonstrate that the SPD will give a better outcome than those envisaged by Neighbourhood Forums?	<p>An explanation of the boundary is set out within the SPD. It includes the whole of the Blackfriars Road and some of the surrounding area. It includes the surrounding area as the surrounding area is also likely to see some development and improvements, particularly possible improvements to public realm. Wording has been added to the SPD to make it clearer that the character and historic value of much of the surrounding area will continue to be protected and enhanced. It has also been made clear that the areas which are predominantly housing will mostly continue to be so, with residents benefitting from the increased range of activities on the Blackfriars Road.</p> <p>Figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area.</p>
1228	1140	Cian	McCarthy		Development Site 43 The Bakerloo Sidings - any development on this site will interfere with long views into the West Square Conservation Area valued by Southwark Planning. What consideration has been given to these in the preparation of this SPD? What is the evidence to support its suitability as a development site as opposed to educational, open space or other use? Under the Elephant & Castle Enterprise Quarter	<p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking the local heritage context into account.</p> <p>The SPD states that list of potential development sites is illustrative of</p>

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					<p>SPD Southwark should have consulted TfL. Under the Localism Act consultees are duty bound to co-operate so where may we see TfL's response? Any building on this site will adversely affect the setting of heritage assets. The Elephant & Castle Enterprise Area SPD mentioned a landmark building. We find reference to any such building on this site deeply concerning given the proximity not only to our own listed houses but also the listed obelisk, St George's RC Cathedral and Imperial War Museum, the latter two being the landmark buildings in this location. How are these proposals affected by the Blackfriars Road SPD?</p>	<p>the huge opportunity for change within the area and the need for a coherent framework. It has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The formal identification of proposals sites within the area will be considered as part of the preparation of the New Southwark Plan.</p> <p>TfL, GLA and Network Rail were all consulted as part of the consultation process. The Blackfriars Road SPD consultation report summarises all the responses received and changes subsequently made to the SPD. The full representations received from these bodies and the council's response to them is included within Appendix J of the Blackfriars Road SPD consultation report.</p> <p>The Elephant and Castle SPD was adopted on 20 March 2012 and replaced the Elephant and Castle Enterprise Quarter SPD (2008) and the Walworth Road SPD (2008). The Blackfriars Road SPD will replace the Elephant and Castle SPD/OAPF guidance for the overlapping areas. The SPD has been updated to make this clearer.</p>
1229	1141	Cannon John	O'Toole	St George's RC Cathedral	<p>I write on behalf of St George's Roman Catholic Cathedral, Lambeth Road, London SE1 6HR and after consultation with the Head teacher of Notre Dame Girls School, 118 St George's Road, London SE1 6EX. We note with interest the potential development sites in our local area (especially Nos 41, 42 and 43 as listed on page 12 of the Draft Blackfriars Road Supplementary Planning Document). As we would be directly affected by any future development so close to us we would greatly appreciate being kept fully informed on any future developments that may be considered – and we would be eager to see and to comment on any specific proposals/options that might be put forward in relation to these sites.</p>	<p>Noted. We have added the contact details provided to our planning policy mailing list for all future planning policy consultations.</p>

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1230	1142	Tanja	Martin		<p>Thank you for the recent Draft supplementary planning document in view of coordinating the growth of Blackfriars road. I'm afraid the proposed strategy is not something which supports residents needs or works towards making this primarily a residential area, as stated in the document. Permitting the removal of almost all of the historic building long Blackfriars road and replacing these with tall glass structures doesn't support the needs of residents. These structures are removing any character in the road and blocking the light from our homes and lives. The mix of shops is being reduced to an abundance of Tesco's, Sainsbury's locals and pret a manger outlets, which do not provide a service to residents. These small chain supermarkets and chain restaurants and coffee shops have already closed a number of the businesses which genuinely contribute to this community and provide a service to residents. We all understand the need to bring money into the area but could we have some more consideration of what the normal residents need to be able to live here on a permanent basis, its not more hotels, student halls of residence buildings or chain sandwich shops.</p>	<p>The SPD sets out the council's emerging vision for the Blackfriars Road area, with detailed guidance to achieve this. It includes guidance on encouraging a range of different businesses uses, town centres uses, cultural uses, as well as many other uses. It also encourages the supporting infrastructure to support growth. The SPD seeks to meet the needs of residents whilst also managing the pressure for new development. The SPD has been updated to make it clearer that the emerging vision and the SPD seeks to ensure that development meets the needs of existing and new residents whilst also attracting new development. Residents will benefit from the increase range of uses including more shops, services and businesses along the Blackfriars Road.</p>
1231	214			Transport for London	<p>The following response contains comments from TfL to LB Southwark regarding the draft Blackfriars Road Supplementary Planning Document (SPD), with detailed matters outlined below. The core area of the document's focus is the Blackfriars Road alignment, running from Blackfriars Bridge in the north to St Georges Circus in the south. Blackfriars Road forms part of the Transport for London Road Network (TLRN) for which TfL is the highway authority. Parts of Stamford Street and Southwark Street are also covered by the document, and these roads are also part of the TLRN. A number of bus routes operate within the SPD area, providing links to the north,</p>	<p>Noted. LBS will continue to support improvements to the TLRN within Southwark and ensure any proposals that may impact the TLRN are delivered in partnership with TfL.</p>

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					south, east and west. The Public Transport Accessibility (PTAL) of the area is highest in the northern part of Blackfriars Road (6a), with Blackfriars Station, Waterloo East and Southwark Station providing links to both National Rail and London Underground services. The southern section of Blackfriars Road also benefits from a high PTAL.	
123 2	214			Transport for London	Bankside & Borough Opportunity Area TfL wish to note that there is an aspiration to create an additional point of access at street level to the Eastern end of Waterloo East station. However, this may conflict with LB Southwark's aspiration to "work with Network Rail to refurbish space under railway arches to provide modern accommodation for small businesses". TfL encourages LB Southwark to engage further with Network Rail and South Eastern to discuss future options for Waterloo East further.	Noted - we will continue to engage effectively with Network Rail and South Eastern to discuss future options for refurbishments of the railway arches and ensure this does not preclude potential options for additional points of access to Waterloo East Station.
123 3	214			Transport for London	In addition, between 2015 & 2018 the Thameslink Upgrade Programme will mean that services to Cannon Street and Charing Cross will not be able to stop at London Bridge station. As such, the consideration of the phasing of developments in the area during the period of works, to facilitate easier access to/from Waterloo East would be encouraged. In addition, TfL encourages LB Southwark, and Network Rail to work towards the improvement of wayfinding from Waterloo East to assist direct passengers who would have otherwise for alighted or changed onto London Underground services at London Bridge.	Noted. An additional bullet point has been added to SPD 6.
123 4	214			Transport for London	Blackfriars Road Vision (P11) TfL requests that this section is revised to reflect the emerging proposals in light of the publication of the Mayor's Vision for Cycling in London which was published in March 2013. As part of this focus on cycling, Cycle Superhighway North-South has been announced. The route will run	Noted - the SPD has been updated following this announcement to refer to this. Both SPD 6 and the ideas for an emerging vision for Blackfriars Road have both been updated.

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					<p>between Kings Cross and Elephant & Castle, crossing the Thames at Blackfriars Bridge, before running along Blackfriars Road. This will introduce significant improvements for cyclists including segregated cycle tracks and junction upgrades along Blackfriars Road. The route will also include enhancement to the urban realm and planting. Public consultation will take place in 2014 with route launched by 2016. TfL are working closely with LB Southwark, local stakeholders and developers to ensure that proposed changes align with wider aspirations for the area. TfL note and welcome LB Southwark's aspirations to improve conditions along Blackfriars Road for pedestrians and cyclists. However, TfL request that reference to "ensuring vehicular traffic continues to move smoothly" is removed. As part of the Cycle Superhighway project, TfL will undertake detailed local and London wide traffic modelling to test design options alongside other large scale projects. However, at this early stage TfL are unable to determine the likely impact of proposals upon vehicular traffic.</p>	
1235	214			Transport for London	<p>TfL note aspirations to enhance and protect areas of the green estate surrounding and upon the TLRN, as well deliver lighting improvements and street art. As noted above, TfL is in the early stages of the design of urban realm improvements along Blackfriars Road, and thus are unable to support specific proposals at this point in time. However, in respect of the public realm scheme which will be delivered by TfL upon the public highway. TfL will be working closely with LB Southwark, local stakeholders and land owners/developers to ensure proposals, satisfy the broad range of street users who require use of Blackfriars Road and the surrounding area.</p>	<p>Noted - SPD 6 has been updated to refer specifically to Blackfriars Road being part of the TLRN and that the council will work with TfL as well as other key stakeholders to ensure that development and investment on and around Blackfriars Road takes place in a coordinated way.</p>
123	137	Jeremy	Leach	South	We welcome the emphasis on pedestrians as set out	Noted.

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6				Southwark Living Streets	in the final paragraph of the vision (on page 11). In order to give more substance to this, we wish to make the following comments on the draft document.	
1237	137	Jeremy	Leach	Southwark Living Streets	1. North of Southwark Station. Development is already well advanced but we welcome the number of proposed and improved pedestrian links particularly through large development sites. The SPD should ensure these are welcoming, permanent and neither restricted to the hours of business nor encumbered by aggressive security people and obstructions. Christchurch and Paris Gardens are the main open areas and we should like to see these enhanced, extending the green route from the river south to The Cut and to Southwark tube station. With increasing numbers of pedestrians, especially arriving and leaving from Blackfriars Station and the nearby major new buildings, we believe a crossing at Stamford Street along the lines of that at Oxford Circus with its many direction pedestrian phase but little street clutter would be beneficial. Crossing any of the arms of this junction on foot is at present dangerous, intimidating and unpleasant. A well designed Oxford Circus layout should be an objective of development policy here.	SPD 6 emphasises the council's commitment to improve the pedestrian environment, with Stamford Street junction specified. The layout of this junction differs in both scale and operation to Oxford Circus and therefore cannot feasibly accommodate an option for multiway crossings. The council will continue to lobby and work with TfL. This will include to look at the layout of the junction and signal timings and developing their designs for this road to ensure any options address pedestrian priority, convenience and safety at this junction.
1238	137	Jeremy	Leach	Southwark Living Streets	2. South of Southwark Station. Few pedestrian routes and no new green spaces have been identified in this southern section with its high population density. We propose that Development Site 27 should have a through pedestrian route between a small green area alongside Blackfriars Road and a green space at the rear and access to Friars Primary School. Southwark Living Streets delivered a report (attached) St George's Circus – Recreating "The Gateway to London" to the London Borough of Southwark, amongst others, in July 2012. In this, we remarked that far from the original designers' vision of a gateway, the	Since the publication of the draft SPD it has been announced that TfL are proposing to introduce a North South Cycle Superhighway along Blackfriars Road linking up to Kings Cross in the north, and Elephant and Castle south of Blackfriars Road. The council support TfL's proposals and the SPD text has been updated to refer to this. We will work with TfL to ensure a holistic approach when developing designs for the cycle superhighway to ensure they balance the needs of all users and improve conditions and facilities for pedestrians. TfL have advised that a consultation will take place over summer 2014. As part of the development for the cycle superhighway, TfL will need to review St Georges Circus.

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					Circus has, for more than a decade, been a barrier to pedestrian movement. It is also woeful for the increasing number of cyclists who now move through this area in all directions. With the imminent opening of the LSBU Enterprise Centre and the development at Erlang House, the SPD should be clearer about requirements at this intersection. The central island needs to be linked to its surroundings by pedestrian crossings of the road round the obelisk with synchronised pedestrian phases across the whole (again, like Oxford Circus). This would provide more direct walking routes, and, if well designed, could better accommodate cyclists while maintaining vehicle flows.	
1239	137	Jeremy	Leach	Southwark Living Streets	3. Tall Buildings, Wind and Trees. With a large number of tall buildings forming a canyon and in close proximity to residential properties we are concerned that swirling winds will cause pedestrians difficulties. Also are the existing trees being kept or replaced? The illustration in the SPD shows smaller varieties than the present plane trees. While an avenue of mature plane trees can be majestic, other and smaller trees may be preferable for a people-friendly street in certain locations. We recommend that the SPD should incorporate a tree strategy, devised with professional arboriculture input.	These matters would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and other planning guidance. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate. Streets trees are supported by the SPD within SPD 3, and would be addressed on a site or project basis.
1240	137	Jeremy	Leach	Southwark Living Streets	4. 20mph. We feel that with the advent of far greater numbers of residents and workers to the area and the large numbers of existing and new pedestrians and cyclists likely to use the proposed north-south cycle route, a strong case should be made for a 20mph speed limit throughout the area and most especially on Blackfriars Rd itself. Making this decision will allow all road design changes to be made to 20mph speed limits which will have a significant impact on the design	TfL are the Highway Authority for Blackfriars Road and as such set the speed limit. Southwark Council support the introduction of 20mph limits on our residential streets. The SPD does not list specific road safety interventions, however if a 20mph limit were to be introduced by TfL this would be supported by existing policies (including the Core Strategy and the Transport Plan) and the guidance within this SPD.

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					making it far more people friendly (with tighter radius junctions for example) that can assist in reducing vehicle speeds. Much research has shown that slower speeds have the greatest impact on increasing road safety and encouraging more active forms of travel. We hope that you will take these points into consideration and incorporate them in the next iteration of the SPD.	
124 1	109 5	Anonym ous 1			Proposed height at Station way to high. Should not use Palestra buildings as a reference point for height – use historical and heritage building for both height and appearance. Obelisk at St Georges Circus is the focal point for that site, don't NEED a tall building there.	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>
124 2	109 5	Anonym ous 1			Limit fast food/takeaway provision in new developments in Blackfriars Road.	In preparing the New Southwark Plan, which will replace the Core Strategy (2011) and saved Southwark Plan policies (2007), we will be considering as part of the early issues and options testing, whether we should prepare more detailed planning policies to help manage the mix of retail uses such as restaurants, bars, cafes and hot food takeaways.
124 3	109 5	Anonym ous 1			Encourage and support existing artisan /small businesses, ensure Union theatre remains open – encourage the `cultural corridor` from Old Vic to Tate	The north of the SPD area lies within the Strategic Cultural Area (Southbank/ Bankside/ London Bridge) which is a designated area recognised through planning policies in the London Plan and the Core

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					Modern/Globe as a concept and tourist attraction.	Strategy. This area is where London's internationally renowned historic environment, natural landscape and cultural institutions, including museums, galleries and theatres, and other major visitor attractions are protected and enhanced. SPD2 encourages the development of new arts, cultural, leisure and entertainment uses in mixed use development throughout the area to help consolidate this cluster of arts and cultural facilities. Through SPD1, we support the provision of small business floorspace, such as small office/studio workshop space, to help to provide appropriately sized modern new space for a variety of small businesses to use, including the creative and cultural sector.
124 4	109 5	Anonym ous 1			Employment opportunities – locals don't get employed in the new Tescos etc. LBS should enforce their own affordable /social housing % in new developments	<p>The council's Economic Well-being Strategy (2012-2020) sets out the ambition for regeneration and development to provide lasting jobs for residents in both the construction of development and also in the final development itself through training and skills programmes.</p> <p>The council's adopted Section 106 Planning Obligations SPD provides the basis for securing planning obligations from new development for employment and enterprise measures which include initiatives to create jobs and training in the final development, and also jobs and training during the construction period of the development.</p> <p>The borough-wide affordable housing policy within the Core Strategy (2011) requires the provision of at least 35% provision in new housing developments. The adopted Affordable Housing SPD (2008) and draft Affordable Housing SPD (2011) set out further detail to implementing the policy, including the guidance on addressing the 'sequential' approach to the provision of affordable housing. The priority for the council is for affordable housing to be provided on-site. The developer needs to submit justification to the council in circumstances where this may not be possible. The SPD does not need any further specific guidance in relation to affordable housing as this is covered in existing borough-wide policies and associated guidance.</p>
124 5	109 5	Anonym ous 1			Support independent traders. Have a proper vision (eg. Isabella Street)	SPD 1 and SPD 2 encourages a range of unit sizes and that spaces should be designed flexibility to meet a range of different needs. The

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						emerging vision is set out in the SPD, and as explained in the SPD will be developed further into development plan policy through the preparation of the New Southwark Plan.
1246	1095	Anonymous 1			GP/Dentist/schools	<p>The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development.</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces. Updates have been made to the SPD to refer to encouraging a range of different uses including health facilities</p> <p>Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an</p>

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						updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.
1247	250	Jean	Bates		38, 39, 40 No high rise buildings because of the skyline, light and wind factors. No building over 30 metres tall in keeping the height of existing buildings	<p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007.</p> <p>In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>
1248	250	Jean	Bates		On sites 10, 18 and 19 – a park for children and adults. We will need more parks for all the children being born and teenagers.	<p>The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents.</p> <p>Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map.</p>

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						Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.
1249	250	Jean	Bates		More health and doctor surgeries and more NOT less fire stations with all the new flats being build so close together	<p>The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development. Updates have been made to the SPD to refer to encouraging a range of different uses including health facilities.</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an</p>

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						updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.
1250	250	Jean	Bates		New building being built should have light cladding and glass designed with a design to fit in with existing buildings. (example how not to do it) eg. 1 Valentine Place next to a pub with lovely brickwork. 1 Valentine Place looks a right eye sore, nothing like the photos before the building was built. I have photos of these before it was built, it has light colour cladding.	The SPD cannot provide such a detailed guidance. However, we have updated wording of SPD 4 to that it materials and features consider the identity of the surroundings, taking the local historic environment into consideration.
1251	250	Jean	Bates		This is a nice quiet area which is how we would like it kept So no MacDonald's or Betting shops. As someone who was born and lived in Southwark most of my life it saddens me to think that we locals are not being listened to. We see how the flats and building going up with no consideration for our place of living.	The SPD area is located within the Bankside, Borough and London Bridge Opportunity Area and part of the Elephant and Castle Opportunity Area and also the Central Activities Zone, which are areas recognised in the London Plan and Southwark's Core Strategy suitable for change and to accommodate new housing and an increase in jobs. The SPD focuses on Blackfriars Road, where most of the change will take place, but also takes in some of the surrounding area which will also see development and improvements, particularly to its public realm. The SPD provides further guidance to existing planning policies in our Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and so the SPD must be read alongside our other planning documents. The SPD guidance promotes a wider mix of shops and services to meet local people's needs as well as the needs of office workers and tourists, in line with existing planning policy. In preparing the New Southwark Plan, which will replace the Core Strategy (2011) and saved Southwark Plan policies (2007), the council will be considering whether we should prepare more detailed policies to manage the number and type of uses on our high streets
1252	250	Jean	Bates		The flats are being built too close together. This is a change to make the area a place of Beauty not Ghettos for the future. I bet 2Boris" would not live with a high rise next to his house. Thank you for reading this and having the meeting. I enjoyed it and look	Existing borough-wide policies ensure high quality residential development of appropriate densities. This includes guidance in the council's Residential Design Standards SPD on distances between residential buildings.

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					forward to the next one.	
1253	635	c/o Agent		London South Bank University	1.1.a. Amendment to text: 'We will work with the Greater London Authority (GLA), Transport for London (TfL), English Heritage, developers, landowners, Bankside Neighbourhood Forum, London South Bank University, Lambeth Council, the community, and other stakeholders to provide a high quality design of public squares, streets and spaces. – SPD 3 Public realm and open space, p. 19	No change. LSBU included in other stakeholders
1254	635	c/o Agent		London South Bank University	1.1.b. Amendment to text: 'We will work with the Greater London Authority (GLA), Transport for London (TfL), developers, landowners, Bankside Neighbourhood Forum, London South Bank University, Lambeth Council, the community and other stakeholders to:'. – SPD 6 Active travel, p.31	In this context LSBU would fall under landowners. We have updated text where relevant to include LSBU however in this instance it is not appropriate to list any individual stakeholders. We have also updated this to take out any specific forum and refer to 'Neighbourhood Forums'.
1255	635	c/o Agent		London South Bank University	1.1.c. Amendment to text: 'We will work closely with TfL, Bankside Neighbourhood Forum, London South Bank University and Lambeth Council' para 3.39 p. 31	In this context LSBU would fall under landowners who are referred to explicitly within the first sentence of SPD 6. It is not appropriate to specify the individual landowners or developers who would be involved at this section of the SPD.
1256	635	c/o Agent		London South Bank University	1.2. As a general point, reference to London South Bank University should be consistent throughout the SPD (amendments underlined): 1.2.a. Amendment to text: 'South Bank Employers' Group, London South Bank University, tenants and residents associations' – Blackfriars Road Vision, p. 10 1.2.b. Amendment to text: 'SE1 Safer Road Forum, London South Bank University, Bankside Neighbourhood Forum' – Implementation, para 4.2.2 p. 33	Noted, this has been updated throughout the SPD.
1257	635	c/o Agent		London South Bank University	1.3. We also request that the basemaps, for figures 2, 5, 6 and 7, are updated to include the completed (Ref: 11-AP-3529) London South Bank University's The Clarence Centre for Enterprise and Innovation (formerly known as The Enterprise Centre).	Noted. The base map has been updated.

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				city		
1258	635	c/o Agent		London South Bank University	2. The Role of London South Bank University 2.1. In general we support the vision, and specifically the aspiration to maximise opportunities to increase the amount and type of flexible innovative business space.	Support noted.
1259	635	c/o Agent		London South Bank University	2.2. We support policy SPD 1, where it recognises the regeneration benefits that can be generated by strengthening links between businesses and education institutions such as London South Bank University, which runs a successful series of initiatives to foster enterprise and business start ups. However, the importance of such links should be clearly stated in the main text of SPD 1 to emphasise the importance of creating opportunities for flexible innovative business space and symbiotic relationships between businesses and learning institutions. As such we propose the following amendments (underlined): 2.2.a. Additional bullet point: 'Encourage the development of business and enterprise by creating and reinforcing links between businesses, enterprises and institutions of education and art, including supporting co-location and provision of incubator facilities.' – SPD 1 Business Space – p.14 2.2.b. Supporting text amendment: 'there is potential for new business space in the southern area to take advantage of opportunities in strengthening business links with the two learning centres (London College of Communication and London South Bank University), building on the foundation of London South Bank University's enterprise centre situated at St. George's Circus'. Business space, para 3.3 p. 15	Support noted. We have amended the supporting text to include reference to the Clarence centre for enterprise and innovation. We do not consider the suggested additional bullet point to be necessary, as this is sufficiently covered in the supporting text
1260	635	c/o Agent		London	2.3. To achieve the vision of creating opportunities for flexible innovative business space, it is also important	We have made an amendment to SPD1 bullet point 1 to include reference to small and start-up businesses. We have also inserted

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				South Bank University	for SPD 1 to promote the creation and support start up businesses and enterprises. We therefore propose the addition of a new bullet point: 2.3.a. Additional bullet point: 'Promote opportunities to develop new start up businesses to support new enterprises and contribute to a sustainable economy.' SPD 1 Business Space – p.14	additional supporting text to highlight the growth of SMEs in the area.
126 1	635	c/o Agent		London South Bank University	2.4. LSBU plays a vital role within the local community of Southwark by providing major social infrastructure, coordinating a number of outreach programmes and community initiatives. The university also provides a range of sport and fitness facilities including a gym and a sports hall, which are open to the wider community. As such, LSBU should be recognised in the SPD as a notable piece of social infrastructure and a community facility and suggest the following (underlined): 2.4.a. Amendment to text: 'Notably, the Blackfriars Settlement has been providing support and resources to the community for 125 years, and is an important asset to the area providing meeting rooms, facilities and community events. London South Bank University provides a range of community outreach programmes to support business, enterprise and education within the community in addition to providing sport and fitness facilities, including a gym and sports hall.' Mixed use town centre, para 3.14 p. 18	We have amended the supporting text to refer to London South Bank University and its outreach programmes.
126 2	635	c/o Agent		London South Bank University	3. The SPD Boundary 3.1. The draft Blackfriars Road SPD boundary overlaps that of the Adopted Elephant and Castle SPD (March, 2012), with partial inclusion of the LSBU campus. To provide clear and unambiguous policy guidance there should be a consistent approach between the two SPDs. 3.2. Following our meeting with LBS we understand that the more recent document, the Blackfriars Road SPD, will take precedence where there are sites covered by both	The boundary of the southern part of the SPD boundary has been amended to include the boundary suggested by LSBU. It is appropriate to include part of the Elephant and Castle Opportunity area with the Blackfriars Road SPD to ensure clear guidance for development fronting onto historic St. George's Circus. The SPD has been updated to refer to the existing SPD/OAPF and that the Blackfriars Road SPD will replace the guidance for the overlapping area.

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					SPDs, it would be helpful for this to be clearly stated within the document.	
1263	635	c/o Agent		London South Bank University	<p>3.3. In order to avoid confusion, we would additionally prefer a consistent approach to guidance where possible between the SPDs. For example, where a site is covered by multiple SPDs the proposals for that site should be consistent in both documents. This is not always achieved in the Blackfriars Road SPD, where a number of development opportunity sites within the LSBU campus are included in the Elephant and Castle SPD but omitted from the draft Blackfriars Road SPD. For consistency and to avoid ambiguity we therefore propose that the following development sites, indicated on page 18 of the Elephant and Castle SPD (March, 2012), should be included as development sites within the Blackfriars Road SPD, as illustrated in Appendix A:</p> <ul style="list-style-type: none"> • Site bounded by Rotary Street, Thomas Doyle Street and London Road (see site 1 in Appendix A); and • Chapel 109 – 112 Borough Road (see site 2 in Appendix A). 	The boundary of the southern part of the SPD boundary has been amended to include the boundary suggested by LSBU. The SPD has been updated to refer to the existing SPD/OAPF and that the Blackfriars Road SPD will replace the guidance for the overlapping area.
1264	635	c/o Agent		London South Bank University	<p>3.4. The quadrant in the north east of the LSBU campus is known as the “Anchor 2” site. It is bounded by London Road, Borough Road, Thomas Doyle Street and Keyworth Street, and includes the recently completed Clarence Centre for Enterprise and Innovation. This area is part of the university’s estates strategy as a potentially comprehensive development opportunity and we therefore request that the boundary is extended to include each block to the east and the west of Rotary Street. Please see the mark up at Appendix A which illustrates the proposed boundary amendment.</p>	The boundary has been updated as requested.
1265	635	c/o Agent		London South	<p>3.5. London Road is important not only as a key point of arrival to LSBU, but more prominently as a main link to the wider regeneration of the Blackfriars Road and</p>	Noted. See officer responses to detailed suggestions.

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				Bank University	Elephant and Castle areas. While we do not consider it necessary to amend the boundary to include the whole of London Road, we propose a number of amendments to reinforce its significance.	
1266	635	c/o Agent		London South Bank University	3.6. We note that the strategic importance of providing connections from the City along Blackfriars Road to Elephant and Castle is recognised throughout the draft SPD, in accordance with Strategic Policy 2 – Sustainable Transport of the Southwark Core Strategy (April, 2011). However, London Road is not specifically stated in the SPD as providing this strategic connection. To emphasise the important role of London Road in connecting surrounding regeneration areas we therefore propose the following amendment (underlined): 3.6.a. Amendment to text: ‘Improve Blackfriars Road as a key walking and cycling route linking Elephant and Castle, the River and the City of London, including improvements to London Road.’ SPD 6 Active travel – p. 31	<p>The SPD focuses on Blackfriars Road, this is made clear within the SPD itself. Only a small part London Road falls within the SPD area. It is not within the scope of the SPD to refer to more improvements along London Road. However this will be looked at in detail through TfL's work on the Cycle Superhighway.</p> <p>Since the first draft of the Blackfriars Road SPD was released, TfL have announced proposals for Cycle Superhighway North - South to link Elephant and Castle to Kings Cross. The council will work with TfL to ensure any designs balance the needs of all users along this route and provide an improved connections for pedestrians as well as cyclists. The SPD has been updated within SPD 6: Active travel and the ideas of an emerging vision for Blackfriars Road to refer to the work being carried out by TfL.</p>
1267	635	c/o Agent		London South Bank University	3.7. We support the recognition of the importance of the route by the principle for London Road to become a green route and a key approach, as illustrated on figure 6 Indicative movement/public realm/open spaces diagram. However, given its importance, London Road should be treated consistently and therefore we request that the green route and key approach are extended to include the full length of London Road as per the mark up of figure 6 Indicative movement/public realm/open spaces diagram at Appendix B.	The SPD focuses on Blackfriars Road, this is made clear within the SPD itself. Only a small part London Road falls within the SPD area. It is not within the scope of the SPD to refer to more improvements or possible green routes along London Road
1268	635	c/o Agent		London South Bank University	3.8. We understand that London Road is currently the focus of a public realm study by Allies and Morrison. We trust that this study will consider the principles included within the Elephant and Castle SPD (March, 2012), such as the requirement to explore	The SPD does not contain detail on specific design options, rather it emphasises the emerging vision for the area and the council's objectives and considerations for developments in the area. Any future proposals for either London Road or other neighbouring streets should be in line with the London Plan and Southwark policies and would

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				sity	opportunities to create a public transport-only street along London Road. Should the findings of that study alter the nature of the proposals for London Road, it may be necessary to consider including London Road within the Blackfriars Road SPD boundary and providing further guidance therein.	therefore not alter the vision of this document. We will be developing the vision more thoroughly through preparation of the New Southwark Plan.
1269	635	c/o Agent		London South Bank University	3.9. We also understand that TfL are undertaking modelling of Blackfriars Road and we strongly recommend that their study is extended to include the whole of London Road given its role and importance in the area. This should include consideration of potential future vehicle, public transport and cycle movements along this important route.	This is outside the scope of the SPD. However since the publication of the draft SPD it has been announced that TfL are proposing to introduce a North South Cycle Superhighway linking Elephant and Castle through Blackfriars Road to the river and continuing a northern alignment to Kings Cross. The council support TfL's proposals and the SPD text has been updated to refer to this. We will work with TfL to ensure a holistic approach when developing designs for the cycle superhighway to ensure they balance the needs of all users and improve conditions and facilities for all users. TfL have advised that a consultation will take place over summer 2014.
1270	635	c/o Agent		London South Bank University	4. Potential Additional Development Sites 4.1. The vacant grade II listed Passmore Edwards Library/12 Borough Road and Caxton House, currently 50% vacant, present opportunities for future development to the north of Borough Road. There is potential to improve the public realm and generate activity along Borough Road. A combination of refurbishment and new build could bring the buildings back to life; conserving and enhancing existing heritage assets, whilst producing new uses and greatly improving the quality of the environment. Therefore we request the following addition: 4.1.a. Include the following additional development sites, as shown on figure 5 (please see Appendix A) and associated table 1 (p12 – 13): • Caxton House on Borough Road (see site 3 in Appendix A); and • The Passmore Edwards Library/12 Borough Road on Borough Road (see site 4 in Appendix A).	The appropriate figures have been updated to include these sites.
127	635	c/o		London	4.2. There is also a further opportunity to support the	The appropriate figures have been updated to include this site.

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1		Agent		n South Bank University	comprehensive development of LSBU's "Anchor 2" site by including the Peabody Hugh Astor Court housing on Thomas Doyle Street as a potential development opportunity. As such we propose the following addition: 4.2.a. Include the following development site as shown on figure 5 (please see Appendix A) and associated table 1 (p12 – 13): • Peabody Hugh Astor Court housing on Thomas Doyle Street (see site 5 in Appendix A).	
127 2	635	c/o Agent		London South Bank University	5.1. Arts, culture, leisure and entertainment uses are important in improving activity, vibrancy and achieving an area which is active during both day and night. We therefore support the positive view of proposals for arts, culture, leisure and entertainment uses. In addition however, higher education should be recognised as a complimentary land use which creates diversity, activity and vibrancy, as such we have proposed the following amendments (underlined> in accordance with Strategic Policy 4 – Places for Learning, Enjoyment and Healthy Lifestyles of the Southwark Core Strategy (April, 2011):	Higher education uses have been added to SPD 2: Mixed use town centre and also to the emerging vision.
127 3	635	c/o Agent		London South Bank University	5.1.a. Amendment to text: 'Higher education, cultural, leisure, arts and entertainment uses will also be encouraged which will benefit local residents and help make Blackfriars Road a destination, linking to many cultural facilities along the South Bank, The Cut and Waterloo.' Vision p.11	The emerging vision has been updated to include higher education uses.
127 4	635	c/o Agent		London South Bank University	5.1.b. Additional bullet point: 'The continuous development of higher education uses will be encouraged, contributing to wider regeneration through benefits such as educational attainment, employment, community outreach, vibrancy and improvements to the physical environment.' Mixed use town centre p. 16.	The suggested change is not considered necessary as we have already covered it elsewhere in the SPD. We have amended the emerging vision for the area, to include reference to higher education uses being encouraged in the area. We have amended bullet point 3 of SPD2 to include reference to education uses. We have also amended Bullet 5 of SPD2 to elaborate on new social infrastructure (which includes schools). The supporting text has been amended to include reference to opportunities to increase and improve the range

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						of infrastructure and facilities being maximised including looking at health facilities and community facilities.
1275	635	c/o Agent		London South Bank University	Amendment to text: Failing the addition of the above bullet point we ask for the following amendment as a minimum: 'Encouraging a mix of complementary higher education, arts, cultural, leisure and entertainment uses, taking into account their economic benefit to the area, their impact on health and well-being and their ability to add vibrancy to the street scene.' Mixed use town centre p. 16.	The suggested change is not considered necessary as we have already covered it elsewhere in the SPD. We have amended the emerging vision for the area, to include reference to higher education uses being encouraged in the area. We have amended bullet point 3 of SPD2 to include reference to education uses. We have also amended Bullet 5 of SPD2 to elaborate on new social infrastructure (which includes schools). The supporting text has been amended to include reference to opportunities to increase and improve the range of infrastructure and facilities being maximised including looking at health facilities and community facilities.
1276	635	c/o Agent		London South Bank University	5.2. Blackfriars Road includes a diverse mix of land uses. We support the encouragement of the area as a place for business, culture, leisure, arts, community and entertainment. In addition however, providing high quality and affordable student accommodation is a key priority for the university and needs to be delivered in suitable locations with appropriate designs to maximise its contribution to the development of a sustainable and diverse community, in accordance with Strategic Policy 8 – Student Homes of the Southwark Core Strategy (April, 2011) and Policy 4.7 Non-Self Contained Housing for Identified User Groups of the Southwark plan (July, 2007). As such, there will be circumstances where accommodation should not necessarily be restricted to upper floors, such as areas away from main destinations where mixed use may not be feasible. We therefore suggest the following minor amendment (underlined): 5.2.a. 'There will also be many new homes, primarily on the upper floors of commercial development, offering a range of housing types and sizes.' Vision p.11	The vision has been updated to reflect this.
1277	635	c/o Agent		London	5.3. We note that whilst residential land use, including student accommodation, is not specifically addressed	Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing

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				South Bank University	within the SPD, current policy namely; Policy 1.7 Development within Town and Local Centres and Policy 4.7 Non-Self Contained Housing for Identified User Groups of the Southwark plan (July, 2007) and Strategic Policy 8 – Student Homes of the Southwark Core Strategy (April, 2011) allow for the provision of residential development including student accommodation within local district and major town centres, including LSBU's campus	adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. As referred to within the representation existing policies exist for student accommodation. We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.
1278	635	c/o Agent		London South Bank University	6.1. We are generally supportive of the SPDs approach to promoting high quality design. LSBU is committed to achieving a high quality environment with a diverse mixture of uses, which is safe, stimulating and reinforces local distinctiveness. While many of the principles in the SPD will help to achieve an active, vibrant, and high quality environment there are some areas that could be strengthened to present and promote the highest quality of design, as set out below	Noted.
1279	635	c/o Agent		London South Bank University	6.2. We are generally supportive of the building heights strategy in the draft SPD, specifically the provisions to ensure high quality design and the identification of St. George's Circus as a suitable location for a tall building. However, we would like further clarification in relation to the capacity for tall buildings at St. George's Circus, for example whether it is envisaged as a single tall building or a cluster of tall buildings. It would also be beneficial in terms of design to include recognition and promotion of the role tall buildings and public realm enhancements in signalling strategic gateways and contributing to townscape legibility and wayfinding. As such we have suggested the following amendments (underlined):	Noted.
1280	635	c/o Agent		London	6.2.a. Amendment to text: 'These landmarks will highlight the importance of Blackfriars Road as a	No change.

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				South Bank University	gateway to Southwark and create new focal points at main transport nodes and the junction between Blackfriars Road and Elephant and castle, contributing to a more legible environment'. – Building heights, p. 27.	
1281	635	c/o Agent		London South Bank University	6.2.b. Additional bullet point: 'Tall buildings should be promoted at strategic gateways as shown in figure 6'. - Building heights, p. 27. (please see Appendix B for a mark-up of figure 6 to include strategic gateways).	No change. This is broadly noted within the SPD 5 already.
1282	635	c/o Agent		London South Bank University	6.2.c. Additional bullet point: 'At strategic gateway locations use public open space to announce a point of arrival and egress.' Public realm and open space strategy, p. 19	No change. The locations are acknowledged within the text.
1283	635	c/o Agent		London South Bank University	6.3. Views along the Thames and the Blackfriars Road corridor make a significant contribution to the character of Blackfriars Road and as a result we request that guidance seeks to protect these views, and suggest the following amendments (underlined): 6.3.a. Amendment to text: 'Demonstrate a considered relationship with other tall buildings and building heights in the immediate context in views, including views along the River Thames and the Blackfriars Road Corridor.' – Building heights, p.28	Amendment has been made to support consideration of linear views along Blackfriars Road. SPD 5 has been updated accordingly.
1284	635	c/o Agent		London South Bank University	6.4. In general we support the public realm and open space strategy included within the draft SPD. LSBU is committed to contributing positively to the wider setting of Blackfriars Road by creating a campus for students and the local community. There are a number of opportunities to further improve the potential of the public realm and we therefore propose the following amendments to figure 6 in accordance with the mark	Noted. No change. The locations are acknowledged within the existing text.

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					up provided in Appendix B, to reflect these opportunities and the suggested amendments to the SPD boundary: 6.4.a. Mark on strategic gateway locations at St. George's Circus and to the north of Blackfriars Road to reinforce their importance of its key gateways	
1285	635	c/o Agent		London South Bank University	6.4.b. Include a principle for improved pedestrian links along Thomas Doyle Street and Keyworth Street to increase permeability and help to integrate LSBU's Campus into its setting.	The council will continue to look at routes and connections across the borough. Allies and Morrison are working with LSBU to look at permeability in the area and any designs that come forward will be in line with Southwark policies and will therefore do not require change to this document. Furthermore SPD 3: Public realm and open space already refers to needing to encourage movements and integrating Blackfriars Road with the surrounding streets and areas.
1286	635	c/o Agent		London South Bank University	6.5. We support the approach of the SPD to encourage pedestrian orientated and humanistic environments to generate a range of activities and recognise the role activity plays in reinforcing character, creating vibrancy and aiding security. However, it is also important to create activity both during the day and night. Therefore we suggest the following amendment (underlined): 6.5.a. Amendment to text: 'Contribute to the creation of a sense of place and encourage a variety of activity which supports use during day and night time'. - SPD 3 Public realm and open space strategy, p. 19	No change, as the commitment to street activity is already covered in the SPD.
1287	635	c/o Agent		London South Bank University	6.6. We support the additional principles laid out for St. George's Circus and its importance as a public space and key node connecting Elephant and Castle and the City. The Circus currently lacks active frontages and instead is bound by large inactive facades. There is a need to promote public realm improvements with active frontages to improve the setting and establish it as a destination in its own right, as such we recommend the following amendment (underlined): 6.6.a. Amendment to text: 'Increase the amount of	No change. This guidance is already covered in SPD 3.

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					usable pedestrian space around the perimeter and at the centre of the Circus, supported by active frontages to bring vibrancy to the street scene and promote the Circus as a destination.' – SPD 3 Public realm and open space strategy, p. 20	
1288	635	c/o Agent		London South Bank University	6.7. We recognise the value of tree planting and support the proposals for the creation of green linkages, including reinforcing the boulevard character along Borough Road, Blackfriars Road and London Road. Planting should however be subject to feasibility for example in relation to existing utilities. Therefore we suggest the following amendments (underlined): 6.7.a. Amendment to text: 'Use trees and landscaping to green streets and spaces and reinforce planting where trees are integral to the historic townscape character where appropriate and feasible.' SPD 3 Public realm and open space strategy, p. 19	No change. Feasibility would be assessed at the planning application stage
1289	635	c/o Agent		London South Bank University	6.7.b. Amendment to text: 'There are a number of historic trees that are protected. We will require new street trees and the reinforcement of planting trees where they are integral to the historic character, such as those on Blackfriars Road, where appropriate and feasible.' SPD 3 Public realm and open space strategy, p. 22	No change. Feasibility would be assessed at the planning application stage.
1290	635	c/o Agent		London South Bank University	6.8. We support the focus of the SPD to conserve and enhance heritage assets and ensure that high quality design and architecture make a positive contribution to local character and distinctiveness. The SPD should however, also be flexible to allow contemporary design where it is sensitive to and respects the existing vernacular, As such we propose the following amendment (underlined): 6.8.a. Amendment to text: 'Ensure that materials and features reflect the identity of the surroundings, taking the local historic environment into consideration, whilst incorporating	We have updated SPD 4 so that materials and features consider the identity of the surroundings, taking the local historic environment into consideration. Detailed design would be assessed at the planning application stage.

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					new sustainable and contemporary design that is sensitive to and enhances the historic setting.'	
129 1	635	c/o Agent		London South Bank University	<p>Draft Business and Retail Background Paper In addition to the above suggested amendments to the draft Blackfriars Road SPD, we would also like to take this opportunity to clarify the role of LSBU with regard to employment activity stated in the Draft Business and Retail Background Paper (August, 2013). We provide the following statements for inclusion in that document on the university's role in local business and enterprise, and their role in providing social and community infrastructure: In many ways LSBU is configured as an engine for urban regeneration. The university's location, positive approach to community engagement, and support for local business, offer considerable development capacities that support future development in Southwark. The university has four faculties, each with a strong vocational pedigree: • Arts and Human Sciences; • Business Computing and Information Management; • Engineering, Science and the Built Environment; and • Health and Social Care. LSBU places particular emphasis on preparation for employment and, for students already in work (the university has a high proportion of postgraduate, part-time, and professional study), a focus on up to date course content immediately relevant to today's work place. Over 50% of students are from SE London, and the university celebrates a very wide ethnic and cultural mix (60% of students are from ethnic minorities). Many students are studying for professional qualifications or higher degrees, but the university also works in partnership with local schools and Further Education colleges to provide access to higher education through Level 3 courses (A-level equivalent). A high proportion of students are mature (90% aged 20 or older), and the university encourages</p>	We have included amendments to the SPD Business and Retail background paper to highlight the role of the university in local business and enterprise.

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					applications from students returning to education with non-traditional qualifications (over 80% of students enter the university through this route). There is a very wide programme of courses, backed by niche research (mainly applied) and links with business.	
1293	1148			34-68 Colombo Street	We have to date been active in commenting on the new policy documents published by the Council and in general we support the work the Council is undertaking and feel that in due course the Blackfriars Road SPD will become a useful and respected document. We wish to confirm our support for the overall vision for the area. However, there are a number of areas of we wish to rise, which we have set out below.	Noted. Officer comments are set out in response to the detailed comments.
1294	1148			34-68 Colombo Street	The first comment relates to Figure 5 / Table 1 and the list of potential development sites. We wish to put forward the 34 - 68 Colombo Street site, for mixed use redevelopment. As it currently stands the site represents a highly inefficient use of land that is indefensible in light of current planning guidance. A new development could offer the opportunity for a "win win" outcome whereby new, much needed housing can be provided in a highly sustainable manner alongside replacement, upgraded community space. The London Plan is a strong advocate of this approach, pushing for the redevelopment of this type of site to encourage more efficient use of land. The Plan seeks to ensure that densities of development in appropriate locations be maximised and encourages residential developments such as this proposal. Given this, we consider that 34 - 68 Colombo Street should be included in the list of sites at Figure 5 and Table 1.	The appropriate figures and table have been updated to include this site. It is also important to note that the SPD is not allocating sites as proposals sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.
1295	1148			34-68 Colombo	In terms of the remainder of the SPD, we would question if there should be a policy on residential uses. The SPD covers business space and town centre	The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside

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					Street uses, but almost fails to mention residential completely. There can be no doubt that residential uses will be coming forward on some sites within the SPD, so it seems strange there is so little reference to them. It may be considered that the Core Strategy policies are considered to provide sufficient guidance for residential use. However, if this is the case, then it would be helpful if this could be made clear, otherwise there appears to be a 'gap' within the document.	other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. There is nothing additional that needs further specific guidance for Blackfriars Road. The vision already refers to housing development. Housing will be encouraged on appropriate sites. In order to make this clearer, we have updated SPD 2: Mixed use town centre to include residential development as one of the uses to be encouraged alongside the provision of a mixture of new town centre uses. The fact box on town centre uses has also been updated in accordance with the National Planning Policy Framework definition to make it clear that residential development is not a main town centre use but it can play an important role in ensuring the vitality of town centres. We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.
1296	1149			45 Colombo Street	We have to date been active in commenting on the new policy documents published by the Council and in general we support the work the Council is undertaking and feel that in due course the Blackfriars Road SPD will become a useful and respected document. We wish to confirm our support for the overall vision for the area. However, there are a number of areas of we wish to rise, which we have set out below.	Noted. Officer comments are provided for the detailed representations.
1297	1149			45 Colombo Street	The first comment relates to Figure 5 / Table 1 and the list of potential development sites. 45 Colombo Street site is listed as site 7, and we wish to support this allocation. As it currently stands the site represents a highly inefficient use of land that is indefensible in light of current planning guidance. A new development could offer the opportunity for a "win win" outcome	Support noted. It is also important to note that the SPD is not allocating sites as proposals sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites

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					whereby new, much needed housing can be provided in a highly sustainable manner alongside replacement, upgraded community space. The London Plan is a strong advocate of this approach, pushing for the redevelopment of this type of site to encourage more efficient use of land. The Plan seeks to ensure that densities of development in appropriate locations be maximised and encourages residential developments such as this proposal. Given this, we support the inclusion of 45 Colombo Street in the list of sites at Figure 5 and Table 1.	designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.
1298	149	Eileen	Conn		In terms of Policy SPD 2, we also welcome the reference to support for the provision of new social infrastructure and community facilities as part of mixed use developments.	Support noted.
1299	1149			45 Colombo Street	Figure 6 shows “opportunity sites”, but these are more limited than the “development sites” shown in Figure 5. We assume they relate to opportunity sites with a public realm aspect, but would suggest the label be changed to avoid confusion, perhaps to “public realm opportunity sites”.	<p>We have updated the figure for consistency and amended the key from “opportunity sites” to potential development sites”.</p> <p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. Any development of the potential development sites would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.</p>
1300	1149			45 Colombo Street	In general terms we support the objectives of Policy SPD 5 on Building Heights, but do question the second bullet point under the “All tall buildings over 25 metres / 30 metres must.....” section. Clearly some sites are larger than others, and thus able to	Supported noted. No change to guidance. The size of the site would be a consideration at the planning application stage, alongside the height of any proposed development.

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					provide more public space. We would suggest that reference to the size of the site is added to the second sentence, as follows- “.....Public space should be proportionate to the height of the building, the size of the site and the importance of the location in the town centre”.	
130 1	114 9			45 Colombo Street	In terms of the remainder of the SPD, we would question if there should be a policy on residential uses. The SPD covers business space and town centre uses, but almost fails to mention residential completely. There can be no doubt that residential uses will be coming forward on some sites within the SPD, so it seems strange there is so little reference to them. It may be considered that the Core Strategy policies are considered to provide sufficient guidance for residential use. However, if this is the case, then it would be helpful if this could be made clear, otherwise there appears to be a 'gap' within the document.	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards.</p> <p>The vision already refers to housing development. Housing will be encouraged on appropriate sites. In order to make this clearer, we have updated SPD 2: Mixed use town centre to include residential development as one of the uses to be encouraged alongside the provision of a mixture of new town centre uses. The fact box on town centre uses has also been updated in accordance with the National Planning Policy Framework definition to make it clear that residential development is not a main town centre use but it can play an important role in ensuring the vitality of town centres.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>
130 2	115 0	William	Wareing		I am extremely concerned about building heights along the road having a negative impact on historic buildings such as the Webber Row and Peabody Square estates. It seems like it will be a giant New-York style wind tunnel, which is not in keeping with the heritage	The detailed guidance outlined in SPD 5 and the existing planning policy framework of design, heritage and tall building policies (the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and the NPPF) would ensure appropriate development along Blackfriars Road.

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					nature of the area. It will also impact on the light available to pedestrians.	The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. Matters regarding the impact of tall buildings would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and other planning guidance. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate.
1303	1150	William	Wareing		I am also worried that our tight-knit local community will be transformed into a district of office blocks and sandwich shops that close up at 4pm. It seems as if we will have a huge temporary population rise in the area, straining all the local services, to the detriment of the people who live here.	<p>The SPD is intended to benefit a wide range of groups including existing and new residents. The emerging vision has been updated to make this clearer. The SPD has also been updated within the supporting text to SPD 2: Mixed use town centre, that the SPD area is mixed with both commercial and residential development. The SPD, in particular SPD 2 seeks to encourage a range of different town centre uses as well as business uses to encourage appropriate uses throughout and day and evening.</p> <p>The SPD seeks to meet the needs of residents whilst also managing the pressure for new development. The SPD has been updated to make it clearer that the emerging vision and the SPD seeks to ensure that development meets the needs of existing and new residents whilst also attracting new development. Residents will benefit from the increase range of uses including more shops, services and businesses along the Blackfriars Road.</p>
1304	1150	William	Wareing		It also seems as though too little consideration has been given to the very valid concerns and worries of local residents in a rushed consultation process. I trust that the draft document gives some weight to local residents who object to the scale of the development.	A consultation report has prepared alongside the Blackfriars Road SPD. This sets out a summary of the representations received and how we have taken these into account in preparing the final version of the SPD. The appendices also set out all of the representations received and officer comments on how these comments have been taken into account, and whether the SPD has been updated as a result. The SPD was consulted on in accordance with the council's Statement of Community Involvement (SCI) (2008) and exceeded the consultation requirements of both the SCI and the relevant

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						regulations. The consultation report summarises the consultation carried out.
1305	1151	Orenda	O'Brien - Davies		1. Building heights In 2009 the Tall Building Study carried out by Southwark Council did not recommend any areas south of The Cut as appropriate for tall buildings. But the draft SPD has a policy of encouraging tall buildings all the way down to St George's Circus. This means buildings up to 30m (approx 10 storeys high), plus a 70m (25 to 30 storeys high) tower to be built on top of Southwark tube station and another 70m tower where Erlang House is on Blackfriars Road (near St George's Circus). This height of buildings will have a big impact on how our local area looks and feels. Some key concerns are: loss of light, wind tunnel effect of tall buildings, loss of views, and loss of privacy from being overlooked.	<p>The detailed guidance outlined in SPD 5 and the existing planning policy framework of design, heritage and tall building policies (the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and the NPPF) would ensure appropriate development along Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. Matters regarding the impact of tall buildings would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and other planning guidance. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate.</p>
1306	1151	Orenda	O'Brien - Davies		2. Time given for the draft SPD consultation The draft SPD was announced to the press on 21 June 2013 and on 24 July 2013 the Webber Row Estate received important leaflets through the doors about the consultation. So many people already lost almost 5 weeks of the 12-week consultation period to think about what is being proposed. And now the deadline is almost here. I would like to see a much longer consultation period, with lots of exhibitions and workshops for residents and local businesses to make their views heard, just like there was for the Heygate Estate redevelopment. There are in fact lots of residents living in this area, and we care about where we live.	A consultation report has prepared alongside the Blackfriars Road SPD. This sets out a summary of the representations received and how we have taken these into account in preparing the final version of the SPD. The appendices also set out all of the representations received and officer comments on how these comments have been taken into account, and whether the SPD has been updated as a result. The SPD was consulted on in accordance with the council's Statement of Community Involvement (SCI) (2008) and exceeded the consultation requirements of both the SCI and the relevant regulations. The consultation report summarises the consultation carried out.
1307	1151	Orenda	O'Brien - Davies		3. Commercial development and residents The draft SPD places a really big emphasis on commercial development, tall buildings and more hotels in the area. There is almost no mention of existing residents,	The SPD is intended to benefit a wide range of groups including existing and new residents. The emerging vision has been updated to make this clearer. The SPD has also been updated within the supporting text to SPD 2: Mixed use town centre, that the SPD area is

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					<p>so the needs of our big and long-established communities, especially south of The Cut, have not been included in the document. There is also very little clear provision for affordable housing in the draft SPD. In terms of hotels, we already have H10, Waterloo Road (13 storeys, 177 rooms), Travelodge, Baron's Place (5 storeys, 279 rooms) and soon the Hilton, Waterloo Road (9 storeys, 278 rooms), so we have really done our bit in accepting big hotels right on our doorstep, and Quentin House is now sandwiched between two hotels, the Travelodge and the Hilton. In announcing the draft SPD, Councillor Peter John described our area as having "pockets of residential" but perhaps a visit is needed to our local area as we are much more than just "pockets" – it is our residential communities that make up the real character of this part of Southwark.</p>	<p>mixed with both commercial and residential development. The SPD seeks to meet the needs of residents whilst also managing the pressure for new development. The SPD has been updated to make it clearer that the emerging vision and the SPD seeks to ensure that development meets the needs of existing and new residents whilst also attracting new development. Residents will benefit from the increase range of uses including more shops, services and businesses along the Blackfriars Road.</p>
1308	1151	Orenda	O'Brien - Davies		<p>4. Small businesses I was disappointed when in August of this year, Southwark Council's planning committee voted by a majority of one to allow Network Rail to redevelop premises under the arches at Union Street. This means that the small businesses which have worked from these premises for many years will have to leave because the rents will be too high. I was again very disappointed when last week the planning committee again voted by a majority of one to approve the demolition of the Imbibe pub and St George's Mansions (home of the Blackfriars Cafe for 20 years, a dry cleaners and a newsagent) to make way for Linden Homes to build a ten-storey block for large business space, private flats and a very small amount of affordable homes. The London Plan and the Southwark Plan are official policies which make very clear that local councils are meant to make sure that there are suitable spaces for small businesses, but the recent behaviour of Southwark Council is not meeting</p>	<p>In line with the Core Strategy, the SPD encourages the provision of flexibly designed small business space. We have amended bullet 1 of SPD1 to include encouraging the provision of small and start-up businesses in the area.</p> <p>Bullet 2 of SPD1 reiterates borough wide planning policy of requiring the retention or replacement of business floorspace, and this will continue to be one of a number of priorities for the council to ensure that the concentration of business floorspace in the area is maintained or replaced. In addition, the supporting text outlines borough wide policy on small business space, including employment space available within the railway arches. These spaces can be used for a variety of employment opportunities. We have also added additional reference into the supporting text regarding the saved Southwark Plan Policy 1.5 in order to highlight that this policy aims to protect small business units in proposals for redevelopment or change of use of employment sites, by requiring the equivalent provision for small units within the replacement floorspace, subject to exception criteria. We have also inserted additional text to bullet 1 of SPD2 to encourage the flexible</p>

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					these policies, so even though the draft SPD talks about looking after small businesses, is this really likely to happen? What are the safeguards for local businesses?	<p>design of new unit sizes for new town centre use in new mixed use development.</p> <p>The assessment and detail of the Linden Homes planning application is available in the Planning Committee report which is available in the link below. http://planningonline.southwark.gov.uk/AcolNetCGI.exe?ACTION=UNWRAP&RIPNAME=Root.PgeResultDetail&TheSystemkey=9549115</p>
1309	1151	Orenda	O'Brien - Davies		<p>5. Facilities The local population in this area is going to really explode with all of the proposed development. This means that we will need the following: schools, youth centres, nurseries, playgrounds, open spaces, GP surgeries, health centres, fire services, police services, etc. But the draft SPD doesn't contain any detail of how which of these facilities are going to be provided, or where, or when. I'm really worried about this.</p>	<p>The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development. Updates have been made to the SPD to refer more to other uses including health and community facilities. Updates have been made to the SPD to refer to encouraging a range of different uses.</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the</p>

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						organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD
1310	1151	Orenda	O'Brien - Davies		6. Historic buildings The London Plan and the Southwark Plan are official policies which make very clear that local councils are meant to try and conserve and enhance heritage wherever possible. But in our local area there is much more of a tendency to knock down our historic buildings to make room for big office blocks. This is what happened in 2010 when the lovely Victorian warehouse at 1 Valentine Place was knocked down. And now we are going to also lose the historic Imbibe pub and the Victorian St George's Mansions next to it in order to make way for the Linden Homes new 10-storey block which is just yet another modern building with no distinctive character.	The SPD sets out clear guidance for heritage considerations which sits within a wider heritage policy framework such as the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and the NPPF. As such, development would be assessed at the planning application stage through the relevant saved Southwark Plan policies
1311	1151	Orenda	O'Brien - Davies		7. Potential development sites One of the most disturbing aspects of the draft SPD is the list of 46 potential development sites. There are no details about which buildings these are or what they are used for at the moment. My neighbour went through the whole list and has let me know her findings. She was horrified to see that lots of these are beautiful buildings, some from historic times and some modern builds. They all look good and are being used as small business space and/or residential accommodation.	<p>The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet.</p> <p>The list and figure has been updated following consultation to take into account suggestions from land owners and residents.</p> <p>Further wording has also been added to the SPD to make it clear that</p>

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					<p>Even Bridgehouse Court (where the supermarket is on the corner of Webber Street and Blackfriars Road) has been earmarked as a development site – what is wrong with this building as it is now? Is this where Southwark Council is maybe thinking of building one of its tall buildings? On the original list was even included Block T of Peabody Square on Blackfriars Road – but it is a Grade II listed building! The planners later said this had been a mistake, but I am worried about how could they get it so wrong. Do they not have enough local knowledge to know about each of these 46 sites? The planners have even included the beautiful green building at 209/215 Blackfriars Road on their list. I would like to see full details about every one of those 46 sites and to know why they are on this list and what the plans for development are.</p>	<p>the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.</p> <p>Block T was a naming error on the figure, and has been updated in the final SPD.</p>
131 2	115 2	Nathan	Phillips		<p>I'd like provide one major point of feedback relating to the Blackfriars Road SPD, namely that the presumption of 70m buildings at St George's circus does not appear well evidenced, appropriate to the obvious smooth trajectory of the street from high to low rise, or in the interest of local residents.</p> <p>The presumption of 30m construction along the southern half of the street appears entirely valid for the full stretch south of Southwark tube, inclusive of key junctions- as evidenced by the success of the Palestra building and student accommodation on the westerly side of St George's circus.</p> <p>I very much hope this view can be taken into account</p>	<p>Noted support for the proposed height threshold of 30m along the southern section of Blackfriars Road.</p> <p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has</p>

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						been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.
1313	1153	Sam	West		<p>I am writing to object to aspects of the draft Blackfriars Road Supplementary Planning Document. I am a resident of Gladstone Street, bordering on the area under discussion, and a member of our residents' association, the Albert Association. I am very supportive of development in the area however there are a couple of aspects of the SPD that I object to: 1: Provision for a tower block 70 metres high at St George's Circus 2:</p> <p>The designation of the Bakerloo sidings site (which is immediately behind Gladstone Street) as a potential development site. During consultation we have been informed that no particular end use is envisaged for any of the sites designated for development. Where is the justification for ignoring the suitability of particular sites of the designated areas for any particular form of development, given the sensitive nature of the heritage context?</p>	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking the local heritage context into account. The SPD states that list of potential development sites is illustrative of the huge opportunity for change within the area and the need for a coherent framework. It has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. The formal identification of proposals sites within the area will be considered as part of the preparation of the New</p>

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						Southwark Plan.
1314	1153	Sam	West		Boundary Development Site 43 The Bakerloo Sidings. Any development on this site will interfere with long views into the West Square Conservation Area valued by Southwark Planning. What consideration has been given to these in the preparation of this SPD? What is the evidence to support its suitability as a development site as opposed to educational, open space or other use? Any building on this site will adversely affect the setting of heritage assets. The Elephant & Castle Enterprise Area SPD mentioned a landmark building. Reference to any such building on this site deeply concerning given the proximity not only to our own listed houses but also the listed obelisk, St George's RC Cathedral and Imperial War Museum, the latter two being the landmark buildings in this location. How are these proposals affected by the Blackfriars Road SPD?	<p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking the local heritage context into account.</p> <p>The SPD states that list of potential development sites is illustrative of the huge opportunity for change within the area and the need for a coherent framework. It has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. The formal identification of proposals sites within the area will be considered as part of the preparation of the New Southwark Plan. The impact of development is assessed at the planning application stage and would have to comply with the guidance set out in the SPD and wider policy framework.</p>
1315	1153	Sam	West		Strategic views St George's Circus is a fine example of Georgian town planning with its focal point at its centre, the Grade 2* listed obelisk. SPD 5 Building Heights proposes "a tall building of height up to 70 metres should provide a focal point at St George's Circus". A tall building will affect the setting of not only the obelisk, an important heritage asset, but also the listed Georgian terraces in London Road. Please demonstrate under London Plan CDR1 how tall building development, a fundamental change in architecture, will not adversely affect the local character. Where is the comprehensive urban design analysis of the local character and historic context? (CABE and English Heritage Guidance on Tall Buildings CDN25) Development sites 39, 40, 41 and	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has</p>

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					<p>43 directly affect the Circus and other heritage assets. Council officers have stated that tall buildings at St George's Circus would not be a conflict with the adjoining heritage assets. Where is the evidence that this is not a conflict? In determining tall building height limits within the SPD of 70 metres, where is the assessment of three dimensional modelling to determine the potential effect on the local context? (CABE and English Heritage Guidance on Tall Buildings CDN25)</p>	<p>been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70ms. A tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The GLA's representation confirms that the Mayor supports the council's approach on tall buildings, but suggests that the SPD should be more flexible in relation to building heights, and that buildings 'in the region' of 70/30m would be appropriate. The council disagrees with this proposed amendment as it could allow buildings that are greater than the 70m/30m threshold, which would be considered inappropriate based on our evidence base. As such, the council considers SPD 5 to balance local character and development potential.</p> <p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. Any development of the potential development sites would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.</p>
1316	1153	Sam	West		<p>No mention is made of environmental impact assessments, wind and daylight modelling, which are fundamental requirements in considering proposals of this nature, particularly considering the difficulties with the Palestra and 'Walkie Talkie' buildings.</p>	<p>These matters would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy 12 and the relevant policies of the London Plan and other planning guidance. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate</p>
1317	1153	Sam	West		<p>Why has West Square Conservation Area not been mentioned in SPD4 and SPD5? The tall buildings proposed affect the setting of this Conservation Area and its Listed Buildings.</p>	<p>The West Square conservation area is situated outside the Blackfriars Road SPD area. It would still be considered as a heritage asset in relation to the guidance set out in SPD 3, 4 and 5. Any development proposal would be assessed at the planning application stage against</p>

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						the relevant saved Southwark Plan policies, Core Strategy Policy 12 and the relevant policies of the London Plan and other planning guidance.
1318	1153	Sam	West		The Council's Core Strategy 2010 does not support tall buildings in Blackfriars Road South, as they do not meet the criteria for 'vision vibrancy and life'. Why does the Council's vision now differ from the Core Strategy?	<p>The policy approach within the SPD is considered to be consistent with the NPPF (2012), the London Plan (2011), the Core Strategy (2011) and the saved Southwark Plan (2007), taking into account changes in the surrounding context since developing the Core Strategy vision in 2009/2010. The London Plan, Core Strategy and saved Southwark Plan form the development plan for Southwark, with the NPPF setting out national guidance. The development plan sets out the policies for tall buildings. Key policies are: London Plan policy 7.7 which identifies that tall and larger buildings should generally be limited to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. Blackfriars Road lies within the Central Activities Zone, is an opportunity area and a town centre with good access to public transport. Core Strategy strategic policy 12 requires tall buildings to have an exemplary standard of design and identifies locations where tall buildings could go. The Core Strategy vision for Bankside and Borough refers to the council setting out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework. Saved Southwark Plan policy 3.20 sets out criteria for considering applications for tall buildings and applies across the borough</p> <p>It should be noted that the GLSA is supportive of the proposed building heights strategy. The GLA's representation confirms that the Mayor supports the council's approach on tall buildings, but suggests that the SPD should be more flexible in relation to building heights, and that buildings 'in the region' of 70/30m would be appropriate. The council disagrees with this proposed amendment as it could allow buildings that are greater than the 70m/30m threshold, which would be considered inappropriate based on our evidence base. As such, the council considers SPD 5 to balance local character and development potential</p>

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1319	1153	Sam	West		In 2012 UNESCO noted in its convention briefing paper that in April 2011 Southwark's Core Strategy "includes an emphasis on heritage assets and revises their approach to tall buildings on the area". Why has the council reneged on this? UNESCO's World Heritage Committee Report June 2012 "notes the intention of Southwark Council to develop a Supplementary Planning document to clarify how and where development can take place and to define building height thresholds so as to inform the appropriateness of subsequent development proposals". Is this the said SPD?	The UNESCO paper relates to the area around London Bridge and the potential impact of tall buildings on the setting of the Tower of London World Heritage Site. The heights proposed in the Blackfriars Road SPD building heights strategy are consistent with Southwark's development plan consisting of the saved Southwark Plan policies, Core Strategy and the London Plan. Our testing shows that the proposed heights would not impact the setting of the Tower of London site. The proposed 70m threshold guidance for the southern of Blackfriars Road responds to the sensitivity to the Palace of Westminster World Heritage site.
1320	1154	Polly	Rossdale		1. Building heights In 2009 the Tall Building Study carried out by Southwark Council did not recommend any areas south of The Cut as appropriate for tall buildings. But the draft SPD has a policy of encouraging tall buildings all the way down to St George's Circus. There are likely to be knock-on deleterious effects such as loss of light, wind tunnel effect of tall buildings, loss of views, and loss of privacy (from being overlooked). My own views which currently extend to Blackfriars Rd (from Webber St corner) would be impacted and much of the pleasing mixed character of the buildings (residential flats, old warehouse, renovated warehouse, the Shard, new office block) would be lost.	The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD and does not propose new policy for the area. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007.
1321	1154	Polly	Rossdale		2. Inadequate consultation time. I only received leaflets about the consultation process at the end of July. This is insufficient time for the community to consider such large-scale plans.	A consultation report has prepared alongside the Blackfriars Road SPD. This sets out a summary of the representations received and how we have taken these into account in preparing the final version of the SPD. The appendices also set out all of the representations received and officer comments on how these comments have been taken into account, and whether the SPD has been updated as a result. The SPD was consulted on in accordance with the council's Statement of Community Involvement (SCI) (2008) and exceeded the consultation requirements of both the SCI and the relevant

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						regulations. The consultation report summarises the consultation carried out.
132 2	115 4	Polly	Rossdale		<p>3. Insufficient consideration given to the impact on local residence. Prioritisation on large scale Commercial concerns over local residents & small businesses. Existing residents - who are the heart of the current community - are barely mentioned. There is also little mention of affordable housing. As it stands there is a real risk that Blackfriars will simply be a soulless wasteland - populated by short term visitors and chain cafes / shops who contribute little socially, culturally or in long economic terms. What efforts will be made to ensure that Blackfriars Rd is not simply a long line of Sainsbury's, Tesco's, eat, pret a manger etc etc? This area does not any more of need that. We need real community investment - buildings that are civic and not solely commercial in nature. There should be joined up thinking with the South Bank's cultural zone - which could be extended down Blackfriars Rd. Otherwise there is nothing lure visitors away from the South Bank to another row of identikit shops and offices</p>	<p>The guidance focuses primarily on Blackfriars Road, where most of the change will occur. This is made clear within the SPD. This is set out in section 1 of the SPD.</p> <p>The emerging vision aspires for Blackfriars Road to have its own distinct identity as a lively and vibrant area, becoming an exciting place where people want to work, live and visit. In terms of providing further guidance on affordable housing, the SPD provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards.</p> <p>SPD1 supports the provision of small business floorspace, such as small office/studio workshop space, to help to provide appropriately sized modern new space for creative and cultural businesses to locate in the area.</p> <p>SPD2 recognises there is an opportunity to promote a much wider mix of town centre uses as part of the development of the potential sites identified in the SPD area. This includes a range of different types and sizes of retailers.</p> <p>The SPD cannot designate land use on potential development sites, however we will consider the range of uses that would be appropriate for development sites through the preparation of the New Southwark Plan.</p> <p>The north of the SPD area lies within the Strategic Cultural Area (Southbank/ Bankside/ London Bridge) which is a designated area recognised through planning policies in the London Plan and the Core</p>

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						Strategy. The SPD2 guidance encourages the development of new arts, cultural, leisure and entertainment uses in mixed use development throughout the area to help consolidate this cluster of arts and cultural facilities. Further detail on the council's strategy on retail provision is set out in the SPD's business and retail background evidence paper
1323	1154	Polly	Rossdale		4. Historic buildings The London Plan and the Southwark Plan are official policies which make very clear that local councils are meant to try and conserve and enhance heritage wherever possible. But in our local area there is much more of a tendency to knock down our historic buildings to make room for big office blocks. This is what happened in 2010 when the lovely Victorian warehouse at 1 Valentine Place was knocked down. And now we are going to also lose the historic Imbibe pub and the Victorian St George's Mansions next to it in order to make way for the Linden Homes new 10-storey block which is just yet another modern building with no distinctive character. I would welcome further detailed information about the 46 potential development sites mentioned in the SPD. Given the Council's prior record on failure to protect historic buildings this is all the more important.	The SPD sets out clear guidance for heritage considerations which sits within a wider heritage policy framework such as the relevant saved Southwark Plan policies, Core Strategy Policy 12 and the relevant policies of the London Plan and the NPPF. As such, development would be assessed at the planning application stage through the relevant saved Southwark Plan policies
1324	196	David	Watkinson	Greater London Authority	Thank you for consulting the Mayor of London on the draft stage of Blackfriars Road Supplementary Planning Document (SPD). The Mayor has afforded me delegated authority to make comments on his behalf on emerging SPDs. The GLA welcomes the opportunity to consider the document at this draft stage. These comments are officer –level only and do not preclude any further comment the Mayor may make on future consultation phases of the Council's Local Development Framework. The SPD appears comprehensive and should prove to be a useful tool for both planners and prospective developers	Noted.

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1325	196	David	Watkinson	Greater London Authority	The Mayor particularly supports Southwark Council's approach to tall buildings and its building height strategy in the Blackfriars area. However, SPD5 appears too prescriptive in terms of building heights. In the Vauxhall Nine Elms Battersea (VNEB) OAPF some heights were limited to avoid them appearing in the Mayor's strategic views. As this is not the case on Blackfriars Road, the Mayor would welcome a more flexible approach to building heights and suggests that the wording "up to" 70/30 metres is replaced by "in the region of" 70/30metres. As stated in the SPD, it will be important to demonstrate that the buildings contribute positively to the London's skyline.	<p>Minor changes have been made to the wording of SPD5.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings" 2007. This evidence base shows that heights that exceed those outlined in the guidance could be inappropriate. The proposed amendment to 'In the region' could allow greater heights that may have adverse impact. The BBLB Characterisation Study (2013) also informs this evidence base.</p>
1326	1157	John	Tolson		1. It's important to ensure that the SPD is consistent with the design principles arising from the Public Realm Study and to take full account of the public concerns that emerged from that consultation process.	Noted. The SPD has been updated in light of the consultation.
1327	1157	John	Tolson		2. Fulfilling the aims of the plan do not depend on the construction of the two tall buildings at Southwark Station and St George's Circus. Both are quite out of scale and keeping with the surrounding areas and there is no magic about having "landmark" buildings at "key nodes". The obelisk is already the key landmark to the south and so to in its own way is the Palestra building at the station. I am not opposed to building on either site but it needs to be of a scale and bulk to complement , not shout at, the existing built environment. Any loss of office and residential space is balanced by the extensive development already taking pace and planned on Blackfriars Road. Already we are up to the Council's planned capacity for hotel rooms reflecting this progress.	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>

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1328	1157	John	Tolson		<p>3. Development of local infrastructure and amenities must be included in the plan on a scale to match the proposed development. This means schools, doctors and dentists, children's play and other open areas (the existing ones are under increasing pressure) as well as local retail.</p>	<p>The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development. Updates have been made to the SPD to refer more to other uses including health and community facilities.</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4.4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide</p>

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						level through these dedicated documents rather than through the Blackfriars Road SPD
1329	1157	John	Tolson		4. Proper attention must be given to the side streets off Blackfriars Road. These areas should be highlighted as integral to the plan's success. They have their own character and will be a big attraction - helping to draw new people to live, work and enjoy the area and hence realising the vision. It follows that building heights must be significantly lower than for Blackfriars Road to enhance and preserve this character and "heritage" assets in their widest sense must be preserved.	SPD 4 and 5 sets out guidance for the areas off Blackfriars Road.
1330	1156	Andrew	Thomas Quinn		While I strongly support the council's aim of redeveloping the area and creating a mixed use area, I question some of the methods listed in the plan. In particular, the emphasis on hotels in the plan as crucial to redevelopment is incorrect. Although the hotels have provided some mixed use space in the form of bars and restaurants, I would encourage the Council to survey users of those spaces to see how many of them are residents or workers in the area and Greater London. In my experience, these spaces are entirely ignored by residents/workers in London, who instead tend to patronise local or small businesses. Furthermore, given that the area is already on track to meet its target of 2,500 hotel rooms in advance of the 2026 deadline, it seems pointless for Southwark Council to encourage the building of more high quality hotels.	The SPD 2 provides guidance to support strategic policy 10 'Jobs and business' of the Core Strategy (2011) which sets out the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. This policy is also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account, including local employment effects. The promotion of ancillary facilities to be part of the design of hotel developments will help to encourage wider use of the building and contribute to the vibrancy of the area. The London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2031. The estimate of the approximate net and gross hotel rooms required over the period 2007-2026 for Southwark, as set out in the GLA's Hotel Demand Study, is based on assessment of factors including transport links to central London and connections to airports, proximity of tourist attractions/business locations, cafes and restaurants in the area, night time economy, cultural facilities and attractions, and regeneration initiatives and site availability. The forecast for Southwark should be treated as indicative only, and local circumstances should also be factored in. It is important to consider that the SPD area is within the Central Activities Zone, Bankside, Borough and London Bridge

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						Opportunity Area and part of the Elephant and Castle Opportunity Area which are areas promoted in the London Plan to accommodate strategically important hotel provision. Arts, cultural and tourism activities have flourished in Southwark in the last decade, particularly in the Strategic Cultural Area, which is within the CAZ. Bankside, Borough and London Bridge has consequently experienced a growth in the number of hotels to support this increasing visitor economy.
133 1	115 6	Andrew	Thomas Quinn		In addition, I would like to see more concrete proposals on the development of better pedestrian and cycle facilities on Blackfriars, given some recent accidents that have occurred there. I do appreciate the emphasis placed on cycling and pedestrian facilities in the plan. Finally, as an urban planner in the area, please let me know if there's any way I could contribute to the area's redevelopment.	Since the publication of the draft SPD it has been announced that TfL are proposing to introduce a Cycle Superhighway on Blackfriars Road. The council support TfL's proposals to introduce a segregated cycle lane and the SPD has been updated to demonstrate our support. TfL have advised that a consultation will take place over summer 2014. SPD 6: Active travel, sets out the aspirations to improve junctions along the street specifically Stamford Street and St George's circus and will work with TfL to ensure a holistic approach when developing designs for the cycle superhighway that balance the needs of all users and improve conditions and facilities for pedestrians.
133 2	115 5	Tanya	Heasman		Development Site 43 The Bakerloo Sidings 1. Any development on this site will interfere the heritage West Square Conservation Area, previously valued by Southwark Planning. What consideration has been given to the nature and special characteristics of this area in the preparation of this SPD? 2. What is the evidence to support its suitability as a development site as opposed to educational, open space or other use? 3. Any building on this site is likely to adversely affect the setting of heritage assets. The Elephant & Castle Enterprise Area SPD mentioned a landmark building. Tall buildings on this site will affect the proximity not only to our own listed houses but also the listed obelisk, St George's RC Cathedral and Imperial War Museum, the latter two being the landmark buildings in this location. 4. St George's Circus and Tall Buildings. St George's Circus is a fine example of Georgian town planning with its focal point at its	<p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.</p> <p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p>

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					centre, the Grade 2* listed obelisk. A tall building will affect the setting of not only the obelisk, an important heritage asset, but also the listed Georgian terraces in London Road. 5. Development sites 39, 40, 41 and 43 directly affect the Circus and other heritage assets. Council officers have stated that tall buildings at St George's Circus would not be a conflict with the adjoining heritage assets. Where is the evidence that this is not a conflict?	<p>TfL, GLA and Network Rail were all consulted as part of the consultation process. The Blackfriars Road SPD consultation report summarises all the responses received and changes subsequently made to the SPD. The full representations received from these bodies and the council's response to them is included within Appendix J of the Blackfriars Road SPD consultation report.</p> <p>The Elephant and Castle SPD was adopted on 20 March 2012 and replaced the Elephant and Castle Enterprise Quarter SPD (2008) and the Walworth Road SPD (2008). The Blackfriars Road SPD will replace the Elephant and Castle SPD/OAPF guidance for the overlapping areas. The SPD has been updated to make this clearer.</p>
1333	1155	Tanya	Heasman		6. Why are hotels being promoted (SPD 3.10) as viable use when Southwark has already achieved or is close to achieving the requirements. The figures for hotel rooms in the SPD make it clear that, of the 2500 bedrooms required by the GLA's Hotel Demand Study 2006 by 2026, all but 75 have either been built or are in the pipeline. Travel	<p>The London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2031. The estimate of the approximate net and gross hotel rooms required over the period 2007-2026 for Southwark, as set out in the GLA's Hotel Demand Study, is based on assessment of factors including transport links to central London and connections to airports, proximity of tourist attractions/business locations, cafes and restaurants in the area, night time economy, cultural facilities and attractions, and regeneration initiatives and site availability. The forecast for Southwark should be treated as indicative only, and local circumstances should also be factored in.</p> <p>It is important to consider that the SPD area is within the Central Activities Zone, Bankside, Borough and London Bridge Opportunity Area and part of the Elephant and Castle Opportunity Area which are areas promoted in the London Plan to accommodate strategically important hotel provision. Arts, cultural and tourism activities have flourished in Southwark in the last decade, particularly in the Strategic Cultural Area, which is within the CAZ. Bankside, Borough and London Bridge has consequently experienced a growth in the number of hotels to support this increasing visitor economy. The SPD2 provides guidance to support Core Strategy policy 10 'Jobs and business' which sets out the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do</p>

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						not harm the local character. Policy 10 and SPD 2 are also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals in the area will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account.
1334	1155	Tanya	Heasman		7. SPD6 gives no specific information as Blackfriars Road falls under the jurisdiction of TfL. Under the Localism Act both TfL and Southwark Council are duty bound to share any consultation information regarding active travel. What plans have been proposed?	<p>The text within SPD 6 has been updated to clarify that Blackfriars Road falls under the jurisdiction of TfL.</p> <p>A consultation report has been prepared summarising responses to the consultation on the draft Blackfriars Road SPD. All responses to the SPD consultation will be published on the Council's website prior to the SPD being taken to Cabinet for adoption TfL have now announced that TfL are proposing to introduce a Cycle Superhighway on Blackfriars Road, with consultation proposed for summer 2014. Results of this consultation would be shared on TfL's website.</p>
1335	1155	Tanya	Heasman		8. Why has West Square Conservation Area not been mentioned in SPD4 and SPD5? The tall buildings proposed affect the setting of this Conservation Area and its Listed Buildings	The West Square conservation area is situated outside the Blackfriars Road SPD area. It would still be considered as a heritage asset in relation to the guidance set out in SPD 3, 4 and 5.
1336	1155	Tanya	Heasman		9. This SPD has 1 Business Space, 2 Mixed Use Town Centre, 3 Public Realm and Open Space, 4 Built Form and Heritage, 5 Building Heights and 6 Active Travel. It does not have a Strategy or Guidance for Housing. Why not?	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards.</p> <p>The vision already refers to housing development. Housing will be encouraged on appropriate sites. In order to make this clearer, we have updated SPD 2: Mixed use town centre to include residential development as one of the uses to be encouraged alongside the provision of a mixture of new town centre uses. The fact box on town centre uses has also been updated in accordance with the National</p>

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						<p>Planning Policy Framework definition to make it clear that residential development is not a main town centre use but it can play an important role in ensuring the vitality of town centres.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>
1337	1155	Tanya	Heasman		<p>The Council's Core Strategy 2010 does not support tall buildings in Blackfriars Road South, as they do not meet the criteria for 'vision vibrancy and life'. Why does the Council's vision now differ from the Core Strategy? In 2012 UNESCO noted in its convention briefing paper that in April 2011 Southwark's Core Strategy "includes an emphasis on heritage assets and revises their approach to tall buildings on the area". Why has the council reneged on this? UNESCO's World Heritage Committee Report June 2012 "notes the intention of Southwark Council to develop a Supplementary Planning document to clarify how and where development can take place and to define building height thresholds so as to inform the appropriateness of subsequent development proposals".</p>	<p>The UNESCO paper relates to the area around London Bridge and the potential impact of tall buildings on the setting of the Tower of London World Heritage Site. The heights proposed in the Blackfriars Road SPD building heights strategy are consistent with Southwark's development plan consisting of the saved Southwark Plan policies, Core Strategy and the London Plan. Our testing shows that the proposed heights would not impact the setting of the Tower of London site. The proposed 70m threshold guidance for the southern of Blackfriars Road responds to the sensitivity to the Palace of Westminster World Heritage site.</p>
1338	1158			CERE P Sampson House, CERE P Ludgate House	<p>Generally, the draft SPD is welcomed as establishing the Borough's vision for the Area, namely potential for intensification, high quality landmark buildings and the strategic provision of offices and housing. Detailed comments are provided below which relate to the need for the Area's designation as an Opportunity Area (OA) to be recognised and, specifically, for residential development to be fully acknowledged as a valuable contributor towards the creation of mixed and sustainable communities.</p>	<p>Noted.</p>

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				& Carlyle Real Estate LLP		
1339	1158			CERE P Sampson House, CERE P Ludgate House & Carlyle Real Estate LLP	Boundaries of the SPD area (page 5) Figure 1 (page 4) notes the location of several Opportunity Areas (OAs) in Southwark, most significantly the Bankside, Borough and London Bridge OA which the whole of the Blackfriars Road SPD Area falls within.	Noted.
1340	1158			CERE P Sampson House, CERE P Ludgate House & Carlyle Real Estate LLP	Figure 2 notes both the Waterloo and Elephant and Castle OAs, however, there is no indication of Bankside, Borough and London Bridge. An OA designation infers that an Area is affected by a number of significant local and regional policies relating to appropriate land uses, development targets and levels of intensive development. This discrepancy should therefore be corrected and the OA designation identified.	Figure 1 shows the location of Blackfriars Road, and illustrates the surrounding opportunity areas at Waterloo and Elephant and Castle. It also shows the Bankside, Borough and London Bridge Opportunity Area. The Blackfriars Road SPD area falls mostly within the Bankside, Borough and London Bridge Opportunity Area with a small part lying within the Elephant and Castle Opportunity Area. This is made clear in the SPD - in figure 1 and in the text. Figure 1 has been updated to show the overlapping boundaries more clearly. Figure 2 simply shows the boundaries of the SPD area. The figure has been updated to remove reference to the opportunity areas to increase the focus on the actual boundary and to avoid any confusion.

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134 1	115 8			CERE P Sampson House, CERE P Ludgate House & Carlyle Real Estate LLP	Bankside and Borough (page 9) "There are development opportunities throughout the area, but the largest developments will be around Blackfriars Road and Bankside" This is in line with the current planning application which seeks to remove existing barriers to the river, improve the relationship between the river and riverside buildings and maximise the significant capacity of this part of the OA for housing and commercial development, improvements to the public realm and access to public transport.	Noted.
134 2	115 8			CERE P Sampson House, CERE P Ludgate House & Carlyle Real Estate LLP	"Blackfriars Road will continue to have a mix of shops, services and offices servicing both a local and wider need." There is no reference to the continued provision of housing here although it is listed as one of the Areas strengths that should be developed on page 7 ("There is scope to develop the strengths of the Area for strategic office provision as well as housing..."). It is suggested that this sentence is amended to include residential uses within the mix of uses at Blackfriars Road. This comment is also made in respect of page 11 where the sentence is repeated.	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards.</p> <p>The vision already refers to housing development. Housing will be encouraged on appropriate sites. In order to make this clearer, we have updated SPD 2: Mixed use town centre to include residential development as one of the uses to be encouraged alongside the provision of a mixture of new town centre uses. The fact box on town centre uses has also been updated in accordance with the National Planning Policy Framework definition to make it clear that residential development is not a main town centre use but it can play an important role in ensuring the vitality of town centres.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary</p>

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						planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.
1343	1158			CERE P Sampson House, CERE P Ludgate House & Carlyle Real Estate LLP	“There will be a range of building heights along Blackfriars Road, with the tallest buildings at the north end of the road, signifying the gateway to Central London and the gateway to Southwark” This aim is supported and it is consistent with other local guidance. The Core Strategy refers to the northern end of Blackfriars Road as an Area where a tall building would be appropriate (Figure 12: Bankside, Borough and London Bridge, page 41) and also confirms the draft Bankside, Borough and London Bridge SPD (2010) which refers to a cluster of tall buildings in this location and the unique opportunity they provide to act as a stimulus for regeneration and boosting the local economy.	Support noted.
1344	1158			CERE P Sampson House, CERE P Ludgate House & Carlyle Real Estate LLP	SPD 1 Business space (page 14) “We will encourage the generation of new jobs and businesses in the Blackfriars Road area to help consolidate and expand the existing business service cluster and reinforce the area as a strategic office employment location” “Requiring existing business floorspace (B1) to be retained or replaced, unless an exception can be demonstrated in accordance with our borough wide employment policies.” Although strategic office uses in Blackfriars Road are supported we object to this policy as it could negatively impact on support for other types of development, namely residential. This draft policy is not reflective of guidance contained in the National Planning Policy Framework, 2012 (NPPF) which states that local planning authorities should normally approve planning applications for change to residential use where there is an identified need for additional housing	<p>We do not consider the proposed change to SPD 1 is appropriate. It is important for the SPD guidance to be read in conjunction with adopted planning policy. The Core Strategy sets out the borough’s strategy for housing and the targets over the plan period, which include the target for the opportunity area.</p> <p>We have amended SPD 2 to make it clear that space for town centre uses should be developed alongside both residential development and also business uses. The requirement to retain or replace existing business space is consistent with borough-wide policies and is justified by the council’s evidence base which points to the need to protect and intensify employment land and business floorspace over the plan period.</p> <p>Core Strategy policy 10 and saved Southwark Plan policy 1.4 require applicants to demonstrate the loss of business floorspace (B1, B2 and B8) against a range of exception criteria where the site falls within a</p>

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					<p>provided that there are not strong economic reasons why such development would be inappropriate (paragraph 51). Subsequently, we do not consider that there are strong economic reasons that indicate residential uses within the Blackfriars Road SPD Area would be inappropriate. The SPD Area also falls within the adopted Central Activities Zone (CAZ) as shown on Figure 1. The associated London Plan CAZ policies simply identify office floorspace as an appropriate land use (policies 2.10, 2.11 and 2.12) do not seek to protect or prioritise it. The London Plan contains housing targets for all boroughs and supports increased housing development across London; Southwark's housing target is to provide 20,050 new dwellings in the period 2011 to 2021 (Table 3.1) particularly in areas with high levels of accessibility. The pressing need for additional housing in London is not acknowledged by this draft policy nor is the general, wider need to create mixed and sustainable communities and deliver a wide range of high quality homes, as per the NPPF. In addition, the Bankside, Borough and London Bridge OA has a target of 1,900 new homes which applies to the whole SPD Area, this is further developed by the London Plan which considers OA targets to be a minimum to be exceeded. The draft policy would therefore be at least inconsistent if not contrary to achieving these targets. It is considered that draft policy SPD 1 unduly constrains the delivery of adopted housing targets and is considered to be contrary to adopted policy. The wording should therefore be amended to acknowledge that the loss of office floorspace is acceptable where it is replaced by residential floorspace, rather than requiring a case to be made against its retention.</p>	<p>range of locations, which include (amongst others) the CAZ. Land outside these locations can be released for other uses. This strategy ensures the retention of existing business floorspace where this is appropriate, to ensure there continues to be space available for established businesses to move into the area and for start up businesses to establish themselves. The council considers that it is reasonable to expect applicants to demonstrate that in the areas where business floorspace is protected that there is a lack of demand or viability, or physical and/or environmental constraints which preclude re-provision or an uplift of employment space (see saved Southwark Plan Policy 1.4). It is considered that this is consistent with paragraphs 21 and 22 of the NPPF. Southwark CAZ was also exempted from the government's recent change to the General Permitted Development Order to allow office buildings to convert to residential. The CAZ has been recognised by the government as being a nationally significant area of economic activity. We also encourage through our planning policies the development of other employment generating town centre uses such as cultural/community, retail and leisure to be provided alongside B1 uses and residential use. Residential development can play an important role in ensuring the vitality of town centres but is not a main town centre use when planning for competitive town centres that provide customer choice and a diverse offer and experience in the context of Southwark's planning policies. We will be considering development site allocations through the preparation of the New Southwark Plan. The SPD identifies possible development opportunities, some of which may be complete redevelopment, and some may be more minor changes or improvements.</p>
1345	1158			CERE P	Fact box: Town centre uses (page 16) "Residential use is appropriate in town centres but is not a town centre	We have amended the fact box to set out further clarification. The definition of town centre uses now reflects the NPPF definition of main

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				Sampson House, CEREP Ludgate House & Carlyle Real Estate LLP	use for the purpose of Southwark's Local Plan." This is not consistent with the NPPF which states that LPA's should "recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites" (paragraph 23); we therefore object to this statement.	town centre uses. We have also made it more clear within the fact box that whilst residential development can play an important role in ensuring the vitality of town centres, is not a main town centre use when planning for competitive town centres which need to provide customer choice and a diverse retail offer and experience in the context of Southwark's Local Plan.
1346	1158			CEREP Sampson House, CEREP Ludgate House & Carlyle Real Estate LLP	SPD 3 Public realm and open space (page 19) "Public realm should: ... Provide and promote new links that are safe, direct and convenient for pedestrians and cyclists...Create environments that are inclusive and follow Secured by Design principles such as ensuring spaces are well lit, overlooked and feel safe at different times of the day and in the evening." This is consistent with the draft Bankside, Borough and London Bridge SPD (February 2010) which states that new development will be complemented by major public realm improvements that include access to and along the riverside and to and from Blackfriars station.	Support noted.
1347	1158			CEREP Sampson House, CEREP	SPD 5 Building heights (page 27) "Buildings which are significantly higher than 50 metres must demonstrate that they contribute positively to London's skyline, when viewed locally and in more distant views, particularly on the river front and that they make exceptional contribution to the regeneration of the area." "All tall buildings over 25 metres / 30 metres	Support noted.

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				Ludgate House & Carlyle Real Estate LLP	must: Demonstrate an exemplary standard of design, provide high quality accommodation which significantly exceeds minimum space standards and promote housing choice by providing a mix of unit types.” Achieving high quality urban design is a key planning objective throughout all levels of policy and a key driver for the current proposals which are located on the riverside and therefore subject to more rigorous standards of design. This objective is therefore supported and the potential for tall building and high quality architecture to act as a catalyst for wider regeneration is recognised.	
1348	1158			CERE P Sampson House, CERE P Ludgate House & Carlyle Real Estate LLP	SPD 5 Building heights (page 28) “In addition to the above criteria, buildings which are significantly higher than 70 metres must: Include a publicly accessible area on upper floors where feasible in the tallest buildings in the north of Blackfriars Road.” This would be overly-prescriptive; in particular there are security issues associated with allowing access to upper floors which require considerable management. The provision of such an area would also impact significantly on the amount of usable floorspace as a result of the need to provide a dedicated core which would unduly constrain the final design. We therefore object to the proposed requirement to provide public areas at upper levels.	This requirement is consistent with London Plan 7.7. The viability and feasibility of a publically accessible space would be assessed at planning application stage. The SPD has been updated to change the word "must" to "should".
1349	1158			CERE P Sampson House, CERE P Ludgate	Building heights (page 29, paragraph 3.33) “The amount of public space at the base of the building should relate to its height” Although there is a relationship between height and the amount of public space at the base of a building this statement is queried because it is also affected by other factors such as the constraints of the site and the context of surrounding buildings and public realm. It is not always	No change. Site context and constraints would be assessed at planning application stage

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				e House & Carlyle Real Estate LLP	possible to provide a significant amount of public space at the base of a building, however, this may be consistent with character of an area or complemented by open spaces available nearby.	
1350	443	Andrew	Richardson	Bankside Residents Forum	The forum is disappointed that consultation on this important document has been timed for the peak summer holiday period and limited to only eight weeks. Notwithstanding:-	A consultation report has prepared alongside the Blackfriars Road SPD. This sets out a summary of the representations received and how we have taken these into account in preparing the final version of the SPD. The appendices also set out all of the representations received and officer comments on how these comments have been taken into account, and whether the SPD has been updated as a result. The SPD was consulted on in accordance with the council's Statement of Community Involvement (SCI) (2008) and exceeded the consultation requirements of both the SCI and the relevant regulations. The consultation report summarises the consultation carried out.
1351	443	Andrew	Richardson	Bankside Residents Forum	1. Quality of Life The SPD area is mixed residential and commercial, with large numbers of visitors at the northern end. The document makes little or no mention of the needs of existing or future residents and barely acknowledges their existence. We do agree that a balanced mix of shops is needed, with a variety of small independent shops to be encouraged. The emphasis on the sitting of tall buildings does not mention factors such as wind tunnels, overshadowing and sound amplification which affect residents both at home and on the street. Visitors are hardly mentioned in the SPD and should be considered as their activities impinge on the life of residents, in terms of numbers and night time activities in particular. There is a particular urgent need for the provision of public toilets and/or a community toilet scheme.	<p>The SPD is intended to benefit a wide range of groups including existing and new residents. The SPD has been updated to make this clearer.</p> <p>The vision has been updated.</p> <p>The SPD has also been updated within the supporting text to SPD 2: Mixed use town centre, that the SPD area is mixed with both commercial and residential development. Support noted re encouraging a mixture of shops.</p> <p>SPD 5: Building heights provides guidance within the criteria for tall buildings, including a bullet point on avoiding harmful microclimate and shadowing effects. Saved Southwark Plan policy 3.2 also ensure adequate protection of amenity. Visitors are mentioned explicitly in the supporting text and guidance in SPD 2 looking at encouraging a mixed use town centre. Saved Southwark Plan policy 1.7: Development</p>

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						within town and local centres already sets the framework to ensure proposals in town centres provide amenities for users of the site such as public toilets, where appropriate.
1352	443	Andrew	Richardson	Bankside Residents Forum	2. Additional pressures? The SPD document speaks at length about increased commercial development, notably B1 office building and of hotels etc on many potential sites but little about the effect of increased numbers of people passing through the area or accessing facilities. It fails to identify sites for the new or enlarged nursery schools, clinics, surgeries, primary schools and other community facilities that will be required to serve the additional business and residential accommodation. We also note the significant amount of un-let office space both locally and in the City, which does not enhance any street or locality.	The SPD supports adopted planning policy and it provides further area guidance to help to deliver and implement the overarching policies. It cannot allocate sites for development. We will be considering development site allocations through the preparation of the New Southwark Plan. The SPD identifies possible development opportunities, some of which may be complete redevelopment, and some may be more minor changes or improvements Policy 14 of the Core Strategy recognises that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. Section 4.4 of the SPD on infrastructure, sets out that much of the funding for infrastructure to support growth will be raised through the Community Infrastructure Levy, and site specific mitigation of development impacts will be secured through section 106 planning obligations.
1353	443	Andrew	Richardson	Bankside Residents Forum	3. Complementing the existing environment? Although the Conservation Areas and listed buildings are shown on the maps the document is weak on identifying and giving protection to historic and architectural buildings, and other structures of quality which give the area its character and interest. The conservation and enhancement of the remaining heritage buildings is not considered. There is no list of buildings of particular interest; we recommend one should be attached to this document. In particular the business uses of the railways arches and as both west-east and north-south routes could be featured much more strongly. The historic environment of St George's Circus is not given due consideration.	SPD4 is read in conjunction with the existing heritage policy framework and designations. Guidance and the identification of buildings will be addressed in a new Heritage SPD that will be prepared alongside the New Southwark Plan.
1354	443	Andrew	Richardson	Bankside Residents Forum	4. Maintenance and management High levels of maintenance and management should be written in to every planning application, especially with regard to design solutions to the noise issues relating to sitting	Saved Southwark Plan policy 3.2 Protection of amenity, sets out that planning permission will not be granted where it would cause loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Further

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				Forum	of proposed housing on major transport routes as well as nuisance and noise arising from refuse collection from and servicing of shops, bars, restaurants, and other lower floor uses.	guidance is also set out in the Residential Design Standards SPD, Sustainable Transport SPD and the Sustainable Design and Construction SPD. Frequently planning conditions or section 106 planning obligations are required as part of a planning permission to ensure minimal impact and where appropriate to ensure construction management plans. The Blackfriars Road SPD also refers directly to requiring construction management plans in section 4.
1355	443	Andrew	Richardson	Bankside Residents Forum	5. Long term benefit for Bankside? In the long term Bankside should continue to have a mixed residential community, with all types of housing provision available to support community life and activity. The current proposals, while aspiring to build 1500 homes, make no mention of the provision of affordable housing to ensure a social mix of people, including the children of existing families who wish to continue to live and work in their home area.	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents.. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. Existing policies and guidance provide clear policies for affordable housing.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>
1356	443	Andrew	Richardson	Bankside Residents Forum	6. Relationship to higher level planning documents. Planning and planning policy documents are understood to proceed from the general to the particular, for obvious and sound reasons, and the higher level document takes precedence over the lower level one, which should confine itself to more detailed policy within the framework of higher level one. The legal standing of this SPD document is therefore unclear to us. We look forward to contributing to many aspects of the new Southwark Plan in due course.	<p>Figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and neighbourhood plans. The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>
135	443	Andrew	Richard	Banksi	7. General Development is, by its nature, largely	Noted. One of the key purposes of the SPD, as set out within the SPD

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7			son	de Residents Forum	piecemeal, but there is a strong feeling that there could be more “working together” by those involved in development, and approval of it, to produce an improved living and working environment in the area. Anything that the plan and planners can do to encourage this would be welcome.	is to provide a strategic framework and detailed guidance to coordinate future growth.
1358	443	Andrew	Richardson	Bankside Residents Forum	8. Blackfriars Road There is no detail relating to the plans for Blackfriars Road itself and the key objectives for it are not spelled out in the plan.	The SPD has been updated within the vision and SPD 6: Active travel to refer to the council working with Transport for London to deliver a segregated cycle route along Blackfriars Road. At the time of preparing this SPD there is not further detail as yet to include in the SPD as plans are still being drawn up by TfL.
1359	443	Andrew	Richardson	Bankside Residents Forum	Detailed Comments: Section 2: Vision for Blackfriars Road p.7, Para. 2.15 states that “fig. 4 illustrates the core strategy vision developed in consultation”. This shows the “main focus of development” ending just south of the Stamford St./ Southwark Street/ Blackfriars Rd. junction and not extending further south as is now proposed in this document. An extension of tall buildings south of this area is contrary to the policy that is the outcome of relatively recent consultation, thus undermining the confidence in consultation by the council.	With regards to consultation, a consultation report has prepared alongside the Blackfriars Road SPD. This sets out a summary of the representations received and how we have taken these into account in preparing the final version of the SPD. The appendices also set out all of the representations received and officer comments on how this comments have been taken into account, and whether the SPD has been updated as a result. Both the London Plan and the Core Strategy identify Bankside, Borough and London Bridge, and Elephant and Castle opportunity areas as areas for change and development. The Core Strategy sets out that both the opportunity areas are growth areas. The whole of the Blackfriars Road SPD area lies within these opportunity areas and is already identified as a growth area and area for change and development. For clarification, figure 4, the Core Strategy vision has been removed from the SPD.
1360	443	Andrew	Richardson	Bankside Residents Forum	The present site of high buildings at these junctions (and at the Elephant & Castle) has a certain rationale in that they are significant bus and rail/tube junctions, but high building at St. George’s Circus, as envisaged in p.11, para.2 does not have this justification. It is also contrary to the sentiments expressed in p.25, para.3.29 regarding the setting of nearby listed buildings and conservation areas.	A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies

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						<p>specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>
136 1	443	Andrew	Richardson	Bankside Residents Forum	<p>P.8 The current vision of providing "over 1,900 new homes, 665 affordable housing units and around 25,000 new jobs" in the Bankside, Borough and London Bridge opportunity area is welcome. Realization of the affordable homes element is of crucial importance to the viability, vitality and safety of this mixed community but this commitment to affordable housing and hence to a viable mixed community does not appear to be carried through to the draft SPD in any significant way.</p>	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents.. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. Existing policies and guidance provide clear policies for affordable housing.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>
136 2	443	Andrew	Richardson	Bankside Residents Forum	<p>We are concerned that the Council's Affordable Housing policy already has little credibility in Bankside so offers no reassurance, especially since hotels, commercial, offices, retail, student accommodation (which impact on residential provision) ARE all mentioned in the SPD. If this is to be a mixed and sustainable community, residential provision, including affordable, needs to be actively written in.</p>	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. Existing policies and guidance provide clear policies for affordable housing.</p>

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						There is nothing additional that needs further specific guidance for Blackfriars Road in relation to affordable housing. We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.
1363	443	Andrew	Richardson	Bankside Residents Forum	Inner London is about half the residential density of Paris or New York and there is scope for a considerable increase in the SDP area. However the lessons from demolished 60's tower blocks are that all new accommodation needs to be built to high space and construction standards and must be appropriate for those who are to live in them.	Noted. Existing policies in the Core Strategy set out the approach to density. The Central Activities Zone is one of the areas where a higher level of density may be permitted if the development is of an exemplary design and provides excellent living accommodation.
1364	443	Andrew	Richardson	Bankside Residents Forum	The bottom of p.8 states that Southwark "are working with landowners, Better Bankside and Cross River Partnership to enhance the area's mix of culture, history and business in a way that is sensitive to it's resident communities", but there is no mention of resident involvement. How are their views and needs to be expressed and fully taken into account?	Section 4 of the SPD on implementation highlights the importance of working with all our partners including residents and the local community. It refers specifically to continuing to engage with the local community and residents, and also refers to continuing to engage with many groups and key stakeholders as well as look at opportunities for engagement with other groups and residents. Furthermore, a consultation report has prepared alongside the Blackfriars Road SPD. This sets out a summary of the representations received and how we have taken these into account in preparing the final version of the SPD. The appendices also set out all of the representations received and officer comments on how these comments have been taken into account, and whether the SPD has been updated as a result.
1365	443	Andrew	Richardson	Bankside Residents Forum	Under the heading "emerging ideas for a vision for Blackfriars Road, p.11, Para 2 states "development will be of exceptional design and will enhance the local character, sustain and enhance the local environment". However, "exceptional design" is not defined and tall buildings, as proposed at St. George's Circus will have the opposite effect, diminishing the	Exemplary design is already covered in adopted planning policy documents and there is no need to repeat existing borough-wide policy and guidance. Overarching design policies in the Core Strategy and the saved Southwark Plan require high quality design. Existing guidance in section 2.2 of the council's Residential Design Standards SPD sets out the criteria for a development to be considered as being of exemplary standard of design It includes criteria such as "make a

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					nearby conservation areas and listed buildings. Out of city centre office blocks and hotels are often bland and lacking in quality and a wall of glass clad buildings of similar age and style of the kind currently emerging along Blackfriars Road will not “enhance the local character” or “the local environment” as stated.	positive contribution to local context, character and communities, including contributing to the streetscape”. SPD 5 of the Blackfriars Road SPD has been updated to make it clearer the a taller building could be at the southern end of Blackfriars Road. Wording has also been updated to refer specifically to the heritage assets and their settings.
1366	443	Andrew	Richardson	Bankside Residents Forum	Identity can be preserved and created by a good mix of new and old, but consent for destruction of buildings such as the Paper Moon pub, recently demolished near Christ Church, detracts from a street that has all too few such buildings of character and replaces them with new buildings all of one era, with no links to the past and that generally look just like new buildings anywhere else. (This is contrary to the sentiments expressed in p.25, Para. 3.29 on.) Emerson Studios in Emerson St., the S.E Railway Offices in Tooley St. and a number of other cases illustrate the same lack of adequate application of this principle elsewhere in the borough.	The SPD provides guidance on heritage assets and would be read in conjunction with the existing heritage policy framework and designations.
1367	443	Andrew	Richardson	Bankside Residents Forum	Section 3: Strategies & guidance. SPD1: Business Space. p.15, Para. 3.6. The railway arches are a heritage asset to the area as well as a venue for small business. Well and sensitively developed they can provide a wide variety of business space readily accessible to the public and of general benefit in the area too. The space in front of them has the potential to create an attractive and relatively safe route-way for pedestrians and cyclists throughout the area.	Noted. The SPD encourages the sensitive reuse of the railway arches and public realm improvements in and around them.
1368	443	Andrew	Richardson	Bankside Residents Forum	A route-way from the City over a new bridge using the piers of the old London Chatham and Dover Railway bridge and then continuing south to cross Union Street, from which an identifiable route exists all the way to the Elephant & Castle (and beyond) appears achievable using land primarily providing service access space for maintenance of the railway viaducts.	The SPD sets out a vision for the area. The council will continue to work with TFL, and developers and land owners to improve walking and cycling routes in the area and this is set out in SPD 6 with aspirations for improved routes and links in the figure. The SPD is not the appropriate document to set out the precise detail on how this will be achieved and thus sets out overarching ideas to ensure any future design options are not ruled out such as this.

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					This should form part of the vision for the area and be incorporated in the SPD as a long-term aspiration.	
1369	443	Andrew	Richardson	Bankside Residents Forum	Affordable business space is needed and should be provided in new development if local employment and amenities are to be protected. If local businesses are displaced, new development should be required to provide affordable accommodation for them so that they are not lost to the area.	In line with the Core Strategy Policy 10 'Jobs and Business', SPD 1 encourages the provision of flexibly designed new business floorspace in a range of unit sizes to cater for different sized businesses. This includes small office/studio/workshop business space. The SPD also repeats the requirement set out in borough-wide policy for the retention or replacement of existing business space in developments to meet the needs of the SE1 office market. There is no particular evidence that subsidised business space is required at the moment. We have inserted additional text to bullet 1 of SPD1 to set out that we will encourage the provision of small and start-up businesses in the area.
1370	443	Andrew	Richardson	Bankside Residents Forum	SPD 2, Mixed use town centre. Page 16 refers to "town centres". (Is Blackfriars Road really defined as a town centre?) The "fact box" states that "residential use is appropriate in town centres but is not a town centre use for the purposes of Southwark's local plan". However, p.11, para.1 says "there will be many new houses on the upper floors of commercial developments offering a range of housing types and sizes" yet the following SPD2 makes no mention of housing.	The Blackfriars Road SPD area is located within the Borough, Bankside and London Bridge district town centre, which is identified in the Core Strategy and on our adopted policies map. We have amended SPD 2 to make it clear that space for town centre uses should be developed alongside both residential development and also business uses. We have amended the fact box to set out further clarification on town centre uses. The definition of town centre uses now mirrors the NPPF definition of main town centre uses. We have also made clearer that whilst residential development can play an important role in ensuring the vitality of town centres, is not a main town centre use when planning for competitive town centres which need to provide customer choice and a diverse retail offer and experience in the context of Southwark's Local Plan.
1371	443	Andrew	Richardson	Bankside Residents Forum	Rather SPD 2 says it will support "proposals for hotels and other visitor accommodation (C1), however, P.17, para 3.10 says the recent provision has already met the GLA (2006) study requirement for hotel bedrooms to 2026. Para. 3.11 says "we will support new high quality hotels" but the transport, parking and loading and unloading implications of this are not addressed. The area has already reached the local quota on new hotel beds. Residents would like to see more benefits	The London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2031. The estimate of the approximate net and gross hotel rooms required over the period 2007-2026 for Southwark, as set out in the GLA's Hotel Demand Study, is based on assessment of factors including transport links to central London and connections to airports, proximity of tourist attractions/business locations, cafes and restaurants in the area, night time economy, cultural facilities and attractions, and regeneration initiatives and site availability. The forecast for Southwark should be treated as indicative only, and local

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					<p>from any new hotels, including a 'local' rate for visitors to residents, and negotiated use of sport or gym facilities for local people. If housing on upper floors of commercial properties is to form part of the plan, future re-development needs to be considered as housing over offices may pose redevelopment problems in the future as, based on post war experience, good housing will usually have a significantly longer life than office buildings.</p>	<p>circumstances should also be factored in.</p> <p>It is important to consider that the SPD area is within the Central Activities Zone, Bankside, Borough and London Bridge Opportunity Area and part of the Elephant and Castle Opportunity Area which are areas promoted in the London Plan to accommodate strategically important hotel provision. Arts, cultural and tourism activities have flourished in Southwark in the last decade, particularly in the Strategic Cultural Area, which is within the CAZ. Bankside, Borough and London Bridge has consequently experienced a growth in the number of hotels to support this increasing visitor economy. The SPD guidance needs to be read in conjunction with borough-wide adopted policies in the Core Strategy and saved Southwark Plan. SPD2 provides guidance to support Core Strategy policy 10 'Jobs and business' which sets out that the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. Policy 10 and SPD 2 are also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals in the area will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account. SPD2 and the supporting text sets out that proposals for hotels should seek to include ancillary facilities which can encourage the wider use of the building to benefit the local community and passing public. The SPD also sets out guidance on the built form, which includes guidance for development to reinforce the civic scale along the main routes by incorporating flexibility in the design of non-residential buildings which permit adaptability for multiple uses, and applying inclusive design principles for all building and spaces. These guidelines will help to ensure that mixed use development can make a positive contribution to the local character and distinctiveness of the area.</p>
137 2	443	Andrew	Richardson	Bankside Reside	All new housing should meet good space standards, be of good quality materials and design and, if on upper floors, should adequately address the need for	Noted. The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read

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				nts Forum	alternative lift access in the event of lift failure. It should also provide design solutions to the noise issues of location on major transport routes as well as nuisance and noise arising from refuse collection from and servicing of shops, bars, restaurants, shops and other lower floor uses.	alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. These existing policies and guidance include requirements such as minimum space standards. Existing policy documents also deal with requiring high quality design and to address potential issues such as noise specifically saved Southwark Plan policy 3.2: Protection of amenity as well as guidance in the Residential Design Standards SPD, Sustainable Design and Construction SPD and Sustainable Transport SPD.
1373	443	Andrew	Richardson	Bankside Residents Forum	p18, 3.14 says "New housing and business floor space will also increase the resident and working population and it is important to see that infrastructure is in place to support the community". However, the plan does not identify sites for the new or enlarged clinics, surgeries, nursery schools, primary schools, play areas, parks and other community facilities that will become necessary in the significantly enlarged community. Sites need to be identified and safeguarded if they are to be conveniently sited to meet future users' needs.	<p>The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development. Updates have been made to the SPD to refer more to other uses including health and community facilities.</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4.4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in</p>

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						the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to be provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.
1374	443	Andrew	Richardson	Bankside Residents Forum	The recent spate of new hotels and aspirations in the SPD p.18, para.3.13, for more on Blackfriars Road all signal growth of a night-time economy. The implications of controlling and servicing this need to be addressed, paying particular attention to noise nuisance to nearby residents and control of drunkenness etc. (The area is already designated an alcohol control zone because of past problems, but this is not acknowledged in the plan) The provision of 24 hour wc's needs to be addressed and provided for if this part of the plan is to remain.	We have amended the SPD to include reference to the Borough and Bankside licensing saturation area, which is a local policy that addresses the cumulative impact of licensed premises. All applications for new or varied premises licences for night-clubs, public houses and bars, restaurants and cafes, off-licences, supermarkets and grocers need to address the saturation concerns set out in the council's licensing policy within the premises operating schedule. Our saved Southwark plan policy 1.7 on town centre development requires proposals to provide amenities for users of the site such as public toilets, where appropriate.
1375	443	Andrew	Richardson	Bankside Residents Forum	The plan should address the need for shops to be spread around the area. The tendency for supermarkets to group in one area with nothing in another does not recognize that residents are spread throughout the SPD area and look for everyday needs shops to be reasonably close at hand. After a dearth of supermarkets of any size, there are now too many of the same kind.	SPD2 already promotes the development of a much wider mix of town centre uses alongside business and residential. This should include a range of different types and sizes of retailers, to help boost the local economy by generating additional spending and inward investment in other businesses and providing an increased number of employment opportunities. The SPD cannot designate land use on development sites, however we will consider the range of uses that would be appropriate for allocated development sites through the preparation of the New Southwark Plan and its accompanying adopted policies map.
137	443	Andrew	Richard	Banksi	SPD 3, Public realm and open space. The proposed	Noted.

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6			son	de Residents Forum	widening of footpaths, boulevard tree planting, and increased road frontage activity is welcome, together with the introduction of cycle lanes and the resultant narrowing of the main carriageway. Good landscaped spaces, comparable with e.g. the City's high quality small parks, are important too. 'Open Space' should be 'open' and not overshadowed by neighbouring tall buildings.	
1377	443	Andrew	Richardson	Banksi de Residents Forum	Larger schemes should be required to provide some genuine new, attractive and useful public open space as part of the development.	Noted. This guidance is set out in SPD 3.
1378	443	Andrew	Richardson	Banksi de Residents Forum	The idea proposed in p23, fig. 6 of a "green route" down Blackfriars Road is stretching the term too far for a route-way that is (appropriately) described in p.31, para. 3.36 as "part of the A201, a strategic N/S corridor between the Elephant & Castle in the south and King's Cross in the north, and is strategically important for busses, freight, pedestrians and cyclists."	Our Open Space Strategy(2013) identifies how links between open spaces can have a variety of different functions and characteristics depending on their size and location. Different types of green links can include: <ul style="list-style-type: none"> • Green links - these are links which join one green space to another by extending the amount of green between the two. These can form pedestrian pathways and woodland edges. These links can improve biodiversity by providing habitats and enabling wildlife to move between open spaces. • Quiet green routes – these are links which are lightly trafficked roads and streets used by cyclists with trees and other planting designed to slow car traffic and to improve and green the overall environment. Creating them can involve widening or building out pavements or planting more trees and other forms of greenery. • Greened main roads - these are links that are often already heavily planted with mature trees. In many cases this planting is part of the historic townscape which contributes significantly to their character and reinforces the perception of them as pleasant and attractive routes. The idea of promoting a "green route" along Blackfriars Road would be more in line with the concept of a greened main road as identified above.
1379	443	Andrew	Richardson	Banksi de Residents Forum	P.20, last para. includes an aim to "enhance the setting of the conservation area, listed buildings and the listed obelisk." This will not be achieved by	A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that

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				nts Forum	allowing tall buildings in this part of the SPD area. Rather the possibility of altering the gyratory traffic pattern to allow the circus to be attached to the adjoining proposed large development site to the south west should be pursued and the opportunity taken to enable the circus to become part of a safely accessed high quality pocket park extending into the adjoining development site. (Similar ideas have been pursued elsewhere, most notably in Trafalgar Square and are being considered on the A1 at Highbury Corner and Highgate roundabouts.)	<p>includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets. With regards to the gyratory, we will continue to work with TfL on improving the traffic management within the area.</p>
1380	443	Andrew	Richardson	Bankside Residents Forum	P.21 para 3.20 states "We will... encourage the introduction of activity and movement under and around the area's railway viaduct arches so that there are more vibrant places for people and businesses to use". As mentioned above, this could best be achieved by a policy of opening up these largely continuous routes along one side of these arches to create a safe and attractive landscaped pedestrian cycle route from the river, beside the new Blackfriars station Bankside entrance, crossing Union Street and continuing to the Elephant & Castle (and beyond). This would intersect with a similar east-west route from London Bridge to Waterloo (the "Low-Line") now emerging as part of the Bankside Neighbourhood Plan. Fig.6, p.23 should be developed to include these through railway side routes as "proposed and improved pedestrian links" and "cycle links".	The council will work with Network Rail and landowners to improve the permeability of the area and open up routes where feasible. We have received confirmation that network rail support proposals for the Low Line and a north south link also.
138	443	Andrew	Richard	Banksi	P.22, para. 3.22. An increase in the public realm and	Guidance for new public spaces and improved public realm is set out

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1			son	de Residents Forum	(where appropriate and useful) existing open spaces, should be traded with developers as a quid pro quo for any beneficial change of use or increased height and density granted to them by a planning consent. The area is short of open space and where it is achieved the plan should require it to be of the sort of high design and quality found in the many City of London parks.	in SPD 3. Our Open Space Strategy (2013) has identified a deficiency in open spaces within then area; however given the limited opportunities for the creation of opens, our priority is to focus on improving out existing open spaces. We will seek to provide new open space and greening as set in the strategy. A new paragraph has been added to SPD 3 "we are doing this because" to provide further background on the Open Spaces Strategy recommendations.
138 2	443	Andrew	Richardson	Banksi de Residents Forum	The designation of SLOAP (space left over after planning) as public open space, to be maintained at public expense but of very little use to it, should be avoided.	Our Open Space Strategy (2013) has identified a deficiency in open spaces within then area; however given the limited opportunities for the creation of opens, our priority is to focus on improving out existing open spaces. We will seek to provide new open space and greening as set in the strategy. New open spaces cannot be designated through an SPD. This may addressed through the new Southwark Plan. A new paragraph has been added to SPD 3 "we are doing this because" to provide further background on the Open Spaces Strategy recommendations.
138 3	443	Andrew	Richardson	Banksi de Residents Forum	The plan's mention of linking safe green routes through the area is welcomed, but more needs to be said to define where these might be and what they might link.	Indicative green links have been identified through the borough, our Open Space Strategy sets out further detail on the different types and characteristics of green links that may be encourages within the borough. This could include safe green routes between existing open spaces and key destinations. A new paragraph has been added to SPD 3 "we are doing this because" to provide further background on the Open Spaces Strategy recommendations.
138 4	443	Andrew	Richardson	Banksi de Residents Forum	There needs to be more consideration of the way in which pedestrians currently cross Blackfriars Road and making these safer with controlled crossings, zebra crossings or central refuges as appropriate eg at the Burrell Street/Colombo Street crossing point.	Noted. The council will work with TfL to ensure Blackfriars Road is safe for all users. SPD 6: Active travel has been updated to refer to TfL's proposals for a segregated cycle lane on Blackfriars Road.
138 5	443	Andrew	Richardson	Banksi de Residents Forum	It would be helpful if the SPD included a plan showing the extent of Council owned land.	It is not appropriate to include a figure on council ownership within a planning document.
138	443	Andrew	Richard	Banksi	SPD4, Built form and heritage. Good public realm is	SPD 4 is read in conjunction with the existing heritage policy

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6			son	de Residents Forum	achieved by more than good urban landscape treatment of the space between buildings. It is important to keep good old buildings of character and ones associated with the history of the area as well as to achieve good quality, well-designed new development. It is generally the older buildings and structures that give an area it's unique character and sense of continuity and history, and this is particularly true of the Bankside area. Loss of buildings such as the Paper Moon pub, the S.E. railway offices in Tooley Street and the pending loss of Emerson Street Studios, among others, diminish the unique character of the area. There are all too few such buildings in the Blackfriars Road SPD area and those that still exist need to be identified, protected and retained. 169-172 Blackfriars Road, also now under threat, is a short run of characterful period buildings incorporating useful shops for local people of the kind that the road needs to keep amongst the new development if it is not to lose its sense of place and history and it's unique character. No 169 could readily take a mansard type extra storey.	framework and designations. Appendix A has been added to the SPD to cross refer to the key policies in the Core Strategy and saved Southwark Plan. Guidance and the identification of buildings will be addressed in a new Heritage SPD that will be prepared alongside the New Southwark Plan.
1387	443	Andrew	Richardson	Bankside Residents Forum	The area is rich in social history and industrial archaeology and its character largely stems from this. (The Temperance Society Building is just one example) This should be appreciated and acknowledged by the plan and policies for protecting it should be given greater weight and prominence.	SPD 4 is read in conjunction with the existing heritage policy framework, the characterisation study and designations. Appendix A has been added to the SPD to cross refer to the key policies in the Core Strategy and saved Southwark Plan. Guidance and the identification of buildings will be addressed in a new Heritage SPD that will be prepared alongside the New Southwark Plan.
1388	443	Andrew	Richardson	Bankside Residents Forum	The inclusion of buildings shown on the policy map Fig 7 as "buildings of townscape merit or heritage value outside of conservation areas" should be enough to result in their retention within new surrounding development. All such buildings in the area should be identified and shown on the policy map and, where close to nearby conservation areas, these should be	SPD 4 is read in conjunction with the existing heritage policy framework, the characterisation study and designations. Appendix A has been added to the SPD to cross refer to the key policies in the Core Strategy and saved Southwark Plan. Guidance and the identification of buildings and conservations areas will be addressed in a new Heritage SPD that will be prepared alongside the New Southwark Plan.

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					extended to accommodate them as was recently (2012) done with Valentine's Place CA. Where groups of listed buildings such as the Peabody Estate, at the south end of Blackfriars Road, exist, a conservation area should also be created there and include near-by buildings of townscape merit or heritage value.	
1389	443	Andrew	Richardson	Bankside Residents Forum	Fig. 7 p.26 is worryingly misleading. It is an out of date map that fails to show the Valentine's Place area as a conservation area. This was designated in 2012. It is vital that it is shown as such on this map as this designation should give the protection needed to the number of buildings of character and merit there.	Noted. The figure has been updated.
1390	443	Andrew	Richardson	Bankside Residents Forum	The Colorama buildings, in Lancaster Street, are of some merit and character but are already approved for demolition. However, the buildings at the north end of nearby Boyfield Street and Silex Street are listed and those continuing the terrace to the south, on the east side of Silex Street should be included as "of merit" in the fig.7 map.	Guidance and the identification of buildings and conservations areas will be addressed in a new Heritage SPD that will be prepared alongside the New Southwark Plan.
1391	443	Andrew	Richardson	Bankside Residents Forum	The possibility of adding the buildings "of merit" in fig.7 on King James Street and between Lancaster Street and Borough Road into an extended St. George's Circus conservation area should be considered.	Guidance and the identification of buildings and conservations areas will be addressed in a new Heritage SPD that will be prepared alongside the New Southwark Plan.
1392	443	Andrew	Richardson	Bankside Residents Forum	It is not just characterful, good or historic buildings that need to be identified and protected but also passageways, yards and other, sometimes hidden, spaces too. The approach to re-development of the area should be based on the models provided in other successful urban areas with distinctive local character derived from their history and existing period architecture, such as Covent Garden, King's Cross and York Way, Islington.	Guidance and the identification of buildings and conservations areas will be addressed in a new Heritage SPD that will be prepared alongside the New Southwark Plan.
1393	443	Andrew	Richardson	Bankside	P.24, Penultimate bullet point, lines 2&3. The comments above relating to P.21 para 3.20 are also	Noted. SPD 3 provides guidance for public realm opportunities in and around the viaducts, while the guidance set out in SPD 1, 2 and 4 also

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				Residents Forum	relevant here. The railway viaducts in the SPD area are an important part of the district's character and heritage and offer the chance of developing linear strips and route-ways of real character with a great variety of small business, retail, recreation and community accommodation etc. making use of the spaces beneath the viaduct arches. The railway's viaduct structures in the area have, hitherto, largely been seen as an unsightly disadvantage and buildings have turned their backs on them and the intervening space has often become unsightly and ill cared for. However, if opened up, with imaginative development and respect for the dramatic, sometimes multi-level, Victorian engineering structures, they could provide great opportunities for the whole district and contribute to the plan's aim of attracting people south from the more popular areas around the river.	applies.
1394	443	Andrew	Richardson	Bankside Residents Forum	The triangular space accessed from Great Suffolk Street and at the multi-level junction of the E-W and N-S high level "Low-Line" routes (and hence at the node points of the potential pedestrian/ cycle routes proposed elsewhere in this document) has huge potential as an urban space of enormous character. It and the vaulted areas across the street (just outside the SPD area) have the potential to match spaces like Birmingham's Gas Street Basin, the Covent Garden Market building, parts of the new emerging King's Cross and other industrial heritage sites as a great and vibrant urban space. It is not difficult to imagine it, for instance as a Camden Market, south of the river!	The SPD cannot include this level of detail, however the aspiration is noted and would be included under the guidance in SPD 3.
1395	443	Andrew	Richardson	Bankside Residents Forum	The general tenor of paras. 3.26 to 3.29 indicate that there is a significant difference between the type of development appropriate at the north end as opposed to the south end of Blackfriars Road: but this is at variance with other parts of the SPD that envisage a	SPD5 sets out guidance building heights and should be read alongside guidance in the rest of the SPD. As set out in the SPD, it is appropriate for the highest building heights to be located at the northern end of Blackfriars Road. The guidance in SPD 3 seeks a cohesive approach to the public realm to ensure an improved

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					similar treatment for the length of the road and tall buildings at it's major junctions, including at St. George's Circus. The changing character of the road and it's distance from the real commercial centres/ transport nodes are currently not recognized by the plan which appears to see the entire road as susceptible to the same general treatment and planning approach, perhaps all the way to the Elephant & Castle, despite the huge differences of the various parts of the route and the areas behind.	pedestrian experience along the length of the road.
1396	443	Andrew	Richardson	Bankside Residents Forum	SPD5, Building heights. P.27 states "A tall building of a height of up to 70m [c.21 storeys] should provide a focal point at St George's Circus." There is an obvious and established planning rationale in locating tall buildings close to significant bus and rail/tube junctions, but St. George's Circus does not have this justification. There is also a widespread acceptance that tall buildings are best in groups (as in the City, Canary Wharf, and proposed at the north end of Blackfriars Road and at Waterloo) rather than in isolation (as Centrepoint at Tottenham Court Road or, as is currently (temporarily) the case, at the Elephant & Castle).	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>
1397	443	Andrew	Richardson	Bankside Residents Forum	BRF members fear that the council has in mind that a group of tall buildings might also be erected on the present Bakerloo sidings site, though no mention is made in the plan of what development might be appropriate there. The plan should address the issue. A group of towers at St George's Circus would not be appropriate. It is not a transport interchange and the	A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD

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					<p>construction of any high buildings in this area would diminish and detract from the setting of the adjoining listed buildings and the buildings in the nearby conservation areas. It does not need a high building to give it identity: this is already achieved by the circus and obelisk. It is these features that should be enhanced. The only principle that is offered about marking nodes with tall buildings has not justified on architectural, public realm or even convenience grounds; BRF strongly suspects this principle is just a current planning fad. Why does a node need marking by a tall building? We have observed over the last few years of regeneration that when a tall building is given planning permission, a new benchmark is set for building heights in the vicinity. This is a further cause for concern at both Southwark tube and St George's Circus. The proposal for a single tower at Southwark Tube station is undesirable for the same reasons, though it does have the justification of being a significant transport interchange</p>	<p>provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.</p> <p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p>
1398	443	Andrew	Richardson	Banksi de Residents Forum	<p>P.27, final para. All new housing should include its full percentage of social housing. The area currently has a mixed community and it is important that this remains the case for social stability and for accommodating employees for vital public services in the area.</p>	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing</p>

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						<p>and residential design standards. Existing policies and guidance provide clear policies for affordable housing.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>
1399	443	Andrew	Richardson	Bankside Residents Forum	<p>P.28 para. 3.30 & 31 state that the London Plan and Core Strategy policy 12 say that tall buildings may be appropriate at the north end of Blackfriars Road. By implication, therefore, they are not appropriate at the south end, at St. George's Circus, and perhaps at The Cut/Union Street junction area, yet the draft SPD seeks to promote tall buildings in these areas on the basis that it will give the area identity. It might, but not in a desirable way or one that would preserve or enhance the character of the adjoining conservation areas, neighbouring listed buildings or the listed obelisk monument. The circus is also cited as a transport node but it is served by busses only and is in no way comparable with Waterloo, London Bridge, the Elephant and Castle or even the junction of Blackfriars Road with Stamford Street/Southwark Street.</p>	<p>The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area.</p> <p>In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>The GLA's representation also confirms that the Mayor supports the council's approach on tall buildings, but suggests that the SPD should be more flexible in relation to building heights, and that buildings 'in the region' of 70/30m would be appropriate. The council disagrees with this proposed amendment as it could allow buildings that are greater than the 70m/30m threshold, which would be considered inappropriate based on our evidence base. As such, the council considers SPD5 to balance local character and development potential</p>
1400	443	Andrew	Richardson	Bankside Residents Forum	<p>It is understood that the evidence basis for other policies has been prepared by outside consultants, whilst that for tall buildings has been done in-house. We believe the resultant lack of independent view gives the outcome less credibility.</p>	<p>The council's evidence base for its planning policies and planning guidance comes from a wide range of sources. Some is prepared internally, some is prepared by consultants on behalf of the council, and some is information obtained from other sources such as the Census. In the case of this SPD with reference to tall buildings, the characterisation study has been prepared by external consultants and</p>

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						the urban design study has been prepared in house.
1401	443	Andrew	Richardson	Bankside Residents Forum	SPD 6. Active travel. Presumably the plan is thin in this area because the road is controlled by TfL. Rather than separate a cycle lane (or lanes) by a white line or unsightly upstanding kerb (as on Southwark Bridge) a slightly raised shrub planting border, with periodic gaps for pedestrian crossing, would reduce the excessive width given over to traffic, add to the "greening" of the road, better separate the uses, appear less temporary, increase safety and generally contribute to humanizing" the road. (A similar idea is currently being implemented by Camden but uses rather insubstantial raised planting boxes (watering and maintenance of which will be more difficult). Notwithstanding, aspirations for the public realm are included earlier in the plan and the illustration on the cover shows a (perhaps rather optimistic) view of the road in the future. The plan should go further and address issues such as "floating" bus stops, pedestrian crossings, parking, widened pavements, mature tree planting (and their maintenance) and the need for a cycle lane on each side of the road. The need for better provision for safe pedestrian crossing is important and greatest towards the busier northern end of the road.	Since the publication of the draft SPD it has been announced that TfL are proposing to introduce a North South Cycle Superhighway along Blackfriars Road linking up to Kings Cross and Elephant and Castle. TfL are the Highway Authority for Blackfriars Road however the council support TfL's proposals and the SPD text has been updated to refer to this. We will work in partnership with TfL to ensure a holistic approach when developing designs for the cycle superhighway to ensure they balance the needs of all users and improve conditions and facilities for pedestrians.
1402	443	Andrew	Richardson	Bankside Residents Forum	Many cyclists and pedestrians prefer to use smaller scale, quieter, routes away from major roads where these are available and where they do not involve any significantly greater travel distances. This should be reflected in the plan's vision and proposals.	This is recognised and the council is working on routes for quieter streets. The key indicative potential connections are shown in the figure.
1403	443	Andrew	Richardson	Bankside Residents Forum	Traffic speeds and pedestrian and cyclist safety around St. George's Circus and at the major junctions needs to be flagged up as deserving particular attention by TfL in conjunction with Southwark.	Noted. The council will continue to work with both TfL and the police to ensure roads in the borough are safe for all users.

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1404	443	Andrew	Richardson	Bankside Residents Forum	<p>P.31. Comments on SPD3, p.21 para. 3.20 are again relevant to this section too. They refer to the potential for use of the existing and largely continuous routes along one side of the railway viaducts to create a safe and attractive landscaped pedestrian cycle route from the river, beside the new Blackfriars station Bankside entrance, and Union Street to the Elephant & Castle (and beyond). This would intersect with a similar east-west route from London Bridge to Waterloo (the "Low-Line") which forms part of the emerging Bankside Neighbourhood Plan. These routes provide a potential safer, quieter and healthier pedestrian and cycle route north-south and east-west across the entire SDP area and should be incorporated in the plan as a long-term aim to be achieved incrementally. Access routes are generally available on both sides of the viaducts and one side should be designated for vehicle access and servicing whilst the other provides a landscaped pedestrian/ cycle route. Development by Network Rail has impacted heavily on the area in recent years and continues to do so, particularly now at London Bridge station where change and disruption is huge. Consents for change of use and development of arches to more lucrative uses are being granted too. The community deserves a substantial quid pro quo for this development. Making the routes along one side of their viaducts available for use as pedestrian cycle routes (leaving the other side to provide vehicle access to the arches beneath) would be an appropriate gesture and would surely have long term advantages for Network Rail too.</p>	<p>The SPD sets out ideas for an emerging vision for the area. The council will continue to work with developers and land owners, including Network Rail to improve walking and cycling routes in the area and this is set out in SPD 6 with aspirations for improved routes and links in the relevant figure. The SPD does not set out how all the detail of how this will be achieved. This ensures that any future design options are not ruled out.</p>
1405	443	Andrew	Richardson	Bankside Residents Forum	<p>4. Implementation. P.33 para. 4.3.1. There may have been 300 new homes built in the last few years, but few, if any, have provided social housing. A proper mix of accommodation is necessary in the area if a safe and viable business and residential community is to be</p>	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance</p>

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					created. The 1,500 dwellings envisaged for the neighbourhood by this SDP must therefore include their full share of social and affordable housing. The plan should state this clearly and unambiguously. One of the aims of the plan is stated to be to create local employment, but if low paid people cannot afford to live in the area jobs will be taken by people living further away, producing an unbalanced community and adding to the burden on public transport and doing nothing to alleviate local unemployment.	already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. Existing policies and guidance provide clear policies for affordable housing. We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.
1406	443	Andrew	Richardson	Bankside Residents Forum	P.33, para. 4.3.2 The 70m height for blocks at the north end of Blackfriars Road is already greatly exceeded by the approved 170m high tower at 1 Blackfriars, thus undermining confidence in any proposed planning control in the area, and particularly on height limits set out in the draft SDP and other plans.	The paragraph has been updated. The guidance for the northern end of Blackfriars Road is set out in SPD 5.
1407	1159			Webber & Quantin TRA	1. Availability of information and timescales of the draft SPD I am very concerned about the timings involved in the issuing of information about the draft SPD to consultees, and about the lack of information provided at local level on the proposed development. • There was a five-week gap between the press announcement of the SPD and the delivery of the Revitalise 'Have your say' leaflet to households (on the Webber Row Estate at least). • The document 'Urban Design Principles' was published in August 2013, six weeks into the consultation period. • Southwark Council did not move the exhibition which was held for seven days from 21 June 2013 at Store Street WC1, to a subsequent location on Blackfriars Road (e.g. Erlang House) so that residents, workers and businesses most likely to be affected by the SPD could access the information locally throughout the consultation period. • The first date to ask questions of councillors from	A consultation report has prepared alongside the Blackfriars Road SPD. This sets out a summary of the representations received and how we have taken these into account in preparing the final version of the SPD. The appendices also set out all of the representations received and officer comments on how this comments have been taken into account, and whether the SPD has been updated as a result. The SPD was consulted on in accordance with the council's Statement of Community Involvement (SCI) (2008) and exceeded the consultation requirements of both the SCI and the relevant regulations. The consultation report summarises the consultation carried out.

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					<p>Borough, Bankside & Walworth Community Council was organised to take place just five days after the press announcement. • Southwark Council set the consultation period to run throughout the summer period, when many consultees were away on holiday. Questions regarding the above points • Considering its role as a key document to read alongside the draft SPD, why was the Urban Design Principles document not made available until six weeks after the announcement of the draft SPD? • Why did Southwark Council wait five weeks between the press announcement of the draft SPD to deliver the Revitalise 'Have your say' leaflet (June 2013) to households? • Why did Southwark Council not provide an exhibition in the SPD area for the duration of the consultation? • Why was the first opportunity to ask questions of councillors set so soon after the press announcement, when many consultees would not have been aware of the news, let alone have had time to study the when consultees were unlikely to have had sufficient time to study the detail of the draft SPD? • Given the scale of the draft SPD and the extensive range of documents relating to it (London Plan, Southwark Plan, Urban Design Principles, Borough and London Bridge Stage 2 Tall Building Study, Localism Act), was it reasonable to run the consultation period during the summer when many people are away on holiday? • Does the approach taken by Southwark Council to all of the above points comply with policy requirement No. 4 in the Communities and Local Government document, 'Local planning regulations: Consultation': "Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach." and to section 1.46 of the London Plan in reference to the Localism Bill: "The</p>	

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					Government has indicated its intention to change the planning system radically, to give neighbourhoods far more ability to decide the shape of the places where people live.”?	
1408	1159			Webber & Quantin TRA	<p>2. Scale of the draft SPD I am very concerned that people have not been given enough time to understand the scale of the Blackfriars Road development and that an extended period for consultation is required. • The Blackfriars Road development is on a scale comparable with the Heygate Estate: the Heygate was part of the vision for Elephant and Castle, as described in the Southwark Plan as follows: “8.2.2 ...Southwark’s vision for the Elephant and Castle is for: A thriving and successful mixed use major town centre that is safe, full of vitality and accessible to and from a highly integrated public transport system; combining historic character with a high quality design and layout of new buildings; a place where people will want to live, work and visit for shopping and leisure.”; the Heygate was also assigned masterplan status and accorded a consultation period which ran from July 2011 to March 2012, comprising various public consultation events (exhibitions and workshops) to inform the local community of the proposals, gather comments and share these with the design team to feed back into the masterplan; the outline planning application was finally submitted to the Planning Committee in January 2013. • By contrast, the large scale development of Blackfriars Road has been accorded only draft SPD status, with a document totalling only 34 pages. Questions regarding the above points • Given that in language and intent, the vision for Elephant and Castle is almost identical to that of the draft SPD’s vision for Blackfriars Road, why has Blackfriars Road not been assigned masterplan status in order to provide a full range of information to</p>	<p>With regards to consultation, the requirements for consultation on supplementary planning documents is set out within the council's Statement of Community Involvement (SCI) (2008) and the Town and Country Planning (Local Planning) (England) Regulations 2012. The consultation on the Blackfriars Road SPD has met and exceeded both these sets of requirements. A consultation report has been prepared as part of the Blackfriars Road SPD adoption, and this summarises the consultation carried out and how it has met and exceeded these requirements.</p> <p>With regards to the comment about masterplan status, the SPD is not a masterplan. It provides guidance and further information on implementing existing Core Strategy and saved Southwark Plan policies. Section 1 of the Southwark Plan, as referred to within the representation is no longer used as this was not "saved" in 2010 as part of the application to "saved" Southwark Plan policies. Furthermore sites are not allocated for specific land uses within the SPD as this will be looked at through the preparation of the New Southwark Plan, which can allocate proposals sites on the adopted policies map</p>

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					<p>consultees over a longer time period and to allow them time to make sense of an extensive range of documents relating to the development (Blackfriars Road draft SPD, London Plan, Southwark Plan, Bankside, Borough and London Bridge Stage 2 Tall Building Study, Urban Design Principles, Localism Act)?</p> <ul style="list-style-type: none"> By assigning SPD rather than masterplan status to Blackfriars Road, to what extent has Southwark Council complied with policy requirement No 2. in the Communities and Local Government document, 'Local planning regulations Consultation': "Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible." and points 109 and 110 of policy 11.4 'Masterplans or Development Frameworks' of the Southwark Plan: "109 The council may also produce from time to time more detailed action plans for wider areas in the form of master plans or development frameworks; 110 These may include references to the council's aspirations for the area when it is acting as a regeneration agency in partnership with other organisations and landowners. These master plans or frameworks will not set planning policy for an area but must reflect it."? 	
1409	1159			Webber & Quantin TRA	<p>3. Shape of the proposed SPD area I do not understand why the proposed shape of the SPD area and I believe that this will have a negative impact on trying to create a common identity for the area.</p> <ul style="list-style-type: none"> The proposed area to the north of Surrey Row and Boundary Row comprises a logical shape and reach in terms of the "corridor" referred to by Councillor Peter John in his announcement of the draft SPD to the press on 21 June 2013, i.e. encompassing Blackfriars Road itself and a number of streets within relatively close proximity to Blackfriars Road. South of Surrey Row and Boundary Row, however, the proposed area 	<p>An explanation of the boundary is set within the SPD It includes the whole of the Blackfriars Road and some of the surrounding area. It includes the surrounding area as the surrounding area is also likely to see some development and improvements, particularly possible improvements to public realm. Wording has been added to the SPD to make it clearer that the character and historic value of much of the surrounding area will continue to be protected and enhanced.</p> <p>Figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a</p>

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					<p>expands significantly outwards, losing this mostly uniform corridor shape and the key common characteristic of being located on or within close proximity to Blackfriars Road. This causes the proposed area to take in areas which do not naturally belong to Blackfriars Road, both geographically and in terms of usage and identity. Examples include: o To the west there is a stretch of Waterloo Road running from Gray Street to St George's Circus; however, Waterloo Road is a completely different street to Blackfriars Road with its own distinct physical history and identity gained from acting as a gateway to Waterloo Station and onwards into Covent Garden and the West End, rather than its counterpart Blackfriars Road's role as a gateway into the City. Moreover, this section of Waterloo Road differs quite significantly in usage from Blackfriars Road: the former comprises significant residential populations across three housing estates (Quentin House on Gray Street, Coopers Close on Waterloo Road and the Webber Row Estate) and individual period houses on Waterloo Road (south of Mawdley House), local businesses, a housing trust, two hotels, two student accommodation blocks and a relatively small number of offices; and the latter is split largely into office accommodation, hotels and pubs to the north of The Cut, and residential estates, small businesses and shops, pubs and office accommodation to the south of The Cut. o Further west, the proposed area extends out even further to take in a large section of both Westminster Bridge Road and Lambeth Road; the rationale is said to be that this is the boundary between Lambeth and Southwark, however, taking an approach along borough demarcations is likely to cause problems in trying to create one common vision and identity for the whole SPD area, since these western parts are vastly</p>	<p>neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area. We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>

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					<p>different to the main stretch of Blackfriars Road itself. To the east, the proposed area extends at its furthest point to take in Southwark Bridge Road. Again, nothing about this area in terms of geographical layout or usage would suggest that it forms a natural part of the Blackfriars Road area. Questions regarding the above points</p> <ul style="list-style-type: none"> • What is the rationale for this proposed shape of the SPD area and what is the plan for creating a common character across such a large area of such differing identities, populations and usages? • Would it not be more logical to maintain the integrity of the “corridor” shape which defines the area north of Surrey Row and Boundary Row and apply this also to the section south of this juncture, thus creating a straighter line on the west side (and thus excluding most of the southern section of Waterloo Road) and excluding all of the proposed Westminster Road and Lambeth Road sections; and creating a straighter line to the east along the line of the railway? 	
1410	1159			Webber & Quantin TRA	<p>4. Vision and character I am concerned that the draft SPD focuses so predominantly on large commercial development that the needs of small businesses and residents have not been sufficiently considered or provided for in the draft SPD.</p> <ul style="list-style-type: none"> • In announcing the draft SPD to the press on 21 June 2013, Councillor Peter John said that the document was intended to "give further confidence to potential investors and comfort to local residents and businesses that we are seeking to protect and enhance the character and identity of this historic borough". • Of the vision for Blackfriars Road, point 2.1.1 of the draft SPD states, "To help create a successful place where people want to work, live and visit, we need a vision which reflects the needs and aspirations of the community, businesses, residents, landowners and local stakeholders." • The Revitalise 'Have your say' (June 2013) leaflet states, "Our 	<p>The SPD is intended to benefit a wide range of groups including existing and new residents. The emerging vision has been updated to make this clearer. The SPD has also been updated within the supporting text to SPD 2: Mixed use town centre, that the SPD area is mixed with both commercial and residential development.</p>

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					strategy is to provide a mixed use town centre supporting a range of town centre uses alongside the existing predominant business use. We encourage more shops, restaurants, cafes and bars. We also support new hotels and encourage a mix of arts, cultural, leisure and entertainment uses. We encourage new and improved social infrastructure and community facilities as part of mixed use developments.”	
141 1	115 9			Webber & Quentin TRA	Questions regarding the above points • Given the predisposition to encourage landowners to raise rents for existing small businesses (e.g. the recent case of Network Rail and small businesses in Union Street) and to approve the demolition of unlisted historic buildings (1 Valentine Place, 169-172 Blackfriars Road and 173 Blackfriars Road), what evidence can Southwark Council provide regarding its commitment, as stated by Councillor Peter John, that the draft SPD will “protect and enhance the character and identity of this historic borough”?	The SPD guidance needs to be read in conjunction with borough-wide adopted policies in the Core Strategy and saved Southwark Plan. This is made clear within the SPD. We have amended the emerging vision for Blackfriars Road in the SPD to reinforce that much of the character and historic value of the surrounding area, particularly the conservation areas and listed buildings will be continue to be protected and enhanced.
141 2	115 9			Webber & Quentin TRA	• Given the predominance of commercial development in the draft SPD, to what extent have the authors of the draft SPD consulted with the residents mentioned in point 2.1.1 of the draft SPD (“businesses, residents, landowners and local stakeholders”) and where can the results of this research be found?	A consultation report has prepared alongside the Blackfriars Road SPD. This sets out a summary of the representations received and how we have taken these into account in preparing the final version of the SPD. The appendices also set out all of the representations received and officer comments on how this comments have been taken into account, and whether the SPD has been updated as a result. The SPD was consulted on in accordance with the council's Statement of Community Involvement (SCI) (2008) and exceeded the consultation requirements of both the SCI and the relevant regulations. The consultation report summarises the consultation carried out.
141 3	115 9			Webber & Quentin TRA	• A “town centre” is usually characterised by a predominance of office and retail space, plus small numbers of residents (who generally require a higher-than-average level of disposable income in order to	The Blackfriars Road SPD area is located within the Borough and Bankside district town centre which is identified in the Core Strategy's hierarchy of town centres. Policy 3 of the Core Strategy states that we will support the provision of new shopping space in the area, and this

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					afford premium-priced, centrally located accommodation); however, since the area south of The Cut actually has a large number of local residents, is Southwark Council's vision of a "mixed use town centre" really an appropriate one for this section of Blackfriars Road?	should include both food and non-food space and aim to meet the needs of local residents, as well as visitors and businesses. We have amended SPD 2 to make it clear that space for town centre uses should be developed alongside residential development and business uses. SPD2 also sets out that we will consider the impact of all new proposals on the overall mix of uses in the area and also on local amenity.
1414	1159			Webber & Quantin TRA	<p>5. Building heights Tall buildings are most appropriate and acceptable when they are clustered together in a purely commercial district, such as Canary Wharf. They are not appropriate to an area like Blackfriars Road, which has many pre-existing buildings of much lower height, and large communities of residents who do not want to live with the negative effects of tall buildings. It is all very well for the Mayor to favour tall buildings when he himself lives in a period house on a street in Islington where there is virtually zero risk of a high rise tower ever being built on his doorstep! • The Revitalise 'Have your say' leaflet (June 2013) says of building heights, "We require development to be of an appropriate height, encouraging tall buildings at the key gateways and nodes." • The Bankside, Borough and London Bridge Stage 2 Tall Building Study (December 2009) identified areas in Blackfriars Road which were appropriate for tall buildings. These areas were all situated north of The Cut. • The Bankside, Borough and London Bridge Stage 2 Tall Building Study (December 2009) stated in point 3.4.1 ("Summary of sensitivities in Blackfriars Road): "We have clustered sites together where they have the same sensitivities. New tall building development should consider its relationship to the existing and proposed tall buildings in the emerging cluster. New tall buildings should provide a transition from the scale of existing tall buildings towards lower height development in the surrounds." • The Bankside,</p>	<p>The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF.</p> <p>The Blackfriars Road SPD urban design study sets out the evidence base. The urban design study utilises a robust methodology that has previously been agreed with English Heritage, and 3D modelling techniques to assess the potential impact on heritage assets. The study updates the testing from the previous urban design studies in light of guidance set out in the NPPF, the London Plan that was adopted after the Core Strategy, schemes that already have been consented within the area and existing development pressure that could lead to piecemeal development within the area. Matters regarding the impact of tall buildings would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and other planning guidance. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate, while SPD3 sets out guidance on landscaping. Figure 5 - now Figure 6 - has been updated with a revised potential development sites list.</p>

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					<p>Borough and London Bridge Stage 2 Tall Building Study (December 2009) stated in point 5.1 of 'Conclusions': "Sensitivities for tall buildings The sensitivities which could provide constraints for tall building development include: New development should be sensitive to the existing and proposed surrounds so that new tall buildings are not out of character with the surrounds or prove dominant or overbearing. New tall buildings development should consider its potential impact on the local setting and character of the general area in views that could be experienced every day by visitors, local residents, community groups and workers. Locations where tall buildings would not be appropriate." • The Bankside, Borough and London Bridge Stage 2 Tall Building Study (December 2009) studied a number of locations as potential sites for tall buildings. From the original list of locations identified, the following were ruled out in point 3.3.3 by reason of being "generally located in areas where new significantly taller development would be out of context with the surrounds, are not at a gateway or point of landmark significance, or have little opportunity for public realm opportunities: o Sampson House o 231 to 241 Blackfriars Road o 6 Paris Garden & 20-21 Hatfields o Wedge House o 46-49 Blackfriars Road o Colombo House and Telephone Exchange" Despite this, all of the above-mentioned sites have subsequently been listed in 'Table 1. Potential development sites' of the draft SPD, but no detail has been provided about the plans for these sites. • The Palestra building already provides a huge landmark of height and mass at the junction of Blackfriars Road and Union Street; however, the draft SPD also proposes an additional "node" comprising a 70m tower on top of Southwark tube station, in close proximity to low rise buildings along The Cut, Georgian</p>	

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					<p>buildings on the west side of Blackfriars Road, and social housing at Nelson Square. • Of Southwark tube station, the Bankside, Borough and London Bridge Stage 2 Tall Building Study (December 2009) concluded the following: Point 3.4.1 of 'Summary of sensitivities in Blackfriars Road': "Southwark tube station Should provide a transition from the proposed new scale of development towards lower height surrounds. Should consider the group of listed buildings along Blackfriars Road south of The Cut. Should consider its relationship to the existing landmark of Palestra on the opposite side of Blackfriars Road." Point 5.1 of 'Conclusions': "The Southwark tube station site at the corner of Blackfriars Road and The Cut has the potential for a new landmark building which could mark the location of the train station and provide a counterpoint of similar height to Palestra on the opposite side of Blackfriars Road." • The draft SPD proposes a 70m tower on Blackfriars Road near St George's Circus and planning is already well advanced in this respect, as evidenced by an exhibition held at Erlang House by Barratt Homes in May 2013, showing visuals of a 30-storey tower and a full scale 3D model of Blackfriars Road; the 3D model showed very clearly the extent to which a 70m tower in this location would dwarf every other building on Blackfriars Road. • Despite being a wide boulevard, the impact of tall buildings on Blackfriars Road is clear to see on sunny days: in the morning, any tall buildings located on the eastern side of the street cast a large shadow across the road, with the reverse occurring in the afternoon once the sun has moved eastwards. • Existing residents who live in the area 24/7 are likely to feel the impact of tall buildings more than anyone else. From a personal perspective, as a resident who has lived on the fifth storey of a</p>	

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					<p>block in Webber Row since 1990, I have seen first-hand the impact of tall buildings on local views. Ten years ago I had a clear view of the following key river landmark buildings: The London Eye, the Oxo Tower, St Paul's Cathedral and Tate Modern. Urban living can be aesthetically harsh but these views gave me a daily appreciation of this great city and added positively to my quality of life. Today, due to the construction of increasingly tall and bulky buildings, the only remaining landmark I can now see on the skyline is the Oxo Tower; all of the other landmarks are hidden by tall and/or bulky new buildings. I miss these views of London and feel strongly that the scale of development of tall buildings is severely eroding local residents' visual enjoyment of living in inner London.</p> <ul style="list-style-type: none"> In the printed presentation entitled 'Draft Blackfriars Road supplementary planning document (SPD)' dated August 2013, the plan in "1. Building heights" contains the following error: 16. is marked as "Peabody estate" but the area marked in purple as Peabody Estate has been shaded in to also include the Grade II listed Webber Row Estate and the Grade II listed Centre for Literacy in Primary Education in Webber Row/Webber Street, which are completely separate entities to the Peabody Estate. This error needs to be corrected. <p>Questions regarding the above points</p>	
1415	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> In the statement in the Revitalise 'Have your say' leaflet (June 2013), "We require development to be of an appropriate height..." what is the definition of "appropriate" - i.e. appropriate to what? 	Appropriate development maximises the development potential of a site while considering its context.
1416	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> In strongly encouraging a strategy of encouraging tall buildings south of The Cut, is the draft SPD in conflict with the following points in the Bankside, Borough and London Bridge Stage 2 Tall Building Study (December 2009): "2.3 Blackfriars Road New tall building 	The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF.

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					<p>development in this location should consider the following:... Relationship to surrounding buildings and spaces. Impact on local amenity of neighbouring properties.” “3.2 The following urban design considerations and reflect those indicated in the Southwark Plan (CDL1) Policy 3.20 and draft replacement London Plan (CDR2) Policy 7.7 that require tall buildings: Relate well to the surrounding scale and character of development, so as not to be overbearing or repeat the mistakes of the past.” and with the following policies in the Southwark Plan: “3.13 Urban design 272 Principles of good urban design must be taken into account in all developments. Urban design is the relationship between different buildings and streets, squares, parks and waterways and other spaces that make up the public domain; the nature and quality of the public domain itself; the relationship of one part of an urban area to another; and the pattern of movement and activity. 273 In designing new developments, consideration must be given to: i. Height, scale and massing of buildings – Designing a building that is appropriate to the local context and which does not dominate its surroundings inappropriately.”? • Does the insistence on encouraging tall buildings south of The Cut conflict with the following policies of The Town and Country Planning (Local Planning) (England) Regulations 2012 “(3) Any policies contained in a supplementary planning document must not conflict with the adopted development plan. (4) Subject to paragraph (5), the policies contained in a local plan must be consistent with the adopted development plan. (5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.”?</p>	<p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage “Guidance on Tall Buildings”, 2007. In light of consultation responses and to add clarity to the guidance relating to St George’s Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets. The GLA’s representation confirms that the Mayor supports the council’s approach on tall buildings, but suggests that the SPD should be more flexible in relation to building heights, and that buildings ‘in the region’ of 70/30m would be appropriate. The council disagrees with this proposed amendment as it could allow buildings that are greater than the 70m/30m threshold, which would be considered inappropriate based on our evidence base. As such, the council considers SPD 5 to balance local character and development potential.</p>

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1417	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> Does the stated intention in the draft SPD to allow a 70m building on top of Southwark tube station constitute a failure to comply with the following policy in 3.4.1 ("Summary of sensitivities in Blackfriars Road"): "New tall building development should consider its relationship to the existing and proposed tall buildings in the emerging cluster. New tall buildings should provide a transition from the scale of existing tall buildings towards lower height development in the surrounds. Southwark tube station Should provide a transition from the proposed new scale of development towards lower height surrounds. Should consider the group of listed buildings along Blackfriars Road south of The Cut. Should consider its relationship to the existing landmark of Palestra on the opposite side of Blackfriars Road."? 	<p>The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets. The GLA's representation also confirms that the Mayor supports the council's approach on tall buildings, but suggests that the SPD should be more flexible in relation to building heights, and that buildings 'in the region' of 70/30m would be appropriate. The council disagrees with this proposed amendment as it could allow buildings that are greater than the 70m/30m threshold, which would be considered inappropriate based on our evidence base. As such, the council considers SPD 5 to balance local character and development potential.</p>
1418	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> Why has Southwark Council not made available clear visuals (photos and 3D models) of how Blackfriars Road looks now and how it would look after the proposed tall buildings had been constructed? Barratt Homes was able to produce architect's impressions and a large 3D model for its proposed plans at its exhibition earlier this year at Erlang House, which is just one individual development; why, then, given the scale of the Blackfriars Road development, has Southwark Council not produced similar visuals and made these available to consultees? 	<p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>
141	115			Webber	<ul style="list-style-type: none"> In preparing the draft SPD, to what extent has 	<p>A tall building up to 70m in height could be appropriate at the southern</p>

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9	9			r & Quantin TRA	Southwark Council studied the impact of a 70m tower at St George's Circus on the setting of the conservation area and the listed Obelisk (which is already a landmark historic entrance to the approach to the City), and issues affecting quality of life, such as loss of light?	<p>end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>
1420	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> To what extent have the following design principles which emerged from the work carried out by urban practitioners Allies and Morrison -as published by Southwark Council in the' Blackfriars Public Realm Study-been taken into account when considering tall buildings as a strategy in the draft SPD: <ul style="list-style-type: none"> o "Provide a cohesive landscaping of Blackfriars Road whilst recognising the need to acknowledge its different sections. o Recognise and respond to the character and heritage of Blackfriars Road and its surroundings."? 	The principles set out in the Allies and Morrison study has informed the preparation of the SPD, especially SPD 3: Public realm and open space.
1421	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> What is Southwark Council's response to the strong concerns expressed by residents regarding the following effects of tall buildings on their quality of life and environment: <ul style="list-style-type: none"> o loss of light o loss of views o wind tunnel effect o lack of human scale o over dominance by tall buildings of existing buildings (especially residential) o loss of historic buildings (where 	These matters would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy 12 and the relevant policies of the London Plan and planning regulations. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate, while SPD3 sets out further guidance on landscaping.

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					demolition of historic buildings is carried out in order to make way for new buildings) o erosion of community feeling o loss of small businesses?	
142 2	115 9			Webber & Quentin TRA	<ul style="list-style-type: none"> • Has Southwark Council considered an alternative vision for the southern section of Blackfriars Road, with a focus on options than simply tall buildings? 	The Blackfriars Road SPD Sustainability Appraisal assesses the impact of the SPD in relation to different options. It should be noted that the aim of the SPD is to provide further guidance for the area that is experiencing intense development pressure and avoid piecemeal or inappropriate development The urban design study also assesses the impact of different building height options along Blackfriars Road.
142 3	115 9			Webber & Quentin TRA	<p>6. Build form and heritage With a predominant emphasis on large commercial development and a clear pre-existing tendency to demolish unlisted historic assets to make room for tall buildings, the draft SPD contains no substance relating to how policy requirements on conserving and enhancing Southwark's build form and heritage will be met. • In announcing the draft SPD to the press on 21 June 2013, Councillor Peter John said that the document was intended to "give further confidence to potential investors and comfort to local residents and businesses that we are seeking to protect and enhance the character and identity of this historic borough". • The Revitalise 'Have your say' leaflet (June 2013) states, "Our guidance requires high quality new development that makes a positive contribution to local character and distinctiveness, including consideration of the historic environment."</p>	The SPD provides guidance on the heritage assets and would be read in conjunction with the existing heritage policy framework and designations, including the saved Southwark Plan policies, Core Strategy, London Plan and NPPF. The potential loss of any heritage would be assessed at the planning application stage.
142 4	115 9			Webber & Quentin TRA	<p>Questions regarding the above points • How can Councillor Peter John's claim that the draft SPD's intent is "to protect and enhance the character and identity of this historic borough" be seen to be valid when there is a clear predisposition on the part of Southwark Council to allow the demolition of historic assets in favour of new commercial buildings which are out of keeping with the character of other buildings</p>	The SPD provides guidance on heritage assets and would be read in conjunction with the existing heritage policy framework and designations, including the saved Southwark Plan policies, Core Strategy, London Plan and NPPF. The potential loss of any heritage would be assessed at the planning application stage.

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					<p>in an area? Recent examples include:</p> <ul style="list-style-type: none"> o The demolition of a superbly restored Victorian warehouse at 1 Valentine Place which was in use as business premises, so that the empty land could be used as a depot yard to service the building of a new seven-storey building (107 Blackfriars Road) which, by Southwark Council's own admission, is so out of keeping with the surrounding buildings that in March 2012 it refused to include this new building in the newly designated Valentine Place Conservation Area. o The decision of the planning committee on 2 September 2013 to approve the demolition of an 18th century public house at 173 Blackfriars Road and the adjacent Victorian St George's Mansions at 169-172 Blackfriars Road in favour of a ten-storey modern building which will offer largely B1 office space, private accommodation, and a quota of affordable housing that is below the required percentage. <p>• In the light of this tendency towards the removal of unlisted heritage buildings in favour of commercial development, are Southwark Council's planning committee's overall decisions in conflict with the following policies: London Plan: "1.44 protecting and enhancing what is distinctive about the city and its neighbourhoods, securing a sense of place and belonging through high quality architecture and design that sits well with its surroundings." and one of the key stated objectives of the Mayor that London should be "4. A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London's built heritage"</p> <p>Southwark Plan: "SP 13 Design and heritage All developments should preserve or enhance the character and vitality of Southwark through excellence in design, and the protection and enhancement of the historic environment."?</p>	

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1425	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> To what extent does the draft SPD comply with the following point in The National Planning Policy Framework (March 2012): 12. Conserving and enhancing the historic environment “126. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account: <ul style="list-style-type: none"> the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place.? 	<p>The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF.</p>
1426	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> Why at planning committee level does there not appear to be a solid set of guidelines on what comprises “exemplary design” in a building? For example, at the planning committee meeting on held at Tooley Street on 3 September 2013, a number of councillors repeatedly asked the developers and planning department representatives to explain why the proposed building was of “exemplary design”; this question failed repeatedly to be answered to the satisfaction of those posing the question and no-one referred to the availability of an agreed set of guidelines on the key criteria for “exemplary” design. Given this situation, are the planning committee procedures in conflict with the following policies in the 	<p>The representation refers to planning committee decision-making and not the SPD. It should be noted that the definition of exemplary design is set out in the adopted Residential Design Standards SPD (2012). An independent design review panel is also used for the larger schemes.</p>

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					Southwark Plan: "3.12 Quality in design 266 Developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. New buildings and alterations to existing buildings should embody a creative and high quality appropriate design solution, specific to their site's shape, size, location and development opportunities and where applicable, preserving or enhancing the historic environment." and "3.15 Conservation of the historic environment 283 Development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance. Planning proposals that have an adverse effect on the historic environment will not be permitted."?	
1427	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> Do the above-mentioned potential conflicts with policy constitute a general failure to comply with the following points in The Town and Country Planning (Local Planning) (England) Regulations 2012: "Form and content of local plans and supplementary planning documents: general 8... (3) Any policies contained in a supplementary planning document must not conflict with the adopted development plan. (4) Subject to paragraph (5), the policies contained in a local plan must be consistent with the adopted development plan. (5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy."? 	The SPD accords with the requirements of the The Town and Country Planning (Local Planning) (England) Regulations 2012. It is consistent with and not in conflict with the adopted development plan. The SPD and figure 3 of the SPD clearly sets out that the SPD provides guidance on our development plan: the London Plan, Core Strategy and saved Southwark Plan.
1428	1159			Webber & Quantin	Hotels Local people, who for the past 15 years have had to accept a very rapid rate of building around them, are very unhappy about the number of large	The London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2031. The estimate of the approximate net and gross hotel rooms required over the period 2007-2026 for Southwark, as set

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				n TRA	<p>hotels constructed, with some properties now being sandwiched between large hotels either side. Despite being near a major railway station (Waterloo) this is not a purely commercial centre, and the feeling from residents who came to this area when no-one else wanted to live here and built up thriving communities is that we have enough hotels now and that this area has done its part in contributing to the 2026 target rooms quota. • During the past ten years there has been an exponential increase in the number of large hotels in the SPD area: H10, Waterloo Road (13 storeys, 177 rooms) Ibis, Blackfriars Road (7 storeys, 297 rooms) Travelodge, Union St (5 storeys, 202 rooms) Travelodge, Baron's Place (5 storeys, 279 rooms) Hilton, Waterloo Road (9 storeys, 278 rooms) – under construction. • Page 9 of the draft SPD states, "We will look at ways to control licensed premises and hotels to ensure a good balance of uses and protect the character of the residential areas". • The siting of the Travelodge (5 storeys, 279 rooms) in Baron's Place and the Hilton (9 storeys, 278 rooms) on Waterloo Road has effectively resulted in Quentin House, a residential block built in the 1950s, becoming "sandwiched" between two very large hotels. • The draft SPD contains a case study (CitizenM) which appears to suggest that hotels can easily develop a culture of offering ancillary services, including facilities for non-guests, However, as a resident of this area, I happen to know CitizenM and its ethos extremely well and in my experience it is absolutely unique in providing a highly welcoming walk-in space for non-guests, which is rooted in its exemplary company culture and staff attitude; I have never seen any other hotel in my local area use this particular type of approach. Questions regarding the above points</p>	<p>out in the GLA's Hotel Demand Study, is based on assessment of factors including transport links to central London and connections to airports, proximity of tourist attractions/business locations, cafes and restaurants in the area, night time economy, cultural facilities and attractions, and regeneration initiatives and site availability. The forecast for Southwark should be treated as indicative only, and local circumstances should also be factored in. It is important to consider that the SPD area is within the Central Activities Zone, Bankside, Borough and London Bridge Opportunity Area and part of the Elephant and Castle Opportunity Area which are areas promoted in the London Plan to accommodate strategically important hotel provision. Arts, cultural and tourism activities have flourished in Southwark in the last decade, particularly in the Strategic Cultural Area, which is within the CAZ. Bankside, Borough and London Bridge has consequently experienced a growth in the number of hotels to support this increasing visitor economy. The SPD2 provides guidance to support Core Strategy policy 10 'Jobs and business' which sets out the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. Policy 10 and SPD 2 are also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals in the area will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account. SPD2 encourages any new hotel proposal to include ancillary facilities. This will help to ensure that these developments are more integrated into the street scene and provide a wider benefit. The inclusion of the case study on Citizen M hotel on Lavington Street provides context by providing an example of how a hotel can offer a range of uses and incorporate active frontages.</p>
142	115			Webbe	<p>• Is the exponential rise in the building of hotels in</p>	<p>The SPD 2 provides guidance to support Core Strategy policy 10</p>

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9	9			r & Quentin TRA	conflict with the draft SPD statement (page 9), "We will look at ways to control licensed premises and hotels to ensure a good balance of uses and protect the character of the residential areas"?	'Jobs and business' which sets out the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. Policy 10 and SPD 2 are also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals in the area will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account.
1430	1159			Webber & Quentin TRA	<ul style="list-style-type: none"> Does the sitting of two large hotels either side of Quentin House in Gray Street constitute a failure to meet the following promise set out in Southwark Council's 'A fairer future for all in Southwark Interim performance report 2012/13': "Treating residents as we would wish members of our own families to be treated."? 	The SPD provides further guidance to existing planning policies in our Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and so the SPD must be read alongside our other planning documents. The guidance focuses primarily on Blackfriars Road, where most of the change will occur. The emerging vision aspires for Blackfriars Road to have its own distinct identity as a lively and vibrant area, becoming an exciting place where people want to work, live and visit. The specific details for the assessment of the hotel developments within individual applications needs to be referred to within the Planning Committee reports.
1431	1159			Webber & Quentin TRA	<ul style="list-style-type: none"> Is the encouragement of more hotel building, particularly of the type witnessed in Waterloo Road (Hilton) and Baron's Place (Travelodge) in conflict with policy 1.12 ('Hotels and visitor accommodation') in the Southwark Plan: "193 Hotels and visitor accommodation will not be permitted where they would result in a loss of existing residential accommodation, or an over dominance of visitor accommodation in the locality."? If so, does this also constitute a failure to comply with the following points in The Town and Country Planning (Local Planning) (England) Regulations 2012: "Form and content of local plans and supplementary planning documents: general 8... (3) Any policies contained in a supplementary planning document must not conflict with the adopted development plan. (4) Subject to paragraph (5), the 	The SPD provides further guidance to existing planning policies in our Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and so the SPD must be read alongside our other planning documents. The guidance focuses primarily on Blackfriars Road, where most of the change will occur. The SPD2 provides guidance to support Core Strategy policy 10 'Jobs and business' which sets out the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. Policy 10 and SPD 2 are also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals in the area will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account.

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					policies contained in a local plan must be consistent with the adopted development plan. (5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.”?	
143 2	115 9			Webber & Quantin TRA	<ul style="list-style-type: none"> • What is the value of including a case study in the draft SPD about the CitizenM hotel when it has a unique ethos rooted in its company culture, and when Southwark Council has no powers to enforce a similar culture at other hotels? 	The SPD provides further guidance to existing planning policies in our Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and so the SPD must be read alongside our other planning documents. The guidance focuses primarily on Blackfriars Road, where most of the change will occur. The SPD2 provides guidance to support Core Strategy policy 10 ‘Jobs and business’ which sets out the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. Policy 10 and SPD 2 are also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals in the area will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account.
143 3	115 9			Webber & Quantin TRA	<ul style="list-style-type: none"> • Residents There are large numbers of existing residents in the proposed SPD area, particularly south of The Cut. Despite this, the draft SPD takes no account of these existing communities and their needs. • In announcing the draft SPD to the press on 21 June 2013, Councillor Peter John said that the document was intended to "give further confidence to potential investors and comfort to local residents and businesses that we are seeking to protect and enhance the character and identity of this historic borough". • The draft SPD “sets out our aspirations for growth, helping to make Blackfriars Road a destination where people want to live, work and visit.” • The language of the draft SPD frequently refers to making 	<p>The SPD is intended to benefit a wide range of groups including existing and new residents.</p> <p>The emerging vision has been updated to make this clearer.</p> <p>The SPD has also been updated within the supporting text to SPD 2: Mixed use town centre, that the SPD area is mixed with both commercial and residential development. The SPD and other planning policy documents also provide the framework for the provision of infrastructure to support development which will be used by both new and existing residents. SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p>

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					<p>Blackfriars Road a place “where people want to live, work and visit” (e.g. in point 1.1.2). However, nowhere in the entire draft SPD is there any reference to the fact that the SPD area – in particular south of The Cut – is already home to large and long-established residential populations and small business owners who have been in the area for many years and have made a major contribution to its character by building up thriving residential and business communities. • The draft SPD makes no reference to the fact that there are major differences between the areas to the north and south of The Cut: the northern section is clearly predominantly commercial (office space and hotels) with small pockets of residential, while the southern section is predominantly residential and includes also a range of small businesses and a small number of larger businesses. • Long-established residential populations in the section south of The Cut are located at Nelson Square, Pakeman House, Blackfriars Road (Georgian houses), Great Surrey Street, Bridgehouse Court, Webber Row Estate, Quentin House Estate, Brookwood House, Silex Street, Boyfield Street, Library Street, Peabody Square, Gladstone Street, and Coopers Close. These residents are part of the fabric and character of this particular section of Blackfriars Road. • The draft SPD contains 15 mentions of the word “residents” but nowhere is a distinction made as to whether this means existing residents, new residents, or both. • The lack of provision for existing residents within the draft SPD suggests that its authors have not considered their needs and have not taken into account the findings of research such as the Blackfriars Public Realm Study, and that priority has been given to commercial development over the needs of residents. • Where reference is made to issues that</p>	<p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development. Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough’s Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to be provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark’s CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council’s capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.</p>

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					relate to the daily needs of residents and local workers, e.g. infrastructure, access to small businesses, open spaces, this is done without any actual detail on the what, where and how of achieving this.	
1434	1159			Webber & Quantin TRA	Questions regarding the above points • What calculation basis was used for Councillor Peter John's description of the SPD area having "pockets of residential" when the draft SPD was launched on 21 June 2013, and how can such a description be seen to be valid for the area south of The Cut?	The SPD is intended to benefit a wide range of groups including existing and new residents. The emerging vision has been updated to make this clearer. The SPD has also been updated within the supporting text to SPD 2: Mixed use town centre, that the SPD area is mixed with both commercial and residential development. The SPD seeks to meet the needs of residents whilst also managing the pressure for new development. The SPD has been updated to make it clearer that the emerging vision and the SPD seeks to ensure that development meets the needs of existing and new residents whilst also attracting new development. Residents will benefit from the increase range of uses including more shops, services and businesses along the Blackfriars Road.
1435	1159			Webber & Quantin TRA	• To what extent has Southwark Council considered the large existing residential communities, especially south of The Cut, in drafting the SPD, and their clear contribution to the existing character of Blackfriars Road?	The SPD is intended to benefit a wide range of groups including existing and new residents. The emerging vision has been updated to make this clearer. The SPD has also been updated within the supporting text to SPD 2: Mixed use town centre, that the SPD area is mixed with both commercial and residential development. The SPD seeks to meet the needs of residents whilst also managing the pressure for new development. The SPD has been updated to make it clearer that the emerging vision and the SPD seeks to ensure that development meets the needs of existing and new residents whilst also attracting new development. Residents will benefit from the increase range of uses including more shops, services and businesses along the Blackfriars Road.
1436	1159			Webber & Quantin TRA	• A 'town centre' is usually characterised by a predominance of office and retail space, and small numbers of residents (who generally need a with a higher-than-average level of disposable income in order to afford centrally located accommodation). Given the large numbers of local residents south of	The Blackfriars Road SPD area is located within the Borough and Bankside district town centre which is identified in the Core Strategy's hierarchy of town centres. Policy 3 of the Core Strategy states that we will support the provision of new shopping space in the area, and this should include both food and non-food space and aim to meet the needs of local residents, as well as visitors and businesses. We have

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					The Cut, is the vision of a “mixed use town centre” really an appropriate one for this part of Blackfriars Road?	amended SPD 2 to make it clear that space for town centre uses should be developed alongside residential development and business uses. SPD2 also sets out that we will consider the impact of all new proposals on the overall mix of uses in the area and also on local amenity.
1437	1159			Webber & Quentin TRA	<ul style="list-style-type: none"> To what extent have the following principles in the Allies and Morrison Blackfriars Road Public Realm Study which relate to quality of environment for residents been taken into account in the draft SPD: <ul style="list-style-type: none"> Enhance and extend greenery to provide visual and acoustic softening, and prevent water run off; Recognise and respond to the character and heritage of Blackfriars Road and its surroundings, with key anchors being Peabody Estate, the viaduct, community gardens and public space, Christ Church and its yard, and the riverfront; Landscaping along the street should respond to these buildings, materials and provide a suitable setting for them. Provide a cohesive landscaping of Blackfriars Road whilst recognising the need to acknowledge its different sections? 	The principles set out in the Allies and Morrison study has informed the preparation of the SPD.
1438	1159			Webber & Quentin TRA	<ul style="list-style-type: none"> Is the non-acknowledgement of the existing residential population and the lack of substance regarding how and where infrastructure will be provided in conflict with the stated aim regarding vision in the draft SPD point 2.1.1: “To help create a successful place where people want to work, live and visit, we need a vision which reflects the needs and aspirations of the community, businesses, residents, landowners and local stakeholders” and the following core principle contained in Southwark Council’s ‘A fairer future for all in Southwark Interim performance report 2012/13’: “Treating residents as we would wish members of our own families to be treated.”? 	The SPD is intended to benefit a wide range of groups including existing and new residents. The emerging vision has been updated to make this clearer. The SPD has also been updated within the supporting text to SPD 2: Mixed use town centre, that the SPD area is mixed with both commercial and residential development. The SPD seeks to meet the needs of residents whilst also managing the pressure for new development. The SPD has been updated to make it clearer that the emerging vision and the SPD seeks to ensure that development meets the needs of existing and new residents whilst also attracting new development. Residents will benefit from the increase range of uses including more shops, services and businesses along the Blackfriars Road.
143	115			Webber	<ul style="list-style-type: none"> In placing the emphasis on commercial development 	It is important to consider that the SPD provides further guidance to

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9	9			r & Quantin TRA	<p>over residents' needs, is the draft SPD in conflict with the following policies due to the huge impact of such large-scale commercial building on the distinctiveness of existing neighbourhoods and factors such as loss of light, wind tunnel effect, erosion of communities, loss of small businesses, lack of affordable housing and lack of human scale in buildings: London Plan ('Quality of Life'): "1.44 At its best, London can provide what is amongst the highest quality of life to be found anywhere. Unfortunately, this is not the universal experience of Londoners, as indicators like the disparities in life expectancy in different places across the city show. There is also a perceived tension between the demands of growth and the conditions for a good – and improving – quality of life, and a concern about the loss of things that have made living in London and its neighbourhoods a distinctive experience."? "1.56 The Mayor's commitment to ensuring all Londoners can enjoy a good, improving and sustainable quality of life now, over the period to 2031 and into the future, underpins the vision and objectives. The quality of life that Londoners experience when living, working, visiting and moving around London is fundamental to how they feel about the city – and to how the capital is perceived from outside. The decisions we make about our city now will shape the quality of life of those who come after us and their view of how successful we have been in our stewardship of London."? Southwark Plan: "9.9 Neighbourhood Areas 61 Neighbourhoods are important because shopping and commercial centres often define a neighbourhood, providing a focus for the community. They provide a wide range of shops and other services used by local communities. Generally there are few large development sites within the neighbourhood centres. The focus of planning</p>	<p>existing planning policies in our Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and so the SPD must be read alongside our other planning documents. The guidance focuses primarily on Blackfriars Road, where most of the change will occur. SPD4 'Built form and heritage' addresses the importance of developments to provide a high quality of design and architecture to ensure that the civic character and scale of the historic environment is sustained or enhanced. The supporting text to SPD4 highlights the area has having an existing mix of character, scale and massing of buildings, and that new development must also consider the distinctive character and context of the surroundings. In addition, SPD 5 'Building heights' refers to tall buildings allowing adequate sunlight and daylight into streets, public spaces and courtyards, as well as ensuring there is no harmful microclimate and shadowing effects on local amenity. The Blackfriars Road SPD area is also located within the Borough and Bankside district town centre which is identified in the Core Strategy's hierarchy of town centres. Policy 3 of the Core Strategy states that we will support the provision of new shopping space in the area, and this should include both food and non-food space and aim to meet the needs of local residents, as well as visitors and businesses. We have amended SPD 2 to make it clear that space for town centre uses should be developed alongside residential development and business uses. SPD2 also sets out that we will consider the impact of all new proposals on the overall mix of uses in the area and also on local amenity, and the character of the area. We have added additional text into the emerging vision for Blackfriars Road to make clear that much of the character and historic value of the surrounding area, particularly the conservation areas and listed buildings will continue to be protected and enhanced.</p>

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					guidance is on protecting, improving, and bringing back into use retail and residential uses, especially above shops.”?	
1440	1159			Webber & Quantin TRA	<p>• Do the above-mentioned potential conflicts with policy constitute a failure to comply with the following points in The Town and Country Planning (Local Planning) (England) Regulations 2012: “Form and content of local plans and supplementary planning documents: general 8... (3) Any policies contained in a supplementary planning document must not conflict with the adopted development plan. (4) Subject to paragraph (5), the policies contained in a local plan must be consistent with the adopted development plan. (5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.”?</p>	The SPD accords with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is consistent with and not in conflict with the adopted development plan and the NPPF. The SPD sets out that it provides further guidance to existing planning policies in the development plan: the London Plan, Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents.
1441	1159			Webber & Quantin TRA	<p>9. Businesses The draft SPD focuses predominantly on large businesses and makes almost no provision for small businesses. Small businesses are already losing their premises due to this focus on large commercial development and related rent rises, despite having operated successfully in the area for many years and made a huge contribution to the diverse business character of the area and providing an excellent range of services to the business and residential community. • The Revitalised ‘Have your say’ leaflet (June 2013) states that the draft SPD “...focuses on encouraging flexible space for a range of different businesses, helping both small and larger businesses benefit from this central London location and its great transport links.” • On page 11 of the draft SPD, reference is made to “Encouraging flexible business use”. • On page 11 of the draft SPD, Southwark Council states, “We will work with Network</p>	In accordance with the Core Strategy, the SPD encourages the provision of flexibly designed small business space. We have inserted additional text to bullet 1 of SPD1 to add some further clarification. This includes encouraging the provision of small and start-up businesses in the area. Bullet 2 of SPD1 reiterates borough wide planning policy of requiring the retention or replacement of business floorspace, and this will continue to be one of a number of priorities for the council to ensure that the concentration of business floorspace in the area is maintained. The supporting text outlines borough wide policy on small business space, including employment space available within the railway arches. These spaces can be used for a variety of employment opportunities. We have also added additional reference into the supporting text regarding the saved Southwark Plan Policy 1.5 in order to highlight that this policy aims to protect small business units in proposals for redevelopment or change of use of employment sites, by requiring the equivalent provision for small units within the replacement floorspace, subject to exception criteria. We have also inserted additional text to bullet 1 of SPD2 to encourage the flexible

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					<p>Rail to refurbish space under railway arches to provide a range of uses including small businesses, shops, cafes and restaurants.” However, recent events at planning committee level have shown a complete disregard for the principle of encouraging and helping small businesses. Prime examples of this are:</p> <ul style="list-style-type: none"> o The decision in August to allow Network Rail to increase rents in Union Street to such an extent that long-established and successful small businesses will be forced to leave their premises. The planning committee voted by a majority of one to override the huge opposition to this move which had been voiced by the deputy leader of the Liberal Democrat party, Cathedral ward councillors, and more than 8,000 signatories of a petition. o Four small businesses (a cafe, a dry cleaning company, a newsagent and a historic public house) at 169-172 Blackfriars Road and 173 Blackfriars Road, which for many years have provided highly useful services to the local community of residents and workers, will lose their premises due to demolition of the existing buildings and the developers’ strategy to construct a new building which will offer mainly B1 use at ground floor level – this despite strong opposition from businesses, local residents and ward councillors. 	<p>design of new unit sizes for new town centre use in new mixed use development. The assessment and detail of the 169-172 Blackfriars Road planning application is available in the Planning Committee report which is available in the link below. http://planningonline.southwark.gov.uk/AcoINetCGI.exe?ACTION=UNWRAP&RIPNAME=Root.PgeResultDetail&TheSystemkey=9549115</p>
144 2	115 9			Webber & Quantin TRA	<p>Questions regarding the above points</p> <ul style="list-style-type: none"> • Given the recent events regarding small businesses in Union Street and Blackfriars Road, how can the stated aims in the draft SPD (“...focuses on encouraging flexible space for a range of different businesses, helping both small and larger businesses benefit from this central London location and its great transport links” and “Encouraging flexible business use”) be considered to be valid? 	<p>It is important to consider that the SPD provides further guidance to existing planning policies in our Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and so the SPD must be read alongside our other planning documents. The SPD supports the provision of flexible small business space and planning applications need to address the requirements in our adopted policies and guidance, and set out appropriate justification for a development scheme.</p>
144	115			Webber	<ul style="list-style-type: none"> • If Southwark Council’s claim on page 11 of the draft 	<p>SPD 1: Business space sets out guidance in supporting the use of</p>

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3	9			r & Quantin TRA	SPD to be working with Network Rail to “provide a range of uses including small businesses..” is true, why did it agree at planning committee level to a Network Rail strategy that would inevitably see the removal of the existing small businesses from Union Street?	railway arches for a range of business use including small business space, creative and cultural industries, light industrial and appropriate A or D class uses. The supporting text has been made clearer to cross refer to saved Southwark Plan policy 1.5 which also aims to protect small business units in proposals or redevelopment of change of use of employment sites.
1444	1159			Webber & Quantin TRA	• What does Southwark Council propose to do in terms of creating implementable policy to ensure that small businesses are protected from landowners imposing unreasonable rent increases which ultimately force these small businesses out of their premises in order to make way for large companies with the wealth to afford rents for B1 use?	In accordance with the Core Strategy Policy 10, the SPD encourages the provision of flexibly designed new business floorspace in a range of unit sizes. This includes small office/studio/workshop business space. The SPD also reiterates the requirement for the retention or replacement of existing business space in developments to meet the needs of the SE1 office market. This is subject to exception criteria set out in saved Southwark Plan policy 1.4. There is no particular evidence that subsidised business space is required at the moment.
1445	1159			Webber & Quantin TRA	• Why is Southwark Council not working with Network Rail to ensure that the latter makes a firm commitment to providing flexible space and rents?	The council will continue to work with Network Rail to ensure development is in line with our vision, policies and guidance for the area.
1446	1159			Webber & Quantin TRA	• Does the loss of small businesses in Union Street and at 169-172 Blackfriars Road and 173 Blackfriars Road constitute a failure to comply with the following policies in the Southwark Plan: “10.2 Tackling poverty and encouraging wealth creation 69 There are nearly 11,000 businesses in Southwark of which 9,000 are small businesses. These are very diverse in their nature and reflect the social and ethnic diversity of the borough. The presence of a large number of very diverse small businesses helps to bring local opportunities to people in the more deprived parts of the borough. The presence of small businesses also reflects an entrepreneurial culture and the importance of the role of business start-up and self employment as an effective means for many of overcoming the barriers to work and providing a way out of poverty.” “71 Tackling poverty is one of the five priorities of the	The council's Economic Well-being Strategy (2012-2020) sets out what we want to achieve between now and 2020, and how we aim to work across the Council and with our partners in the private, public and voluntary sectors in order to make Southwark a place: where people, especially our young people, are equipped with the skills and ambition to make the most of our central London location; where businesses grow and prosper; where town centres and high streets thrive and where our residents are financially independent. In accordance with the Core Strategy Policy 10 and in support of the objectives of the Economic Well-being Strategy, the SPD encourages the provision of flexibly designed new business floorspace in a range of unit sizes. This includes small office/studio/workshop business space. The SPD also reiterates the requirement for the retention or replacement of existing business space in developments to meet the needs of the SE1 office market. This is subject to exception criteria set out in saved Southwark Plan policy 1.4.

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					Southwark Community Strategy. One of the main ways in which this will be achieved is to continue to encourage wealth creation and create more jobs. This is developed in Southwark's Enterprise Strategy which has four main objectives: 1. To build an entrepreneurial culture 2.To retain and support existing businesses and promote inward investment"? 3. To enhance enterprise opportunities in the key business districts and town centres and 72 The Southwark Plan provides the land use and development policies to support this. It seeks to maintain the provision of a range of business premises to suit the needs of all business sectors, including small businesses."?	
1447	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> Do the above-mentioned potential conflicts with policy constitute a failure to comply with the following points in The Town and Country Planning (Local Planning) (England) Regulations 2012: "Form and content of local plans and supplementary planning documents: general 8... (3) Any policies contained in a supplementary planning document must not conflict with the adopted development plan. (4) Subject to paragraph (5), the policies contained in a local plan must be consistent with the adopted development plan. (5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy."? 	The SPD accords with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is consistent with and not in conflict with the adopted development plan and the NPPF. The SPD sets out that it provides further guidance to existing planning policies in the development plan: the London Plan, Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents.
1448	1159			Webber & Quantin TRA	10. Affordable housing Official policies which sit above the draft SPD clearly acknowledge the need for local councils to provide sufficient affordable housing so that people from all walks of life can continue to live in areas such as Blackfriars Road. Despite this, the draft SPD contains an extremely worrying amount of detail on the provision of such housing. • In the 34-page draft SPD there is one mention of affordable housing:" We	The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. Existing policies and guidance

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					are working with the local community and landowners to deliver large scale development and improvements, providing over 1,900 new homes, 665 affordable housing units and around 25,000 new jobs by 2026.”(page 8). • On page 11 of the draft SPD, it is stated, “There will also be many new homes on the upper floors of commercial developments, offering a range of housing types and sizes.” but no reference is made as to whether this will include both private and affordable housing.	provide clear policies for affordable housing. We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.
1449	1159			Webber & Quantin TRA	Questions regarding the above points • With the expected increase in population numbers in the SPD area, will Southwark Council explain why the draft SPD only makes one reference to affordable housing?	The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. Existing policies and guidance provide clear policies for affordable housing. We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.
1450	1159			Webber & Quantin TRA	• In stating” There will also be many new homes on the upper floors of commercial developments, offering a range of housing types and sizes”, does Southwark Council intend to enforce clear policies regarding ratios of affordable housing on the upper floors of commercial developments? If so, what proportion of affordable housing will it expect developers to deliver?	The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. Existing policies and guidance provide clear policies for affordable housing.

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						We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.
145 1	115 9			Webber & Quantin TRA	<ul style="list-style-type: none"> • With the expected increase in population numbers in the SPD area, will Southwark Council explain why the draft SPD only makes one reference to affordable housing? • In stating "There will also be many new homes on the upper floors of commercial developments, offering a range of housing types and sizes", does Southwark Council intend to enforce clear policies regarding ratios of affordable housing on the upper floors of commercial developments? If so, what proportion of affordable housing will it expect developers to deliver? • In making so little reference to, and provision for, affordable housing, is the draft SPD in conflict with the following policies: London Plan ('Strategy: The Mayor's vision and objectives): "This high level, over-arching vision is supported by six detailed objectives. These embody the concept of sustainable development. They give more detail about how the vision should be implemented, and link into the detailed policies in the following chapters:... Ensuring London is: 1. A city that meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners, and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes."? London Plan ('A new focus on quality of life'): "1.44 At its best, London can provide what is amongst the highest quality of life to be found anywhere. Unfortunately, this is not the universal experience of Londoners, as indicators like the disparities in life 	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. Existing policies.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>

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					<p>expectancy in different places across the city show...It is unsurprising, therefore, that consultation on proposals for this Plan have shown a growing concern with quality of life issues, such as: ensuring there are enough homes meeting the needs of Londoners at all stages of their lives and whatever their circumstances, and designed so they actively enhance the quality of the neighbourhoods in which they are located.”</p> <p>Southwark Plan: 3.2 National Policy “10 The Plan must comply with government policies including those set out in Planning Policy Guidance (PPG) and Planning Policy Statements (PPS), unless local circumstances justify a departure. One of the major planks of central government policy is sustainability particularly more re-use of previously developed land, which is detailed in Section 13. Four further areas of central government policy are particularly relevant i. The Government is seeking to increase the quality and supply of housing where it is needed and, in particular, to ensure that there is affordable housing in a range of tenures wherever it is needed. It also wants to see more re-use of developed land in cities for new housing and this will have the added advantage of reducing the need for new development in the open countryside. [PPS 3-Housing]” Southwark Plan: SP 17 Housing “All developments should, where appropriate, provide more high quality housing of all kinds, particularly affordable housing.”? Southwark Plan: Under ‘10.5 Housing’ “10.5.1 London Plan requirements 88 Fifty percent of new dwellings should be affordable. This will include social rented and intermediate housing including homes for key workers.”?</p>	
145 2	115 9			Webber & Quantin TRA	<ul style="list-style-type: none"> • In making so little reference to, and provision for, affordable housing, does the draft SPD fails to deal with the following principles in Southwark Council's ‘A fairer future for all in Southwark Interim performance 	The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within

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					<p>report 2012/13': "With a growing borough population we understand the urgency of addressing the acute need for more good quality affordable housing. We are therefore bringing forward plans to build 1,000 new council homes within the borough before 2020. We shall also target 50% of the new homes specifically for lettings to local residents in priority need, enabling the council to relet existing homes creating better mobility on estates and providing people with appropriate housing suited to their needs." [Extract] "We recognise that access to affordable housing is a major issue for the borough and one that is important in order for local people to be able to access employment and other opportunities that central London offers." "We commissioned an independent housing commission to look at the future of council housing in the borough. It looked at solutions beyond 2015/16 that are sustainable and affordable to council tenants and home owners in the long term, with the aim to break the current cycle of an escalating demand for resources in order to maintain quality of the stock." "The commission submitted a final report to the council proposing long term ideas for innovative yet practical solutions to the unprecedented demand for council housing. This will ultimately provide for a fairer future for generations of families who wish to reach their potential within the heart of central London."?</p>	<p>the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. Existing policies and guidance provide clear policies for affordable housing.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>
1453	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> Do the above-mentioned potential conflicts with policy constitute a failure to comply with the following points in The Town and Country Planning (Local Planning) (England) Regulations 2012: "Form and content of local plans and supplementary planning documents: general 8... (3) Any policies contained in a supplementary planning document must not conflict with the adopted development plan. (4) Subject to paragraph (5), the policies contained in a local plan 	<p>The SPD accords with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is consistent with and not in conflict with the adopted development plan and the NPPF. The SPD sets out that it provides further guidance to existing planning policies in the development plan: the London Plan, Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents.</p>

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					must be consistent with the adopted development plan. (5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.”?	
1454	1159			Webber & Quantin TRA	<p>11. Infrastructure and facilities The local population of workers, residents and tourists in this area will explode with the proposed level of development in the draft SPD. We will need schools, nurseries, youth centres, local group centres, playgrounds, open spaces, GP surgeries, health centres, fire services and police services. Despite this, the draft SPD contains an alarming lack of detail on how this level of infrastructure will be provided. • The Revitalise ‘Have your say’ (June 2013) leaflet states that the 18 development projects in the pipeline already will create in excess of 10,000 jobs, 1,500 new homes and 1,000 hotel rooms. • In addition to this, the proposed development of the Blackfriars Road area will create an additional 2,000 residents and thousands of additional workers as well as an increasing amount of tourists as Southwark continues to work towards its 2026 target quota for hotel rooms. • An expansion in population of this scale will require an extensive infrastructure comprising the following facilities and services: schools, youth centres, nurseries, playgrounds, open spaces, GP surgeries, health centres, fire services, police services, etc. • The draft SPD makes one mention of schools and one mention of youth centres (but no detail as to what or where), and no mentions of GP surgeries, health centres, nurseries, community centres, local group centres, fire stations or police stations. • The draft SPD states that infrastructure needs will be “addressed through external stakeholder’s asset management plans and through the Council’s Capital programme”.</p>	<p>It is important to consider that the SPD provides further guidance to existing planning policies in our Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and so the SPD must be read alongside our other planning documents. Policy 14 of the Core Strategy recognises that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure.</p> <p>Section 4.4 of the SPD on infrastructure, sets out that much of the funding for infrastructure to support growth will be raised through the Community Infrastructure Levy, and site specific mitigation of development impacts will be secured through section 106 planning obligations. The borough’s Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark’s CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council’s capital investment programme also will help to improve infrastructure provision. We have amended the supporting text to improve clarity on infrastructure funding.</p>

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1455	1159			Webber & Quantin TRA	Questions regarding the above points • Can Southwark Council please explain in lay terms what is meant by the statement in the draft SPD that infrastructure needs will be addressed “through external stakeholder’s asset management plans and through the Council’s Capital programme”?	Linked to Section 4.4 of the SPD on infrastructure, the borough’s Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark’s CIL will be used to contribute towards bridging this funding gap. Funds earmarked in the Council’s capital programme also will help to improve infrastructure provision. Stakeholder asset management plans are those prepared by bodies such as the Metropolitan police, Thames Water, London Fire and emergency planning authority, and other utility providers. They also need to be referenced because they also deliver improvements to their own services and infrastructure to accommodate growth. However, we have amended the supporting text to improve clarity on infrastructure funding.
1456	1159			Webber & Quantin TRA	• Why are none of the 45 proposed development sites being considered as sites for essential facilities such as schools, health centres, open spaces or affordable housing	<p>The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the</p>

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						preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.
1457	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> Why, at a SPD workshop on Monday 19th August 2013 with planners from Southwark Council, in response to a resident's question about provision for schools, did the reply come in the form of "Would you like to suggest some suitable sites?" Surely Southwark Council should be taking the lead on creating a clear strategy of what, where and how schools provision will be achieved to a level that will match the expected increase in residents in the SPD area? 	<p>The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.</p>
1458	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> Does this lack of substance regarding the type, number and location of infrastructural facilities mean that Southwark Council is likely to fail to deliver on the following promises in Southwark Council's 'A fairer future for all in Southwark Interim performance report 2012/13': "Treating residents as we would wish members of our own families to be treated. Making 	<p>The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development. Updates have been made to the SPD to refer to encouraging a range of different uses/</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part</p>

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					Southwark a place to be proud of.”?	<p>of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4.4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough’s Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark’s CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council’s capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.</p>
1459	1159			Webber & Quentin TRA	<ul style="list-style-type: none"> Is the lack of concrete plans for infrastructure in the draft SPD in conflict with the following policies: London Plan: “1.40 In addition to this ‘hard’ infrastructure, a growing and increasingly diverse population will create demand for more social infrastructure, ranging from 	The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development. Updates have been made to the SPD to refer more to other uses including health and community facilities.

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					<p>schools, colleges and universities, theatres, museums and libraries through health facilities to spaces for local groups and places of worship. A green infrastructure of green and other open spaces also has a crucial part to play in ensuring good health and a high quality of life – as well as helping to address the challenges of climate change.” London Plan (‘Planning for growth’): “1.48 In practical terms this means planning for: A growing population – ensuring London has the homes, jobs, services, infrastructure and opportunities a growing and ever more diverse population requires; An ever more diverse population – ensuring London has the schools and other facilities needed by a growing number of younger people, while also addressing the needs of an ageing population, with homes and neighbourhoods suitable for people at all stages of their lives. We will also need to plan for the whole range of other social infrastructure London’s communities and neighbourhoods will need to support a high and improving quality of life.” Southwark Plan10.3. (‘Life chances’): “10.3.1 Community and health services 73 Southwark’s Community Strategy and the London Plan highlight the importance of facilities to enable local communities to become more cohesive, and the important role of voluntary organisations in building communities, reducing social problems and assisting local people with planning issues. Southwark needs more health services to provide for the growth in population and to improve health provision for local people delivering national, London-wide and local objectives and strategies. Community and healthcare provision is a key requirement in Section 8 and 9 policies for all developments within Opportunity and Action Areas where the largest growth in population is predicted to take place. Community facility and health provision</p>	<p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough’s Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark’s CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council’s capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.</p>

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					<p>should be an integral part of masterplans and larger developments. The type and quantity of provision should be set through discussions with local community and health providers especially the Local Strategic Partnership, Strategic Health Authority, Primary Care, Acute and Foundation Trusts and hospitals. This will be measured as a requirement of the sustainability assessment policy, which requires consideration of health and community issues in the context of the social, economic and environmental impacts of major developments. There is a general change in health provision towards more healthy living centres, doctors and satellite hospital facilities within residential areas serving the local population in addition to the large centralised sites.” Southwark Plan (‘Part two: The policies’): “Section one: Tackling poverty and encouraging wealth creation SP 6 Accessible services All developments should, where appropriate, improve the range and quality of services available in Southwark and ensure that these are easily accessible by all sections of the community, particularly by foot, cycle and public transport.”</p>	
1460	1159			Webber & Quantin TRA	<p>• Do the above-mentioned potential conflicts with policy constitute a failure to comply with the following points in The Town and Country Planning (Local Planning) (England) Regulations 2012: “Form and content of local plans and supplementary planning documents: general 8... (3) Any policies contained in a supplementary planning document must not conflict with the adopted development plan. (4) Subject to paragraph (5), the policies contained in a local plan must be consistent with the adopted development plan. (5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.”?</p>	<p>The SPD accords with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is consistent with and not in conflict with the adopted development plan and the NPPF. The SPD sets out that it provides further guidance to existing planning policies in the development plan: the London Plan, Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents.</p>

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146 1	115 9			Webber & Quantin TRA	<p>Community spaces The SPD area already suffers from a lack of community space, and the draft SPD makes no provision for how this might be improved, especially in view of the fact that thousands of additional workers, residents and tourists are expected to populate the area in the coming years. • In the entire proposed boundary area of Blackfriars Road, which takes in a huge area of both office use and residential areas, particularly to the south of The Cut, there are only three protected open spaces, two of which are north of The Cut at Paris Gardens and Christchurch. Considering the fact that the draft SPD is encouraging policies that will a massive increase in the number of people in the area, this is a completely inadequate amount of open space for a population that is already growing and is set to grow even more if the scale of development proposed in the draft SPD goes ahead.</p>	The SPD cannot provide site specific guidance.
146 2	115 9			Webber & Quantin TRA	<p>Questions regarding the above points • Are any of the 46 sites identified as potential development sites being considered for use as open space?</p>	<p>The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will</p>

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						be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.
1463	1159			Webber & Quantin TRA	• Why does the draft SPD make no attempt to create enforceable policy with landowners and developers to create such space?	This requirement would be outside the scope of the SPD.
1464	1159			Webber & Quantin TRA	• Is the lack of concrete plans for open spaces in the draft SPD in conflict with the following policy: Southwark Plan "10.4 Clean and green 83 Open spaces significantly contribute to the character of the borough, contributing to nature conservation and providing space for leisure and recreation activities. Open spaces have been given three tiers of protection: Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space all of which are identified on the Proposals Map. Sites of importance for nature conservation and local nature reserves are also protected."	No. Policy 10.4 has not been saved and is now out of date The SPD is consistent with the our open space strategy which has identified a deficiency in open spaces within then area; however given the limited opportunities for the creation of opens, our priority is to focus on improving out existing open spaces. We will seek to provide new open space and greening as set in the strategy.
1465	1159			Webber & Quantin TRA	• Do the above-mentioned potential conflicts with policy risk constituting a failure to comply with the following points in The Town and Country Planning (Local Planning) (England) Regulations 2012: "Form and content of local plans and supplementary planning documents: general 8... (3) Any policies contained in a supplementary planning document must not conflict with the adopted development plan. (4) Subject to paragraph (5), the policies contained in a local plan must be consistent with the adopted development plan. (5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy."?	The SPD accords with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is consistent with and not in conflict with the adopted development plan and the NPPF. The SPD sets out that it provides further guidance to existing planning policies in the development plan: the London Plan, Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents.
146	115			Webber	13. Potential development sites The draft SPD	The figure and table within the SPD shows potential development

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6	9			r & Quantin TRA	contains a list of 46 "potential development sites" with no accompanying detail whatsoever on what these are, why they have been selected and what the plans/ideas are. A closer look at these sites reveals an extremely worrying trend of earmarking buildings - both period and modern - which are already fit for purpose in terms of serving the business and residential communities well by meeting key policy issues such as the preservation of heritage assets, the provision of small business space and the provision of residential accommodation. • The complete lack of detail in the draft SPD about the 46 potential development sites effectively means that consultees have been given no opportunity to comment on this extremely important aspect of the draft SPD.	<p>sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.</p>
1467	1159			Webber & Quantin TRA	Questions regarding the above point • Prior to selecting the 46 sites, did the authors of the draft SPD physically walk around the entire proposed area and look in detail at every one of these buildings in order to assess their architecture, design and current usage?	<p>The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents.</p> <p>Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings. The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites.</p>

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						The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.
1468	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> Do any of the authors of the draft SPD live in, or close to, the proposed area and thus possess vital local knowledge of its physical appearance and local character, and the role played by each of the 46 sites in both the residential and business communities? 	<p>The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.</p>
1469	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> When will Southwark Council be issuing the following details to all parties in this consultation regarding every one of these 46 sites in the form of visuals (photographs), and details on current usage, why they 	The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are

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					have been selected for development and what developments are being considered (visuals plus descriptions)?	<p>going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.</p>
1470	1159			Webber & Quantin TRA	<p>• In particular, will Southwark Council please comment on the following sites marked as potential development sites:</p> <ul style="list-style-type: none"> o ID11: This seven-storey building at 209/215 Blackfriars Road has a finely restored facade and is in active use by major international businesses such as PR Newswire Europe. The building clearly already meets policy requirements regarding heritage and businesses in the London Plan and the Southwark Plan. Michael Tsoukaris, Group Manager, Design & Conservation at Southwark Council said of this building on 19 September 1012: "No 209-215 is a fine building and retains many of its original features." Given these facts, why has this building been selected for potential development and do the plans entail? 	<p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p>
1471	1159			Webber &	<ul style="list-style-type: none"> o ID 14: 200 Union Street is marketed via a high quality website as "newly refurbished Entire 1st and 	<p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify</p>

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				Quentin TRA	Part Ground Floor Comprehensively Refurbished Media Style Offices” comprising the following: new VRF air conditioning (exposed services), plaster ceiling with new suspended LG7 sympathetic lighting, refurbished male and female WCs, 13 person passenger lift, bicycle storage, 24 hour access and excellent 24 hour access. Given the fact that this building already meets policy requirements regarding businesses in the London Plan and the Southwark Plan, why has it been identified as a site for development and what do the plans entail?	potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings
1472	1159			Webber & Quentin TRA	o ID15: Block T, Peabody Square, Blackfriars Road is a Grade II listed building which forms an integral part of this historic estate, constructed in 1871 by the Peabody Donation Fund and funded by the visionary American banker, diplomat and philanthropist George Peabody to tackle the poverty he saw in London and provide decent housing for artisans. Given the major significance of the Peabody Estate in terms of its contribution to London Plan and Southwark Plan policies regarding the preservation of heritage and the provision of affordable housing to a long-established community of residents, and the fact that, even without a physical visit to the estate, some simple desk research would have revealed its role in and importance to the local area, how and why did Block T end up on the list of 46 potential development sites? Does this suggest that the authors of the SPD lack vital local knowledge and/or have not carried out site visits to the potential development sites?	Block T was added in error to the draft list. The figure has been updated and is now Figure 6.
1473	1159			Webber & Quentin TRA	o ID 17: 235-241 Union Street is a modern building of modest design and provides one of the few remaining views for residents of Applegarth House, a building which has been severely impacted by the Palestra building directly opposite it on Union Street. Why is	The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of

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					this building on this list and what are the plans in regard to proposed height, massing and usage?	sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.
1474	1159			Webber & Quantin TRA	o ID 20: Southwark College in The Cut underwent a refurbishment several years ago which resulted in an aesthetically pleasing modern building of a scale which is in complete harmony regarding height and massing of the buildings along The Cut. Furthermore, at the rear of the College there is an area of land which is allocated as green space and could be developed further for use by students and even by local residents who do not have access to a garden space, as a gardening/food growing space. Given these facts, why is this building on the list of 46 sites and what do the plans entail?	The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings
1475	1159			Webber & Quantin TRA	o ID 24: Marked on Table 1 as Friden House, 96-101 Blackfriars Road, this is an error as on Figure 5 the building numbered appears to be 2-10 Valentine Place, which is part of the designated Valentine Place Conservation Area. Can Southwark Council please confirm that this error will be rectified on Table 1 and Figure 5 and that these documents will be made available publicly to all consultees?	Noted. The figure has been updated.
1476	1159			Webber & Quantin TRA	o ID 25: Also marked on Table 1 as Friden House, 96-101 Blackfriars Road, on Figure 5 the numbering of ID 25 appears to be 27-31 Webber Street, 21 Webber Street, 17/19 (odd) Valentine Place, 3-5 Valentine Place and a gap site at 1 Valentine Place, all of which are buildings in the Valentine Place Conservation Area: Can Southwark Council please confirm that this error will be rectified on Table 1 and Figure 5 and that these documents will be made available publicly to all consultees?	Noted. The figure has been updated.
147	115			Webber	o ID 26: 109-115 Blackfriars Road is a three-storey	The figure and table within the SPD shows potential development

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7	9			r & Quantin TRA	purpose-built structure comprising private residential accommodation on the upper floors, internal residential and business garage parking, and four well-established small businesses on the ground floor providing highly useful services to the community, including: an extended hours (7am to 11pm) food store, newsagents and off licence; a hairdressing and beauty salon; a shipping service; and the highly popular Cafe Pronto/Masters Catering. Moreover, the building's architectural style, height and massing are in harmony with the adjacent Valentine Place Conservation Area. Given the fact that this building already meets London Plan and Southwark Plan policies regarding the provision of space for small businesses, the provision of quality accommodation, and cohesiveness with the surrounding buildings (and with the adjacent conservation area in particular), why has it been selected as a potential development site?	<p>sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.</p>
1478	1159			Webber & Quantin TRA	o ID 28: 57 Webber Street appears to be the site of the caretaker's premises for Friars Primary Foundation School. Why has this site been selected for potential development?	<p>The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not</p>

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						provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.
1479	1159			Webber & Quantin TRA	o ID 29: 61 Webber Street is a three-storey modern building providing office space. Its height and massing are in harmony with all of the surrounding buildings and allow light and views to be available to three long-established communities of residents in the area directly opposite (Boyfield Street, Silex Street and Webber Street) in buildings ranging between 3 and 5 storeys. Given the fact that 61 Webber Street meets London Plan and Southwark Plan policies regarding the provision of space for small businesses and cohesiveness with the surrounding buildings, why has it been selected for potential development and what is the nature of the development plans/ ideas?	<p>The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.</p>
1480	1159			Webber & Quantin	o ID 33 & ID 35: 63 Webber Street / 94 Webber Street is a handsome three storey period building currently in use as small business office space on the ground floor	The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites

Rep Ref	Obj Ref	First Name	Surname	Organisation	Details of Representation	Officer Response to Representation
				n TRA	and what appears to be residential accommodation on the upper floors, with a separate gated entrance in Rushworth Street. Given the fact that this building already meets London Plan and Southwark Plan policies regarding the provision of space for small businesses, the provision of quality accommodation, and the preservation of heritage, why has it been selected for potential development and what is the nature of the development plans/ideas?	<p>have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.</p>
148 1	115 9			Webber & Quantin TRA	o ID 34: 96 Webber Street is a characterful heritage asset comprising a two storey period building. The setting and design of the building are in perfect harmony with the existing railway arches immediately to the south. The building provides accommodation for local small creative business owners, including a photographic studio, a carpenter and a antique furniture restorer. Given the fact that this building already meets London Plan and Southwark Plan policies regarding the provision of space for small businesses and the preservation of heritage, why has it been selected for potential development and what is the nature of the development plans/ideas?	<p>The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan</p>

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						document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.
148 2	115 9			Webber & Quantin TRA	ID 30: 33-38 Rushworth Street is a two storey period building serving as business space. Its height and massing are in complete harmony with the surrounding buildings and the provision of small business space and larger business space. Given the fact that this building already meets London Plan and Southwark Plan policies regarding the provision of space for small businesses and the preservation of heritage, why has it been selected for potential development and what is the nature of the development plans/ideas?	<p>The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.</p>
148 3	115 9			Webber & Quantin TRA	o ID 37 52-56 Lancaster Street is a four storey building providing affordable social housing. Given the fact that this building already meets building already meets London Plan and Southwark Plan policies regarding social housing, why has it been selected for potential	The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans

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					development and what is the nature of the development plans/ideas?	<p>as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.</p>
1484	1159			Webber & Quantin TRA	<ul style="list-style-type: none"> Can Southwark Council please take into account the following buildings of interest in the SPD area: Hunter House, St James Street Gardner House, Lancaster Street The Bridge House, Lancaster Street Murphy House, Borough Road Albury Buildings and Clandon Buildings, Boyfield Street Parish of St George the Martyr Public Library, Borough Road 	The identification of buildings will be addressed in a new Heritage SPD that will be prepared alongside the New Southwark Plan. The Heritage SPD will also provide guidance.
1485	214			Transport for London	Overall TfL Property supports the land use principles and vision for Blackfriars Road, in particular on TfL land identified as (i) Development Site 18, Southwark Tube Station, 68-71 Blackfriars Road; and (ii) Development Site 43, TfL Bakerloo Sidings and 7 St. George's Circus. This Representation relates specifically to development sites 18 and 43.	Noted.
1486	214			Transport for London	Development Site 18: Southwark Station TfL Property supports the principle of development on Development Site 18. However, draft Policy SPD 5 (Building	Noted. A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan

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				n	<p>Heights) of the SPD specifically states that ‘a tall building, of a height of up to 70 metres should provide a focal point at Southwark tube station.’ Whilst a tall building is welcomed at this location, this can only be achieved if the structural capacity of the existing station structure and any supplementary structure will remain unaffected and disruption to the operation of the London Underground tube network is not incurred. TfL Property is undertaking further feasibility work to ascertain the appropriate building structure and thus height which could be accommodated on the site subject to satisfying (i) operational engineering constraints to ensure the operation of the tube network is not compromised; and (ii) other technical issues for example Rights of Light are resolved. Therefore until the work is complete, TfL Property cannot confirm whether a development of 70m in height is achievable and deliverable on the site. To ensure draft Policy SPD 5 is flexible as per paragraph 182 of the National Planning Policy Framework (NPPF), TfL Property would welcome the inclusion of additional text within the explanatory text to draft Policy SPD 5 reflecting the operational and engineering constraints.</p>	<p>that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage “Guidance on Tall Buildings”, 2007. In light of consultation responses and to add clarity to the guidance relating to St George’s Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets. There is no need for further update within the SPD as the feasibility of development on this site would be assessed at the pre-application and planning application stage. At this stage operational constraints and technical issues etc would be discussed.</p>
1487	214			Transport for London	<p>Development Site 43, TfL Bakerloo Sidings and 7 St. George’s Circus Again, TfL Property supports the principle of development on the site. Draft Policy SPD5 notes a tall building of up to 70m could be accommodated in St. George’s Circus, a principle and approach which TfL Property support however the exact location for this building is not specified within the SPD. Draft Policy SPD 3 relates to public realm and states development must contribute to the importance of St George’s Circus as a strategic gateway. Currently the site 1.2ha in size, is open cutting and comprises of offices and sidings for stabling trains associated with the Bakerloo line. The</p>	<p>Support noted. A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage “Guidance on Tall</p>

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					<p>site in its current form does little to contribute to the SPD's aspiration of a strategic gateway. There are currently no plans to relocate the current Bakerloo operations therefore any form of development on the site can only be achieved with the construction of a decked structure. As experienced with similar schemes, this is a very complex structure that will need to take into account the current operational engineering constraints, as such significant abnormal costs will be experienced which will need to be borne by the scheme. A modest or low density scheme is considered to be an unviable solution and thus unrealistic for the site, as such the proposals for the site within the SPD would not be in accordance with paragraph 154 of the NPPF. The NPPF states plans should proactively drive and support sustainable economic development in addition to providing a framework whereby decisions can be made with a high degree of predictability (para 17). To ensure the development aspirations for the site can be realised and a viable scheme delivered, planning policy support is required for a tall structure at this location. Without the support of this policy position, there is no degree of certainty that a tall scheme would be considered acceptable on the site. The site represents an excellent opportunity to bring forward significant development in a sustainable urban location. In addition, the site is situated in the prominent location of St George's Circus between Blackfriars Road and One the Elephant, thus any future development scheme on the site has the potential to provide a landmark building acting as a strategic gateway between these locations and the ability to contribute positively to the local character of the surrounding area</p>	<p>Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p> <p>It should be noted that the SPD does not provide site specific guidance for sites and so there is no detailed guidance for the Bakerloo sidings site. Any development at the site would be assessed and determined at the planning application stage, taking the local heritage context into account. The SPD states that list of potential development sites is illustrative of the huge opportunity for change within the area and the need for a coherent framework. It has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. The formal identification and allocation of proposals sites within the area will be considered as part of the preparation of the New Southwark Plan.</p>
1488	1173	Malcolm	Souch	NHS Londo	The area covered by the draft SPD lies within the Bankside, Borough and London Bridge Opportunity	The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development. Updates

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				n Health Urban Development Unit	Area and adjoins the Elephant and Castle and Waterloo Opportunity Areas. Together these areas have to potential to provide a minimum of 7,800 new homes and 40,000 new jobs. As such, development in the wider area needs to take place in a coordinated way and the cumulative impact of development on social infrastructure, including on healthcare facilities and services should be addressed. Southwark and Lambeth PCTs have previously expressed the need for new or enhanced health infrastructure in the Elephant and Castle and Waterloo areas	<p>have been made to the SPD to refer to encouraging a range of different uses/</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.</p>

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1489	1173	Malcolm	Souch	NHS London Health Urban Development Unit	<p>We support the intention, in paragraph 3.15, to seek improvements to social infrastructure and keep the need for new infrastructure under review as the area changes. However, there is the need to address the immediate and future impact of housing and population growth in Blackfriars Road and in the wider area and work with service providers and stakeholders to plan for future provision and address existing capacity issues. Future provision should address existing and future healthcare needs. Further discussions are needed with Southwark Clinical Commissioning Group and the Council's public health team.</p>	<p>The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development. Updates have been made to the SPD to refer to encouraging a range of different uses.</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014.. It is appropriate to look at the provision of infrastructure at a borough-wide</p>

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						level through these dedicated documents rather than through the Blackfriars Road SPD.
1490	1173	Malcolm	Souch	NHS London Health Urban Development Unit	The list of potential development sites (Table 1) provides no indication of planned or potential housing capacity. A Development Capacity Assessment for the area was undertaken in July 2011 and we would welcome an updated assessment. From a quick review of planning permissions and applications in the Blackfriars Road area there is nearly 2,000 residential units in the pipeline. There is little reference to the provision of affordable housing and no commitment to a range of unit sizes, including family housing. We would welcome a wider commitment to tackle deprivation in terms of improving health, crime and access to employment and housing.	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. This is particularly the case for housing, including affordable housing. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards.</p> <p>We are currently reviewing our Core Strategy and saved Southwark Plan and preparing the New Southwark Plan which will look at allocating proposals sites on the adopted policies map. We will update our development capacity assessment as part of this process alongside our current work on feeding into the Mayor's Strategic Housing Land Availability Assessment.</p> <p>In terms of wider commitment to tackling deprivation, this is covered within existing policies. The sustainability appraisal also assesses the likely impact of the SPD guidance on social, environmental and economic sustainability, including on indicators of health, crime, employment and housing. Overall it shows a likely positive impact.</p>
1491	1173	Malcolm	Souch	NHS London Health Urban Development Unit	There is no reference to or analysis of current uses on the 43 development sites or the potential to replace or provide new social infrastructure. This includes Site No 7 (45 Colombo Street) which includes the Blackfriars Medical Practice where they maybe opportunities to redevelop the health centre as part of a mixed-use development.	The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or

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						<p>surroundings.</p> <p>The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations.</p>
149 2	117 3	Malcolm	Souch	NHS London Health y Urban Development Unit	We support the intention to manage the provision of student accommodation as a concentration of student housing can have a significant impact on healthcare services. Further discussions are needed as to the future of the St Georges Health Centre (Site No 38) and the Blackfriars Road Community Drug and Alcohol Team provided by South London and Maudsley NHS Foundation Trust.	Noted.
149 3	117 3	Malcolm	Souch	NHS London Health y Urban Development Unit	We support 'SPD 2 Mixed use town centre' which encourages a mix of uses taking into their economic and health and wellbeing impacts. New healthcare facilities and services can contribute to the vitality and viability of centres.	Support noted.
149 4	117 3	Malcolm	Souch	NHS London Health y	We support 'SPD 3 Public realm and open space' and 'SPD 6 Active travel' recognising the need to improve the environmental quality of Blackfriars Road and the conditions for pedestrians and cyclists and the opportunity to manage traffic and create a continuous	Noted.

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				Urban Development Unit	green route linking open and public spaces. We welcome the commitment to strengthen east-west links across Blackfriars Road between Waterloo and the South Bank, Bankside and London Bridge.	
1495	1162	Raul	Peschiera		I would like to add my concern and disappointment to the Blackfriars SPD, as it gives very little reference to the effects on the local communities who live there.	The SPD is intended to benefit a wide range of groups including existing and new residents. The emerging vision has been updated to make this clearer. The SPD has also been updated within the supporting text to SPD 2: Mixed use town centre, that the SPD area is mixed with both commercial and residential development. The SPD seeks to meet the needs of residents whilst also managing the pressure for new development. The SPD has been updated to make it clearer that the emerging vision and the SPD seeks to ensure that development meets the needs of existing and new residents whilst also attracting new development. Residents will benefit from the increase range of uses including more shops, services and businesses along the Blackfriars Road.
1496	1162	Raul	Peschiera		I think that the Council and developers should be much more aware of the communities that currently live in this area , their needs (current and future) and how any development affects their lives now and for future generations. Nowhere is there any understanding or clear acknowledgement of how the development will actually benefit people who live here. Already we are pressed on all sides by no less than 6 hotels and even more student housing. With such a great and growing transitory population, businesses are not catering for local established communities but to the requirement of tourists and short term residents. It is a moral obligation for the Council to support and prioritise the communities that they represent . By favouring the requirements of developers and hotels above the needs of local people, the Council is renegeing on its central obligation	The SPD is intended to benefit a wide range of groups including existing and new residents. The emerging vision has been updated to make this clearer. The SPD has also been updated within the supporting text to SPD 2: Mixed use town centre, that the SPD area is mixed with both commercial and residential development. The SPD seeks to meet the needs of residents whilst also managing the pressure for new development. The SPD has been updated to make it clearer that the emerging vision and the SPD seeks to ensure that development meets the needs of existing and new residents whilst also attracting new development. Residents will benefit from the increase range of uses including more shops, services and businesses along the Blackfriars Road.
1497	1162	Raul	Peschiera		In this development there is no quarter given to the local people. Very tall office blocks are blocking light,	These matters would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy

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					marring the local skyline and devastating the sense of community (while tall buildings look elegant in an architect's model, the human experience and scale is completely missed, creating wind tunnels, bleak landscapes of glass and featureless streetscapes that aesthetically and literally damage the local area - take the new City building whose design literally blinds and burns those unlucky enough not in its huge dominant shadow).	Policy SP12 and the relevant policies of the London Plan and planning regulations. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate.
1498	1162	Raul	Peschiera		You cannot in good conscience allow developers free rein in over-developing an area to maximise their profits at a huge cost on the living standards of the communities on the ground. Our historic quarter is being demolished systematically while nothing of equal or better design or purpose is built instead . Our location is our greatest asset and we can demand developers to know tow to local needs and provide beautiful architecture because this is an area people want to visit and live	The SPD provides guidance intended to benefit a wide range of groups including existing and new residents. Existing policies in the Core Strategy and saved Southwark Plan as well as guidance in topic based SPDs provide the framework alongside this SPD, the NPPF and the London Plan to deliver sustainable development. This includes policies and guidance on the historic environment. The SPD seeks to meet the needs of residents whilst also managing the pressure for new development. The SPD has been updated to make it clearer that the emerging vision and the SPD seeks to ensure that development meets the needs of existing and new residents whilst also attracting new development. Residents will benefit from the increase range of uses including more shops, services and businesses along the Blackfriars Road.
1499	1162	Raul	Peschiera		Improve the area - yes, of course! But allowing yourselves to be hoodwinked into believing that extremely tall, impersonal buildings, destruction of historical buildings and contributing to an unsustainable density of hotels is the only way to attract development isn't best foolish and at worst criminal	Noted.
1500	1162	Raul	Peschiera		We deserve better. Southwark deserves better. We have the talent in city planning here in this borough - remember Coin Street! - that can design profitably, culturally and aesthetically while centring it all on the needs of the local community. By demanding more and requiring more from developers, we can achieve	The SPD is intended to benefit a wide range of groups including existing and new residents. The SPD seeks to meet the needs of residents whilst also managing the pressure for new development. The SPD has been updated to make it clearer that the emerging vision and the SPD seeks to ensure that development meets the needs of existing and new residents whilst also attracting new development.

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					this. And this SPD is not it. Not by a mile.	Residents will benefit from the increase range of uses including more shops, services and businesses along the Blackfriars Road.
150 1	116 3	Esther	Bell		I am writing to object to the building of a tower block at St George's Circus and the designation of the Bakerloo sidings site as a potential development site. Both of these proposals would have a negative impact on the local community. Any development on the Bakerloo sidings will interfere with long views into the West Square Conservation Area valued by Southwark Planning. What consideration has been given to these in the preparation of this SPD? What is the evidence to support its suitability as a development site as opposed to educational, open space or other use? Any building on this site will adversely affect the setting of heritage assets. The Elephant & Castle Enterprise Area SPD mentioned a landmark building. We find reference to any such building on this site deeply concerning given the proximity not only to our own listed houses but also the listed obelisk, St George's RC Cathedral and Imperial War Museum, the latter two being the landmark buildings in this location. How are these proposals affected by the Blackfriars Road SPD?	A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets. The Elephant and Castle SPD was adopted on 20 March 2012 and replaced the Elephant and Castle Enterprise Quarter SPD (2008) and the Walworth Road SPD (2008). The Blackfriars Road SPD will replace the Elephant and Castle SPD/OAPF guidance for the overlapping areas. The SPD has been updated to make this clearer.
150 2	116 3	Esther	Bell		St George's Circus is a fine example of Georgian town planning with its focal point at its centre, the Grade 2* listed obelisk. SPD 5 Building Heights proposes "a tall building of height up to 70 metres should provide a focal point at St George's Circus". A tall building will affect the setting of not only the obelisk, an important heritage asset, but also the listed Georgian terraces in London Road. Please demonstrate under London Plan CDR1 how tall building development, a fundamental change in architecture, will not adversely affect the	A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.

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					local character.	The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets. The GLA's representation confirms that the Mayor supports the council's approach on tall buildings, but suggests that the SPD should be more flexible in relation to building heights, and that buildings 'in the region' of 70/30m would be appropriate. The council disagrees with this proposed amendment as it could allow buildings that are greater than the 70m/30m threshold, which would be considered inappropriate based on our evidence base. As such, the council considers SPD 5 to balance local character and development potential.
1503	1163	Esther	Bell		No mention is made of environmental impact assessments, wind and daylight modelling, which are fundamental requirements in considering proposals of this nature, particularly considering the difficulties with the Palestra and 'Walkie Talkie' buildings.	These matters would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and planning regulations. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate.
1504	1163	Esther	Bell		The document states that crime will be reduced yet there is no reference to existing or anticipated crime statistics. Has the Metropolitan Police been consulted? If these studies have been obtained and modelling carried out then these should be in the public domain and not withheld. Please advise where these may be seen.	The Metropolitan Police are on the planning policy's mailing list and were consulted as part of the consultation on the Blackfriars Road SPD. The sustainability appraisal and the sustainability appraisal scoping report which both informed the preparation of the SPD provide further information on the possible impact of the SPD on crime. The sustainability appraisal assessed the impact of the SPD guidance on sustainability objective SDO4: To reduce the incidence of crime and fear of crime, and finds that the SPD is likely to overall have a positive impact. The sustainability scoping report also provides further information setting out information on the Indices of Multiple Deprivation which includes crime as one of its six indicators. Both documents are available to view on the council's web site at:

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						<p>www.southwark.gov.uk/blackfriarsroadspd and www.southwark.gov.uk/planningpolicy</p>
1505	1167	Maxine	Walker		<p>The SPD has very little to say about the social and environmental issues arising from intensive development. Indeed it seems to have largely forgotten the communities who live here. It does not address the greatest social problem facing areas such as this, the driving out of working class communities as rents get higher and 'affordable' housing remains beyond the reach of vast parts of the population. In that sense its ethos is simply that development is good, irrespective of where it leads. I would argue that if development is not for people then who is it for?</p>	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. Existing policies and guidance provide clear policies for affordable housing.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>
1506	1167	Maxine	Walker		<p>Although the SPD asserts that development creates employment, it does not offer any evidence about the kind of employment it creates or whether local people are able to take up these opportunities. Indeed the SPD has scant evidence of any of its assertions. For example it says there will be a mix of shops for the local communities and visitors. Current evidence would indicate that this is not the case with the Cut, for example dominated by restaurants and the normal highly priced Sainsbury's and Tesco's and the loss of varied shops and a much missed launderette.</p>	<p>The SPD promotes the development of a wide range of town centre uses, which will help to create a varied mix of employment opportunities, such as retail, office, light industry, creative and cultural jobs. The council's Economic Well-being Strategy (2012-2020) sets out the ambition for regeneration and development to provide lasting jobs for residents in both construction and related industries and end use job in developments, through training and skills programmes. The council's adopted Section 106 Planning Obligations SPD sets out the detail on securing planning obligations from new development for employment and enterprise measures which include initiatives to create jobs and training in the final development, and also jobs and training during the construction period of the development. The council currently seeks to secure a contribution of the equivalent cost of providing a Work Place Coordinator to assist in the placement of unemployed jobseekers from the local area into jobs within the final development either through an existing programme, or through setting up a new training and skills programme to target the employment sector of the final development The SPD provides further guidance to</p>

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						existing borough-wide planning policies. The existing adopted policies are based upon a robust evidence base. For key issues we have set out further detail in the business and retail background evidence paper.
1507	1167	Maxine	Walker		Although it asserts that it will take the local historic environment into account, there is no sign of this with the demolition of the only surviving terrace on Blackfriars Road. Indeed there is little sign in the document that anyone knows the history of the area. The proposal to have very tall buildings at the junction of Blackfriars Road/the Cut and St George's has no merit at all either in design, architectural, social or environmental terms. They will be out of place, overshadow residential areas, create more wind tunnels (as Palestra has in Union Street) and be alienating. These two areas already have focal points, the monument at St George's and the tube station at Southwark.	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>
1508	1167	Maxine	Walker		Although thousands of new residential units are planned there are no new social amenities. Where are these children to play? Where in the midst of huge upheaval and social change are children to meet, make friends? This is especially important given that new developments are consistently allowed to provide no play space contrary to Mayor's recommendations. If a plan does not give sufficient priority to children, then what is it worth?	<p>The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development. Updates have been made to the SPD to refer to encouraging a range of different uses.</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4.4 of the SPD refers specifically to infrastructure, crossing</p>

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						<p>referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to be provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Soutwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD</p>
1509	1167	Maxine	Walker		<p>Planning should begin with people. In that sense the only document which gives any consideration to social issues is the Equality Impact Assessment of the SPD. It too is entirely devoid of evidence for any of its assertions. For example it says: The scale of change proposed may potentially have a negative/uncertain impacts on some groups, and so the guidance in The implementation section seeks to minimise this by requiring construction management plans and encouraging developers and contractors to work together and with the Bankside and London Bridge Logistics Group to coordinate all aspects of the</p>	<p>The SPD is intended to benefit a wide range of groups including existing and new residents. The equalities analysis has been undertaken alongside the sustainability appraisal to assess the likely impact of the SPD on the nine protected characteristic groups and a range of sustainability indicators. Both refer to evidence where appropriate and have followed the council's and/or national/EU requirements for carrying out these assessments. Both have been updated as part of the adoption of the SPD alongside the preparation of a sustainability statement.</p> <p>There is also further evidence which underpins the Core Strategy and saved Soutwark Plan policies including the Strategic Housing Market</p>

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					construction process including issues such as traffic management, noise and pollution, local employment opportunities and public realm works. This mitigation measure is likely to have an impact on all groups including a beneficial impact by encouraging local employment opportunities which may benefit the young'.	Assessment, the Housing Requirements Study, the Employment Land Review and the Retail Capacity Study as well as the Bankside, Borough and London Bridge characterisation study. In particular the Strategic Housing Market Assessment and the Housing Requirements Study set out a lot of detail about residents within the whole of Southwark.
1510	1167	Maxine	Walker		For those of us who have lived with continuous building work for over a decade and will live with it for decades more, this is hardly a mitigation of endless noise, dust and disturbance. Nor is it the case that large scale building works are monitored by Southwark in any serious sense. The very least that should happen is that developers should be forced to pay for more building control inspectors so that when (as we saw in Union Street when the Travelodge builders began dismantling scaffolding over the heads of passers by) there is an immediate and robust response. As it is, the developers make a very huge amount of money and the local residents and workers pay the price in health terms. Nor is there evidence brought forward that employment opportunities will increase.	Saved Southwark Plan policy 3.2 Protection of amenity, sets out that planning permission will not be granted where it would cause loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Further guidance is also set out in the Residential Design Standards SPD, Sustainable Transport SPD and the Sustainable Design and Construction SPD. Frequently planning conditions or section 106 planning obligations are required as part of a planning permission to ensure minimal impact and where appropriate to ensure construction management plans. The Blackfriars Road SPD also refers directly to requiring construction management plans in section 4.3.
1511	1167	Maxine	Walker		The EIA does not appear to have resulted from any factual base nor from consultation with the affected groups. For example, it has been reported by local charities that local elderly people are becoming greatly more isolated as their children have to move out of the area having been priced out. A little investigation would have turned up this fact rather than merrily asserting that all groups will benefit from development. I would strongly suggest research is commissioned about this area, its character, history, strengths and problems and that this is fed into an overall development plan. That evidence is brought forward	The SPD is intended to benefit a wide range of groups including existing and new residents. The equalities analysis has been undertaken alongside the sustainability appraisal to assess the likely impact of the SPD on the nine protected characteristic groups and a range of sustainability indicators. Both refer to evidence where appropriate and have followed the council's and/or national/EU requirements for carrying out these assessments. Both have been updated as part of the adoption of the SPD alongside the preparation of a sustainability statement. In particular the equalities analysis has been updated to cross refer to the evidence that underpins the Core Strategy and saved Southwark Plan as well as the more recent evidence documents informing the Blackfriars Road SPD including the

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					that development will produce employment for local communities and for the other assertions in this document. Above all development should not be an excuse for the wholesale driving out of working class communities from this and other areas (as we have seen in the Elephant.)	Blackfriars Road Urban Design Study and the Bankside, Borough and London Bridge characterisation study.
1512	749	Eileen	Goodway		<p>When will Southwark Council ever be proud of the borough it runs and when will we be proud of it? History is repeating itself as the council goes hell for leather for another bout of manic and dismal building. I should be a fine borough and a fantastic place to live. Post war, the push for Le Corbusier style blocks meant that the 60s and 70s were a golden age for developers and much that we would now value was demolished. Panicked by its foolishness the council then obstructed intelligent development for the next few decades and the borough got left behind. Now fearing it has missed some unidentified gravy train the Planning Department has rushed through another SPD – that for Blackfriars Road. Between the miserable 70s block are what managed to survive the wrecking ball last time around but now we are supposed to thrill to the idea of sweeping away these for yet more speculative and likely underused building. Hasn't the council learnt anything? When is true inspiration, calm consideration and an ability to take a long view and not follow the herd going to be a prerequisite for running Southwark Planning Department? As an architect said to me at a consultation Blackfriars Road "This is first class area with third class prices". How much clearer does he have to be? A developer has got a bargain and the Planning Department (something of a misnomer) have, in the Blackfriars Road SPD, written a charter for him. We are not a wealth borough so why are some of our greatest assets being discarded so briskly and so cheaply?</p>	Comments noted. The SPD seeks to provide guidance to implement the policies in the saved Southwark Plan, Core Strategy and London Plan. As set out within the SPD it does not repeat borough wide policies and the SPD must be read alongside other planning documents. Together these documents provide a framework to deliver and manage change including policies and guidance on protecting the historic environment and the type of appropriate development.

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1513	749	Eileen	Goodway		Active frontages. What is the point of a long street of shops there was almost no demand for those recently built in Southwark Bridge Road and borough Road? Across our great city almost 10% of shops are unoccupied and our "Town Centre" at the Elephant and Castle is only part occupied. New rents will be too high for all but the boring chain stores, the interesting shops we need have no change and our present shops will have been driven out of business. A revitalised Marylebone High Street was achieved by a policy of low rents and choice of a mixture of tenants-the Ginger Pig butcher's shop pays less there than it does in Borough Market. The Planning Department say we cannot have any such policy so how will it achieve 'world class shopping' for the area?	The business and retail background evidence paper sets out further detail to SPD2 and the future retail capacity for the Bankside and Borough district town centre. This detail has been referenced from the Southwark Retail Capacity Study. The study evaluates the vitality and viability of the town centre, in terms of its retail performance and identified that the focus should be on continuing to meet the needs of workers, tourists and visitors. New schemes will be supported by an increase in population in the area, through new residents, workers and visitors and these will come forward on an incremental basis. We have amended SPD2 bullet 1 to include reference to supporting a range of unit sizes for new town centre uses, which will encourage a wider diversity of offer.
1514	749	Eileen	Goodway		Heritage and grand designs. The borough could not be luckier in having a remarkable piece of town planning, yet the planners in their SPD disregard this. A 'boulevard' Blackfriars Road may be but it only one of a series of grand roads radiating from St George's Circus. What a fantastic resource on which to create an area unlike any the in London. The SPD largely disregards housing, yet that is what central London sorely needs. Whilst having no borough architect surely it is not beyond the wit of those employed to consider how fine Blackfriars Road could be if they found a 21st century Haussmann or someone of the calibre of the architects of Vienna's Ringstrasse? How exciting it would be to have a sympathetic but enlivening SPD. It could so easily atone for the sins of our predecessors who wilfully demolished the Georgian terrace in the 1070s. That this shabby document was launched outside the borough, at the Building Centre, Store Street, WC1, beggars belief. Bad enough that Southwark wrote it but to broadcast to the world that Southwark is a pushover for wily	SPD paragraph 1.2.2 sets out that the SPD provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. The vision already refers to housing development. Housing will be encouraged on appropriate sites. In order to make this clearer, we have updated SPD 2: Mixed use town centre to include residential development as one of the uses to be encouraged alongside the provision of a mixture of new town centre uses. The fact box on town centre uses has also been updated in accordance with the National Planning Policy Framework definition to make it clear that residential development is not a main town centre use but it can play an important role in ensuring the vitality of town centres.

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					developers to public embarrassment that should not be tolerated.	
1515	749	Eileen	Goodway		Tall building. Southwark Planners told UNESCO it would take care with tall building. Blackfriars Road cuts right across the views from Westminster to the City as the Thames meanders. Our unique, central, situation could add crucially to the greatness of London yet our planners care so little for it. Modelling. A poor substitute for experience. An elderly resident near the river has said she does not care if she dies. A new high rise building has taken all her sun. Her flat is now cold and she cannot afford to heat it. With proposed canyon we will all be blown away or burnt to a cinder (the Palestra glare has much in common with the still incomplete Solar Death Ray in the City). Who has come off worse? Not the developer nor planners but those having to live with the consequences. Does modelling include the cost to Southwark's Social Services of depression? This is not meant facetiously. It is a cost.	<p>A tall building up to 70m in height provided that it complies with the detailed guidance outlined in SPD 5 and the existing planning policy framework of design, heritage and tall building policies (the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan) could be appropriate at the southern end of Blackfriars Road and at Southwark tube station.</p> <p>The Blackfriars Road SPD urban design study sets out the evidence base. The potential impact on World Heritage Sites has been assessed and informs the guidance. Detailed design matters would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and planning regulations. Bullet point 14 of SPD 5 sets out further guidance regarding microclimate.</p>
1516	749	Eileen	Goodway		In 2008 the Planning Department produces the Elephant & Castle SPD and five years later we have the Blackfriars Road SPD. The areas overlap and the latter contradicts the former. Blackfriars Road SPD blatantly and cynically undermines the Localism Act. South Bank & Waterloo and Bankside Forums, composed of both businessmen and resident, are far more representative and more likely to achieve a fully functioning mixed economy for the area. Furthermore the SPD undermines various Conservation Area Plans. What a mess. This latest document merely adds another layer of bureaucracy, increases the workload for planning officers, frustrates good planning and abuses the planning hierarchy The Planning Department in its SPD seems to display self interest	<p>An explanation of the boundary is set out within the SPD. It includes the whole of the Blackfriars Road and some of the surrounding area. It includes the surrounding area as the surrounding area is also likely to see some development and improvements, particularly possible improvements to public realm. Wording has been added to the SPD to make it clearer that the character and historic value of much of the surrounding area will continue to be protected and enhanced. It is appropriate to overlap with part of the boundary of the Elephant and Castle SPD (2012) to ensure coherent guidance and consideration of St George's Circus including the conservation area. The SPD has been updated to make it clearer that the guidance in the Blackfriars Road SPD will replace that in the Elephant and Castle SPD/OAPF for the overlapping area.</p> <p>Figure 3 of the SPD illustrates the relationship between different</p>

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					and ignorance about the area and in so doing lies to the Planning Committee. If the Committee vote to accept this SPD then they will be cuckolds once more. How low do our Planning Department have to stoop before the Chief Executive and elected Councillors call them to account?	planning documents including supplementary planning documents and neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area.
1517	1095	Anonymous 1			I was dismayed at the non-accessible language in the document. What on earth are 'agglomeration benefits' and 'synergies' - accommodated or not? With difficulty I translated 'vehicular mode share' in to 'percentage' and fenestration in to windows? Has your department not heard of the campaign for Plain English? On page 22 it states that Blackfriars important that it is easy to understand! I could only wish you'd grasped that concept for the SPD document. Also as was said at the consultation meeting your document should be readily and wholly, recycle-able.	Noted. The SPD has been updated where appropriate to make the guidance as clear as possible. A tracked change version of the SPD is available on our website.
1518	1095	Anonymous 1			On to specifics. No objection to 'active frontages' but you don't address the active retailing by individuals with considerable front around the drug clinic. They are a major deterrent to using this stretch of road and I doubt this is the 'unique identity' you are aiming for. Plans? Not even a little tiny aim or ambition here?	The SPD provides adequate detail with regard to active frontages and building form. The supporting text promotes the development of a finer grain in the design of large frontages, to help ensure a human scale to the buildings fronting the streets, and which will help to enhance the character of the streetscape and activate the public realm.
1519	1095	Anonymous 1			I wish LBS would preserve and enhance the historic environment. London Homes now have permission to knock down historic pub/ St Georges mansions despite strong community objection. What else will we lose to provide more Sainsbury retail opportunities? (Isn't it time LBS considered a saturation policy for them?)	The assessment and detail of the Linden Homes planning application is available in the Planning Committee report which is available in the link below. http://planningonline.southwark.gov.uk/AcolNetCGI.exe?ACTION=UNWRAP&RIPNAME=Root.PgeResultDetail&TheSystemkey=9549115 SPD2 recognises there is an opportunity to promote a much wider mix of town centre uses in the SPD area. This should include a range of different types and sizes of retailers. The SPD cannot designate land

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						use on development sites, however we will consider the range of uses that would be appropriate for allocated development sites through the preparation of the New Southwark Plan and its accompanying proposal sites map.
1520	1095	Anonymous 1			SPD3 – I'm glad you intend to ensure Nelson Square is maintained and enhanced – but as a garden, please, not a 'green infrastructure' You aim to introduce a network of public spaces provided by new development – again 'Linden Homes has got away with not doing this. Where exactly will there new pocket parks/green spaces be? Suggestion - there's a fenced off bit of greenery by St George's Circus that could be a new pocket park, which would serve as a contemplative's space for honouring the Cenotaph, enhancing it's setting.	The SPD does not designate proposals sites or provide site specific guidance, as this would beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.
1521	1095	Anonymous 1			Opposite Southwark Tube Station, LBS could usefully engage their housing/parks departments in weeding the entrance paths, improving the planting and generally maintaining Nelson Square estate. Heroic efforts are made by volunteers, but we pay for non-existent services, so the area looks shabby.	SPD 3 and the Section 4 'Implementation' sets out how the council will continue to work with stakeholders within the area.
1522	1095	Anonymous 1			At 3.18 you hold up Isabella Street and The Cut as good examples for your vision. Leaving aside that they are largely in Lambeth, The two areas have distinct and entirely different qualities. The Cut hosts chain coffee stores of the kind that pay no UK tax, alternating with branches of Sainsbury's. It also, of course has the theatres, and the fantastic garden at Styles House (under constant threat of planning blight!) It's a busy street, and a complete contrast to Isabella Street, which is leafy, enclosed, and a haven for wildlife, particularly birds. Which, if either, is your model for Blackfriars Road? You could usefully create a more welcoming entrance to Isabella Street from the tube station with generous landscaping around the	There are opportunities for a variety of public spaces along and off Blackfriars Road. The guidance in the SPD supports the creation of new and enhanced public realm. Southwark tube station and 1 Joan Street are identified as potential development sites. The SPD does not designate proposals sites, make site allocations or provide site specific guidance, as this would beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.

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					Boris bikes compound. This would link to Nelson Square, providing a green corridor and provide a more attractive introduction to the area, and a counter-point to the concrete/glass.	
1523	1095	Anonymous 1			<p>SPD – I am implacably opposed to any plans you 70m buildings at Southwark tube and St Georges Circus. The road is already `booked –ended' by tall building. Any more `books' and you'll have `book-case' effect. NO! St George's Circus already has a `focal point' in the historic shape of the Cenotaph – this should be enhanced ? for idea of garden), not desecrated for financial greediness by developers (and LBS). At the tube station there is already a `focal point' in the highly (56m) undesirable shape of Palestra which dominates the `streetscape', due to its `iconic' design it is clearly visible the length of Blackfriars Road, satisfying any possible need to way find/identify /gateway the station. And since when did people start navigating the streets from one tall building to the next, like pigeons? A 70m building over the tube station is going to be an enormous, costly, and disruptive plan. Do you think potential businesses, residents new and old will welcome this? The tube is extremely busy, used by many tourists as well. OK, there's nearby Waterloo, but that is busy too. Isabella Street would lose it's essence of business, Nelson Square (particularly Rowland Hill House) will be cast into shadow – We have already seen the negative effects of shading and wind-tunnels Resulting from Palestra on our day-light and gardens. No more! Then there is the security issue – Palestra is currently ring-of-steeling their site, such as the sensitivity of operations there. What are the key terrorists targets? Tall buildings (baltic x 2), transport (7/7), sensitive Government operations – The ground floor is well defended, where do you aim? OK, I watch too many episodes of spooks, but you don't</p>	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road and Southwark tube station, provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road.</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets. Detailed design matters would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and planning regulations.</p>

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					need much imagination to determine negative possibilities of an over-looking tower by Palestra	
1524	1095	Anonymous 1			<p>SPD. Active travel. How do you define in-active travel? OK, walking is healthy, especially if you don't risk trips/falls on current uneven pavement. Segregated cycle routes- perfect. Why do people not walk? Handy shops, bus stops, tube stations all close by, so no need. However, local shops don't have all you need, and local Sainsbury/Tesco don't carry 'value' lines, so cheaper to go to larger store. How are you getting there, and more importantly back home with those heavy tins/bulky loo rolls if you don't drive/ no parking/car-free development? Not cycling, really – so, bus! OK, fewer trips, monthly shop – or, order it all over the internet and get delivered. Circle living-room for an hour to meet /comply with LBS policy on active travel. There is not one word on supporting those with mobility problems to access the new and exciting active Sainsbury frontages. Of course wheelchair users will benefit from smoother pavements etc. However, those of us not at the stage, but with dodgy knees bipedally actively transporting ourselves forth and back, permeably, to the cheaper stores at the Elephant and Castle would welcome inactivity way stations (benches). There we can admire the finer grain buildings; contemplate the mysteries of accommodating synergies and Sainsbury's pricing policy in smaller stores; and ponder on the folly of tall buildings at St Georges Circus and Southwark tube station.</p>	The council actively supports provision of facilities for the mobility impaired and as stated in section 1 of the SPD, this SPD provides further guidance to existing policies in the Core Strategy, saved Southwark Plan and other SPDs such as Sustainable Transport but does not repeat borough wide policies or objectives included in other policy documents. The Sustainable Transport SPD sets out specific policies that relate to those with less mobility including car parking provision. Appendix A also cross refers to key existing Southwark policies.
1525	1095	Anonymous 1			So, to finalise. Thanks again for the effort. If you can contain the urge to desecrate heritage monuments, flatten much-loved buildings; truly ensure that new builds reflect the historic /listed buildings, determine no more Valentine Place horrors allowed; actually get	Comments noted.

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					new green spaces, avoid pedestrians being flattened by cyclists, and stop fretting about us `understanding' Blackfriars Road, you may yet succeeded on providing a visionary and lasting legacy	
1526	1168	Chris	Jane		<p>I am writing to express my concern due to some of the features in the draft plans for Blackfriars Road and the surrounding area. These include; 1. Provision for a tower block 70 metres high at St George's Circus This is exceedingly high, taking into account what is on and around this street this would dwarf the structures and be out of character. St George's Circus is a fine example of Georgian town planning with its focal point at its centre, the Grade 2* listed obelisk. SPD 5 Building Heights proposes "a tall building of height up to 70 metres should provide a focal point at St George's Circus". This statement displays a fundamental ignorance of this circus. A tall building will affect the setting of not only the obelisk, an important heritage asset, but also the listed Georgian terraces in London Road. Please demonstrate under London Plan CDR1 how tall building development, a fundamental change in architecture, will not adversely affect the local character.</p>	<p>The policy approach within the SPD is considered to be consistent with the NPPF (2012), the London Plan (2011), the Core Strategy (2011) and the saved Southwark Plan (2007), taking into account changes in the surrounding context since developing the Core Strategy vision in 2009/2010. The London Plan, Core Strategy and saved Southwark Plan form the development plan for Southwark, with the NPPF setting out national guidance. The development plan sets out the policies for tall buildings. Key policies are: London Plan policy 7.7 which identifies that tall and larger buildings should generally be limited to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. Blackfriars Road lies within the Central Activities Zone, is an opportunity area and a town centre with good access to public transport. Core Strategy strategic policy 12 requires tall buildings to have an exemplary standard of design and identifies locations where tall buildings could go. The Core Strategy vision for Bankside and Borough refers to the council setting out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework. Saved Southwark Plan policy 3.20 sets out criteria for considering applications for tall buildings and applies across the borough A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012).</p> <p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity</p>

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						to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.
1527	1168	Chris	Jane		Where is the comprehensive urban design analysis of the local character and historic context? (CABE and English Heritage Guidance on Tall Buildings CDN25)	The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007
1528	1168	Chris	Jane		Development sites 39, 40, 41 and 43 directly affect the Circus and other heritage assets. Council officers have stated that tall buildings at St George's Circus would not be a conflict with the adjoining heritage assets. Where is the evidence that this is not a conflict?	The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.
1529	1168	Chris	Jane		In determining tall building height limits within the SPD of 70 metres, where is the assessment of three dimensional modelling to determine the potential effect on the local context? (CABE and English Heritage Guidance on Tall Buildings CDN25)	The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007
1530	1168	Chris	Jane		Why are hotels being promoted (SPD 3.10) as viable use when Southwark has already achieved or is close to achieving the requirements. The figures for hotel rooms in the SPD make it clear that, of the 2500 bedrooms required by the GLA's Hotel Demand Study 2006 by 2026, all but 75 have either been built or are in the pipeline.	The London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2031. The estimate of the approximate net and gross hotel rooms required over the period 2007-2026 for Southwark, as set out in the GLA's Hotel Demand Study, is based on assessment of factors including transport links to central London and connections to airports, proximity of tourist attractions/business locations, cafes and restaurants in the area, night time economy, cultural facilities and attractions, and regeneration initiatives and site availability. The forecast for Southwark should be treated as indicative only, and local circumstances should also be factored in. It is important to consider that the SPD area is within the Central Activities Zone, Bankside, Borough and London Bridge Opportunity Area and part of the Elephant and Castle Opportunity Area which are areas promoted in

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						<p>the London Plan to accommodate strategically important hotel provision. Arts, cultural and tourism activities have flourished in Southwark in the last decade, particularly in the Strategic Cultural Area, which is within the CAZ. Bankside, Borough and London Bridge has consequently experienced a growth in the number of hotels to support this increasing visitor economy. SPD2 provides guidance to support Core Strategy policy 10 'Jobs and business' which sets out the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. Policy 10 and SPD 2 are also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals in the area will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account.</p>
153 1	116 8	Chris	Jane		<p>2: The designation of the Bakerloo sidings site as a potential development site. In including large areas of land that have nothing to do with Blackfriars Road, Southwark Council will undermine Neighbourhood Forums (South Bank and Waterloo Neighbourhood Forum and the Bankside Neighbourhood Forum) and the Localism Act 2011. Can the council demonstrate that the SPD will give a better outcome than those envisaged by Neighbourhood Forums? Development Site 43 The Bakerloo Sidings Any development on this site will interfere with long views into the West Square Conservation Area valued by Southwark Planning. What consideration has been given to these in the preparation of this SPD? What is the evidence to support its suitability as a development site as opposed to educational, open space or other use? Under the Elephant & Castle Enterprise Quarter SPD Southwark should have consulted TfL. Under the Localism Act consultees are duty bound to co-operate so where may we see TfL's response? Any building on</p>	<p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table 1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.</p> <p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>The SPD is responding to development pressure and the potential for piecemeal development. The guidance set out within the SPD is</p>

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					<p>this site will adversely affect the setting of heritage assets. The Elephant & Castle Enterprise Area SPD mentioned a landmark building. We find reference to any such building on this site deeply concerning given the proximity not only to our own listed houses but also the listed obelisk, St George's RC Cathedral and Imperial War Museum, the latter two being the landmark buildings in this location. How are these proposals affected by the Blackfriars Road SPD?</p>	<p>consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. Any forthcoming neighbourhood plans also has to be consistent with the adopted planning framework.</p> <p>TfL, GLA and Network Rail were all consulted as part of the consultation process. The Blackfriars Road SPD consultation report summarises all the responses received and changes subsequently made to the SPD. The full representations received from these bodies and the council's response to them is included within Appendix J of the Blackfriars Road SPD consultation report.</p> <p>The Elephant and Castle SPD was adopted on 20 March 2012 and replaced the Elephant and Castle Enterprise Quarter SPD (2008) and the Walworth Road SPD (2008). The Blackfriars Road SPD will replace the Elephant and Castle SPD/OAPF guidance for the overlapping areas. The SPD has been updated to make this clearer.</p>
153 2	116 8	Chris	Jane		<p>The Council's Core Strategy 2010 does not support tall buildings in Blackfriars Road South, as they do not meet the criteria for 'vision vibrancy and life'. Why does the Council's vision now differ from the Core Strategy?</p>	<p>The policy approach within the SPD is considered to be consistent with the NPPF (2012), the London Plan (2011), the Core Strategy (2011) and the saved Southwark Plan (2007), taking into account changes in the surrounding context since developing the Core Strategy vision in 2009/2010. The London Plan, Core Strategy and saved Southwark Plan form the development plan for Southwark, with the NPPF setting out national guidance. The development plan sets out the policies for tall buildings. Key policies are: London Plan policy 7.7 which identifies that tall and larger buildings should generally be limited to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. Blackfriars Road lies within the Central Activities Zone, is an opportunity area and a town centre with good access to public transport. Core Strategy strategic policy 12 requires tall buildings to have an exemplary standard of design and identifies locations where tall buildings could go. The Core Strategy vision for Bankside and Borough refers to the council setting out in detail which sites are</p>

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						appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework. Saved Southwark Plan policy 3.20 sets out criteria for considering applications for tall buildings and applies across the borough It should be noted that the GLA is supportive of the approach to building heights. The GLA's representation confirms that the Mayor supports the council's approach on tall buildings, but suggests that the SPD should be more flexible in relation to building heights, and that buildings 'in the region' of 70/30m would be appropriate. The council disagrees with this proposed amendment as it could allow buildings that are greater than the 70m/30m threshold, which would be considered inappropriate based on our evidence base . As such, the council considers SPD5 to balance local character and development potential.
1533	1168	Chris	Jane		In 2012 UNESCO noted in its convention briefing paper that in April 2011 Southwark's Core Strategy "includes an emphasis on heritage assets and revises their approach to tall buildings on the area". Why has the council reneged on this? UNESCO's World Heritage Committee Report June 2012 "notes the intention of Southwark Council to develop a Supplementary Planning document to clarify how and where development can take place and to define building height thresholds so as to inform the appropriateness of subsequent development proposals". Is this the said SPD?	The UNESCO paper relates to the area around London Bridge and the potential impact of tall buildings on the setting of the Tower of London World Heritage Site. The heights proposed in the Blackfriars Road SPD building heights strategy are consistent with Southwark's development plan consisting of the saved Southwark Plan policies, Core Strategy and the London Plan. Our testing shows that the proposed heights would not impact the setting of the Tower of London site. The proposed 70m threshold guidance for the southern of Blackfriars Road responds to the sensitivity of the Palace of Westminster World Heritage site.
1534	1169	Peter	Earnshaw		The Council in promoting this SDP is seeking to change its policy on tall buildings from that contained within the Core Strategy, which states that Blackfriars Road South is not a suitable location for tall buildings. Any SPD currently proposed must conform to existing policies of the Core Strategy and saved policies of the Southwark Plan. It cannot claim to conform to a new Southwark Plan, which does not exist. If a new Southwark Plan is to be produced it should follow	The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area. The Blackfriars Road SPD urban design study sets out the evidence base. The urban design study utilises a robust methodology that has previously been agreed with English Heritage, and 3D modelling

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					<p>correct protocol and be accordance with the London Plan and the NPPF and receive approval of the Secretary of State. It is from this document that any future SPDs should flow. This appears to be an attempt by the Council to circumvent the strictures of its own policy and also those of national government, perhaps in an effort to support the application by Barratt for a 70 metres high tower at St Georges Circus, which fails to comply with current policy. Please explain why this inverted approach is being taken and how the NPPF justifies the change in policy being promoted by this SPD.</p>	<p>techniques to assess the potential impact on heritage assets. The study updates the testing from the previous urban design studies in light of guidance set out in the NPPF, the London Plan that was adopted after the Core Strategy, schemes that already have been consented within the area and existing development pressure that could lead to piecemeal development within the area. The GLA's representation confirms that the Mayor supports the council's approach on tall buildings, but suggests that the SPD should be more flexible in relation to building heights, and that buildings 'in the region' of 70/30m would be appropriate. The council disagrees with this proposed amendment as it could allow buildings that are greater than the 70m/30m threshold, which would be considered inappropriate based on our evidence base . As such, the council considers SPD5 to balance local character and development potential.</p>
1535	1169	Peter	Earnshaw		<p>There is no justification for tall buildings around St Georges Circus. St Georges Circus with its central feature and wide radiating roads stands alone as a past example of Georgian circus design in South London. With its central Grade II* listed obelisk it is itself the focal point. To construct a 70 metre high tower adjacent to it as a focal point can only distract from the importance of the historic circus and have a detrimental effect on its setting and the local conservation areas. Where has the impetus for this building come from and where is the town planning evidence base to support such a contention?</p>	<p>The policy approach within the SPD is considered to be consistent with the NPPF (2012), the London Plan (2011), the Core Strategy (2011) and the saved Southwark Plan (2007), taking into account changes in the surrounding context since developing the Core Strategy vision in 2009/2010. The London Plan, Core Strategy and saved Southwark Plan form the development plan for Southwark, with the NPPF setting out national guidance. The development plan sets out the policies for tall buildings. Key policies are: London Plan policy 7.7 which identifies that tall and larger buildings should generally be limited to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. Blackfriars Road lies within the Central Activities Zone, is an opportunity area and a town centre with good access to public transport. Core Strategy strategic policy 12 requires tall buildings to have an exemplary standard of design and identifies locations where tall buildings could go. The Core Strategy vision for Bankside and Borough refers to the council setting out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework. Saved Southwark Plan policy 3.20 sets out criteria for considering applications for tall buildings and applies across the borough The approach is supported by our evidence base including the Blackfriars</p>

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						Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.
1536	1169	Peter	Earnshaw		The Draft SPD attempts to justify a case for tall buildings adjacent to St Georges Circus by claiming it to be a transport node. This is false. Buses are the only public transport available, yet bus stops are remote from the Circus and there are no interchanges. A fine piece of Georgian town planning, which would be a source of civic pride in most European capitals has been reduced to a traffic roundabout. Why does the Draft SPD not contain any substantive encouragement for the improvement of this heritage asset?	In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets. The SPD also sets out clear guidance for the enhancement of St George's Circus in SPD 3, 4 and 6
1537	1169	Peter	Earnshaw		Why does the draft SPD not contain a schedule of historic buildings or buildings with potential to be listed as would normally be produced to demonstrate that the proposals are sympathetic to these?	Guidance and the identification of buildings will be addressed in a new Heritage SPD that will be prepared alongside the New Southwark Plan.
1538	1169	Peter	Earnshaw		The draft SPD claims that the local character will be enhanced. Being physically a residential and small business area it is difficult to conceive that the character of Blackfriars Road will be enhanced by buildings ranging in height from 30 – 70 metres. Where is the evidence to support this claim?	The policy approach within the SPD is considered to be consistent with the NPPF (2012), the London Plan (2011), the Core Strategy (2011) and the saved Southwark Plan (2007), taking into account changes in the surrounding context since developing the Core Strategy vision in 2009/2010. The London Plan, Core Strategy and saved Southwark Plan form the development plan for Southwark, with the NPPF setting out national guidance. The development plan sets out the policies for tall buildings. Key policies are: London Plan policy 7.7 which identifies that tall and larger buildings should generally be limited to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. Blackfriars Road lies within the Central Activities Zone, is an opportunity area and a town centre with good access to public

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						transport. Core Strategy strategic policy 12 requires tall buildings to have an exemplary standard of design and identifies locations where tall buildings could go. The Core Strategy vision for Bankside and Borough refers to the council setting out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework. Saved Southwark Plan policy 3.20 sets out criteria for considering applications for tall buildings and applies across the borough In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.
1539	1169	Peter	Earnshaw		There is no schedule of buildings which are owned by Southwark Council. What assurance can the Council give that where these exist and are to be considered for disposal of that they will first be considered for the direct benefit of the community and if sold they will be sold at market value?	This level of detail is outside the scope of the SPD.
1540	1169	Peter	Earnshaw		In summary the issuing of the draft SDP is procedurally flawed. Insofar as Blackfriars Road South is concerned it displays a lack of understanding of the area and its community. It offers no evidence based proposals and should be withdrawn forthwith.	Section 1 of the SPD sets out why the council are preparing the SPD. Evidence where appropriate is referred to within the SPD and further information is also set out in the sustainability appraisal.
1541	643	Charles	Muriithi	Environment Agency	Thank you for consulting the Environment Agency on the above which we received on 12 August 2013. We welcome this supplementary planning document and hope it will meet its aim of providing a strategic framework and detailed guidance to coordinate future growth along and around the Blackfriars Road. We have been closely involved in supplying data and information to support the local plans evidence base including the Core Strategy, Bankside, Borough and London Bridge Opportunity Area and Elephant and Castle SPD/Opportunity Area Planning Framework.	Noted.

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154 2	643	Charles	Muriithi	Environment Agency	We support the emerging ideas for a vision for Blackfriars Road as presented on paragraph 2.2.4. For developments fronting the River Thames, we would wish to see the Blackfriars Road distinct identity aligning with the Environment Agency Thames Estuary 2100 (TE2100) Plan which was approved by DEFRA in November 2012.	Support noted. Saved Southwark Plan policies 3.29 and 3.30 set out further detail for development in the Thames Policy Area. We will look to update these policies through the preparation of the New Southwark Plan.
154 3	643	Charles	Muriithi	Environment Agency	We will support the London borough of Southwark with interpretation of TE2100 data and information as required to ensure the revision of the borough Strategic Flood Risk Assessment (SFRA) and flood plans are developed with an understanding of TE2100 analysis and recommendations. We hope the supplementary planning document will support the flood risk management measures identified by the TE2100 Plan. For other most up to date and accurate environmental evidence we recommend using our Data Share service where you can access our environmental datasets and also datasets from Natural England, Forestry Commission and English Heritage. http://www.geostore.com/environment-agency/ Our detailed comments are attached below for your consideration.	Our approach to managing surface water flood risk is borough wide. Further information is set out in strategic policy 13 of the Core Strategy and in our adopted Sustainable design and Construction SPD. We will also look at updating this guidance through the preparation of the New Southwark Plan.
154 4	643	Charles	Muriithi	Environment Agency	TE2100 Policy Unit ;V Wandsworth to Deptford „h Land requirements for each Policy Unit „h Third party riverside developments „h TE2100 Improvements to the Flood Risk Management „h Thames Policy Area (TPA) „h The River Thames The whole of the SPD area is located within a high flood risk zone. It does benefit from a high level of flood protection by a combination of river walls and the Thames Barrier. Despite this there is a residual risk of flooding from either an overtopping of, or breach in the flood defences. The TE2100 Plan is the result of a detailed assessment of the options available to manage flood	Our approach to managing flood risk from the River Thames and surface water flood risk is borough wide. Further information is set out in strategic policy 13 of the core strategy, saved Southwark Plan policies 3.29, 3.30 and 3.31 and our sustainable design and construction SPD. We will be reviewing these policies as part of the preparation of the New Southwark Plan.

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					<p>risk and their economic costs, benefits and environmental impacts. It sets out the strategic direction for managing flood risk across the Estuary, and contains recommendations on what actions we and others will need to take in the short term (next 25 years), medium term (the following 15 years) and long term (to the end of the century). The Plan is based on current climate change guidance, but is adaptable to changes in predictions for sea level rise and climate change over the century. TE2100 Policy Unit Wandsworth to Deptford SPD area falls within the Wandsworth to Deptford policy unit and has the largest developed area of any of the TE2100 policy units. Each policy unit has been assigned a policy which determines how flood risk will be managed in the future. The selected policy for Wandsworth to Deptford is policy P5-; take further action to reduce flood risk beyond that required to keep pace with climate Change. See the table below for more detail. There are 10 underground stations and three major railway terminals in the tidal flood risk area. There are also 32 care homes, 93 schools, three hospitals and over 200 electricity substations potentially at risk. This makes the Wandsworth to Deptford policy unit one of the most vulnerable in the TE2100 area to flood risk in the event of a failure or overtopping of the defences. There is need to agree a programme of floodplain management including local flood protection, resilience and emergency plans for vulnerable key sites in the area. There may be opportunities to set back defences and improve the riverside amenity and habitats. A combination of defence realignment and floodplain management could reduce the impacts of flooding to existing properties and other assets located in the floodable areas on the river side of realigned defences. We need to agree partnership arrangements</p>	

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					<p>and principles to ensure that new development in tidal risk area is safe, and flood risk management is factored into the planning process at all levels for the first 25 years from 2010 to 2034. There is need for greater clarity over methods and procedures for safety in new development behind defences. To view the Thames Estuary 2100 (TE2100) Plan please visit: http://www.environment-agency.gov.uk/homeandleisure/floods/125045.aspx</p> <p>Land requirements for each Policy Unit The Thames Estuary 2100 Plan requires a wide range of works to be implemented on the estuary including: maintenance and repair of defences, rising of defences, new 'fixed' defences and intertidal habitat creation. One of the actions identified in the plan is to develop a Land Strategy for the Thames Estuary to identify and safeguard the land that will be or may be needed for future flood risk management, so that it is available when required. All Policy Units will require land for the following purposes:</p> <ul style="list-style-type: none"> • Along the existing defence lines for inspection, maintenance and repair. • Additional land along the existing defence line where defences are to be raised. This includes all the existing tidal flood defences that are to be raised except where defences are realigned. Additional requirements for Wandsworth to Deptford Policy Unit are listed below. • The local choices include some local defence realignment including the lower reach of the River Wandle. If defences are to be realigned, space will be needed along the new alignment for the defence and an access route. • Land for secondary defences at vulnerable locations including tube station entrances and critical infrastructure, for example pumping stations. • Potential future high level access routes into and out of the main flood risk areas. Third party riverside developments Riverside developments on the 	

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					<p>Thames estuary should be compatible with the TE2100 Plan. Specific requirements include the following: „h Present day flood defence crest levels should be consistent with statutory requirements and the TE2100 Plan. „h Ability to raise flood defences to achieve future design crest levels. „h Space for access to inspect, maintain and repair defences. „h Compatibility with the requirements of riverside strategies (or relevant planning document where riverside strategies are not available). This includes landscape and public access requirements. „h Ensure that the development fulfils floodplain management requirements including public safety. „h Seek opportunities for environmental and recreational enhancements TE 2100 Improvements to the Flood Risk Management We are now looking at the most cost-effective way to implement the recommendations in the TE2100 Plan and starting with the first 10 years. But we can't manage future flood risk alone and will be working with partners and communities to find the best way to meet the future demands for flood risk management on the Thames estuary. The following will be required within the next 10 years: „h Safeguarding land; „h Developing riverside strategies; „h Floodplain management (by partnership working); „h Managing flooding from other sources (by partnership working); „h Agreed approaches to new development (by partnership working); „h Providing information for SFRAs and other purposes Thames Policy Area (TPA) Development should also be in accordance with Core Strategy Policy 3.29 development within the Thames Policy Area as identified in the local development framework. Special policy requirements apply in this area to make sure new development protects and improves the river and the character and quality of the public realm along the</p>	

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					<p>river. Development in this area will be expected to be carefully designed to protect and enhance the river environment and the important contribution it makes to both local people and all of London. This includes its use for recreation and transport, protection and enhancement of the river walkway, and its importance as a habitat and part of the city's natural cycles The River Thames We welcome the recognition of the River Thames as a local and regional asset. We note how the space alongside the River Thames is now more frequently used to celebrate public events that use the River Thames as a London focus. This heightened interest reminds us of the need to consider the highest of standards of riverside design for the public realm. We believe the London Borough of Southwark may wish to consider how it may respond to the need for open water space in relation to facilities that may be required for river related activity and if the local plan will play a constructive role for the betterment of such interests. We support river transport as long as its implementation will maintain the integrity of the flood defences. It is equally important to prevent development into the River Thames that would damage the openness of the riverscape which is the most valuable landscape feature in London. Realignment of the flood defences, habitat creation and removal of obsolete structures are measures which are identified in the 'Thames River Basin Management Plan'. The Environment Agency can provide case study material and further information if needed. For more detail see Estuary edges guidance at: http://www.environment-agency.gov.uk/cy/busnes/sectorau/100745.aspx Surface Water Management „h Lead Local Flood Authority „h Surface Water Management Plan „h Drain London Lead Local Flood Authority The London</p>	

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					<p>Borough Councils are defined as the 'Lead Local Flood Authorities' under the Act and have the following responsibilities:</p> <ul style="list-style-type: none"> • Ensure that flooding is investigated • Maintain a register of assets relevant to flooding • Designate structures that are relevant to flood risk • Ensure use of sustainable drainage on new developments • Build partnerships and ensure effective multi-agency working <p>Surface water Management Plans Under the Flood Risk Regulations 2009 LLFAs are also responsible for assessing, mapping and planning for local flood risk, and any interaction these have with drainage systems and other sources of flooding, including from sewers.</p> <p>London Borough of Southwark as the Lead Local Flood Authority (LLFA) has full responsibility for managing flood risk from surface water, groundwater and ordinary watercourses. Developments should have regard to the following criteria:</p> <ul style="list-style-type: none"> • Determination of potential overland flow paths and proposals for appropriate solutions to minimise the impact of development on surface water flooding. Road and building configuration should be considered to preserve existing flow paths and improve flood routing, whilst ensuring that flows are not diverted towards other properties elsewhere; • In the areas outlined in the Surface Water Management Plan as areas with increased risk of surface water flooding, a FRA should mitigate off site surface water flooding by aiming to achieve greenfield run off rates or better. SUDS techniques should be applied with regard to the London Plan Sustainable Drainage Hierarchy. • Incorporation of soft landscaping and permeable surfaces into all new residential and non-residential developments. Retention of soft landscaping and permeable surfaces in front gardens and other means of reducing, or at least not increasing, the amount of 	

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					hard standing associated with existing homes is encouraged. New driveways or parking areas associated with non-residential developments and those located in front gardens should be made of permeable material. „h Application of a site wide sequential approach to development by locating buildings within the areas of lowest flood risk on a site in accordance with the areas set out within the Surface Water Management Plan as areas with increased risk of surface water flooding.	
1545	643	Charles	Muriithi	Environment Agency	Design of mixed use development As pointed out in the Sustainability Appraisal, the Environment Agency notes that the high level of development proposed in the opportunity area could lead to environmental and ecological impacts that require mitigation.	Noted.
1546	643	Charles	Muriithi	Environment Agency	We welcome Southwark’s consideration of the design of mixed use development within the Blackfriars Road Supplementary Planning Document area. The area is within the defended tidal floodplain of the Thames and Southwark’s Strategic Flood Risk Assessment recommends that residential living accommodation, in particular sleeping accommodation be located on the first floor and above. This may also need to be considered in the use of student accommodation beneath railway arches and visitor accommodation on lower and street levels as described within the SPD.	Noted. This guidance is set out in our sustainable design and construction SPD. We also require a Flood Risk Assessment to be submitted alongside planning applications demonstrating how the proposal meets the sequential and exceptions tests where necessary as set out in the NPPF.
1547	643	Charles	Muriithi	Environment Agency	We recognise the importance of active lower floor building frontages but also the need for these spaces to have access to higher ground or levels for emergency planning purposes in the event of inundation. Given the large numbers of people attracted to the area as a result of new tall buildings access, egress and emergency planning should also be particularly considered for the lower and ground floor community spaces.	It is important to consider that the SPD provides further guidance to existing planning policies in our Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and so the SPD must be read alongside our other planning documents. This is made clear within the SPD. We have a Sustainable Design and construction SPD which sets out minimum requirements for flood prevention measures in new buildings. We also require the submission of a Flood Risk Assessment alongside planning proposals.

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1548	643	Charles	Muriithi	Environment Agency	Sustainable urban drainage should be considered in the design of new buildings and the use of open space to limit flood risk from surface water as set out within the Strategic Flood Risk Assessment.	This is a borough wide issue. Further guidance is set out in strategic policy 13 of the core strategy and our Sustainable Design and Construction SPD. We will be reviewing this guidance as part of the preparation of the New Southwark Plan.
1549	643	Charles	Muriithi	Environment Agency	Any development along the Thames frontage should be in keeping with the Environment Agency's Thames Estuary 2100 Plan and consider the future improvements to defences that may be required within their design.	Support noted. Saved Southwark Plan policies 3.29 and 3.30 set out further detail for development in the Thames Policy Area. We will look to update these policies if appropriate through the preparation of the New Southwark Plan.
1550	1170	Michael	Doust		However, I feel the draft SPD lacks a clear and inspiring vision for the area, which needs to be more carefully articulated in order to effectively guide development in this area. In my opinion this should be to build on the area's strength as a cultural centre, with Blackfriars Road and Union Street becoming key 'cultural destinations' in their own right as well as 'cultural corridors' to existing attractions in the area, supported by high quality dining, entertainment and retail facilities. I think the council should take a much more active role in shaping the area. The drawing on the front cover of the SPD document (top right) is an attractive and appealing vision for the area (with wider and segregated cycle lanes). However, current council policies and leadership are not aligned to deliver this. We already have an overabundance of chain store supermarkets in the area, which make very little contribution to the public realm, yet have been facilitated by the council's planning policies. Left to developers Blackfriars Road will turn into a corridor of bland, high rise, low value architecture with chain store supermarkets and coffee shops on the ground floor. This is not my vision for the area, nor the majority of residents.	Comments noted. The emerging vision is set out in section 2 of the SPD, and as set out in the text, will be developed further through the preparation of the New Southwark Plan. One of the indicative diagrams on the front cover has been updated.
1551	1170	Michael	Doust		SPD 1 Business space We need to attract businesses that will enhance the look and feel of the area. As such	In preparing the New Southwark Plan, which will replace the Core Strategy (2011) and saved Southwark Plan policies (2007), the council

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					I would like to suggest: - no further A5 uses allowed in the SPD area, - new business spaces limited in size to attract local and SME retailers, - dedicated space is provided to attract art galleries into the area, and - avoid retail space being used only Mon-Fri.	will be considering whether we should prepare more detailed policies to manage the mix of retail uses such as restaurants, bars, cafes and hot food takeaways. In line with the Core Strategy, the SPD encourages the provision of flexibly designed small business space. We have inserted additional text to bullet 1 of SPD1 to add some further clarification. This includes encouraging the provision of small and start-up businesses in the area. The supporting text outlines borough wide policy on small business space, including employment space available within the railway arches. These spaces can be used for a variety of employment opportunities. We have also added additional reference into the supporting text regarding the saved Southwark Plan Policy 1.5 in order to highlight that this policy aims to protect small business units in proposals for redevelopment or change of use of employment sites, by requiring the equivalent provision for small units within the replacement floorspace, subject to exception criteria. SPD2 encourages the development of new arts, cultural, leisure and entertainment uses in mixed use development throughout the area to help consolidate this cluster of arts and cultural facilities. Through SPD1, we support the provision of small business floorspace, such as small office/studio workshop space, to help to provide appropriately sized modern new space for creative and cultural businesses to move in the area. We have also inserted additional text to bullet 1 of SPD2 to encourage the flexible design of new unit sizes for new town centre use in new mixed use development. The Borough and Bankside licensing saturation area is a local licensing policy that addresses the cumulative impact of licensed premises. All applications for new or varied premises licences for night-clubs, public houses and bars, restaurants and cafes, off-licences, supermarkets and grocers need to address the saturation concerns set out in the council's licensing policy within the premises operating schedule.
155 2	117 0	Michael	Doust		SPD 2 Mixed use town centre The SPD area should support a mixed use town centre, but also one with a unique character. This puts even greater emphasis on the council to clearly articulate their vision for the area – based on feedback from residents – and take a very active role in shaping the place, to ensure the area	Our emerging vision for Blackfriars Road has been amended since consultation, and includes the aspiration for Blackfriars Road to be transformed into a vibrant place providing a range of different activities regenerating the area from the river along Blackfriars Road and stimulating change at the Elephant and Castle. This vision is carried forward into SPD4 which promotes development to help create a

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					develops as envisioned and to meet the needs of the community rather than those of developers and high street stores which have little commitment or attachment to the area.	sense of place and identifiable character.
1553	1170	Michael	Doust		SPD 3 Public realm and open space The area lacks significant green and open space and the Council should seek to increase this provision from new developments – however viewing platforms, shopping plazas or enclosed green space restricted to residents of a particular development do not meet this need. What is needed is greater provision of accessible green and recreation space. In addition I think the area needs more green roofs, green walls and green corridors – for example, I would like to see a tree-lined hard-shoulder running through the middle of Blackfriars road from St George's Circus to the river, ideally with path for pedestrians in the middle.	The SPD is consistent with our Open Space Strategy (2013) which has identified a deficiency in open spaces within then area; however given the limited opportunities for the creation of opens, our priority is to focus on improving out existing open spaces. We will seek to provide new open space and greening as set in the strategy. SPD 3 encourages new street trees. A new paragraph has been added to SPD 3 "we are doing this because" to provide further background on the Open Spaces Strategy recommendations.
1554	1170	Michael	Doust		SPD 4 Built form and heritage There is a real need to protect the area's heritage and ensure development is sympathetic to the area's history and character. Old buildings – even if not listed – should be protected and incorporated into new developments rather than destroyed and replaced. New developments should be of the highest architectural standards, slender and varied to ensure for an interesting and dynamic cityscape. A lot of new buildings that the council is giving planning permission for are bulky, unimaginative and ubiquitous developments that are crowding the area, undermining the heritage and creating a less pleasant environment.	The SPD provides guidance on heritage assets and would be read in conjunction with the existing heritage policy framework and designations, including the saved Southwark Plan policies, Core Strategy, London Plan and NPPF. The potential impact on any heritage would be assessed at the planning application stage.
1555	1170	Michael	Doust		SPD 5 Building heights I agree with the height proposals at the north end of Blackfriars Road. However, I do not think a 70m at Southwark tube station is appropriate or needed to provide a focal point. The Palestra building, whilst architecturally	Noted. A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning

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					appealing, is too tall, bulky and dominant for this area and should not be used as a reference point. Building height here should be limited to 30meters. Similarly for St George's Circus. Between Southwark tube station and St George's Circus building height should be no higher than neighbouring buildings and sympathetic to listed buildings, and other buildings or architectural value, in the area. This should also apply to new developments in areas covered by the SPD but away from Blackfriars road. Developments like Mt Anvil on Union Street, which is too tall and entirely incongruous with other buildings in the area, should not be allowed to happen elsewhere in the area.	documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets. The SPD sets out guidance for building heights away from Blackfriars Road
1556	1170	Michael	Doust		SPD 6 Active Travel Surely the time has come for a segregated cycle lane along Blackfriars Road. In my opinion this should be in both directions, on both sides of the road, with bus stops and any parking bays on the road / traffic side of the segregated cycle lane. Elsewhere in the SPD area, cycle infrastructure should be upgraded: delineating additional road space for cyclists with hard and soft barriers, improving signage for cyclists (e.g. roads that are a dead-end for cars but not for cyclists should be indicated as such rather than just a dead-end sign), dedicated traffic lights for cyclists, updated sequencing of traffic lights to ensure cyclists have sufficient time to cross a junction safely (not the case at the moment) etc. The council should play an active role in this and really champion cycling in the area to improve air quality, encourage active travel and generally create a more pleasant, inclusive and safer built environment. People will begin to cycle, and switch from cars, buses and taxis if cycling is made safer and more enjoyable.	Since the publication of the draft SPD it has been announced that TfL are proposing to introduce a Cycle Superhighway on Blackfriars Road. The council support TfL's proposals to introduce a segregated cycle lane and the SPD has been updated to refer to this. TfL have advised that a consultation will take place over summer 2014.

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1557	1171	Phoebe	Greenwood		Friars Bridge Court 41-45 Blackfriars Road We would like to put forward Friars Bridge Court 41-45 Blackfriars Road as a potential site for development and would like to know why it has not been included? It is an unattractive po-mo 80s building that has no appeal and is regularly lambasted as being a horror by the architecture and building community. It's also a big site, so there's scope for significant new development.	Figure 6 - and Table 1 has been updated with this potential development site.
1558	1171	Phoebe	Greenwood		On behalf of Webber and Quentin TRA, 250 residential flats that fall within the proposed Draft Blackfriars Road SPD area, we would like to make the below comment. This letter is to be read in conjunction with that of Barbara Grehs, deputy chair of Webber & Quentin TRA. She has submitted a very extensive report that we as a TRA support. This comment is to further elaborate on our serious concern that the Blackfriars SPD is a document devised for the business community and that it does not put forward a strategic framework that takes into consideration the needs of the existing local community, nor does it have any detail about how the needs will be met of a massively increased residential population. Overall, we feel the draft Blackfriars Road SPD document reads like a sales brochure to developers and real estate investors - not a strategy for sustainable growth. This view is confirmed by statements such as, "the market is now realising the potential of this amazing location". It's our view that there is a contradiction in the strategy that makes the draft SPD document flawed. 'Blackfriars Road' and the 'area around Blackfriars Road', as contained in the SPD boundary, are two completely distinct areas, which require different strategic frameworks. The draft Blackfriars Road SPD, in it's current form, we would argue is only relevant to the buildings actually on Blackfriars Road. We would ask that the SPD boundary be redrawn or that a	<p>The SPD is intended to benefit a wide range of groups including existing and new residents. The SPD seeks to meet the needs of residents whilst also managing the pressure for new development. The SPD has been updated to make it clearer that the emerging vision and the SPD seeks to ensure that development meets the needs of existing and new residents whilst also attracting new development. Residents will benefit from the increase range of uses including more shops, services and businesses along the Blackfriars Road. An explanation of the boundary is set out in the SPD. It includes the whole of the Blackfriars Road and some of the surrounding area. It includes the surrounding area as the surrounding area is also likely to see some development and improvements, particularly possible improvements to public realm.</p> <p>Wording has been added to the SPD to make it clearer that the character and historic value of much of the surrounding area will continue to be protected and enhanced.</p> <p>Figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area.</p>

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					second SPD is produced that takes into account the below points and reflects the actual composition of the area included in the SPD. The area around Blackfriars Road is largely residential, with pockets of small-businesses in low-rise industrial buildings, plus a high number of Conservation areas and buildings of local heritage interest. It is certainly not a 'hinterland' and we find it offensive and troubling that it should be referred to as such in a planning document. Any strategy that encompasses this area must include extensive details pertinent to the actual make-up of buildings and populations contained within it. We believe that the SPD in its current form is not fit for purpose and that a new strategy document is required that takes in the below concerns	
1559	1171	Phoebe	Greenwood		1. Residents p.6 To help create a successful place where people want to work, live and visit, we need a vision which reflects the needs and aspirations of the community, businesses, residents, landowners and local stakeholders. Despite the above statement there is in fact only 6 references to 'local residents' or 'residents' in the whole document. There are large numbers of residents in the proposed area, living in a wide variety of private properties and local authority housing, particularly south of The Cut. The draft SPD takes no account of these existing communities and their needs. We would expect the BR SPD to include up-to-date data about the current residential population in the SPD area. What is the size of the existing residential population and number of homes? We would then expect this figure to be quoted alongside any projections for the number of new homes and any assessment of further social infrastructure that will be required.	The SPD is intended to benefit a wide range of groups including existing and new residents. Section 4 of the SPD on implementation highlights the importance of working with all our partners including residents and the local community. Section 4.1 specifically refers to continuing to engage with the local community and residents, and similarly section 4.2 refers to continuing to engage with many groups and key stakeholders as well as look at opportunities for engagement with other groups and residents.
156	117	Phoebe	Greenw		p.9 "There will be new businesses, shops, housing ...	The SPD and other planning policy documents provide the framework

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0	1		ood		<p>this will include new improved community and youth facilities". p.11 "Cultural, leisure, arts and entertainment uses will also be encouraged". p. 18 3.14 New and improved leisure, social infrastructure and community facilities with accessibility for all will help to strengthen the relationships between people living and working in the area, encourage more activity and also facilitate the exchange of ideas and skills. New housing and business floorspace will also increase the resident and working population and it is important to ensure that infrastructure is in place to support the community. We would expect the BR SPD to include a serious assessment of how all of the above will be funded, also where are the recommended sites for their location - are these included in the recommended development sites? If not, why are recommended sites for local infrastructure not included alongside the 'potential development sites'?</p>	<p>for the provision of infrastructure to support development. Updates have been made to the SPD to refer to encouraging a range of different uses/</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD</p>
156	117	Phoebe	Greenw		p.16 Supporting the provision of new social	The SPD and other planning policy documents provide the framework

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1	1		ood		<p>infrastructure and community facilities as part of mixed use developments. Opportunities should be taken to ensure that new community facilities are accessible to all members of the community. The local population of workers, residents and tourists in this area will explode with the proposed level of development in the draft SPD. We will need schools, nurseries, youth centres, local group centres, playgrounds, open spaces, GP surgeries, health centres, fire services and police services. We would like to see included explanations of how this level of infrastructure will be provided. Also, we would like to understand how it will be enforced, the recent Linden Homes scheme saw the developer fail to provide any playground facilities, instead only conceding to a £15,000 sum to improve nearby facilities. The Mayor of London has developed Supplementary Planning guidelines (September 2012) for children's space arising from new developments. It says that 'All developments with an estimated child occupancy of ten children or more should seek to make appropriate play provision to meet the needs arising from the development.' We would expect the BR SPD to include a serious assessment of overall play needs in this rapidly developing area.</p>	<p>for the provision of infrastructure to support development. SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments. SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces. Section 4.4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD</p>
156 2	117 1	Phoebe	Greenwood		<p>p.18 Improvements to social infrastructure such as schools, health facilities, post offices and police facilities are addressed through external stakeholder's asset management plans and through the council's Capital programme and infrastructure planning process. Can you please explain in lay terms what this means?</p>	<p>The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development.</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4.4 of the SPD refers specifically to infrastructure, crossing</p>

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						<p>referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to be provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD</p>
1563	1171	Phoebe	Greenwood		<p>p. 11 Opportunities to improve existing open spaces, specifically Christ Church, Nelson Square and Paris Gardens will be maximised through working with groups such as BOST. Please can you elaborate on what will this working arrangement be, will BOST receive an increase in funds? They are already very active in the community. We would expect the BR SPD to explain how this arrangement would be delivered.</p>	<p>SPD cannot set out specific guidance, however we will continue to work with BOST and other community organisations on a project by project basis to deliver public realm and open space improvements within the area.</p>
1564	1171	Phoebe	Greenwood		<p>p. 16 We will encourage the provision of a balanced mix of town centre uses to help enhance the commercial attractiveness of the Blackfriars Road area</p>	<p>The identification of baseline information and the range of economic, social and environmental issues in the area was undertaken as part of the Bankside, Borough and London Bridge Sustainability Appraisal</p>

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					<p>and the status and function of the wider CAZ. p.17 The GLA's Hotel Demand Study sets out the approx. amount of new hotels required over the period 2007-26.... This amounts to 2,500 bed spaces for Southwark.... Since 2007, approx. 1625 hotel bed spaces have been completed and approx. 850 are in the pipeline. p. 18 The development of the evening and night-time economy will help keep the town centre lively and safe at different times of day and night As residents, we have already noticed qualitative differences in the quality of life due to the influx of large, budget hotels; increased office and business space and student accommodation. Due to the scale of proposed growth and development planned, We would expect the BR SPD to include a serious assessment what the effects have been so far on the local neighbourhood of large-scale commercial development and of a new, transient population. What new local services have arrived in the area, what are the opening hours, have they been successful in creating local employment, who frequents them, are they the types of businesses that best serve a local community, what have been the positive and negative effects, do they contribute to keeping a town centre lively or in fact do the opposite? With Southwark already close to fulfilling it's hotel quota 13 years ahead of schedule, we would expect the BR SPD to include a comprehensive review of what has been the effect of hotels on the area, particularly on the local community. We do not think that a single case study, Citizen M Hotel, is sufficient. And with the hotel quota achieved, we would like it assessed as to whether an emphasis should be placed in the BR SPD on encouraging residential developments.</p>	<p>Scoping Report, which was published for consultation in October 2012. This work has informed the preparation of the SPD guidance.</p> <p>SPD2 provides guidance to support strategic policy 10 'Jobs and business' of the Core Strategy (2011) which sets out the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. This policy is also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account.</p> <p>SPD2 encourages any new hotel proposal to include ancillary facilities. This will help to ensure that these developments are more integrated into the street scene and provide a wider benefit. The inclusion of the case study on Citizen M hotel on Lavington Street provides context by providing an example of how a hotel can successfully offer a range of uses and incorporate active frontages.</p> <p>The SPD provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards.</p>
1565	1170	Michael	Doust		<p>p.9 Making sure that student accommodation is included without dominating is important for a</p>	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not</p>

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					<p>balanced mix of activities. With the huge number of new student accommodations, we find it very concerning that there is only one reference to student accommodation in the entire document. We think a strategy for the area must address how they affect and interact with local infrastructure, what are their needs, do they add a huge new demand on health services for example? We would expect the BR SPD to also include details about long-term concerns. A new student development at Paris Gardens has gone on sale this week with prices of £409 per week for a single bed apartment and £215 per room per week for a three bed apartment. These are very expensive rents and with there being so much new student accommodation in the area, we would like to see a report on the long-term viability of these developments. Who is this wealthy student demographic and for how long will they continue to exist? What is considered a sustainable amount of places and how close is the current number of rooms to that recommended maximum limit?</p>	<p>repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. Specific policies on student housing are already set out in Core Strategy policy 8 and saved Southwark Plan policy 4.7. Further guidance is also set out in the Affordable Housing SPD and Residential Design Standards SPD.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>
1566	1171	Phoebe	Greenwood		<p>3. Southwark's Retail Capacity Study (2009), local needs and specialist, independent retailing Page 14 Supporting use of the railway arches for a range of business uses (B1) including small business space, creative and cultural industries, light industrial uses and appropriate A or D class uses. Page 17 Southwark's Retail Capacity Study (2009) suggests that the Bankside and Borough district town centre should continue to be a centre for local needs and specialist, independent retailing and any new retail schemes can be supported by workers, tourists and residents, coming forward on an incremental basis. Therefore, in order to continue to promote the area as a commercially attractive location for business, it will be important to maximise the diversity of offer and</p>	<p>It is important to consider that the SPD provides further guidance to existing planning policies in our Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and so the SPD must be read alongside our other planning documents. This is made clear within the SPD. The SPD supports the provision of flexible small business space and planning applications need to address the requirements in our adopted policies and guidance, and set out appropriate justification for a development scheme.</p>

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					facilitate a range of town centre uses as part of mixed use development in conjunction with a high quality public realm. Recently, two high profile planning decisions demonstrated that Southwark Council is not committed to giving small businesses protection: Network Rail evicting small businesses in Union Street Linden Homes evicting SE1 Drycleaners; Imbibe; Newsagent; Blackfriars Cafe In light of the above, we would like to know how can the stated aims in the draft SPD ("...focuses on encouraging flexible space for a range of different businesses, helping both small and larger businesses benefit from this central London location and its great transport links" and "Encouraging flexible business use") be considered to be valid?	
1567	1171	Phoebe	Greenwood		Page 14 Supporting the provision of new business floorspace (B1 use class). Space should be designed flexibly to accommodate a range of unit sizes helping to contribute to a diverse stock of business accommodation. Page 16 Proposals should seek to maximise the opportunity to include ancillary facilities and activity along the lower and street level frontages. We would expect the BR SPD to include case studies of street level businesses with active frontages that have moved into new large-scale developments in the SPD area over the past 5 years. Evidence shows that the majority are mini-supermarkets, the rest largely remain unoccupied or are eventually taken up by charities. We would expect the BR SPD to detail what is the strategy to counteract the above trend. We would also like details in the BR SPD about the council's policy on mini-supermarkets, is there a saturation point as with licensed services or betting shops? There are now six in a 0.6 mile radius—waterloo road, Blackfriars road, Union Street, the Cut, two on Great Suffolk Street. It's widely documented that they hinder rather than encourage 'specialist,	SPD 2 promotes new development to maximise the diversity of the retail offer in the area, to strengthen the appeal of the area and encourage a wider range of occupiers. In preparing the New Southwark Plan, which will replace the Core Strategy (2011) and saved Southwark Plan policies (2007), the council will be considering whether we should prepare more detailed policies to manage the mix of uses in the town centre.

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					independent retailing’.	
1568	1171	Phoebe	Greenwood		<p>4. Building heights p24 We will ... reinforce the civic scale along the main routes of Blackfriars Road, Stamford Street and Southwark Street, by: Design buildings of an appropriate massing to create a human scale of development at street level. We would like it explained how buildings of 70m comply with the above commitment to design buildings of a human scale at street level? We do not understand or accept the change in guidance on tall buildings since it does not match the Core Strategy nor the council’s Tall Building Study December 2009 and want further justification for encouraging buildings of up to 70m. It states in the Core Strategy and was concluded in the 2009 review, that tall buildings are suitable in a cluster and should be sited to the North of Blackfriars Road and that a building of the height of Palestra – and not taller – would be suitable for above Southwark Tube.</p>	<p>The policy approach within the SPD is considered to be consistent with the NPPF (2012), the London Plan (2011), the Core Strategy (2011) and the saved Southwark Plan (2007), taking into account changes in the surrounding context since developing the Core Strategy vision in 2009/2010. The London Plan, Core Strategy and saved Southwark Plan form the development plan for Southwark, with the NPPF setting out national guidance. The development plan sets out the policies for tall buildings. Key policies are: London Plan policy 7.7 which identifies that tall and larger buildings should generally be limited to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. Blackfriars Road lies within the Central Activities Zone, is an opportunity area and a town centre with good access to public transport. Core Strategy strategic policy 12 requires tall buildings to have an exemplary standard of design and identifies locations where tall buildings could go. The Core Strategy vision for Bankside and Borough refers to the council setting out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework. Saved Southwark Plan policy 3.20 sets out criteria for considering applications for tall buildings and applies across the borough The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage “Guidance on Tall Buildings”, 2007. In light of consultation responses and to add clarity to the guidance relating to St George’s Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>
1569	1171	Phoebe	Greenwood		<p>Point 5.1 of ‘Conclusions’: “The Southwark tube station site at the corner of Blackfriars Road and The Cut has the potential for a new landmark building which could mark the location of the train station and provide a counterpoint of similar height to Palestra on the</p>	<p>These matters would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and planning regulations. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate.</p>

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					opposite side of Blackfriars Road.” p9 Bankside will be a location of large offices and major arts and cultural facilities, including an expanded Tate Modern. We think taking Bankside could be an interesting case study in the effect of tall and large-scale buildings on an area. It has seen huge development, similar to that coming to Blackfriars Road. Its local residents now suffer from: loss of light loss of views wind tunnel effect lack of human scale over-dominance by tall buildings of existing buildings (especially residential) loss of historic buildings (where demolition of historic buildings is carried out in order to make way for new buildings) erosion of community feeling loss of small businesses We would expect the BR SPD to have a serious assessment of the above negative impacts and how they would be mitigated. In Bankside, the predominance of new tall, mainly office and hotel buildings on Southwark Street, have not contributed to a lively, mixed use town centre, instead they overshadow public space and create wind tunnels, making it unpleasant to be in the public realm. The large developments have failed to attract amenities that serve local needs, so despite the high volume of visitors to riverside attractions, and the existing residential community, the area around Southwark Street is desolate after working hours and on weekends.	
1570	1171	Phoebe	Greenwood		6. Built form and heritage p24 We will ensure that high quality design and architecture make a positive contribution to local character and distinctiveness, in particular reinforcing the civic character and scale of the historic boulevard of Blackfriars Road, the Thames riverfront and the main east west routes of Stamford Street and Southwark Street, Union Street and The Cut. Development should: Help to create a sense of place and identifiable character, sustaining, enhancing	The SPD sets out built form guidance in relation to the area’s context, heritage and development potential. The guidance set out within the SPD is consistent and read in conjunction with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance is underpinned by the BBLB Characterisation study (2013) which interprets the area’s character and development.

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					<p>or better revealing elements of the existing local and historic environment which have good character. This includes conserving and enhancing heritage assets and their settings. Ensure that materials and features reflect the identity of the surroundings, taking the local historic environment into consideration. Reinforce the civic scale along the main routes of Blackfriars Road, Stamford Street and Southwark Street Design buildings of an appropriate massing to create a human scale of development at street level. The SPD has a predominant emphasis on large commercial development, taking this into account alongside Southwark council planning team's willingness to allow developers to demolish unlisted historic assets to make room for tall buildings, there is nothing in the SPD that meaningfully sets out how policy requirements on conserving and enhancing Southwark's built form and heritage will be met or enforced. We would expect the BR SPD to include a detailed assessment of the historic character of the area, it's benefits to quality of life, and to include a more forceful strategy to 'conserve and enhance' that heritage. We would argue that the recent approval of the Linden Homes scheme, which fails to comply with any of the criteria stated in the SPD, calls into question the point of the SPD. The Linden Homes devpt is an average scheme that has no relation at all in scale or material to its surroundings. It also involves the demolition of two buildings of significant historical interest. With policy on heritage not being applied by the council's planning team, why should any developer feel they need to comply with SPD recommendations?</p>	
157 1	117 1	Phoebe	Greenwood		<p>10. Affordable housing p.8 We are working with the local community and landowners to deliver large scale development and improvements, providing over 1,900 new homes, 665 affordable housing units and around</p>	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within</p>

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					25,000 new jobs by 2026. Official policies which sit above the draft SPD clearly acknowledge the need for local councils to provide sufficient affordable housing so that people from all walks of life can continue to live in areas such as Blackfriars Road. Despite this, the draft SPD contains an extremely worrying lack of detail on the provision of such housing. With the expected increase in population numbers in the SPD area, will Southwark Council explain why the draft SPD only makes one reference to affordable housing?	<p>the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. Existing policies and guidance provide clear policies for affordable housing.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>
157 2	117 1	Phoebe	Greenwood		11. Community green space p.22 Urban greening and the provision of green infrastructure is an important part of a high quality public realm. Green infrastructure can significantly contribute to a sense of place and result in social and economic benefits, as well as positive environmental effects. The SPD area already suffers from a lack of genuine public open space, by this we are not referring to public realm provided at the space of large developments. These sites are always shaded, generally windy and do not provide genuine open space which by definition exists apart from buildings. Are any of the 46 sites identified as potential development sites being considered for use as green open space? If not, why are no sites identified for new public or green space?	The SPD is consistent with our Open Space Strategy (2013) which has identified a deficiency in open spaces within then area; however given the limited opportunities for the creation of opens, our priority is to focus on improving out existing open spaces. We will seek to provide new open space and greening as set in the strategy. SPD 3 encourages new street trees. A new paragraph has been added to SPD 3 "we are doing this because" to provide further background on the Open Spaces Strategy recommendations. The SPD does not designate development sites, allocate proposals sites or provide site specific guidance, as this would beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.
157 3	117 1	Phoebe	Greenwood		13. Potential development sites In this we support the comments of Barbara Grehs: The draft SPD contains a list of 46 "potential development sites" with no accompanying detail whatsoever on what these are, why they have been selected and what the plans/ideas are. A closer look at these sites reveals an extremely worrying trend of earmarking buildings - both period	The figure and table within the SPD shows potential development sites. These sites are identified by officers as sites with the potential for some change to the building or its surroundings. Some of the sites have planning permission, some are under construction, some are going through the planning process, and some have no known plans as yet. The list and figure has been updated following consultation to take into account suggestions from land owners and residents. Further

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					<p>and modern - which are already fit for purpose in terms of serving the business and residential communities well by meeting key policy issues such as the preservation of heritage assets, the provision of small business space and the provision of residential accommodation. • When will Southwark Council be issuing the following details to all parties in this consultation regarding every one of these 46 sites in the form of visuals (photographs), and details on current usage, why they have been selected for development and what developments are being considered (visuals plus descriptions)? • In particular, will Southwark Council please comment on the following sites marked as potential development sites:</p> <ul style="list-style-type: none"> o ID 11: This seven-storey building at 209/215 Blackfriars Road o ID 14: 200 Union Street o ID 15: Block T, Peabody Square, Blackfriars Road o ID 17: 235-241 Union Street o ID 20: Southwark College in The Cut o ID 24: Marked on Table 1 as Friden House, 96-101 Blackfriars Road o ID 25: Also marked on Table 1 as Friden House, 96-101 Blackfriars Road, o ID 26: 109-115 Blackfriars Road o ID 28: 57 Webber Street o ID 29: 61 Webber Street o ID 33 & ID 35: 63 Webber Street / 94 Webber Street o ID 34: 96 Webber Street o ID 30: 33-38 Rushworth Street o ID 37 52-56 Lancaster Street o Friars Bridge Court 41-45 Blackfriars Road <p>We would like to put forward Friars Bridge Court 41-45 Blackfriars Road as a potential site for development and would like to know why it has not been included? It is an unattractive po-mo 80s building that has no appeal and is regularly lambasted as being a horror by the architecture and building community. It's also a big site, so there's scope for significant new development</p>	<p>wording has also been added to the SPD to make it clear that the list of sites is not exhaustive and that whilst some of the sites will be completely redeveloped other sites might experience less change such as refurbishment or improvements to the existing buildings or surroundings. The SPD is not allocating sites as proposals sites and so does not provide policies on the land uses within each of the sites. The allocation of proposals sites is done through a development plan document. Current designations for Blackfriars Road are in the saved Southwark Plan (2007) which is currently being reviewed through the preparation of the New Southwark Plan. As part of this review we will be looking at whether we should allocate more and/or change existing proposals sites designations and update the adopted policies map. Full consultation will be carried out on the New Southwark Plan in accordance with our SCI and the relevant regulations. Suggestion for Friars Bridge Court, 41-45 Blackfriars Court noted. This site has been added to the figure and table identifying potential development sites as there may be potential for improvements to this site.</p>
1574	1171	Phoebe	Greenwood		<p>14. Sites of heritage interest The below following buildings are of interest in the SPD area and should be</p>	<p>Buildings that contribute positively to the character of conservation areas, buildings of townscape merit or heritage value outside of</p>

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					highlighted as such Hunter House, St James Street Gardner House, Lancaster Street The Bridge House, Lancaster Street Murphy House, Borough Road Albury Buildings and Clandon Buildings, Boyfield Street Parish of St George the Martyr Public Library, Borough Road 209-215 Blackfriars Road The Blackfriars Foundry, 156 Blackfriars Road	conservation areas are identified within figure 5 of the SPD. Guidance and the identification of buildings will be addressed in a new Heritage SPD that will be prepared alongside the New Southwark Plan.
157 5	117 2			Guidewell Ltd	These representations are submitted on behalf of Guidewell Ltd who own land known as Rennie Court, River Court and the Doggetts Coat & Badge Public House, and follow communications with Tom Buttrick. Guidewell Ltd agree with the adopted strategic and local planning policy for the London Bridge, Borough and Bankside Opportunity Area, as set out in the London Plan and Core Strategy, which notes considerable potential for intensification and endorses a cluster of tall buildings around the northern end of Blackfriars Road, providing high quality offices, housing, hotels and shops.	Support noted.
157 6	117 2			Guidewell Ltd	Guidewell Ltd support the Council's emerging vision for Blackfriars Road (para 2.2.4 of the SPD) which endorses maximising opportunities to increase the amount and type of development including housing and states that there will be a range of building heights along Blackfriars Road, with the tallest buildings at the north end of the road.	Support noted.
157 7	117 2			Guidewell Ltd	Guidewell Ltd are keen to work in partnership with the Council and Strategic/Local Stakeholders in contributing to developing this vision.	Noted.
157 8	117 2			Guidewell Ltd	Recommendation 1: Guidewell Ltd recommend that the land within its ownership, as identified on the attached plan ref: LOP001, should be included on Figure 5/Table 1 as potential development sites.	Figure 6 - and table 1 have been updated.
157 9	117 2			Guidewell	Guidewell Ltd support SPD2 (Mixed Use Town Centre) and SPD3 (Public Realm and Open space) which	Noted.

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				Ltd	encourage a mixture of new town centre uses and improvement to the public realm including sustaining and enhancing existing links to the Thames Path. The land within Guidewell Ltd's ownership provides opportunities to contribute towards these objectives.	
1580	1172			Guidewell Ltd	Guidewell Ltd support the fact that SPD5 (Building Heights) does not set out a specific upper limit on building heights at the north end of Blackfriars Road and acknowledges that development proposals should be guided by site specifics and the urban context. Recommendation 2: It would be helpful if the SPD could be clear in stating that there is no defined upper height limit at the north end of Blackfriars Road.	No change. This amendment is not required.
1581	1160			CBRE Lionbrook & Southwark Charities	216 – 230 Blackfriars Road The site is situated on the east side of Blackfriars Road between Burrell Street and Nicholson Street. It comprises 0.74 hectares and includes Conoco House and Quadrant House, Edward Edward's House and Suthring House, as identified on the attached site location plan. There is an existing mix of uses as follows: Conoco House – An office block of 8 floors fronting Blackfriars Road dating from the 1970's. It has a gross internal area of approximately 8,000 sqm and is fully let, but only on short leases. Quadrant House – A nine storey residential block fronting Burrell Street comprising 36 socially rented flats. It adjoins Conoco House and was built as part of the same development Edward Edward's House – A two storey Alms house dating from 1973 comprising 21x 1-bed flats, 5x bedsit/studios, 1x 2-bed flat and an estate office and boardroom for the Charity. The building is situated on the corner of Chancel Street and Nicholson Street and is built around a courtyard. Suthring House – A three storey Public House with six flats above The existing site has a relatively low density with the buildings fronting Blackfriars Road set	Figure 6 - and table 1 have been updated.

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					<p>back from the street, and generous areas of surface car parking and amenity space within the site. None of the existing buildings can be considered to positively contribute to the character and appearance of the area because they lack coherence and are not of architectural merit. The site therefore presents a significant opportunity for redevelopment. Quadrant House and Conoco House are identified as a potential development site within Table 1 of the draft SPD (site 9, amended version). However, the redevelopment of a larger site than currently proposed for site 9 will offer more options in terms of potential development proposals and therefore we request that the identified area is expanded to include the entire site as shown within the red line on the plan attached to these representations. The key stakeholders are in a position to bring forward the whole site for redevelopment enabling a comprehensive scheme to be developed It is envisaged that the site will be brought forward for an office-led mixed use development which will make best use of the opportunities afforded by the site and include a greater amount of floorspace. It is likely that the scheme will include residential uses to replace existing units, and will include a replacement public house. There could also be a supermarket to provide enhanced shopping facilities in this part of the Borough. The site may also be brought forward for development with another site(s) in Southwark to provide replacement Alms house. The existing Alms house is no longer fit for purpose; the lift is inadequate and the building is not compliant with Disability Discrimination Act 1995 requirements. Should two sites be brought forward together they should be considered together in terms of the proposed mix of affordable and private housing.</p>	
158	116			CBRE	Blackfriars Road SPD In terms of the aims of the SPD,	Noted.

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2	0			Lionbrook & Southwark Charities	CBRE Lionbrook and Southwark Charities support the Council's emerging vision for the area. The area is suited to a mix of uses including offices, services, shops and residential uses. The Council's aim to maximise opportunities to increase the amount and type of development is strongly supported. The vision for Blackfriars Road is indeed one where, increasingly, people will want to work, live and visit, and the redevelopment of the CBRE Lionbrook and Southwark Charities site can contribute to this.	
1583	1160			CBRE Lionbrook & Southwark Charities	CBRE Lionbrook and Southwark Charities support draft Policy SPD 1 which seeks to help consolidate and expand the existing business services cluster and reinforce the area as a strategic employment location. The redevelopment of site 9 can help to achieve the policy objectives by providing a greater amount of office space on the site.	Noted.
1584	1160			CBRE Lionbrook & Southwark Charities	CBRE Lionbrook and Southwark Charities support draft Policy SPD 2, which encourages the provision of a balanced mix of appropriate uses. The redevelopment of site 9 can help to achieve the objectives of this draft policy by providing an active street level frontage along Blackfriars Road to add visual interest and contribute towards enhancing the commercial attractiveness of the area. The provision of retail uses will provide continuity with the retail uses currently being constructed at 240 Blackfriars Road.	Support noted
1585	1160			CBRE Lionbrook & Southwark Charities	CBRE Lionbrook and Southwark Charities are also supportive of the principle of enhancing the public realm and open spaces as set out in SPD 3 if linked to an increase in density to support these improvements. The redevelopment of the proposed site will reinforce and enhance the character of Blackfriars Road and can improve permeability with new pedestrian linkage through the site.	Noted.

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1586	1160			CBRE Lionbrook & Southwark Charities	In relation to draft Policy SPD 4, CBRE Lionbrook and Southwark Charities acknowledge the need for high quality design and architecture that makes a positive contribution to local character and distinctiveness.	Noted.
1587	1160			CBRE Lionbrook & Southwark Charities	Draft Policy SPD 5 concerns building heights. The policy sets out that the tallest buildings should be towards the north end of Blackfriars Road and specifically states that buildings between Southwark Tube Station and St. Georges Wharf should be up to 30 metres. However, the proposed height of the buildings between the identified 'Gateway Location' and Southwark Tube is not clearly defined. Given that 240 Blackfriars Road will have a height of 89 metres, there is potential for development on the CBRE Lionbrook site to be as tall as 240 Blackfriars Road, particularly at its northern end. Moreover, the increased size of the site will make it suitable for a comprehensive redevelopment. It should therefore be clear that the proposed site is of a shape and size suitable for substantial development proposals, subject to meeting the relevant planning policy requirements for tall buildings.	The SPD sets out the building heights guidance for the area. Development proposals would be assessed at the planning application stage.
1588	1160			CBRE Lionbrook & Southwark Charities	Policy SPD 6 concerns active travel. The site is located in a highly accessible location with a PTAL rating of 6b (excellent). It is within easy walking distance of Southwark Underground Station and bus stops along Blackfriars Road. It therefore represents a suitable site for high-density development in line with National and local planning policies which seek to locate development in accessible locations and encourage sustainable modes of transport. Active travel patterns can be encouraged as part of any	No change. Development proposals would be assessed for feasibility at planning application stage.

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					redevelopment scheme including the provision of cycle parking and a travel plan.	
1589	1160			CBRE Lionbrook & Southwark Charities	In relation to Section 4 'Implementation', the key stakeholders are happy to work closely with Southwark to further develop the aspirations for the site and public consultation will play an important role when working up development proposals.	Noted.
1590	1160			CBRE Lionbrook & Southwark Charities	Conclusions Overall, CBRE Lionbrook and Southwark Charities support the Council's vision for Blackfriars Road. However, Site 9 should be enlarged to include the area shown on the attached site location plan and the final version of the document should be drafted to provide sufficient flexibility to encourage an appropriate commercial scale of development, including suitable tall buildings, to support a mix of uses and to initiate early redevelopment We request that our comments are taken into account when preparing the final SPD and would be happy to meet with you to discuss the potential of the site further. We would ask that you keep us informed about the progress of this and any other relevant documents.	Noted.
1591	922	Jeremy	Yap		Network Rail is generally supportive of the document and in particular the recognition of the potential scale of growth that is expected to come forward in this area. Having said that, detailed below are additional comments and observations on the document that I would be grateful if you could consider prior to finalising the document.	Noted. Officer comments provided to each of the detailed comments.
1592	992	Steve	Austin	Network Rail	Paragraph 1.2 Network Rail would be keen to understand further the relationship between the various policy documents that cover this part of Southwark. This area is, in local and regional planning policy terms, covered by the London Plan and is	Noted.

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					identified as an Opportunity Area. This area has previously been included in the Draft Bankside, Borough and London Bridge SPD. Is work still continuing on this document? The northern section of the Blackfriars Road SPD boundary is also proposed to form part of the Bankside Neighbourhood Plan boundary. I would welcome a discussion to understand how the local planning policy will operate between these documents if adopted.	
1593	992	Steve	Austin	Network Rail	Blackfriars Road Support is given to the aspirations set out in paragraph 2.2.4 which explains that: "Blackfriars Road will have its own distinct identity as a lively and vibrant area, becoming an exciting place where people want to work, live and visit". It is evident that the area offers a range of opportunities to increase the amount of development and the ability for its potential to be maximised. Network Rail believes that much of its property portfolio can offer flexible innovative business space, as well as residential, cultural, leisure, arts and entertainment uses, as identified in the draft SPD.	Support noted.
1594	992	Steve	Austin	Network Rail	Within paragraph 2.2.4, it is requested that the reference to Network Rail's railway arches providing a range of uses including "small businesses", be amended to "employment opportunities". Network Rail operates a very large and diverse property portfolio, and it is not considered to reflect our objectives to reference "small businesses". We have a vast array of tenants and we continue to strive to offer accommodation to all businesses, many of which are not small in size (in terms of the business not the unit). Therefore we do not wish to see reference which may be interpreted as suggesting Network Rail is attractive to small businesses only or principally.	We have amended the emerging vision in the SPD and included reference to employment opportunities.
1595	992	Steve	Austin	Network Rail	Development Sites The land comprising the railway infrastructure, the arches and associated land is often	Figure 5 (now Figure 6) and Table 1 has been updated with the Bear Lane and Dolben/Gambia Street sites. The proposed Great Suffolk

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					<p>considered a barrier, or generally detached from the local area. As the upgrade of the existing infrastructure continues, opportunities have arisen for some exciting residential and commercial development on railway land. Network Rail wishes to promote the following major development sites which do not appear to have been included on Figure 5: Potential development sites and Table 1: Potential development sites. Some of these sites are expected to be included in the Bankside Neighbourhood Plan and they have also been submitted as part of the Greater London Authority's Strategic Housing Land Availability Assessment (SHLAA). The site plans have been enclosed with this letter and are broadly known as: „h Bear Lane Site Dolben/Gambia Street Site „h Great Suffolk Street/Union Street/Ewer Street Site Due to the nature of the operational infrastructure, commercial uses (associated tenancies and leases) and availability, there are significant constraints and any development may be phased. The approach has to be flexible in order to allow for the aspirations to be delivered. The detailed design of these sites has yet to commence, but it is considered that they could offer a wide range of A, B, C and D uses and would support the low line east/west pedestrian link adjacent to the viaduct where operationally and commercially feasible. Given the site constraints, principally the operational railway, development is likely result in taller buildings. Network Rail is proposing to meet with the London Borough of Southwark in the near future to introduce the development potential of various sites identified. Following this it is anticipated that detailed preparation of the current aspirations is developed and engagement with stakeholders will commence.</p>	<p>Street/Union Street/Ewer Street site is outside the SPD area boundary.</p> <p>The SPD states that the list of potential development sites is illustrative of the huge opportunity for change within the area and the need for a coherent framework. It has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. The formal identification of proposals sites within the area will be considered as part of the preparation of the New Southwark Plan.</p> <p>The SPD sets out a clear building heights strategy for the area in SPD 5, alongside SPD 4. Tall buildings will be encouraged in important locations, where they reinforce the character and function of Blackfriars Road as a main route into central London. These landmarks will highlight the importance of Blackfriars Road as a gateway to Southwark and create new focal points at main transport nodes and the junction between Blackfriars Road and Elephant and Castle.</p>
1596	992	Steve	Austin	Network Rail	SPD1 Business Space In principal Network Rail supports the proposals set out in SPD1 – Business	We have amended the supporting text and included the reference to employment opportunities in the arches.

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					<p>Space, particularly the promotion of a mix of uses within Opportunity Areas. It is appreciated that the arches provide a significant opportunity to accommodate a mix of employment uses, and the flexibility offered specially in the policy for railway arches B1, business use, A and D uses is welcomed. The aims of the policy are considered largely in accordance with guidance set out in the National Planning Policy Framework (NPPF) states that: "In drawing up Local Plans, local planning authorities should: • support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;" (paragraph 21) and "• Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: — any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or — specific policies in this Framework indicate development should be restricted." (paragraph 14) However, Network Rail would not support the reference in paragraph 3.6, which refers to "space for small businesses". It is requested that the reference to Network Rail's railway arches providing a range of uses including "small businesses", be amended to "employment opportunities".</p>	
1597	992	Steve	Austin	Network Rail	<p>SPD 4 Built form and heritage Preserving the local character is extremely important, and Network Rail recognises that the railway arches have an integral part to play in the success of many of the main principles identified in this document and this policy.</p>	<p>No change. Development proposals would be assessed for feasibility at planning application stage.</p>

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					However, Network Rail would object to the stringent use of “resisting the use of solid external roller shutters”. It is considered that there should be a caveat or some element of flexibility built into this statement that would allow for the use of an external roller shutter if it is not physically possible to locate it internally. For example some railway arch units would not offer the opportunity for an internally located roller shutter due to their physical shape or due angle at which they face onto the street scene. A recent example of this is planning application 12/AP/3171, in which after some detailed explanation the use of an external roller shutter was permitted due to the site constraints.	
1598	992	Steve	Austin	Network Rail	It should also considered that whilst every effort will be made to use materials that are considered sympathetic to the heritage of an area, they may be circumstances where alternative materials may be required to allow the site to function safely and without the risk of damage. For example, a number of the railway arches and the viaducts provide unique site conditions, particularly with regards to drainage because of the operational railway above and age of the structure. The railway viaduct includes a drainage system that protects the operational railway and allows it to function. Unfortunately, this does result in some damp and leaking (and the potential for stalactites for example) in the arch units below. The internal elements of the units are lined, but it is difficult to provide a solution to the external elevation. This damp and presence of water would not support the use of materials such as timber, and often a more robust material is required.	We have updated SPD 4, so that materials and features should consider the identity of the surroundings, taking the local historic environment into consideration.
1599	992	Steve	Austin	Network Rail	The significance of each site in relation to the conservation areas and heritage principles should also	Noted.

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					be assessed, as not all of the railway property portfolio is of significance; however Network Rail is committed to improving the assets, as well as preserving and enhancing the heritage assets where identified. Within PPS5 Practice Guide (still relevant guidance following the introduction of the NPPF) it states that: "122. A proper assessment of the impact on setting will take into account, and be proportionate to, the significance of the asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it." This will be reflected in any proposals that are to be developed.	
1600	992	Steve	Austin	Network Rail	SPD 5 Building heights Network Rail acknowledges the current focus and guidance for tall buildings as outlined in SPD 5. However, it is considered that this should be reviewed and amended to reflect the changing nature of this part of London, south of the River Thames. The current policy wording requires that: "The tallest buildings should be at the north end of Blackfriars Road. The tallest heights must be set back from the river and focused around the main junction of Blackfriars Road, Stamford Street and Southwark Street." It is requested that such a stringent control over the location is relaxed slightly. It is requested that this wording is amended to replace "...around the main junction of Blackfriars Road, Stamford Street and Southwark Street", with "...located north of the railway viaduct and Southwark tube". It is also requested that Figure 8: Blackfriars Road section and Figure 9: Building height strategy be amended to reflect the change set out above. There would appear to be a more natural horizontal line across Blackfriars Road and Bankside areas, linking Waterloo (the Shell Centre and Elizabeth House) to London Bridge (the Shard), which could be used as a southern boundary for which tall buildings, providing	No change. The SPD sets out the building height guidance for the area which sets out that the tallest buildings will be at the northern end of Blackfriars Road and will cluster around the main junction of Blackfriars Road, Stamford Street and Southwark Street. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.

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					<p>they meet planning policy, could be located north of. This line should follow the railway viaduct between Waterloo East and London Bridge, rather than Stamford Street and Southwark Street as set out in SDP 5. This is clearly a more distinctive boundary, north of which tall buildings could be located. This would allow for the tallest buildings to be set back from the river as currently described, with a continuation of tall buildings in the area south to the railway viaduct, with Southwark tube still providing a final focal point for a tall building. The alterations proposed for acceptable locations above, would not impact upon the Strategic View Protected Vistas or the London View Management Framework. The area is also designated as part of the Central Activities Zone and part of the Bankside, Borough and London Bridge Opportunity Area, both of which support tall buildings as set out in the London Plan Policy 7.7 C, which states that: "Tall and large buildings should: generally be limited to sites in the, Central Activity Zone, opportunity areas". London Plan Policy 7.7, goes on to further say that any tall building could improve the "improve the legibility of an area" and "permeability of the site". The development sites above the viaducts and potential tall buildings outlined previously would support the legibility of the east/west pedestrian link in terms of legibility. In order to achieve the permeability and east/west link, any development potential needs to be met, particularly in order to sustain a mix of uses and vibrancy in the area.</p>	
1601	992	Steve	Austin	Network Rail	<p>It is considered that the threshold of tall buildings as described in SPD 5 of "up to 70 metres" is too restrictive. It is requested that this is amended to "in the region of 70 metres" or "up to 70 metres, unless it can be demonstrated that a taller building would not adversely harm the surrounding area. There may be</p>	<p>No change. The height threshold guidance set out in SPD is informed by the urban design study. It is considered that heights above the thresholds would have an adverse impact on amenity and heritage assets. As such the proposed thresholds balance development potential with a contextual response.</p>

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					circumstances, where there may be opportunities to develop buildings that are taller than 70 metres, particularly in an area that is earmarked for intensification such as Blackfriars Road. Providing the relevant urban analysis supports the proposed height of development and demonstrates its acceptability, further flexibility in the policy would allow development the potential to meet further objectives in the SPD.	
160 2	992	Steve	Austin	Network Rail	SPD 6: Active travel Network Rail wishes to support this policy. The provision of an east/west pedestrian link, located adjacent to the railway viaduct, where both operationally and commercially feasible, is considered necessary for this area to provide further transport alternatives and facilitate a mixed and active economy. This has been promoted as the "low-line" and considerable work has taken place to date by the Bankside Neighbourhood Forum to try and bring this connection and significant improvement in permeability. Current investigations are also in place for a north/south link which will connect the River (the Tate) to areas south of the railway viaduct (eventually to Elephant & Castle). Network Rail also wishes to support this aspiration and is looking to include it into within its development proposals, where both operationally and commercially feasible.	Noted.
160 3	992	Steve	Austin	Network Rail	Summary Network Rail welcomes the aspirations of the Draft Blackfriars Road SPD and the vision that it is trying to achieve. To help secure the vision, Network Rail believe the few objections and its proposed solutions and changes are key. It is hoped that these will be included in order to realise the full potential of the area and reflect needs of all people who work, live and visit the area. As well responding to this draft SPD, Network Rail is a member of the Bankside Neighbourhood Forum and is keen to continue to work	Noted.

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					<p>closely with the Forum and support the principles and objectives being produced in the Bankside Neighbourhood Plan. Significant work has been undertaken to date and Network Rail looks forward to this continuing, with the eventual adoption of an effective Neighbourhood Plan. If you have any questions or wish to discussions any of the questions, issues or general comments raised in this response, then please do not hesitate to contact me.</p>	
1604	973	c/o agent		Linden Homes	<p>On behalf of our client, Linden Homes South East Limited (Linden Homes), we write to provide comments on the draft Blackfriars Road Supplementary Planning Document (SPD), which has been published for consultation until 12 September 2013. Introduction Linden Homes is a national house builder that has delivered a number of housing developments in Southwark, most recently gaining a resolution to grant planning permission for its development at 169-173 Blackfriars Road. The proposals are for 87 new dwellings and commercial units in a building that is split into two elements, with a 10 storey block fronting onto Blackfriars Road, with a linear 5 storey proposition to the rear, fronting onto both Pocock Street and Surrey Row. The building was designed in tandem with both pre and post application consultation with officers, which resulted in a scale, height, bulk and mass that conforms to Southwark Council's design aspirations for Blackfriars Road and its surrounding area. The comments below reflect the views of Linden Homes in the context of</p>	Noted.
1606	973	c/o agent		Linden Homes	<p>Comments on the Draft SPD Linden Homes support the principle of the production of an SPD for Blackfriars and understands the rationale for adopting an holistic strategy for the area to assist in delivering the required amount of homes and employment in this</p>	Noted.

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					area of the Borough. Linden Homes is in general agreement with the majority of the policies, with the exception of building heights. As a result, the comments below are made only in relation to the tall buildings policy contained within the SPD.	
1607	973	c/o agent		Linden Homes	<p>It is noted that Southwark Council's emerging vision for Blackfriars Road is for it to have its own distinct identity as a lively and vibrant area and will continue to have a mix of offices, services and shops, with new homes on the upper floors of commercial developments, offering a range of housing types and sizes. It states at paragraph 2.2.4 that "opportunities to increase the amount and type of development will be maximised", however, "there will be a range of building heights along Blackfriars Road, with the tallest buildings at the north end of the road...there will also be taller buildings at the important locations of Southwark tube station and on the main junction of St. George's Circus". The above rationale is further quantified in Policy SPD 5 'Building Heights', which sets out further guidance on what is perceived to be the appropriate building height for proposed new buildings at different parts of Blackfriars Road. The Policy states that: "The tallest buildings should be at the north end of Blackfriars Road. The tallest heights must be set back from the river and focused around the main junction of Blackfriars Road, Stamford Street and Southwark Street. • A tall building, of a height of up to 70 metres should provide a focal point at Southwark tube station. • A tall building, of a height of up to 70 metres should provide a focal point at St. George's Circus. Tall buildings must be set back from the Circus. • Buildings of up to 30 metres along Blackfriars Road between Southwark tube station and St George's Circus". • The policy also sets out specific</p>	No change. The height threshold guidance set out in SPD is informed by the urban design study. It is considered that heights above the thresholds would have an adverse impact on amenity and heritage assets. As such the proposed thresholds balance development potential with a contextual response.

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					<p>planning and design criteria that a building over 25 metres should meet for it to be acceptable in planning terms. Linden Homes queries the arbitrary building height limits that are proposed in the draft Policy. Whilst it is noted that Southwark Council has conducted an urban design study that has informed proposed building heights along the road, Linden Homes has commissioned its own urban design work, which justifies buildings taller than 30 metres at parts of Blackfriars Road other than the northern end, St. Georges Circus or Southwark tube. Whilst Linden Homes has obtained a resolution to grant planning permission for its site at 169-173 Blackfriars Road, it maintains the view that the site could deliver a taller building that exceeds the building heights prescribed in Policy SPD 5, whilst meeting all of the planning and design criteria that is required for a tall building. This is demonstrated by the urban design work prepared by Nathaniel Lichfield & Partners, which was commissioned by Linden Homes. This work found that: "Blackfriars Road (South of Southwark Station) has a variety of heights and differs in character between east and west. Buildings range from 4 to 12 storeys. The existing tall buildings along the eastern side are defined by a number of buildings that contribute little to the street scene (Friar House, Hill House and Erlang House). There is a limited variation in height and some may be redeveloped. To reinforce uniformity of height along the eastern side at below 30m AOD would serve to detract from the present variety of heights which are an emerging character of the 'boulevard' aspiration for Blackfriars Road and accentuate the monolithic massing and scale of the large buildings already at these heights. The emerging pattern for Blackfriars Road and areas within the borough at key nodes has been greater diversity in height with clusters of tall</p>	

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					<p>buildings. The site lies close to the Southwark Station node on a site at the intersection of key east – west pedestrian routes through the area. An increased height and scale of a building on the site would enhance legibility and provide a reference point to east west links from the Shard - visible at London Bridge to Blackfriars Road –and therein encourage greater permeability through the area. Blackfriars Road is being transformed by tall buildings. There is no overriding character or scale, but diversity. This pattern has already transcended south towards the site with the development of Palestra which is in stark contrast to the character of the Listed buildings opposite, or the adjacent Nelson Square estate. A meaningful variation in heights (that would be appreciable from walking along the road or from the connecting east west routes such as Pocock Street and Surrey Row) would enhance and reinforce interest and variety in the street scene without detracting from the role of a much taller focal building at Southwark Station.” The Bankside, Borough and London Bridge Stage 2 Tall Building Study December 2009 found that: “Within this appraisal, a visual impact assessment on the proposed tall buildings clustered at Blackfriars Road north noted that St Georges Circus the Grade II* listed Obelisk should remain the focus for views along the road. Within this context, development of a taller building upon the site would not interrupt the visual setting of the Obelisk and would not compete for dominance with the northern cluster - particularly if it is considered that a building of up to 70m would be acceptable upon the station site.” The London Plan states that tall buildings are appropriate in the Central Activities Zones and in the opportunity areas. Given that Blackfriars Road has excellent accessibility, with a PTAL rating of 6a-6b, high density schemes can be</p>	

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					supported. In addition, Linden Homes has sought advice from leading counsel, Mark Lowe QC, who has supported the urban design and tall buildings analysis commissioned by Linden Homes. In Mr Lowe's opinion, dated 1 August 2013, which specifically references the 169-173 Blackfriars Road development site, he concludes: "As with any such policy they should be applied flexibly in a manner responsive to site specific issues as well as in accordance with the proposed hierarchy. The first building proposed here was up to 15 storeys and thus exceeded the 30 metre cut off point. In my view this was justified by site specific considerations not taken account of in these general policies. Such a building would not have disturbed the proposed hierarchy in Blackfriars Road and it would have responded positively to the local context where the creation of a focal point is a desirable objective for the reasons already discussed, where it would establish a local hierarchy in the context of the 12 storey HGH set back on Surrey Row away from the Blackfriars Road frontage and where the Manna Ash building at the end of Pocock Street fronting Blackfriars Road to the south of the appeal site is 9 storeys in height". In light of the conclusions set out above from both the urban design work and the legal opinion sought from Mark Lowe QC, Linden Homes maintain the view that a building that exceeds 30 metres in height could be located in locations along Blackfriars Road, particularly in relation to its site at 169-173 Blackfriars Road.	
1608	973	c/o agent		Linden Homes	It should also be noted, that there is a mistake in the supporting information published with the draft SPD. The urban design study Part 1 describes at pages 49 (paragraph 6.5.10) and 50 (figure 4) the testing of options for heights which have informed the draft SPD. The testing of 'Option 4' is considered to be graphically	The figure within the Urban Design Study has been updated to remove the building in excess of 56m from the southern section of Blackfriars Road, which was included in error. The conclusion of the urban design study remains the same for the southern section of Blackfriars Road. There is potential for a series of taller buildings up to 30m along the southern section of Blackfriars Road, which take into account the

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					misrepresented, illustrating a building in excess of 56m high upon the site whereas it should be illustrating a building of up to 56m as described by the text at paragraph 6.5.10. Were this graphic be correctly shown, a building at up to 56m high upon the site (and up to this height along the remainder of south Blackfriars Road) would still allow for a transition in height between a building of up to 70m high at Southwark Station and 100m at Erlang House that accentuates these more important nodes. We would therefore conclude that the paragraph 6.9.6 should allow for buildings up to 56m high which would retain the characteristics identified important to the boulevard (building lines)and allow for variation in height (characteristic of Blackfriars) subject to impact upon amenity and heritage assets as discussed elsewhere.	existing building height context and boulevard character of the road. Buildings over 30m in height along this section are likely to exceed the transfer in heights required for the building heights strategy in relation to the 70m threshold heights at Southwark tube station and St George's Circus, as well as having a potential adverse impact on the significance of heritage assets and their settings within the local context and a potential impact on amenity of lower scale development to the east and west of Blackfriars Road.
1609	362	Ted	Inman	South Bank Employers' Group	The South Bank Employers Group is an association of the major organisations in the South Bank, Waterloo and Blackfriars dedicated to achieving the best possible experience for employees, residents and visitors to its area, which extends from Lambeth Bridge to Blackfriars Bridge and south to St George's Circus The Group is a non-profit company limited by guarantee, governed by a Board appointed by its members, who currently comprise: Braeburn Estates• Kings College London• British Film Institute• London Duck Tours• British Rail Board (Residuary)• London South Bank University• Coin Street Community Builders• National Theatre• EDF Energy London Eye• Network Rail• Elizabeth House Partners• Park Plaza Hotels• EY• Shell• Guy's and St Thomas' NHS Trust• Southbank Centre• ITV• We have many years experience in developing and delivering masterplans, urban design and planning policy including developing visions for Blackfriars Road in the	Noted.

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					past, notably proposals brought forward by Sainsbury's with Lifschutz Davidson Sandilands and Martha Schwarz in 2001. This was updated with all stakeholders with TfL support in 2006-07, bringing together public highway and private forecourt areas in a high quality holistic scheme. We are also responsible for developing and delivering the Spine Route project, a multi-agency public-private refurbishment of Upper Ground and Belvedere Road with Southwark and Lambeth. We were on the project team for The Cut improvement scheme and now sit on the Blackfriars Road Steering Group and lead with TfL on the IMAX Waterloo Road scheme. The Group welcomes the opportunity to comment on the draft SPD and the references in the draft document to further consultation and engagement with SBEG as the SPD progresses.	
1610	362	Ted	Inman	South Bank Employers' Group	BRB (Residuary) Ltd Braeburn Estates British Film Institute Coin Street Community Builders EDF Energy London Eye Elizabeth House Partners Ernst & Young Guy's & St Thomas' NHS Foundation Trust ITV King's College London London Duck Tours London South Bank University National Theatre Network Rail Park Plaza Hotels Shell UK Southbank Centre A company limited by guarantee. Registered No 2974600. Registered Office: Capital Tower, 91 Waterloo Road, London SE1 8RT 2. Neighbourhood Planning and the Blackfriars Road SPD a) SBEG is also appointed as the administrator for the South Bank and Waterloo Neighbourhood Forum, which has submitted applications to Southwark and Lambeth for the area bounded by the Thames, Blackfriars Road and Lambeth Road to be designated as part of the South Bank and Waterloo Neighbourhood Area. This includes the western side of Blackfriars Road along its whole length and the area between Blackfriars Road and the Borough boundary	Figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area. The SPD has been updated to refer to neighbourhood forums throughout in appropriate places and to refer specifically to South Bank and Waterloo Neighbourhood Forum within section 4 on partnership working, business and community involvement.

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					<p>with Lambeth, all of which falls in the SPD area. The emerging plan will also develop policy for Blackfriars Road. b) The South Bank and Waterloo Neighbourhood Forum, constituted in July 2013, has 180 members, many of them from the area covered by the draft SPD. The Forum will shortly elect a Steering Group and a Chair and will no doubt also wish to comment on matters relating to the SPD. Given the timing of the consultation in relation to the establishment of the Neighbourhood Forum it is hoped that the Council will be flexible about considering further comments from the Forum in the next month. c) Given that the community will soon face further consultation on similar issues set out in the SPD, it is important that the council sets out the reasons for developing an SPD alongside emerging neighbourhood plans and the formal relationship in between them in more detail than is illustrated in Figure 3. This applies also to the New Southwark Plan. Where the community has gone to considerable effort to develop its vision for the area, it is vital that the policies in the Southwark Plan accord with those developed in Neighbourhood Plans for the area. We seek this assurance from Southwark. d) In these circumstances the draft SPD should also reference its commitment to working in partnership with the properly constituted South Bank and Waterloo Neighbourhood Forum throughout.</p>	
1611	362	Ted	Inman	South Bank Employers' Group	<p>3. General Comments a) Importance of Blackfriars Road As the Draft SPD recognises, Blackfriars Road is a strategic north-south link and many aspects of the proposed policies address this. It also recognises that planning policy needs to address east-west linkages across Blackfriars Road and links between the Borough and Bankside and the Waterloo opportunity areas. The London Plan states rightly that 'proposals</p>	<p>An explanation of the boundary is set out within the SPD. It includes the whole of the Blackfriars Road and some of the surrounding area. It includes the surrounding area as the surrounding area is also likely to see some development and improvements, particularly possible improvements to public realm. Wording has been added to the SPD to make it clearer that the character and historic value of much of the surrounding area will continue to be protected and enhanced.</p>

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					<p>for open space network and transport and community infrastructure should be coordinated with those in the Waterloo and Elephant and Castle Opportunity Areas and across borough boundaries'. However, as is evident from references such as that at para 3.41 'We will also continue to work closely with Lambeth Council to deliver cross boundary improvements' this element of the draft SPD does not represent a plan, but simply an intention to plan. The key issue is that in its east-west significance Blackfriars Road forms the natural boundary between Bankside and the South Bank/Waterloo. The chart of planning policies (Figure 3 p6) rightly identifies neighbourhood plans as carrying more weight than the SPD in the planning process. The two neighbourhood plans incorporating parts of the SPD area are capable of adding much missing flesh to the bones of the draft SPD. Even without the emerging neighbourhood plans the full assessment of the east-west cross- boundary issues (borough, opportunity areas, neighbourhoods) needs much greater involvement of the two Neighbourhood Forums, the interested business organisations (SBEG, Waterloo Quarter, Better Bankside), GLA and TfL, Ward Councillors on both sides of the borough boundary etc. Ideally, in our view, the SPD should be delayed to enable this input to be provided in a coordinated fashion and above all to enable the east-west cross boundary issues to be fully addressed by all interested parties.</p>	<p>Figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area.</p>
161 2	362	Ted	Inman	South Bank Employers' Group	<p>b) Implementation The draft SPD also lacks any substantial content on implementation and delivery. It has little reference to how S106 and CiL will be applied to deal with the issues the draft policies identify. It lacks a delivery plan and any information about infrastructure costs and delivery. These matters should be addressed in detail with the parties identified</p>	<p>The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development.</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p>

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					above, or, preferably, should await further input from the two Neighbourhood Forums.	<p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4.4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area.</p>
1613	362	Ted	Inman	South Bank Employers'	Carbon Reduction and Green Infrastructure The SPD is virtually silent on the issue of carbon reduction. A South Bank Employers' Group/LSBU study identified the likely viability of a decentralised energy cluster at	Our approach to reducing energy consumption and carbon dioxide emissions is borough wide. Further detail is set out in strategic policy 13 of the Core Strategy, saved Southwark Plan policy 3.4 and our sustainable design and construction SPD. Core Strategy policy 13

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				Group	the north end of Blackfriars Road. Since then proposals have come forward further south which might also provide the basis for district heating and neighbourhood CHP. Open space references do not reflect cross-borough opportunities and challenges. Similarly, green infrastructure should be supported at every opportunity for the benefits it brings the local community and London as a whole. The South Bank Employers' Group and Waterloo Quarter have published a green audit which identifies sites for green cover such as rain gardens, opportunities for surface water run-off, and principles for new development. These opportunities extend well beyond protecting existing green spaces referred to in the report.	states that all major developments should set up and/or connect to local energy networks where possible. This approach is in line with London Plan policy 5.2. Our approach to open spaces and green infrastructure is also borough-wide. We have set out in Core Strategy policies 11 and 13, saved Southwark Plan policies 3.25, 3.26, 3.27 and 3.28 and our sustainable design and construction SPD how we will protect and improve open spaces and encourage new development to include measures that help to promote green infrastructure. A further paragraph has been added to the SPD to cross refer to the council's Open Spaces Strategy (2013). As set out in the Blackfriars Road SPD, the SPD does not repeat borough wide policies and so the SPD must be read alongside our other planning documents. An appendix has been added to cross refer to key other Southwark planning documents and policies including the Core Strategy, Saved Southwark Plan and Sustainable Design and Construction SPD.
1614	362	Ted	Inman	South Bank Employers' Group	d) With a major student accommodation facility on Blackfriars Road, and a number of university buildings very close by, the SPD should consider how it can support local universities in their student housing needs.	The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. Specific policies on student housing are already set out in Core Strategy policy 8 and saved Southwark Plan policy 4.7. Further guidance is also set out in the Affordable Housing SPD and Residential Design Standards SPD. There is no need for further guidance in the SPD.
1615	362	Ted	Inman	South Bank Employers' Group	Policies could go further to encourage the animation of the public realm and policies might be introduced that do - tables and chairs licences could be favoured where away from residences in order that the street remains animated at different times of day. Licensed pitches for selling appropriate goods might be encouraged.	No change. The activation of the public realm is covered within the SPD.
161	362	Ted	Inman	South	The Council proposes high quality public realm	Noted. Section 106 and in future the community infrastructure levy

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6				Bank Employers' Group	throughout the area of the draft SPD but the document does not allude to the funding required to maintain such public realm to a standard compatible with the aspirations for a high quality approach. If the Council is to seek revenue contributions from developers for this purpose the SPD needs to include this, or to refer to an intention to allocate a proportion of CIL for management and maintenance purposes.	would be determined at the planning application stage. Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD and will seek to adopt these in 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.
1617	362	Ted	Inman	South Bank Employers' Group	g) Bullet 4 of policy SPD 3 calls for a clear distinction between public and private space. This should be clarified to ensure that it means genuinely private space, as opposed to privately owned public realm for which it would be illogical to create a distinction. Developers should be encouraged to provide public use of forecourts and other spaces as part of the wider public realm and there should be as little distinction as possible in those cases.	The SPD encourages a network of new public spaces and improved public realm. Detailed design would be assessed at the planning application stage.
1618	362	Ted	Inman	South Bank Employers' Group	h) A local mechanism for defrayal of s106 and CIL, or at least the local identification of priorities should be encouraged.	The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development. SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments. SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces. Section 4.4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.

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						Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to be provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.
1619	362	Ted	Inman	South Bank Employers' Group	Policy SPD2 and para 3.12 support arts and cultural provision. There should however be close involvement of the South Bank and Bankside Cultural Quarter in providing advice on cultural developments and in ensuring the right balance between new facilities and enhancing existing provision.	We have amended the supporting text to make reference the South Bank and Bankside Cultural Quarter.
1620	362	Ted	Inman	South Bank Employers' Group	4. Specific points P5. Southwark is spelled incorrectly on the map at Southwark Station (and thereafter on all maps). It is also Blackfriars Station, rather than Blackfriars Road Station. It may be worthwhile accurately depicting the opportunity area boundaries at Elephant & Castle and Waterloo (and on the map on P4)	All figures have been updated.
1621	362	Ted	Inman	South Bank	P10 'South Bank University' should be 'London South Bank University'.	Noted. Changed throughout the SPD.

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				Employers' Group		
1622	961	Richard	Parish	English Heritage	Thank you for consulting English Heritage on the London Borough of Southwark's Draft Blackfriars Road SPD and associated Sustainability Appraisal (SA). As the Government's statutory adviser on the historic environment, English Heritage is keen to ensure that heritage conservation and enhancement is fully considered in all aspects of the local planning process. Accordingly, we have reviewed the details of the draft SPD and SA in light of the National Planning Policy Framework (NPPF) which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (NPPF para. 126). In addition we have also considered the details of the draft SPD against the recently published National Planning Guidance (NPG) (2013).	Noted.
1623	961	Richard	Parish	English Heritage	In general, we support the aims of the SPD to provide a framework to guide future development in a coordinated manner. We also welcome the intention of the draft SPD to set out emerging ideas for a Vision for Blackfriars Road (para 2.2.4). However there a number of headline concerns with regards to the emerging Vision and the travel of direction it provides for future development in Blackfriars Road. It is noted in paragraph 2.2.3 that the emerging vision cannot be formally adopted through the SPD and that a review of the Southwark Plan will help formalise the vision for Blackfriars Road. This implies that content of the SPD goes beyond the existing Southwark Plan, which suggest that the content of the draft SPD should be the subject of thorough examination, in the form of an	The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.

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					<p>Area Action Plan. The basis for this opinion is that the scale of development now promoted through the draft SPD appears to be beyond that envisaged and articulated in the Southwark Plan. For example the adopted Core Strategy indicates tall buildings will be appropriate at the north end of Blackfriars Road only. The emerging Vision seeks to deliver a significant uplift in building heights along the length of Blackfriars Road. This is reflected in the policy SPD 5 Building Heights, which encourages new build along Blackfriars Road to between 30m and 70m in height at various points (e.g. Southwark tube station and St George's Circus). The exception to this approach appears to relate to the north end of the Road where the tallest buildings are promoted but without any indication of limit. This is an extensive stretch of the Blackfriars Road which appears to be devoid of any clarity in the management of tall building heights. This is of particular concern when many of the tall buildings emerging in this specific area, are impacting upon the wider historic environment, including many heritage assets in central London. This concern raises the issue that the emerging Vision promotes an extensive range of tall buildings on the premise that the design of developments will be exceptional and will enhance the local character, plus sustain and enhance the historic environment. On considering the details of the draft SPD and the very detailed supporting evidence (e.g. Bankside, Borough and London Bridge Characterisation Study – July 2013; Draft Blackfriars SPD – draft Urban Design Study – August 2013) we would suggest that these two drivers of the emerging vision may not be deliverable in all cases. There are concerns that the significance of the historic environment as encapsulated by its heritage assets may be potentially harmed by the degree of change in</p>	

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					heights proposed on sites along Blackfriars Road. This includes potential harm to heritage assets outside of the draft SPD area, north and south of the River Thames. For example, heritage assets that are potentially at risk include the setting of St George's Circus conservation area and the setting of Somerset House as experienced from within its courtyard (not just from its river terrace).	
1624	961	Richard	Parish	English Heritage	It is noted that the draft SPD promotes the conservation and enhancement of the historic environment, and the reinforcement of the areas distinctiveness. This approach is welcomed. However there are concerns that many of the opportunity sites identified could result in the loss of buildings of particular local interest in terms of their contribution to the distinctiveness of Blackfriars Road. The potential loss of buildings of local interest combined with the proposed scale of development could result in a character that does not reflect the current positive aspects of the Blackfriars area. The concern is that the character of Blackfriars Road will not be enhanced but changed to one that is bland and disconnected from the distinctiveness of its surroundings.	The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. The impact on designated and non-designated assets and their settings, as well as detailed design in relation to context would be assessed at planning application stage.
1625	961	Richard	Parish	English Heritage	The post-war evolution of Blackfriars Road has introduced substantial variations in parapet heights, and a general uncoordinated, low quality, built form. We would support the intention to control heights and note that the heights are maximum with an expectation of a range of heights up to this ceiling. However we are concerned that this does not provide sufficient assurances of quality and design, and that the tendency will be to build to the upper limits. We would recommend that the Council consider the production of a detailed masterplan which sets out the appropriate responses to the different sites and gives greater	The SPD sets out built form guidance in relation to the area's context, heritage and development potential. The guidance set out within the SPD is consistent and read in conjunction with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance is underpinned by the BBLB Characterisation study (2013) which interprets the area's character and history. A master plan is not considered appropriate due to the existing context of consented schemes, the immediate development pressure, the multiple landowners within the area and that a master plan if

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					guidance in respect of the spatial considerations and built form expected. This would greatly assist in realising the vision for Blackfriars Road (eg. the Kings Cross Railway Lands Masterplan effectively utilises elements of local historic character to steer the wider development in a coherent and qualitative way).	successfully tested at appeal, can become quickly outdated. We have worked with Allies and Morrison and continue to work with TfL and developers to develop cohesive public realm principles for Blackfriars Road.
1626	961	Richard	Parish	English Heritage	More detailed comments on the draft SPD include: Table 1 Potential development sites (pg13) As highlighted in the headline comments we have concerns to whether the qualities of existing buildings marked for redevelopment have been fully assessed for their positive contribution to the character of the area. For example Table 1 identifies 209-215 Blackfriars Road as a potential development site. Whilst we recognise this building is outside of a conservation area and undesignated, we would consider this to be a high quality commercial building which represents much of qualities of character which the draft SPD hopes to deliver. In our view, 209-215 should be identified as an undesignated heritage asset. The loss of good quality undesignated historic buildings and their replacement with buildings which fail to respond to local character is a noted problem on Blackfriars Road and we would encourage the council to take this opportunity to address this	The SPD does not designate proposals sites or provide site specific guidance, as this would beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. Guidance and the identification of buildings will be addressed in a new Heritage SPD that will be prepared alongside the New Southwark Plan.
1627	961	Richard	Parish	English Heritage	SPD 1 Business space (pg14). It is noted that SPD1 supports the use of the railway arches for a range of business uses including creative and cultural industries etc as contributor to economic growth. English Heritage supports this approach as there have been many studies recently such as the Heritage Lottery Fund New ideas need old buildings (2013) that demonstrate the adaptability of existing buildings to meeting the needs of new and alternative industries and activities. We would suggest that the wording of	Support noted. Saved Southwark Plan policy 1.4 requires business space to be retained or replaced unless exceptional circumstances can be demonstrated. Southwark CAZ was also exempted from the government's recent change to the General Permitted Development Order to allow office buildings to convert to residential. The CAZ has been recognised by the government as a nationally significant area of economic activity. These new permitted development rights do not apply in the CAZ. Therefore existing office buildings will still need to meet the exemption criteria in policy 1.4.

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					SPD1 should promote this concept beyond the railway arches, to other buildings (particular those of local interest) and areas within the Blackfriars area. This would reflect the supporting comments made in the paragraph 3.3 of the draft SPD.	
1628	961	Richard	Parish	English Heritage	SPD2 Mixed use town centre (pg18) Paragraph 3.16 encourages frontages and interior activities to animate the street frontage. We would suggest that this approach should also be considered in the context of the rear of new buildings, where they are visible within the network of side streets. The majority of the conservation areas (with the exception of St Georges Circus) visually interact with the rear of Blackfriars Road it is therefore essential, in respect of both preserving and enhancing character and appearance, and creating an attractive environment for people to work and live, that the design principles of massing, fenestration and materials should be considered in order to ensure the rear of buildings contribute positively to the character and appearance of the surrounding area. Although relevant to all new development this is particularly relevant to developments such as hotels (paragraph 3.10).	We consider SPD 4 provides sufficient guidance to link with SPD3 on active frontages. SPD4 encourages development to ensure that materials and features reflect consider the identity of the surroundings, taking the local historic environment into consideration. In addition SPD4 encourages development to reinforce the civic scale along the main routes of Blackfriars Road, Stamford Street and Southwark Street, by providing clear entrances that address the street, generous window or areas of glazing.
1629	961	Richard	Parish	English Heritage	SPD3 Public realm and open space (pg19-20) Overall we support the general principles defined in SPD3. However reflecting our headline concerns, we would seek to ensure that the implementation of SPD3 is undertaken from a basis of identifying and utilising existing positive aspects of the public realm that contribute to its character (e.g. St George's Circus). This includes ensuring new public realm works connect successfully to its surroundings, provides a sense of variety and interest, and does not result in a bland design along the whole length of Blackfriars Road. Illustrations (pg21) It would be helpful to add an	Noted. The SPD sets out general principles for high quality public realm improvements throughout the area that recognise the importance of sustaining and enhancing local distinctiveness, taking the historic environment into consideration, while creating a sense of place where the public realm provision is currently poor. Specific principles are set out for places that are especially important, such as St George's Circus, the Thames Path and Blackfriars Road itself. For example, SPD 3 sets out clear public realm principles that seek to enhance the setting of the Grade II* listed obelisk and the St George's Circus conservation area. The photographs illustrate part of the existing public realm context.

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					explanation of the intended principles illustrated by the photographs.	
1630	961	Richard	Parish	English Heritage	SPD 4 Built form and heritage (pg24) In general we support SPD4 subject to the following changes being made; Point 3 dash 2 - We would suggest changing "Activating the base of buildings by providing clear entrances that address the street" to "Activating the base by providing well defined entrances that address the street" to avoid confusion in the misinterpretation of the word 'clear'. Point 4 - We would suggest that additional clarification is provided in respect of the impact of the rear and side elevations of new developments which front onto main routes, and a need for these to enhance local character. This includes responding to local views and the setting of heritage assets.	No change. The guidance is clear. The impact of the rear and side elevations of new developments which front onto main routes, and a need for these to enhance local character would be assessed at planning application stage. SPD 4 provides guidance for areas off the main road.
1631	961	Richard	Parish	English Heritage	SPD5 Building heights (pg27-28) Reflecting our headline concerns, we would advise that greater justification needs to be provided on the heights defined in SPD5. In particular at the north end of Blackfriars Road, where no height limit is defined. It is noted in the supporting evidence that an 'existing context of tall buildings is established', with the highest approved scheme being 165m. However it is not clear whether the remaining tall buildings in this area will expect to be lower than the 165m (therefore representing the peak of the cluster) or additional ones will be taller? In addition it is not clear of the extent of the emerging cluster as SPD5 only starts to define a building height maximum at Southwark tube station. Our concerns relate to the proximity of a range of high grade heritage assets nearby (north and south of River Thames) which could be significantly impacted upon without providing greater clarity of height parameters for tall buildings at this location. Elsewhere, there are	We have updated SPD 5 for greater clarity in relation to the guidance for the northern end of Blackfriars Road and also at the southern end of Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. The impact on heritage assets outside the SPD area was also tested and this is set out in the urban design study.

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					<p>concerns that the height of development at St George's Circus at the southern end of Blackfriars Road, as promoted by SPD5, could detract from the setting of the conservation area. We accept that there are development opportunities near St George's Circus, but due to the context of the heritage assets at this location, we do not see the justification for a taller landmark element, particularly in light of the grade II* obelisk providing an existing and legible historic landmark. We would also consider that the proposed setting back of a taller element at this location would contradict its landmark justification. We would welcome further discussion on this issue and modelling in respect of how these sites can be developed so that they conserve and enhance neighbouring heritage assets. We support the principle that tall buildings must demonstrate that they contribute positively to London's skyline. However we would advise that this principle should be applied to all tall buildings and not just ones above 50m in height. We support the use of tests that should be applied to all tall buildings over 25/30m and the inclusion of one relating to the conservation and enhancement of heritage assets and their settings. However we would advise that this test should be applicable to heritage assets both within and outside the draft SPD area. The examples of assets identified do not include any outside of the draft SPD area. This raises concerns to the robustness of the evidence when modelling the impact of the proposed tall buildings, and defining appropriate heights within SPD5.</p>	
163 2	961	Richard	Parish	English Heritage	<p>Appendix 2 – Relevant plans and policies; National Planning Policy (pg 68). The recently published National Planning Practice Guidance should be assessed with regards to its impact upon sustainability of the draft SPD. It should also be noted that PPS5</p>	<p>We have amended the final SA to refer to these documents.</p>

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					Practice Guide has not been rescinded, so should also be considered as part of the SA process.	
1633	961	Richard	Parish	English Heritage	We would also suggest that under the topic of retail (pg92) reference could be made to English Heritage's guidance: Retail Development in Historic Areas	We have included a reference to this document in the table of national relevant plans and policy documents (appendix 2).
1634	961	Richard	Parish	English Heritage	Appendix 4 Sustainability matrices SPD5 Building Heights - in respect of SDO11. It is noted that the commentary states that identifying potential locations for tall buildings will emphasis gateways and key locations. However we would advise that tall buildings also need to respond to the existing context which may already include sufficient elements that highlight gateways and/or key locations. This includes considering the significance of heritage assets that may contribute to an understanding of the existing townscape, in terms of orientation, legibility and sense of place. Our concern is that the matrices suggest that there are no conflicts yet the inappropriate development of tall buildings can cause significance harm. As already detailed above in relation to the draft SPD, in particular SPD5, we would suggest that the SA should not conclude at this stage complete compliance with the sustainability objective SDO11.	We have amended the SA to show that building heights could potentially have an uncertain impact on SDO11. Tall buildings will need to take into consideration the significance of heritage assets that may already contribute to the existing local context. Existing policy in the London Plan, Core Strategy and saved Southwark Plan as well as guidance in the Blackfriars Road SPD will ensure that applications for taller buildings considers the significance of heritage assets.
1635	961	Richard	Parish	English Heritage	In the meantime, English Heritage would advise that the local authority's conservation staff are involved throughout the preparation and implementation of the draft SPD as they are often best placed to advise on; local historic environment issues and priorities; sources of data; and, consideration of options relating to the historic environment.	Noted. The council's design and conservation team have worked closely with the planning policy team in preparing this SPD.
1636	961	Richard	Parish	English Heritage	It must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or	Noted.

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					later consultations.	
1637	961	Richard	Parish	English Heritage	Finally, after considering our comments we would welcome the opportunity to discuss how further iterations of the SPD can be developed. In the meantime I hope you find our comments helpful, and if you have any queries in respect of the above please do not hesitate to contact me.	Noted.
1638	769	Gareth	Parry	Albert Association	We write this submission in response to the draft SPD in the capacity of the Albert Association representing the residents of Gladstone Street and Colnbrook Street within the West Square Conservation Area. Our main concerns relate to:- <ul style="list-style-type: none"> • The deficiencies, inconsistencies and contradictions of this SPD with adopted National, Regional, Local plans and policies • The use of this SPD as a wrapper to introduce by stealth new policy for tall buildings including a 70m height criterion at St Georges Circus / Blackfriars Road South without following a formal adoption process, which includes 	The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy 12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.
1639	769	Gareth	Parry	Albert Association	We contend that the London Borough of Southwark (LBS) falls short of its obligation under NPPF and its own adopted policies in attempting to elevate an SPD as a vehicle to introduce new guidance as if it was proposed policy, (namely for tall buildings 30-70M height) and to promote Blackfriars South and St Georges Circus as suitable designated locations capable of promoting tall building of 70m in height, in contradiction of National, Regional and Local adopted policy, and in the absence of an acceptable evidence base. An SPD is not a valid instrument for LBS to introduce new policy in isolation. There is however an obligation for an SPD to be consistent with, and subservient to, adopted National, Regional and Local	The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.

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					adopted policies and in turn for these documents to support the evidence base for an SPD.	
1640	769	Gareth	Parry	Albert Association	<p>Section 38(6) of the Town and Country Planning Act is clear that development should be determined against current adopted development plans unless material consideration (appropriate tests) suggests otherwise. LBS is deficient in following a formal adoption process for this SPD; there is no clear methodology nor evidence base to provide an appropriate test of its assumptions. Its poor cross referencing to adopted policy is insufficient to demonstrate how it would test its approach. NPPF is clear in ensuring that Planning Authorities get the right developments in the right places and imposes an obligation on LBS to demonstrate, through National, Regional and Local policy, the likely impact on the immediate surroundings and the wider environment. LBS have been inconsistent and deficient in respect of this SPD in the following adopted policy and evidence base:- National Policy Town and Country Planning Act -38(6) NPPF 2012 Part 12: Conserving and Enhancing the Historic Environment Sections: 126, 132-135, 137, 141, and 169 Planning policy guidance note 13 (PPG13) Regional Policy London Plan 2011 Chapter 7: London's Living Places and Spaces Policies 7.4. A, 7.4.B (a, c, d, e), 7.6.A, B (b, d), 7.7. A, C (b, c, d), D (b), E, 7.8.D, 7.9.B Local Plan Southward's Core Strategy 2011 Policies 4.16, 5.114, Figure 12 Saved Southwark Plan Policies 2013 Policies 3.11 (iii), 3.12(i,ii,iii), 3.15, 3.18(i,ii,iii,iv), 3.20(i,ii,iv,v), 3.22 CDD2 Bankside, Borough and London Bridge Stage 1 Tall Building Study 2010, Elephant and Castle SPD/OAPF 2012 St George's Circus and Erlang House are within this SPD/OAPF's Enterprise Quarter. Policies 2.3.6, 3.2.9, 5.8.12, 16, SPDs 16, 17 and 51 St George's Circus CAA 2005 Draft West Square</p>	The SPD accords with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is consistent with and not in conflict with the adopted development plan and the NPPF. The SPD sets out that it provides further guidance to existing planning policies in the development plan: the London Plan, Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents.

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					Conservation Area Appraisal Policy 9 Policy 12.4 (should the new guidance apply to the Conservation Area) Bankside, Borough and London Bridge Characterisation Study 2013 Sections 3.2.4, 6, 8, 9 and 10. Draft Bankside, Borough and London Bridge SPD/OAPF 2010 Policies 3.1, 3.2, 4.2.10, 12	
1641	769	Gareth	Parry	Albert Association	Conflicts between adopted Core Strategy CDD2 Bankside Borough and London Bridge Opportunity Area: Stage1 Tall Building Research Paper March 2010 and the Draft Blackfriars Road Supplementary Planning Document . CDD2 adopted only three years ago (2010), sets out the approach and analysis to establish suitable locations for tall buildings in the Bankside, Borough and London Bridge (BBLB) Opportunity Area. It sets out how it supports the Core Strategy (CDCS1) and the methodology for the study (in accordance with CABE and English Heritage guidance [CDN25]) which sets out criteria which it then investigates, namely :- <ul style="list-style-type: none"> • Evaluation of Historic Context • Evaluation of the Local Character • Evaluation of the Urban Design Opportunities • Identify suitable locations for tall buildings Draft Blackfriars Road Supplementary Planning Document- SPD4 Built form and Heritage is in immediate conflict with SPD5 Building Heights. It makes no reference to how it relates to adopted policy, (including CDD 2); methodology, evidence base and test. It does, however, introduce new policy for a tall building of up to 70m in height at St Georges Circus without making reference to how this vision has evolved and what steps it has taken to demonstrate how it has arrived at this proposition. It is therefore in direct conflict with CDD2. LBS is deficient in by-passing a development plan-led approach to tall buildings. LBS acknowledges that this draft SPD should sit alongside adopted National Planning Policy Framework NPPF, London	The guidance set out within the SPD is consistent with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy 12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.

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					Plan, Core Strategy. Yet it is deficient and in direct conflict with the Framework through its attempts to demonstrate the suitability of specific locations for Tall Buildings without any evidence base. It is also in conflict in proposing to replace, at some point in the future, the adopted local plan and Core Strategy in order to facilitate this 'vision'. In this SPD LBS have not identified within the local development framework, in advance of specific proposals, the spatial, scale and quality requirements as set out in CDD2. The intent of a development plan-led approach is to enable proper public consultation at the plan-making stage on the fundamental questions of principle and design, including appropriate consideration of the historic environment to reduce the scope for unnecessary, speculative applications in the wrong places. A 70m in height tall building at St Georges Circus would be a such a speculative application in the wrong place. LBS are attempting to circumnavigate this process in an attempt to rush through this deficient SPD to justify Barratt Homes speculative application for a 70m tall building at St Georges Circus. The relationship to context, including natural topography, scale, height, urban grain, streetscape and built form, open spaces, rivers and waterways, important views, prospects and panoramas, and the effect on the skyline are all missing from this SPD.	
164 2	769	Gareth	Parry	Albert Association	Conflicts between NPPF 2012 Part 12: Conserving and Enhancing the Historic Environment, Sections : 126, 132-135, 137 ,141, and 169 and the Draft Blackfriars Road Supplementary Planning Document ,SPD 4 and SPD5 In promoting St Georges Circus as a suitable location for tall buildings LBS, in its drafting of this SPD, has fallen short of its obligations under NPPF section 12. Conserving and enhancing the historic environment :- • (126) Local planning	The guidance set out within the SPD is consistent and read in conjunction with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy 12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD. It is not an AAP and does not propose new policy for the area. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance

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					<p>authorities have an obligation to set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. • This SPD attempts to denigrate this significance through the convenient drawing of the boundaries to suit the purpose of this SPD. The West Square Conservation Area is placed outside (but in immediate adjacency), rather than inside, the SPD boundary. No evidence is supplied to describe the significance of the many heritage assets affected by the SPD. There is no evidence demonstrating that St Georges Circus is a suitable location for tall buildings (or to set out what impact a tall building will have on a predominantly 3-5 storey residential community of a Conservation Area. Nor has it adequately demonstrated through its policies how the heritage assets have been assessed in support of SPD 5, using appropriate expertise where necessary. • (133) Where a proposed development will lead to substantial harm to, or total loss of significance of, a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: • the nature of the heritage asset prevents all reasonable uses of the site; and • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use. LBS has not made any attempt through this SPD to address how it will comply with and address these criteria set out in NPPF • (134). Where a development proposal will lead to less than substantial harm to the</p>	<p>on Tall Buildings”, 2007. In light of consultation responses and to add clarity to the guidance relating to St George’s Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>

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					<p>significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. LBS have been deficient in demonstrating through its methodology and evidence base that it addresses SPD4 in relation to SPD5. • (137) Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. LBS have been deficient in demonstrating new policy for a 70m tall building under SPD 5 in the location of St Georges Circus being appropriate in, or preserving, those elements of the setting that make a positive contribution to, or better reveal, the significance of the asset. • (141) to adequately make information about the significance of the historic environment, gathered as part of plan-making or development management, publicly accessible and understood. LBS have made no attempt to comply with this and have fallen short of the standards and methodology of CDD2 and are in contradiction with findings of CDD2. • (169) Historic Environment. In proposing the location of St Georges Circus for tall buildings LBS have not fulfilled their obligation to adequately take into account the evidence about the historic environment in the location area and to use it to assess the significance of heritage assets and the contribution they make to their environment. LBS have specifically been deficient in following its obligation to follow its own methodology set out in CDD2 to demonstrate the :- Relationship to the existing local character the existing and approved scale of development • Evaluation of urban design and area based studies • Other research and evidence prepared for policy documents • Character Area appraisals</p>	

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1643	769	Gareth	Parry	Albert Association	<p>Evaluation of historic context and Setting and views of Conservation Areas - CDD2 4.4.7 Conservation Areas</p> <p>The proposed SPD makes no reference to Evaluation of Historic Context but is in conflict with CDD2:- The character of southern Blackfriars Road as a mainly low-rise area with many historic listed and non-listed buildings including 34 listed 3-5 storey buildings in the St Georges Conservation Area, and several residential communities including the grade 2 listed Gladstone street and Colnbrook street within the West Square Conservation Area. It is completely different from that north of The Cut/Union Street. In this SPD there is a noticeable absence of consideration of the historic context of the immediate conservation areas. NPPF (12) and Local Policy 3.16,3.17,3.18 is specific in guidance on consideration of heritage assets and obligations. The authorities must identify and consider local heritage assets and scheduled monuments when considering the appropriateness for development (in the case of this draft SPD, the suitability of a 70m tall building at St Georges Circus). There is no mention of key historic listed buildings or monuments, no assessment of specific important local views and setting and views of scheduled monuments. It is extraordinary that the significance of the heritage asset of the major junction at St Georges Circus, namely the nationally important Grade II* Obelisk and the wider setting of the conservation areas of St Georges Circus and West Square and the 4-5 storey Peabody and Weber Row, are not adequately considered or feature in any evidence base over a period of time when there have now been several successive documents produced on tall buildings. LBS is deficient in automatically introducing new policy through this SPD with an assumption that a tall building in the location of Blackfriars South St Georges Circus is suitable without</p>	<p>The guidance set out within the SPD is consistent and read in conjunction with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy 12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets. The impact on heritage assets would be assessed at planning application stage.</p>

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					<p>having undertaken the necessary assessment to demonstrate that this location, in its proximity to West Square and St George's Conservation areas, would be sensitive or appropriate. In designating this location as a potential site for tall buildings it has not adequately considered or demonstrated the suitability. Where is the evidence base to demonstrate that a 70m tall building in the location of St Georges Circus is appropriate? LBS has not followed or adequately considered that a tall building should preserve or enhance the historic character setting and appearance of buildings or areas of historical or architectural significance if it is to be permitted. Under CDD2 4.4.7 LBS are suggesting that the 'impact of buildings located outside but close to conservation areas be considered in relation to any relevant conservation area appraisal'. The SPD and CDD2 make reference to having completed conservation area appraisals as relevant documents to reinforce the SPD. • St Georges Circus 2005 pre dates core strategy, tall buildings studies, and makes no reference to how to deal with tall buildings • The West Square appraisal similarly does not cross reference any policy relating to tall buildings or inform how it anticipates the criteria to assess how it would deal with the suitability of proposed designed sites for development LBS in the drawing of boundaries of this SPD have deliberately excluded West Square Conservation Area and provide scant acknowledgement of St George's conservation area in an attempt to falsely validate the suitability of a 70m in height tall building at St George's circus. LBS is deficient in highlighting the suitability of this very sensitive location immediately within St Georges Circus conservation area and West Square which is a contiguous early Victorian residential community of 3-4 storeys. LBS has not followed National Regional or its</p>	

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					own adopted and Local policy methodology to adequately demonstrate that a tall building in this immediate vicinity will not have a harmful and negative impact on the existing residential community, local character, scale and height of development. There is an insufficient level of analysis, consultation and evidence base to demonstrate that a 70m tall building in this location does not have a harmful effect on the historic scale of largely 3-4 storey early Victorian houses of a residential community, nor evidence to demonstrate that the existing character and setting has adequately been taken into account. The SPD new guidance fails to recognize the distinctive character of southern Blackfriars Road as a mainly low-rise area with many historic listed and non listed buildings. The Circus is described only as a 'main junction', completely ignoring its historical significance as the most important surviving example of Georgian town planning in South London, graced by 34 listed buildings including the nationally important Grade II* Obelisk	
164 4	769	Gareth	Parry	Albert Association	Character Areas Whilst the SPD makes reference to CDD2 Core Strategy, (which in turn references CDD32 Blackfriars Road Character Area Appraisal, West Square Conservation Area Appraisal and St Georges Circus Conservation Area appraisal as documents that have been produced) there is no adequate analysis or research paper to demonstrate what affect a tall building of 70Mm would have on the character of a largely 3-4 storey residential community immediately adjacent and within the conservation areas.	The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007.
164 5	769	Gareth	Parry	Albert Association	Urban Design and Area based studies Adopted core strategy CDD2 4.2 'summary of study of considerations that would support tall buildings 'does not support the proposed location of a tall building	The guidance set out within the SPD is consistent and read in conjunction with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy 12, the relevant policies

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					<p>Blackfriars Road South / St Georges Circus . The only criterion suggested by LBS as being satisfied by Blackfriars South as a suitable location for a tall building was its proximity to a major junction (St Georges Circus). This is described in the SPB, (erroneously, as a transport 'node'. It is not, by any accepted definition of the word, a 'node'). 'It has only peripheral access to Southwark station and Waterloo'. It concludes that 'it is not a focus for major redevelopment or activity'. It is only served by busses, and bus stops are remote. LBS, in proposing Blackfriars Road south as a suitable location for 70M tall building, is in direct contradiction, and deficient in its findings in respect of CDD2 and Planning Policy Guidance note 13 (PPG13). Under CDD2 4.1.2 Gateways, Junctions of major roads or points of civic or local significance Blackfriars South (which St Georges Circus sits within) the only urban design consideration that LBS suggested would support tall building development was the criterion of the proximity of St Georges Circus as a 'major junction' or point of 'local significance'. Only in the Character Area of Blackfriars North did LBS suggest that the area would be suitable to meet the urban design criteria to support tall building of:- – Proximity to public transport – Gateway junctions or local significance – Existing and approved scale of development – Vision vibrancy and life – Potential public realm and open space opportunities There is direct contradiction of the other criteria of CDD2 between CDD2 , 4.1.2 and the criteria of CDD2, 4.1.3 and then CDD2 compared with the Draft Blackfriars Road Supplementary Planning Document , SPD 4 and SPD5 'that a tall building of 70M would not be overbearing and out of character' in the location of St Georges Circus. It is LBS obligation to demonstrate that a tall building in this location will</p>	<p>of the London Plan and the NPPF. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007.</p>

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					<p>not dominate. It has not done so, nor has it offered an evidence base. It remains unproven and it is an abdication of LBS's obligations not to deal with this suitability and test at a core strategy level, but instead to rely on a developer to demonstrate it at a planning application stage of the process. Whilst the draft document sets out the assessment criteria that a tall building proposal would have to satisfy in the event of a planning application, LBS ignores compliance with adopted policy in favour of proposing new policy for specific heights 70M, setting specific heights and locations. Whilst LBS will argue that the specific location and height of a tall building can only be identified at planning application stage, the failure to categorically demonstrate the adequacy of the designation of tall building under urban design considerations suggests that the designation of this location as suitable for tall buildings (and indeed this SPD) is premature and the criteria not adequate without further test and evidence base. For instance:-</p> <ul style="list-style-type: none"> • sun path and shading analysis the absence of massing scenarios • local views and context of heritage assets • overlooking and massing studies <p>The original document published Dec 2009 Figure 11 and 12) indicates no consented tall building schemes around the Southern end of Blackfriars road. Within the time of CDD2 becoming an adopted document and this draft SPD, the Strada building at Elephant and Castle was awarded the 'carbuncle award' and Blackfriars has a further nomination pending this year.</p>	
1646	769	Gareth	Parry	Albert Association	<p>Other issues, Designation of site 43 The Bakerloo Sidings for Development Use Any development on this site will interfere with long views into the West Square Conservation Area, valued by Southwark Planning. What consideration has been given to these in the preparation of this SPD? What is the evidence to</p>	<p>The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. The study updates the testing from the previous urban design background papers in light of guidance set out in the NPPF, the London Plan that was adopted after the Core Strategy,</p>

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					<p>support its suitability as a development site as opposed to educational, open space or other use? Under the Elephant & Castle Enterprise Quarter SPD 2012 LBS was obliged to have consulted with TfL. Under the Localism Act consultees are duty bound to co-operate. LBS has an obligation to put in the public domain the outcome of their response. This is also relevant to this current draft SPD as evidence base to demonstrate the suitability of this site for development over an existing and active London Underground siding. Where may we see TfL's response? Any building on this site will adversely affect the setting of heritage assets. The Elephant & Castle Enterprise Area SPD mentioned a landmark building. We find reference to any such building on this site without evidence base or further methodology through a development plan-led approach deeply concerning given the proximity not only to our own listed houses but also the listed obelisk, St George's RC Cathedral and Imperial War Museum, the latter two being the landmark buildings in this location.</p>	<p>schemes that already have been consented within the area and existing development pressure that could lead to piecemeal development within the area.</p> <p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.</p> <p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework.</p> <p>The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>TfL, GLA and Network Rail were all consulted as part of the consultation process. The Blackfriars Road SPD consultation report summarises all the responses received and changes subsequently made to the SPD. The full representations received from these bodies and the council's response to them is included within Appendix J of the Blackfriars Road SPD consultation report.</p> <p>The Elephant and Castle SPD was adopted on 20 March 2012 and replaces the Elephant and Castle Enterprise Quarter SPD (2008) and the Walworth Road SPD (2008). The Blackfriars Road SPD is consistent with the adopted Elephant and Castle SPD (2012).</p>
164	769	Gareth	Parry	Albert	This SPD is deficient in following NPPF, regional and	The SPD sets out that it provides further guidance to existing planning

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7				Association	<p>local policy and demonstrating a methodology and evidence base to show how this proposed document has evolved or how it adequately complies with its own adopted policies. It attempts to introduce new policy for tall buildings height criteria which immediately contradicts adopted policy including CDD2. LBS are deficient in this SPD in putting forward inadequate document which:-</p> <ul style="list-style-type: none"> • no foundation against adopted policies which contradicts adopted core strategy • fails to set out its proposals and methodology for evidence base • fails to set out how it complies and tests adopted policies through a development plan lead process • has not incorporated meaningful and structured consultation with outputs that test criteria against adopted policy • is in contradiction to NPPF and adopted policy <p>It is quite clear that this SPD should not go forward for adoption until LBS has demonstrated how it addresses the conflicts of its proposals in this SPD with Town and Country Planning Act 38(6), NPPF, adopted Regional and Local plans, how the document has evolved and how consultation through a clear methodology that follows a development lead plan lead process has been incorporated and tested. This is a deficient supplementary planning document which is fundamentally at odds with NPPF guidelines which in turn is to ensure LBS avoid attempts for speculative development of tall buildings in the wrong places. LBS are hoping to hastily rush this SPD through to adoption, without adequate approach which should at least involve an Area Action Plan, so as to provide the principal for such a speculative development proposal namely Barratt Homes tall building at St Georges circus. Having reviewed precedent, if this SPD is taken forward and approved by cabinet, we will consider the option of a Judicial Review.</p>	<p>policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. The SPD guidance is consistent with that in the NPPF and the development plan. Policies in the development plan are evidence based with many different evidence documents informing their preparation. Further information is set out on the council's website.</p> <p>Much of this same evidence has informed the preparation of the Blackfriars Road SPD. Further evidence and information has been prepared since the adoption of the most recent development plan document which directly relate to Blackfriars Road. This includes the Bankside, Borough and London Bridge Characterisation Study (2013), the Blackfriars Road Urban Design Study (2014) the Blackfriars Road SPD Business and Retail Background Paper (2014). Furthermore, more information on documents which have informed the preparation of the SPD is set out within the updated Blackfriars Road SPD sustainability appraisal, specifically under the appendix 2 on relevant plans and policies.</p>

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1648	1161	Catherine	Hope		<p>I object strongly to the SPD in its present form being put forward for formal adoption by the Southwark Cabinet. It represents a flawed unrepresentative view and contains contradictions and inconsistencies. Rather than detailing all the contentious issues line by line, I am restricting my observations here to those which are of particular personal concern. From my standpoint, having lived in Southwark every year of my married life since December 1972, and walked to work up Blackfriars Road for many of those years, I find there are three particularly objectionable aspects of the "vision" set out in the SPD. One is the assertion that the framework and detailed guidance contained in this document are what will make the road a destination where people want to "live, work and visit" (ignoring the fact that we already do). Plenty of fine sentiments are expressed, but the detailed contents pay at best lip service to consideration of what people living (and working around, and visiting), the south end of the road actually might want.</p>	<p>The SPD is intended to benefit a wide range of groups including existing and new residents. Wording has been added to the vision to make it clearer that the majority of change will take place on Blackfriars Road. The SPD seeks to meet the needs of residents whilst also managing the pressure for new development. The SPD has been updated to make it clearer that the emerging vision and the SPD seeks to ensure that development meets the needs of existing and new residents whilst also attracting new development. Residents will benefit from the increase range of uses including more shops, services and businesses along the Blackfriars Road.</p>
1649	1161	Catherine	Hope		<p>The Core Strategy focused primarily on the potential of the northern end and that "town centre" opportunity area. By the time the road reaches St George's Circus, it is no longer running through an opportunity area, but the Obelisk (listed) marks its end and the entry to the Elephant and Castle "town centre" area. The "vision" takes insufficient account of the variations in neighbourhoods along the length of the road, which shape its character. There are plans for shop frontages and offices. Where though are proposals for designated sites for the provision of affordable housing? Instead of detailing any such ideas, we face Scoping Opinion applications from developers clearly confident that high rise/high density flats will be welcomed by the Borough planners. (Deja vu?).</p>	<p>The whole of the Blackfriars Road SPD boundary lies within opportunity area boundaries: the majority within the Bankside, Borough and London Bridge Opportunity Area, and a small part of the southern part of Blackfriars Road and around St George's Circus is within the Elephant and Castle Opportunity Area. The SPD cannot allocate proposals sites. The figure and table within the SPD shows potential development sites and wording has been added to the SPD to make it clear that these are just potential development sites and that the list is not exhaustive. Land uses on specific sites will be looked at through the preparation of the New Southwark Plan and will eventually be adopted on the Adopted Policies Map and so the SPD does not designate specific sites for a specific type of use such as housing. Existing borough wide affordable housing policies, as set out in the Core Strategy and saved Southwark Plan will continue to be used to determine applications for residential development.</p>

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1650	1161	Catherine	Hope		<p>This leads me to the second wholly objectionable aspect is the proposal (which has materialised out of nowhere but unsurprisingly been given credibility by commercial developers and endorsed media coverage), namely that there could/should be high rise buildings in the immediate vicinity of St George's Circus. (As you will know, in the context of the SPD, "high rise" has a very specific definition). The notion that there could be significant high rise development at the south end of the road is devastating. Again there are plenty of fine words, but the SPD chooses to ignore inconvenient consequences of such a change in policy and therefore does not address the adverse effect on the setting of the heritage assets in the immediate area such development would cause. This is a heritage setting we have worked hard to preserve around the Circus, even faced with the monstrosity which replaced the old Eye Hospital. The care and effort put into getting the LSBU's London Road Georgian terrace back into use would be reduced to being laughable instead of laudable if there were to be 70 metre buildings within a stone's throw of the Obelisk, next to the conservation areas and the listed Peabody Buildings. The historic pattern of the Circus itself already constitutes a focal point for the "gateway" to the Elephant and Castle if one is needed, and a vision incorporating more public open space there, rather than more building, could enhance this.</p>	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>
1651	1161	Catherine	Hope		<p>The third objectionable aspect of the contents of the SPD on which I wish to comment here is the proposed designation of the Bakerloo sidings as a "development site". It appears that this has been included without much thought, without any evidential consideration of context, and certainly without any indication of future preferred usage. Given its proximity to conservation areas and heritage sites/buildings, I would have</p>	<p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets. The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does</p>

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					expected better.	identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.
165 2	116 1	Catherine	Hope		The Cabinet should be aware that local residents and workers in the Borough want to engage and be involved in our Council's plans since they impact on our lives and the quality of our community. This SPD is one sided, lacks supporting evidence and is in contradiction to existing stated policies. It should be withdrawn, rather than continuing to see the light of day in this flawed form, and instead the documents to which it is subordinate should be revised as appropriate after due process.	The SPD is being taken to Cabinet for adoption on 10 December 2013. The consultation report is one of the appendices to the Cabinet Report, summarising the consultation on the SPD, the consultation responses, and how these have influenced the final SPD. Similarly all the representations received and the officer comments on these representations are appended to the Cabinet report.
165 3	116 1	Catherine	Hope		The time and efforts of the Planning Team would be better directed to consulting on any changes to the Southwark Plan and Core Strategy after engaging in a full debate and discussion, instead of this attempt to introduce, by a subsidiary document, very material revisions to existing stated policies by dressing them up in the guise of a "vision". To proceed to submit the current SPD for formal adoption by Cabinet, likely without discussion, gives the impression of the Council pandering to commercial developers without regard to enhancing Southwark's heritage or to the views of local residents.	A consultation report has prepared alongside the Blackfriars Road SPD. This sets out a summary of the representations received and how we have taken these into account in preparing the final version of the SPD. The appendices also set out all of the representations received and officer comments on how this comments have been taken into account, and whether the SPD has been updated as a result. The SPD was consulted on in accordance with the council's Statement of Community Involvement (SCI) (2008) and exceeded the consultation requirements of both the SCI and the relevant regulations. The consultation report summarises the consultation carried out. The consultation report and all the representations and officers report form appendices to the Cabinet report.
165 4	116 4			Lenta Business Centre	We write on behalf of Lenta Business Centres to make representations to the Southwark's Draft Blackfriars Road Supplementary Planning Documents (SPD) (June 2013). The aim of this letter is to outline our comments on the issues, vision and objectives noted within the Draft Blackfriars Road SPD. Our comments	Noted.

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					<p>principally concern the Council's approach to the provision of new business space (particularly small and medium accommodation) and the regeneration of the existing employment uses. In order to understand the context of our client's comments, we have provided below a detailed description of the Lenta model and how they operate their business. We also highlight below their specific interests/aspirations in relation to their portfolio within the Blackfriars area and the wider context of Southwark. Lenta Business Holdings - History and Background Lenta Business Holdings was first formed by The London Enterprise Agency in 1981 as a joint venture originally set up by Midland Bank, Barclays Bank, BP and Shell to provide small business units for start-up operations. The company was one of the first public/private partnerships set up to assist start up businesses in London. The company was purchased by CP Holdings, a multinational holding company based in Watford, employing approximately 7,000 people. CP Holdings acquired the company in order to build on the existing portfolio and develop the serviced office business. Lenta is also a founder member of the BCA (Business Centres Association) and employs over 60 people. In the last 33 years Lenta has successfully provided service offices for start-ups, individuals and for small and large businesses. It is well regarded serviced office provider that generates loyalty from its clients and provides space and the opportunity for local business to thrive. Lenta currently owns and manages 23 centres largely in London with a combined area of approximately 450,000sq ft. Occupiers are a mixture of traditional tenants on commercial leases and licenses on flexible agreements. There are currently 500 licensees in the buildings employing 3,000 people. The company</p>	

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					<p>provides a range of services within the office centres and Licences can run for a minimum period of one month and provides total flexibility. The average stay is approximately one year although Lenta do have a number of clients that have been with them for more than 20 years. Lenta has purchased seven buildings in London in the Last two years and plans to increase its portfolio significantly over the next five years. It has adopted a strategy which targets mid-town London locations close to transport hubs. The company will seek to expand by procuring and upgrading existing empty space as well as regenerating existing sites in their ownership to create value which will be pumped back into the area where they have derived the benefit. Lenta in Southwark 1989-2013 - Properties Owned In Southwark Lenta has provided serviced offices and residential accommodation in the Borough for more than 24 years. Lenta owns and manages 6 business centres in Southwark providing business units for 130 companies and over 1000 employees. Below we set out the properties owned by Lenta within Southwark. Officially opened in 1989 by Margaret Thatcher the Blackfriars Foundry saw the transformation of a derelict building into 41 modern units with a further 15 units at the Foundry Annexe. The buildings were made available to Lenta by the City of London Corporation as part of its 800th anniversary celebrations. 1990-Lenta converted the former Archbishop Temple School, donated by the Inner London Education Authority, into the Chandlery with 46 business units. In 2005 Lenta undertook redevelopment of the Chandlery turning it into a mixed use development selling 13 flats (including live/work) and some commercial units. Also in 2005 Lenta bought Delta House on Borough High Street. This property is listed and has been subdivided internally to provide</p>	

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					<p>small office units. In 2011 Lenta bought Tree Tuns House also on Borough High Street. Lenta turned this into its innovative Co-Work concept. In January 2012 Lenta completed on the purchase of Waterloo House and has completed the refurbishment and letting of this building. As you can see Lents have a long standing presence in the borough and has and continues to contribute to the local economy through the provision of new business spaces. Lenta is seeking to use their skills and experience to increase the number of business centres that they own and manage in Southwark. By providing additional serviced offices Lenta believe that there is scope to attract business back into the area by increasing the supply of additional business centres within the borough. Lenta recognise that this approach will support the wider regeneration of Southwark by providing a sustainable balance between economic and residentially led regeneration. Lenta are at present investigating opportunities to improve the provision of business accommodation within Southwark and are currently looking at the Southwark portfolio with a view to redeveloping, extending and refurbishing their properties to provide additional office space in particular their properties at 154-156 Blackfriars Road and the Foundry Annex Building located at Glasshill Street. At this stage no firm proposals have been developed however Lenta is keen to progress the improvement. Further detail on these sites will be provided as part of further discussions with the Council. Lenta – Promoting and supporting new small and medium businesses. Lenta seeks to provide well managed, modern, flexible B1 space, offered with flexible lease arrangements. Lenta provide space that is flexible/adaptable, incorporate communal areas (i.e. café, break-out space etc), modern communal meeting</p>	

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					<p>rooms, a high profile reception area, good IT links, data cabling, excellent site security, modern servicing facilities, 24 hour operational access etc. Lenta's business model is focused on providing new accommodation which is specifically designed to promote, support and accommodate new and existing small/medium businesses in London, and where possible they incorporate the following:</p> <ul style="list-style-type: none"> • flexible and adaptable – new business space is typically designed on a flexible grid arrangement to enable a variety of unit sizes to be achieved. • capable of accommodating a range of businesses and uses – often business centres will accommodate a diverse range of businesses and activities. • providing a range of services/telecom internally within the space – including broadband, telecommunications, data cabling and utility services. • providing a high profile reception area – a 'front door' is important to all Workspace customers. • including communal facilities for customer use – in addition to the main reception, new business centres will often provide modern communal meeting rooms, a café, toilet facilities, shower room etc. • incorporating new waste disposal and recycling facilities – new tenants are encouraged to recycle waste materials and adopt a sustainable working practice; • providing comprehensive site security. • ensuring new business space meets disabled access requirements. • adopting a high quality and distinctive architectural approach to all new development. <p>Formulating a positive Planning Policy Approach In order to support the regeneration of existing employment sites and to promote the provision of additional business space. Lenta advocates the adoption of a flexible policy. In particular, Lenta are of the view that new policy must recognise that the renewal/regeneration/improvement of existing</p>	

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					business space is only likely to be achievable/viable if the uplift in business space can be achieved via an integrated mixed-use scheme, which incorporates higher value uses such as residential or retail etc which can then act as an enabling development.	
1655	1164			Lenta Business Centre	In terms of responding to the Councils Draft Blackfriars Road SPD we make the following representations: Table 1 Potential development sites – should be amended to include the Foundry Annex located on Webber Street and Glasshill Street.	We have updated the figure and table. The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.
1656	1164			Lenta Business Centre	SPD1 – Business Space Policies for the safeguarding of existing business space are insufficiently flexible, potentially contributing to long-term vacancies and dereliction, as well as limiting opportunities for releasing sites to provide for alternative uses for which there are known needs and demands. The policy wording also does not offer encouragement to employment land to be developed more efficiently and more intensively, which in certain circumstances can create new opportunities for other beneficial land uses. Policy should seek to encourage and support the rationalisation of existing business space. In particular, there are a number of smaller sites which are located within residential areas and separated from other commercial/business locations. Often these smaller sites provide low quality, inefficient space; which, twinned with their location, hampers their effective functioning/operation as business/employment locations. In these circumstances, significant benefits/efficiencies could be achieved by	The suggested changes are not considered appropriate for the SPD guidance. It is important for the SPD guidance to be read in conjunction with both adopted planning policy. The requirement to retain or replace existing business space is consistent with borough-wide policies. The policy requirement for the replacement of business floorspace is justified by the council's evidence base which points to the need to protect and intensify employment land and business floorspace over the plan period. Core Strategy policy 10 and saved Southwark Plan policy 1.4 require applicants to demonstrate the loss of business floorspace (B1, B2 and B8) against a range of exception criteria where the site falls within a range of locations, which include (amongst others) the CAZ. Land outside these locations can be released for other uses. This strategy ensures the retention of existing business floorspace where this is appropriate, to ensure there continues to be space available for established businesses to move into the area and for start up businesses to establish themselves. The council considers that it is reasonable to expect applicants to demonstrate that in the areas where business floorspace is protected that there is a lack of demand or viability, or physical and/or environmental constraints which preclude re-provision or an uplift of

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					<p>supporting/encouraging the relocation of existing business space onto an larger business sites within the Borough. This will not only rationalise employment space within the Borough, but also provide the opportunity to create business clusters which benefit from shared/communal facilities on a single site. This approach would be particularly beneficial for the small businesses - who thrive within larger sites which can successfully provide a business community aspect. This approach also allows smaller sites to be released for alternative uses (including residential), which can be far better related to the neighbouring urban area. We suggest amendments to the currently drafted policy as follows: SPD 1 – Business Space Add the following sentence to bullet point 1 “Where additional office floor space has been provided this can be set aside as a credit which can be used in the future within an agreed time frame to offset proposals where there is a loss of office accommodation” Add the following sentence to bullet point 2 “Where exceptional circumstances cannot be demonstrated and in appropriate locations the relocation of existing business space onto another existing business site (also located within the Borough) will be supported”. Future policy must be sufficiently flexible to recognise that in certain areas and circumstances that the reduction in office space in one location and redevelopment of sites will support the long term delivery of business space within the Borough. As noted above, Lenta is investigating opportunities to improve the business accommodation provided at 2 sites within the Borough – 154-156 Blackfriars Road and the Foundry Annex Building located at Glasshill Street. At this stage, no firm proposals have been developed. However, Lenta is keen to progress the improvement of these properties through the SPD. It is</p>	<p>employment space (Southwark Plan Policy 1.4). It is considered that this is consistent with paragraph 21 and 22 of the NPPF and provides adequate flexibility. We will be considering development site allocations through the preparation of the New Southwark Plan. The SPD identifies possible development opportunities, some of which may be complete redevelopment, and some may be more minor changes or improvements.</p>

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					our intention to provide you with more detail on our client's proposals in relation to these two sites as and when detailed regeneration proposals come forward.	
1657	1166	Jenna	Barry		<p>General The two aspects of the SPD that we find most objectionable are: 1: Provision for a tower block 70 metres high at St George's Circus 2: The designation of the Bakerloo sidings site (which is immediately behind Gladstone Street) as a potential development site. The SPD proposes that Blackfriars Road be developed solely as a series of tall buildings with infill of significant height. Where is the evidence to support this 'vision' for the area rather than some alternative development plan? Which other plans were considered and rejected? During consultation we have been informed that no particular end use is envisaged for any of the sites designated for development. Where is the justification for ignoring the suitability of particular sites of the designated areas for any particular form of development, given the sensitive nature of the heritage context? It seems clear to us that the role of the Local Authority in connection with the SPD is that of a development enabler rather than a regulator. This throws onto the community the responsibility to act as a regulator</p>	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets. The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets. The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p>

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1658	1166	Jenna	Barry		In including large areas of land that have nothing to do with Blackfriars Road, Southwark Council will undermine Neighbourhood Forums (South Bank and Waterloo Neighbourhood Forum and the Bankside Neighbourhood Forum) and the Localism Act 2011. Can the council demonstrate that the SPD will give a better outcome than those envisaged by Neighbourhood Forums?	<p>An explanation of the boundary is set out within the SPD. It includes the whole of the Blackfriars Road and some of the surrounding area. It includes the surrounding area as the surrounding area is also likely to see some development and improvements, particularly possible improvements to public realm. Wording has been added to the SPD to make it clearer that the character and historic value of much of the surrounding area will continue to be protected and enhanced. It has also been made clear that the areas which are predominantly housing will mostly continue to be so, with residents benefitting from the increased range of activities on the Blackfriars Road.</p> <p>Figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area.</p>
1659	1166	Jenna	Barry		Development Site 43 The Bakerloo Sidings Any development on this site will interfere with long views into the West Square Conservation Area valued by Southwark Planning. What consideration has been given to these in the preparation of this SPD? What is the evidence to support its suitability as a development site as opposed to educational, open space or other use? Under the Elephant & Castle Enterprise Quarter SPD Southwark should have consulted TfL. Under the Localism Act consultees are duty bound to co-operate so where may we see TfL's response? Any building on this site will adversely affect the setting of heritage assets. The Elephant & Castle Enterprise Area SPD mentioned a landmark building. We find reference to any such building on this site deeply concerning given	<p>The West Square conservation area is situated outside the Blackfriars Road SPD area. It would still be considered as a heritage asset in relation to the guidance set out in SPD 3, 4 and 5. Any development proposal would be assessed at the planning application stage against the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and other relevant planning guidance.</p> <p>The TfL Bakerloo sidings site (Site 43 in Figure 5/Table 1 in the draft SPD, but re-numbered as Site 47 in Figure 6/Table1 in the updated SPD) has been included as a potential development site, due to its recognisable development potential. Any development at the site would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.</p>

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					the proximity not only to our own listed houses but also the listed obelisk, St George's RC Cathedral and Imperial War Museum, the latter two being the landmark buildings in this location. How are these proposals affected by the Blackfriars Road SPD?	<p>The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p> <p>TfL, GLA and Network Rail were all consulted as part of the consultation process. The Blackfriars Road SPD consultation report summarises all the responses received and changes subsequently made to the SPD. The full representations received from these bodies and the council's response to them is included within Appendix J of the Blackfriars Road SPD consultation report.</p> <p>The Elephant and Castle SPD was adopted on 20 March 2012 and replaced the Elephant and Castle Enterprise Quarter SPD (2008) and the Walworth Road SPD (2008). The Blackfriars Road SPD will replace the Elephant and Castle SPD/OAPF guidance for the overlapping areas. The SPD has been updated to make this clearer.</p>
1660	1166	Jenna	Barry		Strategic views St George's Circus and Tall Buildings St George's Circus is a fine example of Georgian town planning with its focal point at its centre, the Grade 2* listed obelisk. SPD 5 Building Heights proposes "a tall building of height up to 70 metres should provide a focal point at St George's Circus". This statement displays a fundamental ignorance of this circus. A tall building will affect the setting of not only the obelisk, an important heritage asset, but also the listed Georgian terraces in London Road. Please demonstrate under London Plan CDR1 how tall building development, a fundamental change in architecture, will not adversely affect the local	A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's

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					<p>character. Where is the comprehensive urban design analysis of the local character and historic context? (CABE and English Heritage Guidance on Tall Buildings CDN25) St George's Circus is stated on page 29 of the SPD to be a transport node. It cannot, by the accepted definition of a transport node, be so described. Development sites 39, 40, 41 and 43 directly affect the Circus and other heritage assets. Council officers have stated that tall buildings at St George's Circus would not be a conflict with the adjoining heritage assets. Where is the evidence that this is not a conflict? In determining tall building height limits within the SPD of 70 metres, where is the assessment of three dimensional modelling to determine the potential effect on the local context? (CABE and English Heritage Guidance on Tall Buildings CDN25)</p>	<p>Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets. The GLA's representation confirms that the Mayor supports the council's approach on tall buildings, but suggests that the SPD should be more flexible in relation to building heights, and that buildings 'in the region' of 70/30m would be appropriate. The council disagrees with this proposed amendment as it could allow buildings that are greater than the 70m/30m threshold, which would be considered inappropriate based on our evidence base. As such, the council considers SPD5 to balance local character and development potential. The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings. Any development of the potential development sites would be assessed and determined at the planning application stage, taking into account local context, which includes the local heritage assets.</p>
1661	1166	Jenna	Barry		<p>Why are hotels being promoted (SPD 3.10) as viable use when Southwark has already achieved or is close to achieving the requirements. The figures for hotel rooms in the SPD make it clear that, of the 2500 bedrooms required by the GLA's Hotel Demand Study 2006 by 2026, all but 75 have either been built or are in the pipeline.</p>	<p>The London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2031. The estimate of the approximate net and gross hotel rooms required over the period 2007-2026 for Southwark, as set out in the GLA's Hotel Demand Study, is based on assessment of factors including transport links to central London and connections to airports, proximity of tourist attractions/business locations, cafes and restaurants in the area, night time economy, cultural facilities and attractions, and regeneration initiatives and site availability. The forecast for Southwark should be treated as indicative only, and local circumstances should also be factored in. It is important to consider that the SPD area is within the Central Activities Zone, Bankside, Borough and London Bridge Opportunity Area and part of the Elephant and Castle Opportunity Area which are areas promoted in</p>

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						the London Plan to accommodate strategically important hotel provision. Arts, cultural and tourism activities have flourished in Southwark in the last decade, particularly in the Strategic Cultural Area, which is within the CAZ. Bankside, Borough and London Bridge has consequently experienced a growth in the number of hotels to support this increasing visitor economy. SPD2 provides guidance to support Core Strategy policy 10 'Jobs and business' which sets out the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. Policy 10 and SPD 2 are also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals in the area will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account.
166 2	116 6	Jenna	Barry		Travel SPD6 gives no specific information as Blackfriars Road falls under the jurisdiction of TfL. Under the Localism Act both TfL and Southwark Council are duty bound to share any consultation information regarding active travel. What plans have been proposed?	The text within SPD 6 has been updated to clarify that Blackfriars Road falls under the jurisdiction of TfL. A consultation report has been prepared summarising responses to the consultation on the draft Blackfriars Road SPD. All responses to the SPD consultation will be published on the council's website prior to the SPD being taken to Cabinet for adoption. TfL have now announced that TfL are proposing to introduce a Cycle Superhighway on Blackfriars Road, with consultation proposed for summer 2014. Results of this consultation would be shared on TfL's website.
166 3	116 6	Jenna	Barry		General The document refers to shops along the whole of Blackfriars Road but makes no reference to a retail impact study, indicating demand for these or the effect on neighbouring shops.	The business and retail background evidence paper sets out further detail to SPD2 and the future retail capacity for the Bankside and Borough district town centre. This detail has been referenced from the Southwark Retail Capacity Study. The study evaluates the vitality and viability of the town centre, in terms of its retail performance and identified that the focus should be on continuing to meet the needs of workers, tourists and visitors. New schemes will be supported by an increase in population in the area, through new residents, workers and visitors and these will come forward on an incremental basis.
166	116	Jenna	Barry		No mention is made of environmental impact	These matters would be assessed at the planning application stage

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4	6				assessments, wind and daylight modelling, which are fundamental requirements in considering proposals of this nature, particularly considering the difficulties with the Palestra and 'Walkie Talkie' buildings	through the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and planning regulations. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate.
1665	1166	Jenna	Barry		The document states that crime will be reduced yet there is no reference to existing or anticipated crime statistics. Has the Metropolitan Police been consulted? If these studies have been obtained and modelling carried out then these should be in the public domain and not withheld. Please advise where these may be seen.	<p>The Metropolitan Police are on the planning policy's mailing list and were consulted as part of the consultation on the Blackfriars Road SPD.</p> <p>The sustainability appraisal and the sustainability appraisal scoping report which both informed the preparation of the SPD provide further information on the possible impact of the SPD on crime. The sustainability appraisal assessed the impact of the SPD guidance on sustainability objective SDO4: To reduce the incidence of crime and fear of crime, and finds that the SPD is likely to overall have a positive impact. The sustainability scoping report also provides further information setting out information on the Indices of Multiple Deprivation which includes crime as one of its six indicators. Both documents are available to view on the council's web site at: www.southwark.gov.uk/blackfriarsroadspd and www.southwark.gov.uk/planningpolicy</p>
1666	1166	Jenna	Barry		Why has West Square Conservation Area not been mentioned in SPD4 and SPD5? The tall buildings proposed affect the setting of this Conservation Area and its Listed Buildings.	The West Square conservation area is situated outside the Blackfriars Road SPD area. It would still be considered as a heritage asset in relation to the guidance set out in SPD 3, 4 and 5.
1667	1166	Jenna	Barry		This SPD has 1 Business Space, 2 Mixed Use Town Centre, 3 Public Realm and Open Space, 4 Built Form and Heritage, 5 Building Heights and 6 Active Travel. It does not have a Strategy or Guidance for Housing. Why not?	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards.</p> <p>The vision already refers to housing development. Housing will be encouraged on appropriate sites. In order to make this clearer, we</p>

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						have updated SPD 2: Mixed use town centre to include residential development as one of the uses to be encouraged alongside the provision of a mixture of new town centre uses. The fact box on town centre uses has also been updated in accordance with the National Planning Policy Framework definition to make it clear that residential development is not a main town centre use but it can play an important role in ensuring the vitality of town centres. We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.
1668	1166	Jenna	Barry		The Council's Core Strategy 2010 does not support tall buildings in Blackfriars Road South, as they do not meet the criteria for 'vision vibrancy and life'. Why does the Council's vision now differ from the Core Strategy?	The policy approach within the SPD is considered to be consistent with the NPPF (2012), the London Plan (2011), the Core Strategy (2011) and the saved Southwark Plan (2007), taking into account changes in the surrounding context since developing the Core Strategy vision in 2009/2010. The London Plan, Core Strategy and saved Southwark Plan form the development plan for Southwark, with the NPPF setting out national guidance. The development plan sets out the policies for tall buildings. Key policies are: London Plan policy 7.7 which identifies that tall and larger buildings should generally be limited to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. Blackfriars Road lies within the Central Activities Zone, is an opportunity area and a town centre with good access to public transport. Core Strategy strategic policy 12 requires tall buildings to have an exemplary standard of design and identifies locations where tall buildings could go. The Core Strategy vision for Bankside and Borough refers to the council setting out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework. Saved Southwark Plan policy 3.20 sets out criteria for considering applications for tall buildings and applies across the borough. The GLA's representation confirms that the Mayor supports the council's approach on tall buildings, but suggests that the SPD should be more flexible in relation to building heights, and that buildings 'in the region'

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						of 70/30m would be appropriate. The council disagrees with this proposed amendment as it could allow buildings that are greater than the 70m/30m threshold, which would be considered inappropriate based on our evidence base. As such, the council considers SPD 5 to balance local character and development potential.
1669	1166	Jenna	Barry		In 2012 UNESCO noted in its convention briefing paper that in April 2011 Southwark's Core Strategy "includes an emphasis on heritage assets and revises their approach to tall buildings on the area". Why has the council reneged on this? UNESCO's World Heritage Committee Report June 2012 "notes the intention of Southwark Council to develop a Supplementary Planning document to clarify how and where development can take place and to define building height thresholds so as to inform the appropriateness of subsequent development proposals". Is this the said SPD?	The potential impact of tall buildings on the setting of the Tower of London World Heritage Site. The heights proposed in the Blackfriars Road SPD building heights strategy are consistent with Southwark's development plan consisting of the saved Southwark Plan policies, Core Strategy and the London Plan. Our testing shows that the proposed heights would not impact the setting of the Tower of London site. The proposed 70m threshold guidance for the southern of Blackfriars Road responds to the sensitivity of the Palace of Westminster World Heritage site.
1670	1165	Anne	Critchley		I have lived close to Blackfriars Road (BR) for over 30-years. Most of this response then is centred on BR as I know it in detail – the rest of the area less so – but the same principles apply: viz-need for diversity of buildings old and new, need for social housing including housing for older people: strict controls on the height of new building: protection of existing green spaces and creation of new ones; protection for the mature trees in BR; protection of historic buildings; respect for the rich cultural heritage of the area; strong ecological/ environmental policy for all new buildings: protection for small businesses. Background to BR and its environs BR is a, broad historical road linking the City of London to South London. Wide streets with mature trees give an attractive potential. At the North end is the imposing Blackfriars Bridge with a statue of Queen Victoria and a marvellous vista of the river up to the National Theatre and beyond. To the East is the	Noted. The BBLB Characterisation Study (2013), a detailed assessment of the character of the area underpins the preparation of the SPD, alongside other planning documents such as conservation area appraisals.

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					<p>new Blackfriars Station. A striking obelisk built in the 18th century marks the Southern end of BR and links BR to London Road. (St Georges Circus) Nearby is St Georges Cathedral and the imperial War Museum worthy of mention is Duke of Cumberland pub and a row of refurbished Georgian houses belonging to South Bank University in London Road just above the Obelisk. BR has a smattering of historical buildings Peabody Estate (listed), Blackfriars Foundry and 176 BR the former London HQ of the Temperance Friendly Society. This is a much loved local building and is awaiting a decision on listing from English Heritage. A row of Georgian houses (mostly listed) are close by. Significant contemporary buildings include Palestria opposite Southwark Tube Station; the station itself with its unusual `space ship` design which won an award when first built. Worthy of mention is the K2 building at South Bank University which is not only handsome but has many environmental aspects built in. Proof that `ancient and modern` can work together. Other local historic buildings include the Original Blackfriars Settlement building in Nelson Square, Red Cross Cottages and Garden (Octavia Hill), Drapers Cottages in Glasshill Street, and St George the Martyr in borough High Street where Henry V is reputed to have stopped after the Battle of Agincourt! Charles Dickens lived in nearby Lant Street – what an amazingly rich heritage we have locally. This absolutely must not be ignored by the Council. Local people love the history and so do thousands of visitors to the area. NOTE/176 Blackfriars Road is featured on the Councils brochure on Blackfriars Road! You have only to look at some new buildings locally to understand residents's concerns about overdevelopment. When you see the density of office behind Tate Modern witch virtually obliterate Great Guildford Street at this point. The</p>	

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					pattern of former small street has also disappeared. We need a diversity of buildings and a considerable number of people live locally – in the small estates off BR and in private flats and houses. Their needs to be listened to as well and don't get much mention your document.	
167 1	116 5	Anne	Critchley		<p>New buildings At the Northern end of BR No 1 will be 52 storeys high! Opposite on the Old Daily Express site will be another building 52 storeys high. The South Bank Tower, Stamford Street will now be 42 storeys and a building 45 storeys high is planned next to Christchurch Gardens. And yet Southwark Council is planning more tall buildings at the Northern end of Blackfriars Road – this time without any control of height. This is downright irresponsible and will destroy the marvellous skyline at Blackfriars Bridge. Anything further from a boulevard cannot be imagined.</p> <p>Southwark Station is a destination in its own right. – there is absolutely no need for higher buildings at this point nor at St Georges Circus where the obelisk stands out boldly. Any building here should not be higher than the student building (12) storeys otherwise the sense of balance and space will be lost. I personally would also like to see a moratorium on any more commercial buildings in the small residential streets off BR. There has already been too many in roads. This is not to say the area should be preserved in aspic but here needs to be strict planning control on all new builds, - not a ruthless pursuit of s106 money by the council as at present. This is just giving carte blanche to developers and will ultimately destroy the area which provides money the CII relies on. Then what?</p>	<p>A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.</p>
167 2	116 5	Anne	Critchley		Green Space & Mature Trees I would absolutely support the idea of attractive shared spaces in	The SPD cannot provide this level of detail or designate new green spaces. This can be undertaken through the New Southwark Plan.

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					Blackfriars Road, but in order to create attractive spaces the current mature trees need to be protected and any planting envisaged should be of non-corporate variety. We need attractive planting which gives us joy through all the seasons and hopefully helps wildlife too (see the planting outside Peronett House and in Isabella Street/EV Restaurant). Some public seating would also be very welcome and also some streets sculptures. The council could also encourage vertical planting and greet roofs and create a whole street of colourful banners illustrating local building and history (see South Bank Arts complex). A more creative approach would free up the corporate image which the council seems keen on promoting. It goes without saying that all existing greet spaces should be protected including the small community garden next to 176 Blackfriars Road which is not mentioned in the council document.	SPD 3 encourages improved landscaping and greening and a new paragraph has been added to the supporting text of SP4 to cross refer to the council's Open Spaces Strategy (2013).
1673	1165	Anne	Critchley		Environmental Policy I would like to see a strong overarching environmental policy for BR and its environs. Not just lip service, but a real understanding of global warming and our diminishing energy resources. This definitely means control over the height tall buildings which create wind tunnels, over shadowing, and use massive amounts of electricity through air conditioning and the practice of leaving all lighting on over night. Solar panels are a more practical means of creating heating and hot water and the recycling of the grey water. Green roofs cool buildings in the summer and retain heat in the winter. A good provision of cycle racks and no car parking except for the disabled is required	<p>Our approach to reducing energy consumption and carbon dioxide emissions is borough wide. Further detail is set out in strategic policy 13 of the Core Strategy, saved Southwark Plan policy 3.4 and our sustainable design and construction SPD. Core Strategy policy 13 requires major development to achieve a reduction in carbon dioxide of 20% from using renewable technologies which may include solar panels.</p> <p>Our car parking and cycle parking standards are set out in appendix 15 of the Southwark Plan and our Sustainable Transport SPD. As set out within the Blackfriars Road SPD, the SPD does not repeat borough wide policies and must be read alongside our other planning documents.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has</p>

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						been updated to refer to this new appendix.
1674	1165	Anne	Critchley		<p>Social Housing There is a real need for social housing locally. Unfortunately Southwark's answer to this is to pursue s106 money in order to provide housing elsewhere in Southwark (so they say). If we carry on with this dubious policy Blackfriars, Borough and Bankside will be peopled only the rich. We need a good social mix for a healthy society. Why shouldn't ordinary people enjoy the cultural and historical delights of the area. Even one storey of small flats on commercial buildings would turn the tide.</p>	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. Existing policies and guidance provide clear policies for affordable housing.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>
1675	1165	Anne	Critchley		<p>Summary It is a human need to connect with one another and sense of community is essential if we are to survive in a big city. A mixture of housing and people can help create this. So can small businesses which are disappearing at an alarming rate locally,. The remaining shops and cafes in Blackfriars Road and London road must be protected somehow. Otherwise we could be faced with a sea of glass offices, chain shops, and branches of Sainsbury's and Tesco's as far as the eye can see. This is just too awful to contemplate. I'm sure that if Charles Dickens and Octavia Hill were alive today they would share some of the concerns expressed in these comments.</p>	<p>SPD 2 recognises there is an opportunity to promote a much wider mix of town centre uses as part of the development of the potential opportunity sites set out in the SPD. We have amended SPD2 to set out encouragement for flexibly designed space to accommodate a range of unit sizes in new development. Through our borough wide planning policies and SPD guidance we will consider the impact of all new proposals on the overall mix of uses in the area and also on local amenity, and the character of the area. The SPD cannot designate land use on development sites, however we will consider the range of uses that would be appropriate for allocated development sites through the preparation of the New Southwark Plan and its accompanying proposal sites and adopted policies map.</p>
1676	1174	GJ	Cobbett		<p>I object to the draft Blackfriars SPD because it does not properly explain the economic benefits of encouraging people to cycle nor does it explain what street design is required to increase cycling. This objection is based on a wide range of evidence, mostly collected here: http://greenlaneproject.org/stats/. I live</p>	<p>Further information on the potential impact of the SPD guidance on social, environmental and economic sustainability is set out in our sustainability appraisal (SA). The SA assessed the likely impact of the SPD on 17 indicators including indicators specific to sustainable transport. Furthermore, TfL has announced proposals to introduce a segregated cycle lane on Blackfriars Road which will provide a safe</p>

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					<p>within on the border of Southwark. Blackfriars Road is one of my routes to work in London. If you make Blackfriars Road safe to cycle in, then I will cycle there and spend perhaps £2,000 a year in local businesses. If you fail to grasp the nettle and make it properly safe to cycle, as the woolly wording in your SPD implies, then I will continue to take the bus all the way through Blackfriars Road and I will contribute exactly nothing to the local economy. If there are just 25,000 people like me - a tiny proportion of the number of people taking taxis and buses on Blackfriars Road every day - then you're throwing away £50m every single year. 1. Business Benefits of Segregated Cycle Lanes 9th Avenue, New York is a similar scale and type of road to Blackfriars Road. When the local authority replaced a general traffic lane with a segregated cycle lane, local retail trade rose 49% compared to nearby streets with less-good cycle facilities (like the poor-quality, narrow, unsegregated painted lane you show in the main image of your draft SPD). You will only get this economic benefit if you put in properly segregated cycle lanes which continue with priority across side roads and to the left of bus stops and loading bays. 2. Social benefits of Segregated Cycle Lanes After segregated cycle lanes were installed on Green Lane in Philadelphia, pavement cycling dropped by 75%. So pedestrians will feel safer walking among the shops and cafes and spend money there. 3. Congestion Benefits of Segregated Cycle Lanes TfL's Network Assurance modelling team will try to scare you into believing that taking away space from motor vehicles and giving it to cycling will cause unacceptable delays. But their model is flawed because it does not properly account for the reduction in motor traffic that happens when you put in segregated cycle lanes and people choose to cycle instead of driving or taking a taxi. 4.</p>	<p>facility for cyclists. Southwark supports this proposal and the SPD has been updated accordingly.</p>

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					<p>How to Build Segregated Cycle Lanes We can do this in London. Camden council has fully separated cycling from motor traffic, even at bus stops and at junctions, in Royal College Street. Motor traffic volumes have dropped 30% where streets have been designed with properly-segregated cycle paths. This report in the Times</p> <p>http://www.thetimes.co.uk/tto/public/cyclesafety/article3662140.ece describes how local authorities across the UK are making conditions safer for cycling at little cost, and this report in cycling weekly shows how to do it without spending lots of money:</p> <p>http://www.cyclingweekly.co.uk/news/latest/540266/segregated-cycle-lanes-using-planters-and-armadillos-could-spread-across-britain.html.</p>	
1677	1175	Juha	Repo		-I do not feel it is appropriate to have the taller "landmark" buildings further north Blackfriars Road than the railway bridge leading to Waterloo East. There are several conservation areas which will be affected by excessive development and height.	The SPD 5 guidance for the northern end of Blackfriars Road takes the existing planning designations and consented schemes into account, with the tallest heights located around the junction of Stamford, Southwark and Blackfriars Road.
1678	1175	Juha	Repo		the north part of the road is also largely residential and the need for further amenities are not properly addressed in the plans	The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development. SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments. SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces. Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development. Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan,

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						identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to be provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.
1679	1175	Juha	Repo		-the heritage of Blackfriars Road is not properly looked after, and we run the risk of losing almost all of the pre-war building stock along the road, some of which is original since the road was laid out. A clearer effort in protecting existing landscape and building stock should have been included as there really is not much left now.	The SPD sets out built form guidance in relation to the area's context, heritage and development potential. The guidance set out within the SPD is consistent and read in conjunction with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance is underpinned by the BBLB Characterisation study (2013) which interprets the area's character and history.
1680	1175	Juha	Repo		-building a canyon lined by tall buildings along the road will not create the nice atmosphere described in the plans, but the proposed cafes and restaurants along the road will not get any natural light and suffer from a wind tunnel effect.	These matters would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy SP12 and the relevant policies of the London Plan and planning regulations. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate, while SPD3 sets out guidance on landscaping and greening.
1681	1175	Juha	Repo		-not enough emphasis has been placed to improve facilities for the existing residents, and most of the plans will just be aimed for passing trade	The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development. SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments. SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and

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						encouraging further linkages and new spaces. Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development. Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to be provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.
168 2	894	Valerie	Beirne	Bankside Neighbourhood Forum	We are anxious to register our interest in the Blackfriars SPD and to acknowledge its importance, and that of the area it covers, in the future development of this neighbourhood. Bankside Neighbourhood Forum, and its' constituent parts who were responsible for submitting the application for the Bankside Neighbourhood Plan frontrunner, have been clear from the outset that the course of development on Blackfriars was key to how the area unfolds. You will be aware that following the submission of the application for the Bankside Neighbourhood Forum and Area in November 2010, some time elapsed	Noted. We welcome further discussion. Within the SPD, figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area.

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					<p>before the area was agreed. During this time the complexity of the planning context for Blackfriars continued to deepen. The Forum has attempted to keep apprised of the extant planning applications, those in the pipeline and the emerging policy framework. In addition to the Blackfriars SPD this has included, the Bankside, Borough, London Bridge Characterisation Study by URS and the Blackfriars Rd Public Realm Study by A&M Urban Practitioners. Reviewing this wealth of information to the level which it demands, reaching a consensus at the Forum, and testing that with the resident, business and other stakeholder communities is not feasible in the SPD consultation time frame. It would, we feel, be premature for us to respond without the benefit of the Neighbourhood Plan consultation which is currently underway. To formulate a response without reflecting the output of the neighbourhood plan consultation would be to devalue it and the importance of the area. It is apparent from the many meetings of the Forum that the Neighbourhood Plan that emerges will take a position on the crucial issues along Blackfriars and it is imperative that a dialogue with the council continues beyond the consultation deadline. The timings are unfortunate. We would welcome your views on how the adoption of the SPD and of the Neighbourhood Plan can be dovetailed.</p>	
1683	318	Helen	Firminger	Bankside Open Spaces Trust	<p>Bankside Open Spaces Trust welcomes this document and the steps it is taking to enshrine key principles for this special area. BOST particularly welcome the general commitment towards open space, greening, and enhancing the public realm. We do however have one key concern regarding the document's legal status, at 1) below for which reason we believe the document should be withdrawn amended and reissued. If this is dealt with, we believe that the</p>	Noted.

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					document should go a great deal further in terms of defining this commitment, and have the following comments at 2) – 5) to improve the document. We have one additional key concern outlined at point 5) below.	
168 4	318	Helen	Firminger	Bankside Open Spaces Trust	The boundary of the area of the SPD is cohesive in terms of Blackfriars Road, however it overlaps at St George's Circus with that detailed in the Elephant and Castle Supplementary Planning Document and Opportunity Area Framework, revised in March 2012. We have understood from Southwark Council, that there could be no overlap of SPDs according to national planning policy, this was particularly made clear to us at the time of the consultation around the draft Borough and Bankside SPD, for which we sought a cohesive boundary. We would agree that this makes sense as two overlapping areas of SPD with no clear guidance would result in a lack of clarity on planning policy altogether. For this reason we believe that the Council should withdraw the SPD and reissue it with an appropriate boundary to interlink with the E & C SPD. Furthermore, during this process we believe that there should be clear consultation over adjoining areas to ensure that the boundary does not make the same mistakes as that of the E & C – ie by seeking to give itself a cohesive boundary, intruding into the cohesive boundary of adjoining areas.	An explanation of the boundary is set out within the SPD. It includes the whole of the Blackfriars Road and some of the surrounding area. It includes the surrounding area as the surrounding area is also likely to see some development and improvements, particularly possible improvements to public realm. Wording has been added to the SPD to make it clearer that the character and historic value of much of the surrounding area will continue to be protected and enhanced. Figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area.
168 5	318	Helen	Firminger	Bankside Open Spaces Trust	2) Vision on P10, 2.24 a) We welcome the aspiration to give the area an 'identifiable character' however we are unclear what this identifiable character is. We suggest building on suggestions later in the SPD for a 'coherent landscaping scheme' to create a strong visionary identity for Blackfriars Road, please add the following description to the text: 'A boulevard of green, stretching from the City of London Garden at the	a.) No change. The emerging vision and the guidance in the SPD set out a strong and aspirational vision for Blackfriars Road that includes landscaping and greening. SPD 3 that sets out general principles for the public realm and specific principles for areas that are especially important. b.) No change. The emerging vision cannot set out site specific guidance for development sites. Our Open Space Strategy has identified a deficiency in open spaces within then area; however given the limited opportunities for the creation of opens, our priority is

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					<p>Bridge, to a greener St George's Circus to the south, achieved by widened pavements with visionary planting creating a safer and more enjoyable environment for pedestrians, a more sustainable climate, and an identifiable character for the road.' b) Change final line as follows 'Opportunities to create new open spaces within development sites will be sought. Opportunities to improve existing parks including Christ Church Garden, Nelson Square, and Paris Gardens as well as smaller community gardens will be maximised through working with local groups such as the Bankside Open Spaces Trust.' c) The vision needs to add two lines on climate in response to the needs of Blackfriars Road: 'Development, and greening projects, will work to mitigate the difficult windy microclimates currently occurring on Blackfriars Road and the western end of Union Street. Any new development will be required to demonstrate how further exacerbation of wind is avoided. Opportunities for an extensive Sustainable Urban Drainage scheme along the pavements of Blackfriars road will be realised.'</p>	<p>to focus on improving out existing open spaces. We will seek to provide new open space and greening as set in the strategy. New open spaces cannot be designated through an SPD. This may be addressed through the new Southwark Plan. C.) SPD 5 sets out guidance on mitigating microclimate effect, alongside London Plan policy 7.7 and saved Southwark plan policy 3.20. The impact of development on microclimate would be assessed at the planning application stage.</p>
1686	318	Helen	Firminger	Bankside Open Spaces Trust	<p>3) SPD 3 Public Realm and open space starting P19: a) In the introductory paragraph, please add Bankside Open Spaces Trust to the list of groups worked with. We would suggest also adding the local BIDs, as these are clearly important partners divided by Blackfriars Road. b) General principles quotes 'Ensure that there is a clear distinction between public and private space' while a useful aspiration this is a hard aim to enforce, considering for example the different areas of housing land that contribute to the streetscape (eg Styles House Garden, Brookwood House Garden), the importance of the planted dining areas on Isabella Street, and the contribution of Helen Gladstone House Garden to the streetscape. We ask</p>	<p>a) Agreed. We have updated SPD 3 to include BOST. b) No change. The guidance in SPD 3 encourages public realm and open space improvements within the SPD area, including the creation of new public spaces. The requirement for a clear distinction between public and private space seeks to improve the legibility of space so that it encourage people to use public space that is available to them. The guidance in SPD 3 adequately covers this requirement c) No change. Play space is already covered in the adopted Residential Design Standards SPD, the London Plan and the Play and Informal Recreation SPG d) No change. This level of detail is beyond the scope of the SPD. Our approach to improve the quality of the green and amenity space is borough-wide and set out in our Open Space Strategy (2013). e) No change. The points raised regarding landscaping and new public spaces are already covered within SPD 3.</p>

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					<p>that this statement is qualified to 'Ensure that private space is protected, while valuing and realising the contribution it makes to public realm and streetscape.'</p> <p>c) Add general principle 'Plan for the needs of children living in the area, including high quality well maintained play space at Nelson Square Garden, Albury Green, and in pocket play areas on new developments. Protect and enhance the streetscape for pedestrians around Friars School.'</p> <p>d) Amend general principle 'Ensure that protected open spaces at Christ Church Garden, Nelson Square, and Paris Gardens are maintained and enhanced as part of a high quality infrastructure for residents, businesses and visitors, build on this network with improvements and maintenance to further green spaces, including the Helen Gladstone House Garden, Gambia Street Garden, the Diversity Garden, and Styles House Garden. Where possible, seek opportunities to extend these parks and gardens. Protect and enhance the calm and cohesive sense of place of these parks and gardens, ensuring a clear boundary, no increase in shading, and no encroachment'.</p> <p>e) Additional Principles for Blackfriars Road, we welcome the following paragraph and suggest it is amended in line with our comment at 1a) 'Build a green boulevard character for Blackfriars Road, introducing a network of generous, meaningful and personable spaces that are informed by the uses around them and anticipated levels of activity. New public spaces should be provided by new development, while contributing to its unified green boulevard character.'</p> <p>f) Principles for St George's Circus – add 'Further greening of St George's Circus, building on excellent work of the Guerilla Gardeners.'</p>	f) No change. This level of detail is beyond the scope of the SPD.
1687	318	Helen	Firminger	Bankside	P23 – diagram, A number of open spaces need to be added to this map that have significance to local	No change. The SPD cannot provide this level of detail as a SPD cannot allocate land for a specific use on the adopted policies map.

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				Open Spaces Trust	people, are well used, and contribute to streetscape, mental health, and microclimate, as well as the sense of specialness in the area. Their function in this densely populated area is much greater than that than 'pockets of open space that edge residential blocks' as they are described in the URS character study. Please see attached map, which includes most of the following in roughly north to south order: Corporation of London Blackfriars Bridge Garden (far north of map, not labelled). Christ Church Garden Northern extension to Christ Church Garden (agreed as part of approved planning application) Paris Garden Gambia Garden and Play Area Styles House Garden, The Cut, Helen Gladstone House Garden Applegarth Garden Drapers Garden Webber Row – Algar Green Brookwood Triangle Albury Green and Play Area Lingfield Garden Markstone Garden Diversity Garden and Green Store St George's Circus (off the map)	Our protected open spaces are allocated on the adopted policies map and listed within appendices to the saved Southwark Plan and within our area action plans. A review of open space and borough wide review of the recommendations of the Open Spaces Strategy (2013) will be undertaken as part of the preparation of the New Southwark Plan. A new paragraph has been added to SPD 3 "we are doing this because" to provide further background on the Open Spaces Strategy recommendations.
1688	318	Helen	Firminger	Banksi de Open Spaces Trust	The proposed development over Southwark Tube Station would give substantial shading to the café areas on Isabella Street, featured in the draft plan. It is possible that this would make the planting in containers here unviable, which would be a great loss of an important contribution to the viability of the area. Any development at this location should clearly demonstrate how it supports these valuable public realm improvements, and how it does not overshadow them.	Impacts from tall buildings would be assessed at the planning application stage for consistency with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF.
1689	318	Helen	Firminger	Banksi de Open Spaces Trust	6) We are concerned that new developments will be in excess of density standards, and will not achieve external amenity standards, particularly provision of children's play, this should be the first goal. As a secondary goal we need to look to long term improvements and revenue funding. 'All maintenance fund should be set up for the green boulevard, and for	Development proposals would be assessed at planning application stage for consistency with the existing planning policies and guidance that cover this issue, which includes the Core Strategy policy 5, London Plan policy 3.6, the Residential Design Standards SPD and the play requirements in the Mayor's Play and Informal Recreation SPG. We have added an appendix to the SPD which signposts the existing policy framework. Public realm maintenance and project

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					localised pocket parks developed from the list above. A local organisation such as Bankside Open Spaces Trust could then use this fund to maintain the green places at no cost to the local authority or TFL.'	delivery is outside the scope of the SPD, however we will continue to work with BOST and other groups on a project by project basis.
1690	966	Helen	Santer	Waterloo Quarter BID	Waterloo Quarter is the Business Improvement District (BID) for Waterloo. Representing the interests of over 330 local businesses, we aim to improve the area as a destination, create a safer and more pleasant trading environment and develop a creative and connected community in which to work. Waterloo Quarter BID operates on a cross-borough basis, spanning parts of the boroughs of Southwark and Lambeth. The Southwark section of Waterloo Quarter BID includes a significant portion of the SPD area, including Blackfriars Road from The Cut to St George's Circus and the area to the west of this stretching as far as the borough boundary. 139 of our member businesses are based within the SPD area. Our particular comments on the SPD focus on the need for further clarity about acceptable use types on the street and the quantum of commercial space. This is prompted by significant concern at the potential for the continued loss of commercial space in the 'southern section' of Blackfriars Road south of the Palestra, despite the stated policy (SPD1 business space) to require 'existing business floorspace (B1) to be retained or replaced unless an exception can be demonstrated in accordance with our borough wide employment policies.' The reference (p11) to 'flexible innovative business space' is very welcome. We have observed a strong, largely untapped demand for smaller commercial space in particular in the Waterloo/Blackfriars area. Almost 100% of enquiries fielded by the Waterloo Quarter BID team regarding the availability of office space in the area relate to property in the 300-3,000sq ft bracket. Measures to	It is important for the SPD guidance to be read in conjunction with both adopted planning policy. The requirement in SPD1 to retain or replace existing business space is consistent with borough-wide policies. Core Strategy policy 10 and saved Southwark Plan policy 1.4 require applicants to demonstrate the loss of business floorspace (B1, B2 and B8) against a range of exception criteria where the site falls within a range of locations, which include (amongst others) the CAZ. Land outside these locations can be released for other uses. This strategy ensures the retention of existing business floorspace where this is appropriate, to ensure there continues to be space available for established businesses to move into the area and for start up businesses to establish themselves. The council considers that it is reasonable to expect applicants to demonstrate that in the areas where business floorspace is protected that there is a lack of demand or viability, or physical and/or environmental constraints which preclude re-provision or an uplift of employment space (Southwark Plan Policy 1.4). It is considered that this is consistent with paragraph 21 and 22 of the NPPF and provides adequate flexibility. Support noted. SPD 2 recognises there is an opportunity to promote a much wider mix of town centre uses as part of the development of the opportunity sites identified in the SPD area. This includes a range of different types and sizes of businesses to help boost the local economy by generating additional spending and inward investment in other businesses and providing an increased number of employment opportunities. The SPD cannot designate land use on development sites, however we will consider the range of uses that would be appropriate for allocated development sites through the preparation of the New Southwark Plan and its accompanying proposal sites and adopted policies map.

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					increase the diversity of business space in the area are therefore welcome and it may well be that smaller units can be suitably located in the southern part of the area. However, this should not be at the expense of reducing the overall quantity of commercial space, particularly in the southern section of the road. The provision of very small numbers of SME units on development sites should not, as has been proposed in recent planning applications, be considered suitable recompense for significant overall loss of B1 space. We have grave concerns that an emerging trend towards loss of office space in the southern section of Blackfriars Road will continue to emphasise the lack of animation and activity in the road during the day, and that the lack of daytime customers in an area dominated by a (working) residential population will further impact on the viability of local shops and services.	
169 1	966	Helen	Santer	Waterloo Quarter BID	We welcome the proposal to continue to convert railway arches into a variety of commercial uses and consider these sites ideally suited towards nurturing the creative and often independent businesses that characterise the area. We also welcome the promotion of active frontages along Blackfriars Road and the animation that this will bring to the street.	Support noted.
169 2	966	Helen	Santer	Waterloo Quarter BID	We welcome the aspiration to link both sides of Blackfriars Road and to 'integrate it into the surrounding area with enhanced east/west routes at key junctions and existing public spaces (additional principles for Blackfriars Road – p20).	Support noted.
169 3	966	Helen	Santer	Waterloo Quarter BID	We feel that the SPD does not currently set out a clear vision for the potential for St George's Circus to help deliver on this objective. We feel that its potential to be enhanced as a key gateway into Blackfriars Road as an area of public realm needs to be considered	The public realm principles for St George's Circus set out in SPD 3 provide clear guidance for the future improvements at the Circus, alongside guidance in SPD 4 and 5.

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					alongside its relation to neighbouring transport routes – in particular Waterloo Road and Westminster Bridge Road.	
1694	966	Helen	Santer	Waterloo Quarter BID	We believe that the potential reorganisation of the traffic gyratory could help deliver not only improved public realm for Blackfriars Road, but also enhanced traffic management that could have a very positive impact on the entrance to Westminster Bridge Road and Waterloo Road (the latter itself also an important boulevard linking the river to St George's Circus and beyond to Elephant).	Noted.
1695	966	Helen	Santer	Waterloo Quarter BID	As a general point – and acknowledging the restrictions of administrative boundaries in planning terms – we would welcome significantly more reference in the document to the cross-borough implications of the development of Blackfriars Road, both in spatial and economic terms.	Reference is made throughout the SPD at relevant points to the need to work with our neighbours. Further updates had been made.
1696	166	Michael	Ball	Waterloo Community Development Group	(a) The area was not a coherent place which warranted SPD of this sort, but that rather any policy detailed plan beyond the existing and emerging borough-wide plan should be focused on the genuinely coherent area of Bankside or of Waterloo: the area defined as Blackfriars Rd by the draft SPD formed a part of both areas. The area is defined and dominated by a major through-road, which as such forms a barrier between Waterloo and Bankside. This barrier was sufficiently problematic for residents without that barrier being reinforced further by large developments along it, which was the main thrust of the SPD. Furthermore the inclusion of the southern section around St George's Circus and beyond, which includes some of the area of the Elephant SPD recently updated, adds to the incoherence of this proposed SPD's overall approach.	An explanation of the boundary is set out within the SPD. It includes the whole of the Blackfriars Road and some of the surrounding area. It includes the surrounding area as the surrounding area is also likely to see some development and improvements, particularly possible improvements to public realm. Wording has been added to the SPD to make it clearer that the character and historic value of much of the surrounding area will continue to be protected and enhanced. Figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area.
169	166	Michael	Ball	Waterl	(b) There was strong disagreement with any	Our emerging vision for Blackfriars Road has been amended since

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7				oo Community Development Group	suggestion that the area was a commercial area (which the SPD proposes at one point) and strong opposition to moving away from a mixed area towards a more commercial area. This is, of course, entirely in keeping with the London Plan aspirations for Central London. There is a large residential population along both sides of the road which it is all too easy to overlook from an outsiders perspective when focusing on the movement and rhythm of the road from a north/south perspective. There is also considerable commercial uses in the area, with light industrial uses and small offices, particularly in the western side of the southern section of Blackfriars Rd. There were also community uses, education, open spaces, and the retail centre of The Cut and Lower Marsh, making the area genuinely mixed use.	consultation, and includes the aspiration for Blackfriars Road to be transformed into a vibrant place providing a range of different activities regenerating the area from the river along Blackfriars Road and stimulating change at the Elephant and Castle. We have amended the supporting text to include reference to a mixed use area, including residential. The supporting text to SPD2, provides context to the range of uses in the area. It recognises the mix of community uses in the area.
1698	166	Michael	Ball	Waterloo Community Development Group	(c) Traditionally residents have looked towards Waterloo for shopping, community facilities and transport connections, but with the regeneration of Bankside, London Bridge and the Elephant they now tend to look there. Furthermore, residents to the south of the SPD area focused much more readily on the Elephant & Castle. This reinforces the point frequently made that the area falls between 3 opportunity areas and town centres (Waterloo, Elephant, London Bridge/Borough) and was not a place in itself which warranted a SPD, unless that were being used to smuggle in specific changes to planning policy.	The SPD recognises that a number of new large developments have been built, with more under construction or being planned. Due to the scale of growth envisaged for the area there is a need to ensure development takes place in a coordinated way and that Blackfriars Road reaches its potential as a destination with its own identifiable character and identity. This purpose of the SPD is to provide detailed guidance to coordinate future growth along and around the Blackfriars Road, setting out clear aspirations for growth, and be used alongside adopted planning policies.
1699	166	Michael	Ball	Waterloo Community Development Group	(d) Traffic speed, noise, pollution and traffic volumes are the most significant problem of the area, and yet this is not addressed anywhere in the SPD. While it is acknowledged that the Road is a TfL road, this does not prevent LBS from developing a vision for the road which TfL should be persuaded to adopt. A vision for Blackfriars without a vision for the road itself would be	TfL are the Highway Authority for Blackfriars Road and as such set the speed limit. Southwark Council support the introduction of 20mph limits on our residential streets. The SPD does not list specific road safety interventions, however if a 20mph limit were to be introduced by TfL this would be supported by existing policies (including the Core Strategy and the Transport Plan) and the guidance within this SPD.

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					<p>completely flawed. Addressing the issues the road throws up should be the starting point for any investigation of how to repair and regenerate the urban fabric of the area. Blackfriars Rd is generally under-loaded, except during rush-hour (and even then only half the road is fully loaded). The result is that cars can too easily speed – I frequently manage more than 40mph along the southern stretch, and its width and straightness positively invite such a response from road-users. The road could and should be narrower at various points and more crossable, with lights and pelican crossings reducing speeds significantly, as well as offering more points for residents and other pedestrians to cross. This is particularly true at the southern end of the Road. There should be wider pavements in general along the whole road, and there is a very clear opportunity to create a separated cycle route, which would be major boon to London, as well help to try and break the unpleasant dominance of vehicles. Such intervention could also help address the consistently bad accidents on BR and The Cut, which is far largely unacknowledged. A 20mph shared surface was suggested; given the aspirations for the area expressed in the draft SPD, there is no reason not to aim to achieve what has been achieved at Exhibition Road. St George's Circus is particularly difficult to cross, and is a particularly powerful barrier of movement to and from the Elephant.</p>	
1700	166	Michael	Ball	Waterloo Community Development Group	<p>Public realm: All the hotels and offices proposed will generate a lot of pedestrians, who will need more pedestrian space. There is virtually no green space along this whole stretch – a row of trees is not green space. There needs to be real green links to real green spaces just off Blackfriars. There is a rare opportunity at Christchurch Gardens for an extraordinary burst of green through the walls of development – but this is</p>	<p>Indicative green links have been identified throughout the borough through the Open Space Strategy (2013). The Strategy sets out further detail on the different types and characteristics of green links that may be encouraged within the borough. This could include safe green routes between existing open spaces and key destinations. Christ Church Gardens is already a protected open space, being allocated on our adopted policies map. A new paragraph has been added to SPD 3 "we are doing this because" to provide further</p>

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					threatened by the misguided focus on the pro-tall buildings agenda evident throughout the SPD.	background on the Open Spaces Strategy recommendations.
170 1	166	Michael	Ball	Waterloo Community Development Group	In terms of land uses, it is critical that the mix of uses is retained, including all of the small businesses in premises dotted around the area as well as focused to the south of The Cut, and in the arches. There is a need to control the amount of student and other temporary accommodation coming forward in the area. The area is in danger of becoming unbalanced and losing its mix, especially smaller offices and workshops. There is insufficient analysis in the SPD of the impact of so many students and visitors on the area, not just on public space but local hospitals, GPs, fire service, police, and other services. We need to somehow influence the London plan policies that are pushing for these additional student schemes and hotels, and we need to call time on developers producing any new proposals for them in this area.	SPD2 recognises there is an opportunity to promote a much wider mix of town centre uses as part of the development of the potential opportunity sites set out in the SPD. We have amended SPD2 to set out encouragement for flexibly designed space to accommodate a range of unit sizes in new development. Through our borough wide planning policies and SPD guidance we will consider the impact of all new proposals on the overall mix of uses in the area and also on local amenity, and the character of the area. The SPD cannot designate land use on development sites, however we will consider the range of uses that would be appropriate for allocated development sites through the preparation of the New Southwark Plan and its accompanying proposal sites and adopted policies map. Bullet 2 of SPD1 reiterates borough wide planning policy of requiring the retention or replacement of business floorspace, and this will continue to be one of a number of priorities for the council to ensure that the concentration of business floorspace in the area is maintained. The supporting text outlines borough wide policy on small business space, including employment space available within the railway arches. These spaces can be used for a variety of employment opportunities. We have also added additional reference into the supporting text regarding the saved Southwark Plan Policy 1.5 in order to highlight that this policy aims to protect small business units in proposals for redevelopment or change of use of employment sites, by requiring the equivalent provision for small units within the replacement floorspace, subject to exception criteria. Policy 14 of the Core Strategy recognises that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026).
170 2	166	Michael	Ball	Waterloo Comm	Should the small businesses in the arches be replaced with offices? No, this is strongly opposed. There is a line of thinking that the more 'dirty' industries such as	It is important for the SPD guidance to be read in conjunction with both adopted planning policy. This is made clear within the SPD. The saved Southwark Plan policy 1.5 allows the change of use of the railway

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				unity Development Group	taxi repairs and garages shouldn't be in central London, but higher rent offices, bars and restaurants should be. This is short-sighted: the arches provide low rent spaces for small businesses and creative industries, and the area is unusual in the scope of artistic/ creative opportunities, and this should be embraced. The creative industries have remained relatively buoyant throughout the recession, and the area along the river has the largest collection of arts buildings in Europe, so there is a clear economic benefit from encouraging these industries and their support services such as printers to stay. Storage is not a good use.	arches for a variety of uses, including shops, cafes, restaurants, light industry, business, creative uses and community uses, provided that the proposed use does not have an unacceptable impact on the amenities of neighbouring occupiers, or on car parking, traffic congestion and road safety. We have made additional reference to this policy in the supporting text.
1703	166	Michael	Ball	Waterloo Community Development Group	(h) In terms of retail, the area has a multitude of smaller supermarkets and 24/7 shops, but still no proper supermarket to serve the local residential community, many of whom do major household shopping at Vauxhall Nine Elms or the Old Kent Rd. A major outlet was approved for 1 Blackfriars in 2003, but unimplemented. This should be a key aspiration: the most appropriate site would be the Southwark Station site, since it would complement the existing retail centre in The Cut & Lower Marsh, and it would be directly on top of a transport node. Protection of the shopping centre is a priority for local residents. Leisure uses for local residents are also insufficient, with the Colombo Centre threatened with closure should the Doon St leisure centre finally be constructed (this is a condition of the lease). A cinema or music hall would be good.	SPD2 recognises there is an opportunity to promote a much wider mix of town centre uses as part of the development of a range of potential sites identified in the SPD area. This includes a range of different types and sizes of business, to not only help to invest in the local economy but provide services to residents, visitors and workers. The SPD cannot designate land use on development sites, however we will consider the range of uses that would be appropriate for development sites through the preparation of the New Southwark Plan and its accompanying proposal sites map.
1704	166	Michael	Ball	Waterloo Community Development	Major developments should be providing real green space as well as community services such as GP surgeries. But there's a real shortage of green space and parks that you can sit in, and there's a fundamental difference between this and the hard-	The SPD is consistent with the our Open Space Strategy (2013) which has identified a deficiency in open spaces within then area. However given the limited opportunities for the creation of new open space, our priority is to focus on improving our existing open spaces.

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				Environment Group	standing private/ public realm proposed by developers and accepted by planners. While permeable open spaces at the base of developments are useful and necessary and welcome, they are not sufficient. There needs to be attractive pedestrian routes linking up existing open spaces. There are many opportunities for creating pedestrian priority streets and shared surfaces, rather than the continued prime definition of streets as spaces for motor vehicles to move through, particularly when many of these streets are empty of vehicles much of the time.	The SPD seeks to improve walking and cycling opportunities and links throughout the area. This is set out in SPD 6, which has been updated regarding TfL's proposals to create a segregated route for cyclists whilst ensuring the needs of all users are met safely, managing the demands of buses, freight, pedestrians and cyclists. A new paragraph has been added to SPD 3 "we are doing this because" to provide further background on the Open Spaces Strategy recommendations.
1705	166	Michael	Ball	Waterloo Community Development Group	j) The SPD is notably and regrettably silent on the social infrastructure already needed, such as GP surgeries, youth facilities – let alone the amount of infrastructure which will be needed if the scale of developments proposed are actually constructed. The Bakerloo line yard at Lambeth Road is a huge site which could be covered over and developed for all sorts of beneficial uses.	<p>The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development.</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to be provided, any committed sources of funding which will be used to deliver it and the</p>

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						organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.
1706	166	Michael	Ball	Waterloo Community Development Group	(k) A proper mix of additional housing is essential for maintaining the successful social mix of the area. Southwark's policy of accepting masses of market housing but no affordable, with huge quantities of money in lieu to be spent elsewhere, threatens the entire relationship between the residential community and the Council, whose very legitimacy is being undermined as a result. People are moving out of the area with right to buy meaning social rented stocks are dwindling. We need new social rented housing which is genuinely affordable for people to live in the area. We also need key worker housing, to house people that are essential for keeping the infrastructure going. We also need cheap private rented, such as bedsits. None of this is being created in the proposals coming forward, which, at up to £2,000 psf, are proving not to be used as homes but as investments and left empty.	<p>The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards.</p> <p>The vision already refers to housing development. Housing will be encouraged on appropriate sites. In order to make this clearer, we have updated SPD 2: Mixed use town centre to include residential development as one of the uses to be encouraged alongside the provision of a mixture of new town centre uses. The fact box on town centre uses has also been updated in accordance with the National Planning Policy Framework definition to make it clear that residential development is not a main town centre use but it can play an important role in ensuring the vitality of town centres.</p> <p>We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>

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1707	166	Michael	Ball	Waterloo Community Development Group	<p>(l) There is enormous scepticism about the benefits of tall buildings, or the arguments rustled up in their favour. No one at our consultations positively seek tall buildings, and the vast majority actively oppose them. There are no evident benefits to the local community, and enormous impacts in terms of environmental degradation, microclimate, shadowing, the impact on views, and the general dominance they exert upon the area. Whether you live in a house or a high rise, the whole of the visible sky is being filled in, daylight and sunlight has reduced, local winds have increased. Views of historic buildings blocked and Conservation Areas compromised. They should properly meet the planning requirements of not damaging amenity or heritage, but planners and decision-makers seem consistently blinded by the extravagant claims and riches promised by their proponents. Clearly the tall buildings approved at the bridgehead are likely to be built and residents recognise that nothing can be done about this. But the proposals for tall buildings in the other three areas identified along Blackfriars Rd are entirely rejected. The site above Southwark Station is the only one which is a genuine opportunity, but is sufficiently sizeable to accommodate a building of up to 50m without desecrating the various Conservation Areas in Lambeth which lie close by. This is not a site appropriate for a tall building of 70m as suggested – Palestra is already evidence of this! Proposing 100m buildings St George’s is wilfully inappropriate, it would be completely out of context and scale, and would have no relation to the area. This is not a transport node, or a retail node, but simply a complex of roads meeting. The proposal for tall buildings between St George’s and Union St is even more perverse and has no justification whatsoever.</p>	<p>The guidance set out within the SPD is consistent and read in conjunction with the existing planning policy framework of design, heritage and tall building policies, which includes the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF. The guidance proposed falls within the remit of an SPD. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage “Guidance on Tall Buildings”, 2007. Matters regarding amenity and microclimate impacts would be assessed at the planning application stage through the relevant saved Southwark Plan policies, Core Strategy Policy 12 and the relevant policies of the London Plan and other planning guidance. Bullet point 14 of SPD 5 sets out further guidance regarding microclimate.</p>
170	166	Michael	Ball	Waterloo	<p>(m) Most of the sites proposed for redevelopment are</p>	<p>The SPD does not designate proposals sites or provide site specific</p>

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8				oo Community Development Group	<p>simply not development opportunities: ID NAME STATUS 1 Southbank Tower under construction Not a Potential development site 2 1 Blackfriars Rd under construction Not a Potential Development site 6 6 Paris Gardens under construction Not a Potential development site 9 240 Blackfriars rd under construction Not a Potential development site 13 28-30 Southwark Bridge Road Submitted Application 15 Block T Peabody Square Listed Building Occupied Affordable Housing Not a potential Development site 19 1 Joan Street Submitted Application 20 Southwark College Submitted Application 22 St Georges Mansions Approved Application 23 UDP site 8P Garages Approved Application 24 Friden House 93- 101 Wrong address 25 Friden House 93-101 repeated should be omitted 26 109-115 Blackfriars Modern block with shops and resi above Not a development site 27 Friars House under construction Not a Potential development site 28 57 Webber Street under construction Not a Potential development site 30 33-38 Rushworth Conservation area limited development potential 31 38-40 Glasshill Street Approved Application 33 63 Webber St Conservation area limited development potential 34 96 Webber St Conservation area limited development potential 35 94 Webber st Conservation area limited development potential 36 44.50 Lancaster St Approved Application 37 52-56 Lancaster Street Approved Application 38 St Georges Health Centre Submitted Application 39 Erland Hill House Submitted Application 40 Erlang Car park Submitted Application 41 McClaren House 1 St George Occupied multi storey student hostel Not a potential development site 42 35 Westminster Bridge Rd Approved Application</p>	<p>guidance, as this would beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may experience less change such as refurbishment or improvements to the existing buildings or surroundings.</p>
170 9	166	Michael	Ball	Waterloo	<p>Given the work being undertaken to produce a Neighbourhood Plan we would earnestly urge you to</p>	<p>Figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and</p>

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				Community Development Group	change tack on producing guidance for the Blackfriars area, and instead work with local stakeholders on a more appropriate plan for the area which would be adopted by the local community as well as the Council	neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area.
1710	1176	Charlotte	Glazier		The idea that Blackfriars could be considered as two separate sections of the SPD, due to their different character is very welcome, as the South end of Blackfriars Road average building height is much lower than the North and this character should be retained. The terminology used in the SPD needs to be considered in more detail. Words such as identity and character are hollow as it is not prescriptive as to what character and identity Southwark would like to promote and enhance. I am also concerned that the SPD would give the green light to planning application of the proposed 27 story tower at Eileen House, which at this present time is actively encouraged within the SPD. This is really concerning. These proposals are out of touch with the area. St Georges Circus is the landmark in the area and should remain so. The only time you need a landmark of a 27 story tower, is when viewed from out of space. Having read the SPD, there are assumptions that 'growth' equates 'improvement' which seems misguided. There is also reference to the SPD, which states ' high quality new development that makes a positive contribution to the local character. I do not agree that a 28 story tower makes a positive contribution to the local character. The local character is relatively low rise. I do not personally agree that the South of Blackfriars Road is a strategic important location for a tall building - it is not the gateway to the South and is not a transport hub such as E&C. Please	A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.

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					lets have a pause and breathing space retained between all these other high-rise proposals. We also want South of Blackfriars Road to continue to be a place people want to live, yet my neighbours will have no direct sunlight, when the SPD actively encourages a 28 storey tower on the door step	
171 1	117 6	Charlotte	Glazier		It would also be good to see more vision and detail on greening within the SPD, from balconies, green roofs and walls as well as street greening.	The SPD sets out general guidance for landscaping, greening and green infrastructure. Further detail is set out in the Sustainable Design and Construction SPD and the Open Spaces Strategy, as well as the London Plan. A new paragraph has been added to SPD 3 "we are doing this because" to provide further background on the Open Spaces Strategy recommendations.
171 2	117 6	Charlotte	Glazier		Retain historic character and heritage, building heights and street patterns. Get rid of crummy redundant offices.	the existing planning policy framework of design, heritage and tall building policies (the relevant saved Southwark Plan policies, Core Strategy Policy 12, the relevant policies of the London Plan and the NPPF) and the guidance in the SPD seeks to preserve and enhance the area's heritage assets and their settings. The SPD also provides guidance for the new buildings, building heights and public realm that is informed by our evidence base.
171 3	117 6	Charlotte	Glazier		Make the street better for pedestrians, a place to stop and pause rather than rush through	An improved pedestrian environment is key aspiration of the guidance in SPD, especially through SPD 3 and SPD 6.
171 4	117 6	Charlotte	Glazier		I do not personally agree that the South of Blackfriars Road is a strategic important location for a tall building - it is not the gateway to the South and is not a transport hub such as E&C. Please lets have a pause and breathing space retained between all these other high-rise proposals. We also want South of Blackfriars Road to continue to be a place people want to live, yet my neighbours will have no direct sunlight, when the SPD actively encourages a 28 storey tower on the door step.	A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall

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						building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.
1716	1177	Adele	Morris	Liberal Democrats	Before we begin we would like to question why this SPD is being rushed through now when we have two neighbourhood plans in the pipeline covering large parts of this area.	Figure 3 of the SPD illustrates the relationship between different planning documents including supplementary planning documents and neighbourhood plans. The SPD has been updated to make it clear the neighbourhood plans are currently being prepared. Once adopted a neighbourhood plan will have more weight than a SPD in the planning process as it will form part of the council's development plan. At present there is no adopted neighbourhood plan for any of the area covered by the Blackfriars Road SPD. The SPD may need to be reviewed in the future if a neighbourhood plan is adopted for any of the SPD area.
1717	1177	Adele	Morris	Liberal Democrats	1. Introduction - Para1.1.2 does not reflect the fact that this is a historic street where many people have been living for hundreds of years.	Noted. The SPD is intended to benefit a wide range of groups including existing and new residents. The SPD seeks to meet the needs of residents whilst also managing the pressure for new development. The SPD has been updated to make it clearer that the emerging vision and the SPD seeks to ensure that development meets the needs of existing and new residents whilst also attracting new development. Residents will benefit from the increase range of uses including more shops, services and businesses along the Blackfriars Road.
1718	1177	Adele	Morris	Liberal Democrats	Figure 2: Boundaries of the SPD -We note the concerns and opposition of residents about the current proposed boundaries of the Blackfriars Road SPD, particularly the inclusion of the area to the south of St George's Circus (south of Borough Road and Lambeth Road). -We note the extended boundaries of the SPD to the ward boundaries on the west of Blackfriars Road and to Hopton Street/Great Suffolk Street on the east. We question why these boundaries extend so far when the SPD is practically silent on these streets and areas - their character, how they should be developed or how existing heritage and buildings will be protected.	An explanation of the boundary is set out within the SPD. It includes the whole of the Blackfriars Road and some of the surrounding area. It includes the surrounding area as the surrounding area is also likely to see some development and improvements, particularly possible improvements to public realm. Wording has been added to the SPD to make it clearer that the character and historic value of much of the surrounding area will continue to be protected and enhanced.
171	117	Adele	Morris	Liberal	2. Vision for Blackfriars Road (p.10-11) 2.2 Our	The ideas for the emerging vision set out the council's aspirations for

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9	7			Democrats	<p>emerging vision 2.2.4 In regards to the emerging vision we would make the following points “Blackfriars Road will have its own distinct identity as a lively and vibrant area” -It is not clear from the document what this “distinct identity” will or should be in the view of Southwark Council and the document fails in our view to suggest a character for the Blackfriars Road, or to acknowledge in our view that the road is not a single entity in regards to its character. The section to the south of Union Street and The Cut is predominately residential and low scale with buildings less than 10 storeys, while the northern section predominately has businesses on either side of the road, with the exception of Christ Church. There are of course a number of residents living behind the business properties on the northern section including the Rochester Estate, Quadrant House, River & Rennie Courts and Falcon Point. -It is not clear what the Council's definition of a "lively and vibrant area" is. This needs to be clarified and refined - particularly in the context of the Council's licensing saturation policy and the recently published crime and antisocial behaviour statistics for the ward. "Cultural, leisure, arts and entertainment uses will also be encouraged....." -It is not clear how these uses are being encouraged, other than asking for D class uses in new developments. “Opportunities to increase the amount and type of development will be maximised” -We do not agree that this is an appropriate aspiration without some qualification. As stated this appears to be a green light for unregulated overdevelopment, which could have a negative impact on the quality of life for residents and the character and heritage of the road. “Social and community infrastructure will continue to be improved” -We think the statement is too vague and unclear, and makes no reference to how existing</p>	<p>the SPD area. As set out within the SPD, these ideas will be further developed through the preparation of the New Southwark Plan, which will eventually replace the Core Strategy and the saved Southwark Plan. As set out within the SPD the Blackfriars Road is a key route running from the River Thames to St George's Circus and the SPD focuses mostly on the road itself. It is appropriate to include the whole of the road within the emerging vision as a key route and a historic boulevard. Information within the characterisation studies, both for Bankside, Borough and London Bridge Opportunity Area and Elephant and Castle Opportunity Area identify key aspects of character and management principles, and have informed the preparation of the SPD. With reference to "a lively and vibrant area" the SPD has been updated within the supporting text to SPD 2 to refer to the council's licensing saturation area. With regards to how cultural etc uses will be encouraged the SPD encourages this uses in accordance with Core Strategy and saved Southwark Plan policies. These policies and also proposals sites allocations will be reviewed through the preparation of the New Southwark Plan.</p>

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					<p>residents will be consulted as to what their priorities are in regards to new or improved infrastructure “We will work with Network Rail to refurbish space under railway arches to provide a range of uses including small businesses, shops, cafes and restaurants.” -A recent planning decision in our ward in regards to the Union Street railway arches show that an unqualified statement to support refurbishing the railway arches does not have the desired effect of ensuring a range of classes of use and types of businesses. The SPD should be clearer in supporting Policy 1.5 Small Business Units in the Southwark Plan to ensure that the arches are refurbished in a way that ensures they remain affordable and appropriate to a diverse range of local SME businesses. -There are many established businesses in the railway arches and more should be made of how they will be protected. “There will also be taller buildings at the important locations of Southwark tube station and on the main junction of St George’s Circus” -While the northern section of Blackfriars Road (north of Union Street/The Cut) has been considered suitable for taller buildings we would ask Southwark Council to note the strong opposition of existing residents to a tall building at Southwark tube and the overwhelming opposition to a tall building at St George’s Circus. We add our strong opposition to tall buildings on the southern end of Blackfriars Road.</p>	
1720	1177	Adele	Morris	Liberal Democrats	<p>“Figure 5: Potential Development Sites and Table 1: Potential development sites” (p.12-13) “11. 209-215 Blackfriars Road” -The existing building should not in our view be considered as a potential development site as it has architectural merit. “15. Block T, Peabody Square, Blackfriars Road” -The location and description do not match. This is not Block T, Peabody Square, Blackfriars Road but rather an address on either Union Street or Great Suffolk Street “25. Friden</p>	<p>We have updated Figure 85- now Figure 6 - and Table 1 with an updated list of potential development sites. The SPD does not designate proposals sites or provide site specific guidance, as this would be beyond the scope of the SPD. It does identify potential development sites which are illustrative of the huge opportunity for change within the area and the need for a coherent framework. The SPD has also been updated to clarify that the list of sites is not exhaustive and other sites may come forward for development. Some of the sites will be completely redeveloped, whilst other sites may</p>

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					House, 96-101 Blackfriars Road” -We believe this is more likely to be Valentine Place as the same address is used 24 and 25 “38. St Georges Health Centre, 15-153 Blackfriars Road” -This appears to include Tadworth House, which is a council block with 27 properties. We would oppose the redevelopment of this building without the consent of tenants and residents. “43. TfL Bakerloo Sidings and 7 St George’s Circus” We echo the concerns of residents in the Albert Association about the sensitive nature of this area in regards to the West Square Conservation area and request that the suitability of the site is reconsidered or clearer guidelines given as to how this site could be appropriately redeveloped.	experience less change such as refurbishment or improvements to the existing buildings or surroundings.
1721	1177	Adele	Morris	Liberal Democrats	3. Strategies and guidance (p.14-15) SPD1 Business Space 3.5 The protection of office space does not seem to be being applied to the development at Hill House/Erlang House. What judgement is used to decide when it is appropriate to swap office floorspace for retail? “Supporting use of the railway arches for a range of business uses (B1) including small business space, creative and cultural industries, light industrial uses and appropriate A or D class uses” -As stated above in practice this policy aspiration will not be delivered due to a failure to ensure Policy 1.5 Small Business Units is properly interpreted and enforced to ensure that refurbishment does not reduce the variety of uses in railway arches and ensure that these spaces remain affordable compared to more traditional business unit spaces.	It is important for the SPD guidance to be read in conjunction with both adopted planning policy. This is made clear within the SPD. The requirement in SPD1 to retain or replace existing business space is consistent with borough-wide policies. Core Strategy policy 10 and saved Southwark Plan policy 1.4 require applicants to demonstrate the loss of business floorspace (B1, B2 and B8) against a range of exception criteria where the site falls within a range of locations, which include (amongst others) the CAZ. Land outside these locations can be released for other uses. This strategy ensures the retention of existing business floorspace where this is appropriate, to ensure there continues to be space available for established businesses to move into the area and for start up businesses to establish themselves. The council considers that it is reasonable to expect applicants to demonstrate that in the areas where business floorspace is protected that there is a lack of demand or viability, or physical and/or environmental constraints which preclude re-provision or an uplift of employment space (Southwark Plan Policy 1.4). It is considered that this is consistent with paragraph 21 and 22 of the NPPF and provides adequate flexibility. Policy 1.4 allows the replacement of business floorspace with class A (retail) or other suitable town centre uses. The SPD includes a fact box to explain town centre uses. We have amended the supporting text to include reference to Policy 1.5 and the

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						requirement to replace small business units within new development. We have amended the supporting text to SPD2 to include reference to Policy 1.5 and the requirement to replace small business units within new development.
172 2	117 7	Adele	Morris	Liberal Democrats	We are doing this because “3.6 The railway is a dominant feature of the area and many of the arches have already been converted to provide a significant amount of space for small businesses” -As stated above while a number of railway arches in the Blackfriars Road SPD area have already been converted, this has resulted in a variety of uses being replaced by B1 use only, which has had the effect of forcing out existing businesses, providing services to local residents. -We are not aware of any community uses being promoted in railway arches.	It is important for the SPD guidance to be read in conjunction with both adopted planning policy. The saved Southwark Plan policy 1.5 allows the change of use of the railway arches for a variety of uses, including shops, cafes, restaurants, light industry and other types of business, creative uses and community uses, provided that the proposed use does not have an unacceptable impact on the amenities of neighbouring occupiers, or on car parking, traffic congestion and road safety. The SPD encourages a mixture of town centre uses to be developed alongside business uses and residential.
172 3	117 7	Adele	Morris	Liberal Democrats	SPD 2 Mixed use town centre (p.16) “Supporting proposals for new hotels and other forms of visitor accommodation (C1) to ensure there is a good supply of accommodation for visitors and to contribute to a mix of uses and employment opportunities.” -While we welcome and acknowledge the need for additional hotel rooms in London, we also believe that the number of hotels in SE1 and in the proposed area of the Blackfriars Road SPD should be restricted to ensure that other important planning needs in the area for existing residents such as affordable (including social rent) housing, family sized units and additional public services are prioritised and delivered.	New hotel proposals will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account. It is important for the SPD guidance to be read in conjunction with both adopted planning policy. The Core Strategy sets out the borough’s strategy for housing and the targets over the plan period which include the target for the opportunity area. SPD 2 provides sets out our support for the provision of new social and community infrastructure. This is further explained in section 4.4 on infrastructure provision.
172 4	117 7	Adele	Morris	Liberal Democrats	“Considering the impact of all proposals for new or expanded food, drink, evening and night time economy uses, whether cumulatively or individually, on the overall mix of uses in the area and on local amenity.” - We welcome this acknowledgement but would request that this point is strengthened to take into account the very high levels of ASB in Cathedrals Ward and the	We have amended the supporting text to include reference to the Borough and Bankside licensing saturation area, which is a local policy that addresses the cumulative impact of licensed premises. All applications for new or varied premises licences for night-clubs, public houses and bars, restaurants and cafes, off-licences, supermarkets and grocers need to address the saturation concerns set out in the council’s licensing policy within the premises operating schedule. We

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					negative impact on existing residential amenity. We also believe the SPD should acknowledge the fact that this is an area covered by an existing saturation policy.	recognise that if premises are not properly managed and controlled, they could become a serious source of crime and disorder or anti-social behaviour problems. The Council will expect applicants for premises licences to demonstrate in their operating schedules that suitable and sufficient steps are to be taken to prevent crime and disorder in and around the vicinity of their premises and events.
1725	1177	Adele	Morris	Liberal Democrats	<p>“Supporting the provision of new social infrastructure and community facilities as part of a mixed use developments.” -While this aspiration is welcome there is no detail or acknowledgement of what these new social and community facilities should be or what is required. This statement would be stronger if a study of existing facilities had been carried out or included and existing residents had been consulted about what they believe is needed and should be a priority</p>	<p>The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development.</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough’s Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Southwark’s CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council’s capital investment programme also will</p>

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						help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.
1726	1177	Adele	Morris	Liberal Democrats	We are doing this because (p.17-18) "3.7 Land use, is predominantly commercial, with pockets of residential in the south-east, west, and the north, close to the river" -We do not believe this is an accurate description of the make up of the road. As we have indicated earlier the southern end of Blackfriars Road (south of Union Street/The Cut) is predominantly residential and therefore to describe it "as pockets of residential" is misleading and fails to acknowledge the density of the existing residential community. While the northern end is predominantly fronted by businesses there are significant numbers of residents set behind these buildings on either side of the road.	We have amended the supporting text to clarify that the land use in the SPD area is mixed with a large number of commercial buildings alongside areas of residential development.
1727	1177	Adele	Morris	Liberal Democrats	"3.8 Southwark's Retail Capacity Study (2009) suggest that the Bankside and Borough district town centre should continue to be a centre for local needs and specialist, independent retailing and any new retail schemes can be supported by workers, tourists and residents, coming forward on an incremental basis." - While the aspiration for the district town centre continuing to be a centre for local needs and specialist, independent retailing is welcome in practice we have seen a loss of independent retailers in SE1, and a commitment to smaller affordable units and more specific policies about the variety of retail in a parade or block, is probably the only way to stop retail chains pushing out independent retailers and maintaining diversity.	SPD2 recognises there is an opportunity to promote a much wider mix of town centre uses as part of the development of the potential opportunity sites set out in the SPD. We have amended SPD2 bullet 1 to set out encouragement for flexibly designed space to accommodate a range of unit sizes in new development. The SPD cannot designate land use on development sites, however we will consider the range of uses that would be appropriate for allocated development sites through the preparation of the New Southwark Plan and its accompanying proposal sites map.
172	117	Adele	Morris	Liberal	"3.10 The London Plan aims to provide a net increase	The hotel bed spaces forecast for Southwark should be treated as

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8	7			Democrats	of 40,000 hotel bedrooms.... This amounts to 2,500 over this period (2007-2026) for Southwark. Since 2007, approximately 1625 hotel bed spaces have been completed and approximately 850 bed spaces are currently in the pipeline in the borough. Within the SPD area there are seven hotels, with an additional three hotels just beyond the SPD boundary." -As stated earlier we believe the amount of hotels should be limited, so that more important planning priority requirements for the area are delivered. We can see from the figures that Southwark has almost met its target of 2,500 spaces already, despite the target running until 2026.	indicative only, and local circumstances need also to be factored in. The SPD area is within the Central Activities Zone and Bankside, Borough and London Bridge Opportunity Area and part of the Elephant and Castle Opportunity Area which are areas promoted in the London Plan to accommodate strategically important hotel provision. Arts, cultural and tourism activities have flourished in Southwark in the last decade, particularly in the Strategic Cultural Area in the north of the borough and the CAZ. Bankside, Borough and London Bridge has consequently experienced a growth in the number of hotels to support this increasing visitor economy. The SPD2 provides guidance to support strategic policy 10 'Jobs and business' of the Core Strategy (2011) which sets out the council will allow the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. Policy 10 and SPD 2 are also supplemented by the saved policy 1.12 of the Southwark Plan which addresses visitor accommodation. New hotel proposals will be assessed against these relevant planning policies and a consideration of the impact upon local amenity and the balance of land uses will also be taken into account.
1729	1177	Adele	Morris	Liberal Democrats	3.13 The development of the evening and night-time economy will help keep the town centre lively and safe at different times of the day and provide more leisure opportunities for local residents, visitors and workers. Careful consideration needs to be given to measures which mitigate any negative impacts of uses to protect the amenity of nearby residents." -Again as stated earlier the SPD should acknowledge the existence of a licensing saturation policy, the high levels of ASB and the large number of existing residential properties within the SPD area. This should result in stronger safeguards and policies to avoid negative impacts on residential amenity. There are no details or suggestions of how the night time economy will be managed to protect the amenity of nearby residents.	We have amended the supporting text to include reference to the Borough and Bankside licensing saturation area, which is a local policy that addresses the cumulative impact of licensed premises. Saved Southwark Plan policies will be used to assess the impact of development schemes on local amenity.

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1730	1177	Adele	Morris	Liberal Democrats	<p>"3.15 Improvements to social infrastructure such as schools, health facilities, post offices and police facilities are addressed through external stakeholder's asset management plans and through the council's Capital programme and infrastructure planning process. The need for new infrastructure will be kept under review as the area changes." -While we welcome the acknowledgement for improvements to social infrastructure we believe this understates the existing pressures on the social infrastructure and would argue that a commitment to new and increased capacity is required and this should be supported by an evidence based projection of the numbers expected to be living, working and visiting in the area. In addition, it is insufficient to state that external stakeholders will manage the social infrastructure if there are no sites available for any new schools, health facilities etc to be built. This cannot be left to chance when the population is set to expand at such a rate. 3.16 We welcome active frontages on the street but they need to provide an appropriate mix of sizes and uses. 3.20 We welcome the proposal for new and meaningful public spaces, and not vast amounts of "public open space" that have no purpose or value. However, we would like to see a clear definition of "meaningful". The illustration of the Isabella St arches gives a false sense of what is there - behind the greenery are lively premises that cause considerable amenity issues for local residents. These outdoor leisure spaces need careful implementation and management. 3.26 There seems to be some mixed messaging here. The road already has distinct character, yet the SPD is suggesting that it needs to be created. Is it suggesting that the old distinct character should be replaced by a new one? 3.29 The recently approved Linden Homes development has</p>	<p>The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development.</p> <p>SPD 2: Mixed use town centre sets out that we will support the provision of new social infrastructure and community facilities as part of mixed use developments.</p> <p>SPD 3: Public realm and open space refers to the continued protection of the three protected open spaces and encouraging further linkages and new spaces.</p> <p>Section 4 of the SPD refers specifically to infrastructure, crossing referring to the community infrastructure levy (CIL) and section 106 planning obligations to help ensure the delivery of key infrastructure to mitigate the impact of development.</p> <p>Infrastructure is covered within borough-wide planning documents with the overarching policy 14 of the Core Strategy recognising that new development in the borough needs to be supported by adequate infrastructure, including social, environmental and physical infrastructure. The borough's Infrastructure Plan, identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of the Core Strategy (2011-2026). Where possible it identifies the cost of infrastructure to provided, any committed sources of funding which will be used to deliver it and the organisations responsible. It also identifies the funding gap i.e. the gap between known commitments and the total cost of infrastructure required. When it is adopted, Soutwark's CIL will be used to contribute towards bridging this funding gap. Funds earmarked for infrastructure in the Council's capital investment programme also will help to improve infrastructure provision. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. Adoption is planned for 2014. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD.</p>

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					already gone against this by proposing to knock down the existing character buildings and replace them with an over dense block.	
173 1	117 7	Adele	Morris	Liberal Democrats	SPD 3 Public realm and open space (p.19) "Ensure there is a clear distinction between public and private space" -We would question what the intention of this statement is in regards to public realm and open space. While we acknowledge that there will be some private space for businesses and residents, we are broadly in favour of public realm and open space being open to all, while acknowledging the importance of certain spaces to existing communities such as Nelson Square and Christ Church Gardens.	Noted. The guidance in SPD 3 encourages public realm and open space improvements within the area, including the creation of new public spaces. The requirement for a clear distinction between public and private space seeks to improve the legibility of space so that it encourage people to use public space that is available to them.
173 2	117 7	Adele	Morris	Liberal Democrats	SPD 4 Built form and heritage (p.24) SPD 5 Building Heights (p.27) "A tall building, of a height of up to 70 metres should provide a focal point at Southwark tube centre" -Although the northern end of Blackfriars Road is considered suitable for tall buildings we note the strong opposition from local residents to a tall building in this location.	A tall building up to 70m in height could be appropriate at the southern end of Blackfriars Road provided that it complies with the detailed guidance outlined in SPD 5 and the current development plan that includes the relevant policies of the saved Southwark Plan (2007), Core Strategy (2011), London Plan (2011) and other planning documents/guidance, including the NPPF (2012). The development plan sets out the policies for tall buildings. The guidance in the SPD provides detail on how to implement these development plan policies specific to Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007.
173 3	117 7	Adele	Morris	Liberal Democrats	"A tall building, of a height up to 70 metres should provide a focal point at St George's Circus. Tall buildings must be set back from the Circus. -We strongly oppose the location of a tall building up to 70 metres at the southern end of Blackfriars Road. We do not believe any case has been made for a tall building in this location, when there are no existing buildings of this height in this section of the road. Furthermore, we believe a tall building in this location will have a detrimental impact on existing conservation buildings	Based on our evidence base and provided that development was consistent with the guidance outlined in SPD 5 and existing planning policy framework of design, heritage and tall building policies (the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF) a building up to 70m could be appropriate at the southern end of Blackfriars Road. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. In light of consultation responses and to add clarity

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					and areas in that section of the road, particularly the Grade II Blackfriars Peabody estate and the St George's Circus conservation area. A tall building would need to be set back from the circus because of the conservation restraints and therefore there is no justification for the argument that it would provide a focal point at the start of Blackfriars Rd.	to the guidance relating to St George's Circus in SPD 5, the SPD has been updated to clarify that a tall building could provide a focal point at the southern end of Blackfriars Road up to 70m. A tall building should also sustain, enhance or better reveal the local heritage assets.
173 4	117 7	Adele	Morris	Liberal Democrats	Buildings of up to 30m along Blackfriars Road between Southwark tube station and St George's Circus" -We do not believe buildings of up to 30m should be encouraged along the full length of this stretch of Blackfriars Road, but rather that buildings of up to 30m will be considered where appropriate, and generally opposed where they will have a detrimental impact on the St George's Circus conservation area and the Grade II Blackfriars Peabody estate.	The guidance outlined in SPD 5 for the spine of Blackfriars Road would be appropriate provided it complied with the guidance in SPD5 and the existing planning policy framework of design, heritage and tall building policies (the relevant saved Southwark Plan policies, Core Strategy Policy SP12, the relevant policies of the London Plan and the NPPF). The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007.
173 5	117 7	Adele	Morris	Liberal Democrats	"In addition to the above criteria, buildings which are significantly higher than 70 metres must include a publicly accessible area on upper floors where feasible in the tallest buildings in the north of Blackfriars Road." -We do not support a blanket commitment to support a publicly accessible area on upper floors of buildings higher than 70 metres, particularly if this is part of the section 106 or future CIL contributions. Any publicly accessible area should be provided by the developer as part of the building design and costs, and should not be allowed to impact on the viability of the scheme or its ability to meet the Council's policy	This requirement is consistent with London Plan 7.7. The viability and feasibility of a publically accessible space would be assessed at planning application stage.
173 6	117 7	Adele	Morris	Liberal Democrats	3.31 At the centre and south of Blackfriars Road taller heights would provide focal points to emphasise the main transport node of Southwark tube at the junction of Union Street and The Cut as well as St George's Circus a main node and junction of London Road and Borough Road." -We do not support the suggestion that taller buildings are required to provide focal points	The building heights guidance outlined in SPD 5 is considered appropriate, provided that development complied with the guidance outlined in SPD5 and the existing planning policy framework of design, heritage and tall building policies (the relevant saved Southwark Plan policies, Core Strategy Policy 12, the relevant policies of the London Plan and the NPPF). The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been

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					for Southwark tube and St George's Circus. Firstly, we would point out that the Southwark tube junction already has a tall signature building-the Palestra Building. Secondly, we do not accept that the only way to provide a focal point is to have a high building and therefore	prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007.
1737	1177	Adele	Morris	Liberal Democrats	4. Implementation (p.33) "4.2.2 We will ensure that we continue to engage with the many groups and individuals including key stakeholders such as local businesses, South Bank Employers' Group, Waterloo Quarter, Better Bankside, Bankside Open Spaces Trust, Lambeth Council, tenants and residents associations, SE1 Safer Road Forum, South Bank University, Bankside Neighbourhood Forum, Blackfriars Landowners Forum, Southwark Living Streets and Southwark Cyclists. We will also look at opportunities for engagement with other groups and residents." -We believe that residents living in the area should have a higher profile in the list of those to be engaged, followed by the neighbourhood forum(s), existing businesses and other stakeholders in the Blackfriars Road SPD area. We also think ward councillors should be included in the list as the democratically elected representatives.	Section 4 of the SPD on implementation highlights the importance of working with all our partners including residents and the local community. Section 4.1 specifically refers to continuing to engage with the local community and residents, and similarly section 4.2 refers to continuing to engage with many groups and key stakeholders as well as look at opportunities for engagement with other groups and residents. Residents are clearly within the list of people the council engaged with. We do not think it is appropriate to mention ward members specifically in the list of groups and individuals.
1738	1177	Adele	Morris	Liberal Democrats	Active travel	Noted.
1740	209	Alex	Trouton	NHS Southwark	• A number of direct positive impacts on health could be expected, for example the creation of environments conducive to active travel will have beneficial effects particularly for obesity, diabetes and cardiovascular disease (Hardman & Stensal, 2009)	Noted. Further information on the potential impact of the SPD guidance on social, environmental and economic sustainability is set out in our sustainability appraisal (SA). The SA assessed the likely impact of the SPD on 17 indicators including indicators specific to sustainable transport.
1741	209	Alex	Trouton	NHS Southwark	• Greater use of the street environment, for example for street markets, could promote a sense of community which will foster a sense of wellbeing	Noted.

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					(Calve Blanco, 2013).	
174 2	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> Increased employment opportunities, as well as an improved public realm and provision of green spaces/squares and street trees are likely to have a beneficial impact on mental health (Ward-Thompson, 2011). 	Noted.
174 3	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> An increase in the number of well-designed open spaces and squares could enhance opportunities for conviviality, exercise and children's play. 	Play space is covered in the Residential Design Standards SPD, the London Plan and Play and Informal Recreation SPG .
174 4	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> The stipulation that inclusive design principles be applied to all buildings and spaces is welcomed as this is likely to provide greater amenity and opportunities for people with disabilities. This inclusivity will need to consider not only mobility issues but people with other forms of disability (e.g. sensory, learning.) Provision of accessible public toilets will also need to be considered 	Noted. Saved Southwark plan policy 1.7 seeks to secure public amenities on large development sites.
174 5	209	Alex	Trouton	NHS Southwark	<p>However, there are some potential direct negative impacts on health also.</p> <ul style="list-style-type: none"> The proposed tall buildings have a potential for reducing possibilities of social cohesion as there is already evidence from consultation exercises that they are not desired by the existing local residents. There is also UK evidence that tall housing developments, unless they are at the top end of the market, do not promote cohesive communities and can lead to ill health amongst residents (Boys Smith & Morton, 2013). This gives weight to the suggestion, echoed by some residents in consultations, that tall buildings, if at all, should be developed only in the northern part of Blackfriars Road and that the southern area should retain its residential street character. 	The SPD sets out clear building heights guidance. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. This evidence base reveals that heights above those outlined in the guidance would have an adverse impact on heritage assets, amenity or local character.
174 6	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> Care will also need to be taken to ensure that new buildings, particularly those that are high-rise, incorporate opportunities to maximise every day 	Noted. This would be assessed at the planning application stage.

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					physical activity, e.g. by positioning of stairwells, provision of secure cycle parking for employees and visitors, shower rooms, rooftop gardens etc	
1747	209	Alex	Trouton	NHS Southwark	Yes. A number of positive impacts could be anticipated, including: <ul style="list-style-type: none"> • A positive impact on transport as the proposals for the streetscape and plans for mixed use developments with active frontages would promote active walking and the proposal highlights the importance of making cycling in Blackfriars Road safer. The impact on health of increased active travel has been described above 	Noted. TfL has announced proposals to introduce a segregated cycle lane on Blackfriars Road which will provide a safe facility for cyclists. Southwark supports this proposal and the SPD has been updated accordingly.
1748	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> • Increased employment opportunities (as above) 	The council's Economic Well-being Strategy (2012-2020) sets out the ambition for regeneration and development to provide lasting jobs for residents in both the construction of development and also in the final development itself through training and skills programmes. The council's adopted Section 106 Planning Obligations SPD sets out the detail on securing planning obligations from new development for employment and enterprise measures which include initiatives to create jobs and training in the final development, and also jobs and training during the construction period of the development.
1749	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> • The development area brings with it the potential to increase the amount of vegetation-in form of street trees, green open spaces as well as green roofs. As noted in the 2012 Open Space Strategy, the Bankside, Borough and London Bridge sub area is one of overall open space deficiency and this is particularly the case in the NW area. (The area has a total of 0.25ha of park provision /1000 population which is expected to fall to 0.20ha by 2026 as a result of population growth. Recommended standard is .77ha/1000). Given this there could be a greater emphasis within the SPD on the significance of improving the green infrastructure, as the health benefits brought about by increasing outdoor green space are manifold (both direct in terms of promoting exercise and wellbeing, but also indirectly 	Noted. The SPD is consistent with the our Open Space Strategy (2013) which has identified a deficiency in open spaces within then area. However given the limited opportunities for the creation of open spaces, our priority is to focus on improving out existing open spaces. We will seek to provide new open space and greening as set in the strategy. This will be further reviewed through the preparation of the New Southwark Plan.

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					in terms of mitigating global warming and reducing heat related excess deaths. The possibility of creating additional public green spaces and allocating development sites or street spaces to these could be considered. Many residents have commented on the paucity of green spaces in the area, and the density of current green space provision does not meet the targets in recommendations made by Natural England (Natural England, 2011).	
1750	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> Elderly people would benefit particularly from opportunities to exercise in outdoor green spaces and where walking is safe and enjoyable (Takano et al, 2002). 	Noted.
1751	209	Alex	Trouton	NHS Southwark	<p>There are potential negative impacts:</p> <ul style="list-style-type: none"> Negative impact on climate change due to increased population, large developments with large carbon footprints during development and after completion, urban heat island effect, possibility of increased flood event risk. This has potential impact on global health (see below) but also on excess deaths related to heat (Mayor of London, 2006). Negative impact on air quality due to climate created by tall buildings where pollution is trapped in "canyons". The potential impact on health is well documented (Defra, 2013) There could be greater emphasis on the role of vegetation in mitigating against this and the integral role vegetation could have in design proposals 	Noted. The council's adopted Sustainable Design and Construction SPD provide further guidance on this matter. The SPD supports urban greening that includes green infrastructure that recues the height island effect.
1752	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> Other negative environmental impacts of tall buildings such as sun shading, wind tunnels and over-heating on street surfaces from glass-clad buildings 	These matters would be assessed at the planning application stage for consistency with the existing planning policy framework of design, heritage and tall building policies that includes the relevant saved Southwark Plan policies, Core Strategy Policy 12, the relevant policies of the London Plan and the NPPF. Bullet-point 14 of SPD 5 sets out further guidance regarding microclimate.
1753	209	Alex	Trouton	NHS South	<ul style="list-style-type: none"> Child development: there should be an emphasis on ensuring that additional outdoor play facilities for 	Play space is covered in the Residential Design Standards SPD, the London Plan and Play and Informal Recreation SPG.

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				wark	children are created as play makes a vital contribution to child development	
1754	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> An emphasis on active travel should not exclude thoughtful provision for those who are car dependent e.g. Blue Badge users, so that they are able to benefit fully from the enhanced cultural, leisure, retail and employment opportunities in the area. 	Whilst the emphasis in this SPD is on Active Travel this does not preclude essential car users. The SPD refers to the council working with TfL to ensure the road balances the needs of all users. Southwark has existing policies in the saved Southwark Plan and Sustainable Transport SPD to ensure adequate parking provision of disabled parking bays for residents and visitors.
1755	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> Yes • Positive impact likely on exercise in terms of walking and cycling as described above 	Noted. Further information on the potential impact of the SPD guidance on social, environmental and economic sustainability is set out in our sustainability appraisal (SA). The SA assessed the likely impact of the SPD on 17 indicators including indicators specific to sustainable transport.
1756	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> As the SPD proposes increasing amount of leisure facilities accessible to public within hotels and other private buildings there is a potential positive impact on ability to be physically active for residents and workers 	Comment noted.
1757	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> Availability of healthy food: there could be a stipulation on limiting fast food outlets within new premises 	At present we do not consider there should be specific reference to hot food takeaways in the SPD. SPD2 recognises there is an opportunity to promote a much wider mix of town centre uses as part of the development of the potential opportunity sites set out the SPD area. This includes a range of different types and sizes of retailers, to help boost the local economy by generating additional spending and inward investment in other businesses and providing an increased number of employment opportunities. The SPD cannot designate land use on development sites, however we will consider the range of uses that would be appropriate for allocated development sites through the preparation of the New Southwark Plan and its accompanying proposal sites map. In preparing the New Southwark Plan, which will replace the Core Strategy (2011) and saved Southwark Plan policies (2007), the council will be considering whether we should prepare more detailed policies to manage the mix of restaurants, bars, cafes and hot food takeaways.
1758	209	Alex	Trouton	NHS South	<ul style="list-style-type: none"> The suggestion that there could be new street market(s) has the potential to promote provision of 	We do not consider the guidance needs to include specific reference to the provision of a market. It is important for the SPD guidance to be

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				Southwark	healthy food, and the provision of variable sizes of retail unit might promote small independent food retailers to become established	read in conjunction with adopted planning policy. Core Strategy Policy 3 promotes new markets in the borough. The Southwark Markets and Street Trading Strategy sets out a number of actions and opportunities to explore with the operation and provision of markets in the borough. This includes using demographic analysis to support the business case for change or new markets, including exploring areas where new street trading sites could be located.
1759	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> A limitation on the number of new off-licenses and other businesses selling alcohol could be considered 	We have amended the supporting text to refer to the Bankside and Borough licensing saturation policy and the requirement for new license applications to address the saturation concerns set out in the council licensing policy.
1760	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> A significant population increase planned so increased need for all services anticipated including additional primary/community healthcare capacity 	Section 4.4 of the SPD sets out that we will continue to improve existing infrastructure and provide new infrastructure alongside new development. The council's Infrastructure Plan identifies that Southwark NHS will continue to seek investment in their estate where necessary to cope with the anticipated rises in population and increases in demand on healthcare this will create.
1761	209	Alex	Trouton	NHS Southwark	<ul style="list-style-type: none"> The proposals have a potential positive impact on increasing amount of culture and leisure services and this has the potential to increase wellbeing and improve a feeling of safety for road-users particularly at night when the road would become busier (particularly the southern half and the area around St George's Circus where there are currently concerns amongst residents and workers around safety) 	Comment noted.
1762	209	Alex	Trouton	NHS Southwark	As described above, the developments, particularly larger ones, are likely to make a negative contribution to global climate change, and therefore have negative implications for global health. There should be a strong emphasis on mitigating against the climate change effects and there could be stronger emphasis within the SPD itself on use of green infrastructure, green and blue roofs and the integral role that these could have in the design proposals.	It is important for the SPD guidance to be read in conjunction with both adopted planning policy and other strategies. Policy 13 of the Core Strategy sets out the requirements for development to meet high environmental standards. Policy 11 provides the detail on green infrastructure. In addition, the council has an Energy and Carbon Reduction strategy which is also taken into account when preparing planning policy.
176	209	Alex	Trouton	NHS	We welcome this SPD and the opportunities it offers	Major planning applications require the submission of an

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3				Southwark	for taking a coherent, considerate and imaginative approach to regeneration and development in the Blackfriars area. Whilst recognising there is an economic case for intensification, we hope that this SPD can help reconcile the interests of ordinary people, visitors and residents with the market case for expanding the retail and office sector. This screening against key determinants of health indicates where care is required in design and implementation to prevent developments that are unfavourable to health and well-being.	accompanying sustainability assessment checklist, which needs to set out how the scheme has addressed the key sustainability requirements/targets set out in policy and guidance.
1764	209	Alex	Trouton	NHS Southwark	We hope that the area can become a show case for exemplary and sustainable buildings and landscaping. Also that there will be commensurate improvements in the social infrastructure to accommodate the needs of an expanded population. In this respect it will be important to ensure that the NHS (Southwark Clinical Commissioning Group and GSTT Community Services) is informed, consulted and involved as necessary.	The SPD and other planning policy documents provide the framework for the provision of infrastructure to support development. The council are currently preparing our draft community infrastructure charging schedule and an updated section 106 SPD. This is being taken to Cabinet for agreement for consultation on 10 December 2013. It is appropriate to look at the provision of infrastructure at a borough-wide level through these dedicated documents rather than through the Blackfriars Road SPD. We will continue to engage with the NHS (Southwark Clinical Commissioning Group and GSTT Community Services)
1765	209	Alex	Trouton	NHS Southwark	It is encouraging that the section on implementation highlights the need to ensure effective and co-ordinated management of development. Big construction projects can bring disruption and inconvenience to people living and working in an area. This is particularly the case there are a number of different developments going on so it will be important to keep the cumulative impact in mind. The national Considerate Contractors Scheme has the potential to ameliorate this and we recommend that a copy of the checklist be made available on the Planning web pages so that people are able to see the overall standards that are expected from contractors working in their area and understand how to complain if	Noted. The SPD refers specifically to the Considerate Contractors Scheme.

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					standards are breached.	
1766	209	Alex	Trouton	NHS Southwark	Health Impact Assessment is required for large developments under the London Plan but this may not apply to all the developments which take place in the Blackfriars area. As the cumulative impact of development on the health and well-being of the people living in or using the area is likely to be substantial, we would like to see some references included in the SPD to help guide developers to achieve the maximum health gain for the population in their schemes. E.g. the Healthy Urban Development checklist: Watch Out for Health or the New York Active Design Guidelines. Linked to the issue of health impact is the extent to which inclusive/universal design principles are deployed across all the new developments and within the new public realm. It would be helpful if the SPD referenced authoritative sources such as UniversalDesign.com; the TCPA's worksheet in applying inclusive design principles or the NYC Guidebook to Accessibility and Universal Design	Our approach to requiring health impact assessments is borough-wide. We have set out in paragraph 5.52 of the Core Strategy that we will continue to follow London Plan policy 3.2 Improving health and addressing health inequalities and require health impact assessments.
1767	209	Alex	Trouton	NHS Southwark	These recommendations may be more widely applicable and perhaps consideration can be given to the development of a 'Healthy Planning' webpage with useful references/signposting to good quality and evidence based resources.	We are in the process of preparing our New Southwark Plan, which once adopted will replace the Core Strategy and saved Southwark Plan. As part of this work we are also looking at updating our website. We will look at providing appropriate links to useful documents etc as part of this process.
1768	1178			20 Blackfriars Road	Generally BL are very encouraged by the Council's commitment in preparing a vision for Blackfriars Road which is in the process of undergoing significant regeneration and which BL believe offers significant further regeneration opportunities. The draft SPD is welcomed as establishing the Borough's vision which includes potential for intensification, high quality landmark buildings and the strategic provision of offices and housing. Detailed comments are provided below which relate to the need for the Area's	Noted.

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					Opportunity Area (OA) designation to be recognised and specifically for residential development to be acknowledged as a valuable contributor towards the creation of mixed and sustainable communities.	
1769	1178			20 Blackfriars Road	BL welcome SPD2 'Mixed use town centre' which seeks to encourage the provision of a balanced mix of town centre uses to help enhance the commercial attractiveness of the Blackfriars Road area and the status and function of the wider Central Activities Zone. SPD2 is also welcomed for its support for "proposals for new hotels and other forms of visitor accommodation (C1) to ensure there is a good supply of accommodation for visitors and to contribute to a mix of uses and employment opportunities. Proposals should seek to maximise the opportunity to include ancillary facilities and activity along the lower and street level frontages." It is agreed that demand for hotel rooms in Southwark, in particular the north of the Borough will continue to grow with the enhancement of Southwark's and indeed the wider London cultural offer which will soon see the completion of the extension to the Tate Modern gallery to create more performance and exhibition space along with future development of the South Bank Centre.	Support noted
1770	1178			20 Blackfriars Road	BL welcome that a key driver in the SPD is to contribute to the creation of a sense of place and encourage a variety of activity by upgrading and enhancing the public realm within the SPD area which currently is very fragmented. Although in principle new public spaces should be provided by new development, which would help maintain its predominant boulevard character, there should be a recognition that many sites within the SPD are constrained and may not be able to offer substantial areas of public realm.	Noted. The SPD sets out general principles to improve the quality of public realm within the area. Site constraints and further levels of detail regarding specific sites would be assessed at the planning application stage.

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177 1	209	Alex	Trouton	NHS Southwark	BL note the point about public access to tall buildings however, they consider this requirement to be overly prescriptive, in particular, consideration needs to be made to points such as security issues associated with allowing access to upper floors which require considerable management. This would also impact significantly on the amount of usable floorspace as a result of the need to provide a dedicated core which would unduly constrain the final design.	This requirement is consistent with London Plan 7.7. The viability and feasibility of a publically accessible space would be assessed at planning application stage. The SPD has been updated to change the word "must" to "should".
177 2	379	c/o Agent		128-150 Blackfriars Road	Generally, the draft SPD is welcomed as establishing the Borough's vision for the Area, namely potential for intensification, high quality landmark buildings and the strategic provision of offices and housing. Detailed comments are provided below which relate to the need for the Area's Opportunity Area (OA) designation to be recognised and specifically for residential development to be acknowledged as a valuable contributor towards the creation of mixed and sustainable communities.	Noted.
177 3	379	c/o Agent		128-150 Blackfriars Road	Boundaries of the SPD area (page 5) Figure 2 notes the Waterloo and Elephant and Castle OAs but not the Bankside, Borough and London Bridge OA. The plan should be updated to reflect this in order to avoid any confusion.	Figure 1 shows the location of Blackfriars Road, and illustrates the surrounding opportunity areas at Waterloo and Elephant and Castle. It also shows the Bankside, Borough and London Bridge Opportunity Area. The Blackfriars Road SPD area falls mostly within the Bankside, Borough and London Bridge Opportunity Area with a small part lying within the Elephant and Castle Opportunity Area. This is made clear in the SPD - in figure 1 and in the text. Figure 1 has been updated to show the overlapping boundaries more clearly. Figure 2 simply shows the boundaries of the SPD area. The figure has been updated to remove reference to the opportunity areas to increase the focus on the actual boundary and to avoid any confusion.
177 4	379	c/o Agent		128-150 Blackfriars Road	Bankside and Borough (page 9) "Blackfriars Road will continue to have a mix of shops, services and offices servicing both a local wider need." There is no reference to housing being provided within the SPD Area here although it is listed as one of the Areas potential strengths on page 7 ("There is scope to	The SPD sets out that it provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core

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					<p>develop the strengths of the Area for strategic office provision as well as housing..."). It is suggested that this sentence is amended to include residential uses within the mix of Blackfriars Road as many applications coming forward within the past number of years for redevelopment on Blackfriars Road also include residential accommodation. These include for example, 1 Blackfriars and 20 Blackfriars Road and Kings Reach Tower. This comment is also made in respect of page 11 where the sentence is repeated. "There will be a range of building heights along Blackfriars Road, with the tallest buildings at the north end of the road, signifying the gateway to Central London and the gateway to Southwark. There will also be taller buildings at the important locations of Southwark Tube Station and on the main junction of St George's Circus" This aim is supported and the opportunity for tall buildings in these locations will provide a unique opportunity providing stimulus for regeneration and boosting the local economy. There is an opportunity here to expand on why a tall building is appropriate at St George's Circus as the Site is located at the confluence of major routes at St Georges Circus, which links Blackfriars Bridge, Westminster Bridge, Lambeth Bridge, London Bridge and Elephant and Castle. The location of a tall building would mark the southern end of Blackfriars Road and the Site is at a hinge point midway along the spine of regeneration between the northern end of Blackfriars Road and Elephant and Castle. It could also be reiterated that a tall building would need to comply with Policy 3.20 of the Southwark Plan which sets out criteria which need to be met to justify a tall building: i. Makes a positive contribution to the landscape; and ii. Is located at a point of landmark significance; and iii. Is of the highest architectural standard; and iv. Relates</p>	<p>Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. There is nothing additional that needs further specific guidance for Blackfriars Road. The vision already refers to housing development. Housing will be encouraged on appropriate sites. In order to make this clearer, we have updated SPD 2: Mixed use town centre to include residential development as one of the uses to be encouraged alongside the provision of a mixture of new town centre uses. The fact box on town centre uses has also been updated in accordance with the National Planning Policy Framework definition to make it clear that residential development is not a main town centre use but it can play an important role in ensuring the vitality of town centres. We have also inserted a new appendix (appendix A) listing the key borough wide Southwark planning policies and supplementary planning guidance to make it clearer that these policies need to be read alongside the Blackfriars Road SPD. Section 1 of the SPD has been updated to refer to this new appendix.</p>

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					well to its surroundings, particularly at street level; and v. Contributes positively to the London skyline as a whole, consolidating a cluster within that skyline or providing key focus within views.	
1775	379	c/o Agent		128-150 Blackfriars Road	<p>SPD 1 Business space (page 14) "We will encourage the generation of new jobs and businesses in the Blackfriars Road area to help consolidate and expand the existing business service cluster and reinforce the area as a strategic office employment location" "Requiring existing business floorspace (B1) to be retained or replaced, unless an exception can be demonstrated in accordance with our borough wide employment policies." Although strategic office uses in Blackfriars Road are supported BL object to this policy as it effectively reduces support for other types of development, namely residential. The SPD area is within the Central Activities Zone (CAZ) as shown on Figure 1 on page 4. The associated London Plan CAZ policies do not protect or prioritise office floorspace, they simply identify it as an appropriate land use (policies 2.10, 2.11 and 2.12). The policy fails to recognise residential development as promoted through the OA and the CAZ in the London Plan (policies 2.10, 2.11, 2.12 and 2.13) and particularly large residential developments which are promoted in areas of high public transport accessibility (Policy 3.7). The Bankside, Borough and London Bridge Opportunity Area has a target of 1,900 new homes while the Elephant and Castle Opportunity Area has a target of 4,000 net new homes and this is further developed by the London Plan which considers OA targets to be a minimum which should be exceeded. The Blackfriars Road SPD should make reference to these targets. The London Plan contains housing targets for all boroughs and supports increased housing development across London. Southwark's</p>	<p>It is important for the SPD guidance to be read in conjunction with adopted planning policy. This is made clear in the SPD. The Core Strategy sets out the borough's strategy for housing and the targets over the plan period, which include the target for the opportunity area. We have amended SPD 2 to make it clear that space for town centre uses should be developed alongside both residential development and also business uses. The guidance set out in the SPD supports borough wide policies. The requirement to retain or replace existing business space is consistent with borough-wide policies. The policy requirement for the replacement of business floorspace is justified by the council's evidence base which points to the need to protect and intensify employment land and business floorspace over the plan period. Core Strategy policy 10 and saved Southwark Plan policy 1.4 require applicants to demonstrate the loss of business floorspace (B1, B2 and B8) against a range of exception criteria where the site falls within a range of locations, which include (amongst others) the CAZ. Land outside these locations can be released for other uses. This strategy ensures the retention of existing business floorspace where this is appropriate, to ensure there continues to be space available for established businesses to move into the area and for start up businesses to establish themselves. The council considers that it is reasonable to expect applicants to demonstrate that in the areas where business floorspace is protected that there is a lack of demand or viability, or physical and/or environmental constraints which preclude re-provision or an uplift of employment space (Southwark Plan Policy 1.4). It is considered that this is consistent with paragraph 21 and 22 of the NPPF. Southwark CAZ was also exempted from the government's recent change to the General Permitted Development Order to allow office buildings to convert to residential. The CAZ has been recognised by the government as a nationally significant area of economic activity. These new permitted development rights do not apply in the CAZ. We also encourage the development of other</p>

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					<p>housing target seeks to provide 20,050 new dwellings over the period 2011 to 2021 (Table 3.1). The pressing need for additional housing in London is therefore not acknowledged nor is the general, wider need to create mixed and sustainable communities as per the National Planning Policy Framework (NPPF), 2012 which promotes the delivery of a wide range of high quality homes. BL consider that reference should be made within the SPD to the fact that both Hill House and Erlang House are large floor plate office buildings which do not meet market requirements without major investment which is not viable in this location. It is recognised that while some areas of the Southbank including the north end of Blackfriars Road are viable Grade A office locations other areas are not. There are three distinct bands along Blackfriars Road from St Georges Circus up to the River. The southern most band reaching down to Elephant and Castle does not fall within a location where there would be a demand for Grade A accommodation or indeed larger floor plate offices. While offices this far south might have succeeded historically, it is considered that they would not succeed now. A review of employment uses has been undertaken by EA Shaw for BL in relation to 128-150 Blackfriars Road. They identified the optimum approach to employment provision on the site was to provide a mix of retail and flexible Class B1 office space targeted at SME's. Retail use placed at ground floor would create footfall and activate frontages. SME office space could meet a local market demand which is also identified with the draft BBLB SPD.</p>	<p>employment generating town centre uses such as cultural/community, retail and leisure to be provided alongside B1 uses. We will be considering development site allocations through the preparation of the New Southwark Plan. The SPD identifies possible development opportunities, some of which may be complete redevelopment, and some may be more minor changes or improvements.</p>
1776	379	c/o Agent		128-150 Blackfriars Road	<p>Fact box: Town centre uses (page 16) "Residential use is appropriate in town centres but is not a town centre use for the purpose of Southwark's Local Plan." This is not consistent with the NPPF which states that LPA's should "recognise that residential development can</p>	<p>We have amended the fact box to set out further clarification. The definition of town centre uses now reflects the NPPF definition of main town centre uses. We have also made clearer that whilst residential development can play an important role in ensuring the vitality of town centres, is not a main town centre use when planning for competitive</p>

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					play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites" (paragraph 23).	town centres which need to provide customer choice and a diverse retail offer and experience in the context of Southwark's Local Plan.
1777	379	c/o Agent		128-150 Blackfriars Road	SPD 3 Public realm and open space (page 20) "Additional principles for St George's Circus To enhance St George's Circus, public realm schemes should: • Focus on reinforcing the character and geometry of the Circus. • Increase the area of usable pedestrian space around the perimeter and at the centre of the Circus. • Enhance the setting of the conservation area, listed buildings and the listed obelisk. • Contribute to the importance of the Circus as a strategic gateway south to Elephant and Castle, and north to Blackfriars Road and onwards to the City." The SPD recognises that St George's Circus makes an important contribution to Blackfriars Road. The current application for 128-150 Blackfriars Road recognises the importance of the Circus and seeks to improve it by undertaking physical works on and around the site and by contributing towards physical improvements to the Circus in the form of S.106 planning obligations.	Noted.
1778	379	c/o Agent		128-150 Blackfriars Road	SPD 5 Building heights (page 27) BL notes and welcomes the Council's acceptance that 128-150 Blackfriars Road is an appropriate site for a tall building "A tall building, of a height of up to 70 metres should provide a focal point at St. George's Circus. Tall buildings must be set back from the Circus". BL however consider it to be entirely inappropriate to prescribe a height of 'up to 70m' for the site. No evidence base to substantiate this assumption has been undertaken in the form of detailed urban analysis, heritage testing or assessment of views. Instead, it would be appropriate to note the potential for a tall building at 128-150 Blackfriars Road / St	The SPD sets out clear building heights guidance. The policy approach within the SPD is considered to be consistent with the NPPF (2012), the London Plan (2011), the Core Strategy (2011) and the saved Southwark Plan (2007), taking into account changes in the surrounding context since developing the Core Strategy vision in 2009/2010. The London Plan, Core Strategy and saved Southwark Plan form the development plan for Southwark, with the NPPF setting out national guidance. The development plan sets out the policies for tall buildings. Key policies are: London Plan policy 7.7 which identifies that tall and larger buildings should generally be limited to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. Blackfriars Road lies within the Central Activities Zone, is an opportunity area and

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					<p>George's Circus which represents a step down in height from the very tall buildings at the north end of Blackfriars Road and at Elephant and Castle which are up to mid 40 storeys in height. The appropriate height should then be determined through a planning application process which would fully consider the quality of design and associated impacts in line with the criteria set out within Policy 3.20 of the Southwark Plan. "Buildings which are significantly higher than 50 metres must demonstrate that they contribute positively to London's skyline, when viewed locally and in more distant views, particularly on the river front and that they make exceptional contribution to the regeneration of the area." "All tall buildings over 25 metres / 30 metres must: Demonstrate an exemplary standard of design, provide high quality accommodation which significantly exceeds minimum space standards and promote housing choice by providing a mix of unit types." Achieving high quality urban design is a key planning objective throughout all levels of policy and a key driver for the 128-150 Blackfriars Road site which is partly within a Conservation Area and therefore subject to more rigorous standards of design. This objective is therefore supported and the potential for tall building and high quality architecture to act as a catalyst for wider regeneration is recognised. With the above text, it is considered that reference should be included to exceeding the minimum dwelling size standards as set out within the London Plan.</p>	<p>a town centre with good access to public transport. Core Strategy strategic policy 12 requires tall buildings to have an exemplary standard of design and identifies locations where tall buildings could go. The Core Strategy vision for Bankside and Borough refers to the council setting out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework. Saved Southwark Plan policy 3.20 sets out criteria for considering applications for tall buildings and applies across the borough. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABI and English Heritage "Guidance on Tall Buildings", 2007. This evidence base reveals that heights above those outlined in the guidance would have an adverse impact on heritage assets, amenity or local character. The Residential Design Standards SPD sets out minimum space requirements for the borough. The SPD provides further guidance to existing planning policies in the London Plan, our Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and so the SPD must be read alongside our other planning documents</p>
1779	379	c/o Agent		128-150 Blackfriars Road	<p>SPD 5 Building heights (page 28) "In addition to the above criteria, buildings which are significantly higher than 70 metres must: Include a publicly accessible area on upper floors where feasible in the tallest buildings in the north of Blackfriars Road." This requirement is considered to be overly prescriptive, in</p>	<p>This requirement is consistent with London Plan 7.7. The viability and feasibility of a publically accessible space would be assessed at planning application stage. The SPD has been updated to change the word "must" to "should".</p>

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					particular, consideration needs to be made to points such as security issues associated with allowing access to upper floors which require considerable management. This would also impact significantly on the amount of usable floorspace as a result of the need to provide a dedicated core which would unduly constrain the final design. We therefore object to the proposed required provision of public areas at upper levels. Notwithstanding this, BL do support communal access for residents within tall buildings of above 70m, as provided at Canada Water and proposed at 128-150 Blackfriars Road	
1780	379	c/o Agent		128-150 Blackfriars Road	Building heights (page 29, paragraph 3.33) "The amount of public space at the base of the building should relate to its height" Although there is a relationship between height and the amount of public space at the base of a building this statement is queried because it is also affected by other factors such as the constraints of the site and the context of surrounding buildings and public realm. It is not always possible to provide a significant amount of public space at the base of every tall building, however, this may be consistent with the character of an area or complemented by open spaces available nearby.	Development proposals would be assessed at planning application stage.
1781	907	c/o Agent		Development Securities Plc	Generally, the draft SPD is welcomed as establishing the Borough's vision for the Area, namely potential for intensification, high quality landmark buildings and the strategic provision of offices and housing. Detailed comments are provided below which relate to the need for the Area's Opportunity Area (OA) designation to be recognised and specifically for residential development to be acknowledged as a valuable contributor towards the creation of mixed and sustainable communities.	The SPD area's designation within the Bankside, Borough and London Bridge opportunity area is recognised throughout the SPD.
1782	907	c/o Agent		Development	Boundaries of the SPD area (page 5) Figure 2 notes the Waterloo and Elephant and Castle OAs but not the	Figure 1 shows the location of Blackfriars Road, and illustrates the surrounding opportunity areas at Waterloo and Elephant and Castle. It

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				Securities Plc	Bankside, Borough and London Bridge OA. The plan should be updated to reflect this in order to avoid any confusion.	also shows the Bankside, Borough and London Bridge Opportunity Area. The Blackfriars Road SPD area falls mostly within the Bankside, Borough and London Bridge Opportunity Area with a small part lying within the Elephant and Castle Opportunity Area. This is made clear in the SPD - in figure 1 and in the text. Figure 1 has been updated to show the overlapping boundaries more clearly. Figure 2 simply shows the boundaries of the SPD area. The figure has been updated to remove reference to the opportunity areas to increase the focus on the actual boundary and to avoid any confusion.
1783	907	c/o Agent		Development Securities Plc	Bankside and Borough (page 9) "Blackfriars Road will continue to have a mix of shops, services and offices servicing both a local wider need." There is no reference to housing being provided within the SPD Area here although it is listed as one of the Areas potential strengths on page 7 ("There is scope to develop the strengths of the Area for strategic office provision as well as housing..."). It is suggested that this sentence is amended to include residential uses within the mix of Blackfriars Road as many applications coming forward within the past number of years for redevelopment on Blackfriars Road also include residential accommodation. These include for example 1 Blackfriars Road and Kings Reach This comment is also made in respect of page 11 where the sentence is repeated. "There will be a range of building heights along Blackfriars Road, with the tallest buildings at the north end of the road, signifying the gateway to Central London and the gateway to Southwark. There will also be taller buildings at the important locations of Southwark Tube Station and on the main junction of St George's Circus" This aim is supported and the opportunity for tall buildings in these locations will provide a unique opportunity providing stimulus for regeneration and boosting the local economy. There is an opportunity here to expand on why a tall building is appropriate at the Southwark	With regards to the point on housing, the SPD sets out that the SPD provides further guidance to existing planning policies in the Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and the SPD must be read alongside other planning documents. Housing is not given its own section within the SPD because the borough-wide housing policies and guidance already cover housing adequately. This includes policies in the Core Strategy and saved Southwark Plan and SPDs on affordable housing and residential design standards. There is nothing additional that needs further specific guidance for Blackfriars Road. The vision already refers to housing development. Housing will be encouraged on appropriate sites. In order to make this clearer, we have updated SPD 2: Mixed use town centre to include residential development as one of the uses to be encouraged alongside the provision of a mixture of new town centre uses. The fact box on town centre uses has also been updated in accordance with the National Planning Policy Framework definition to make it clear that residential development is not a main town centre use but it can play an important role in ensuring the vitality of town centres. Support noted with regards to the building strategy. However, it is not appropriate to include more detail within the vision on the suitability of why Southwark Tube Station node is suitable for a tall building. This detail is provided as part of SPD 5: Building heights and within the urban design study.

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					Tube Site as this represents a key transport node in the London Borough of Southwark and as the site marks an important landmark location at the corner on The Cut and Blackfriars Road. The location of a tall building would also mark a mid section along Blackfriars Road, between the proposed tall buildings that mark the north end of Blackfriars Road and the gateway to the City of London and the south end of Blackfriars Road at St George's Circus which is also identified as a location for a tall building.	
1784	907	c/o Agent		Development Securities Plc	SPD 1 Business space (page 14) "We will encourage the generation of new jobs and businesses in the Blackfriars Road area to help consolidate and expand the existing business service cluster and reinforce the area as a strategic office employment location" "Requiring existing business floorspace (B1) to be retained or replaced, unless an exception can be demonstrated in accordance with our borough wide employment policies." Although strategic office uses in Blackfriars Road are supported we object to this policy as it effectively reduces support for other types of development, namely residential. The SPD area is within the Central Activities Zone (CAZ) as shown on Figure 1 on page 4. The associated London Plan CAZ policies do not protect or prioritise office floorspace, they simply identify it as an appropriate land use (policies 2.10, 2.11 and 2.12). The policy fails to recognise residential development as promoted through the OA and the CAZ in the London Plan (policies 2.10, 2.11, 2.12 and 2.13) and particularly large residential developments which are promoted in areas of high public transport accessibility (Policy 3.7). The Bankside, Borough and London Bridge Opportunity Area has a target of 1,900 new homes while the Elephant and Castle Opportunity Area has a target of 4,000 net new homes and this is further	It is important for the SPD guidance to be read in conjunction with both adopted planning policy. The Core Strategy sets out the borough's strategy for housing and the targets over the plan period, which include the target for the opportunity area. The guidance set out in the SPD supports borough wide policies. The requirement to retain or replace existing business space is consistent with borough-wide policies. The policy requirement for the replacement of business floorspace is justified by the council's evidence base which points to the need to protect and intensify employment land and business floorspace over the plan period. Core Strategy policy 10 and saved Southwark Plan policy 1.4 require applicants to demonstrate the loss of business floorspace (B1, B2 and B8) against a range of exception criteria where the site falls within a range of locations, which include (amongst others) the CAZ. Land outside these locations can be released for other uses. This strategy ensures the retention of existing business floorspace where this is appropriate, to ensure there continues to be space available for established businesses to move into the area and for start up businesses to establish themselves. The council considers that it is reasonable to expect applicants to demonstrate that in the areas where business floorspace is protected that there is a lack of demand or viability, or physical and/or environmental constraints which preclude re-provision or an uplift of employment space (Southwark Plan Policy 1.4). It is considered that this is consistent with paragraph 21 of the NPPF. Southwark CAZ was also exempted from the government's recent change to the General Permitted Development Order to allow office buildings to convert to

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					<p>developed by the London Plan which considers OA targets to be a minimum which should be exceeded. The Blackfriars Road SPD should make reference to these targets. The London Plan contains housing targets for all boroughs and supports increased housing development across London. Southwark's housing target seeks to provide 20,050 new dwellings over the period 2011 to 2021 (Table 3.1). The pressing need for additional housing in London is therefore not acknowledged nor is the general, wider need to create mixed and sustainable communities as per the National Planning Policy Framework (NPPF), 2012 which promotes the delivery of a wide range of high quality homes. Development Securities consider that reference should be made within the SPD that while some areas of the Southbank including the north end of Blackfriars Road are viable Grade A office locations, there are potentially three distinct bands, from St Georges Circus up to the river. The southern most band reaching down to Elephant and Castle does not fall within the location where there would be a demand for Grade A accommodation or indeed larger floor plate offices and it is considered that smaller start up business units may be appropriate with a mix of other uses such as residential and retail. The area to the south of the railway line (mid way point along Blackfriars Road) offers the potential for office provision but, also together with other town centre uses and residential use whereas the area to the north of Blackfriars Road has proven to be an attractive location for office development and this can be seen through the redevelopment of Sea Containers House and 240 Blackfriars Road where work is currently taking place on site.</p>	<p>residential. The CAZ has been recognised by the government as a nationally significant area of economic activity. These new permitted development rights do not apply in the CAZ. The supporting text encourages small office/studio/workshops space in the southern part of the SPD area, to help consolidate the existing cluster of creative sector businesses which have chosen to locate in the area. We have also made an amendment We also encourage the development of other employment generating town centre uses such as cultural/community, retail and leisure to be provided alongside B1 uses. We will be considering development site allocations through the preparation of the New Southwark Plan. The SPD identifies possible development opportunities, some of which may be complete redevelopment, and some may be more minor changes or improvements.</p>
178 5	907	c/o Agent		Develo pment	Fact box: Town centre uses (page 16) "Residential use is appropriate in town centres but is not a town centre	We have amended the fact box to set out further clarification. The definition of town centre uses now reflects the NPPF definition of main

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				Securities Plc	use for the purpose of Southwark's Local Plan." This is not consistent with the NPPF which states that LPA's should "recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites" (paragraph 23).	town centre uses. We have also made clearer that whilst residential development can play an important role in ensuring the vitality of town centres, is not a main town centre use when planning for competitive town centres which need to provide customer choice and a diverse retail offer and experience in the context of Southwark's Local Plan
1786	907	c/o Agent		Development Securities Plc	SPD 3 Public realm and open space (page 19-20) The general principles as set out under SPD 3 are generally welcomed and indeed new developments should indeed try to promote active ground floor use however, it should be recognised that not all sites will be able to deliver a "network of generous, meaningful and personable public spaces due to the constrained nature of many of the sites within the SPD area.	Relevant development proposals would be assessed at planning application stage.
1787	907	c/o Agent		Development Securities Plc	SPD 5 Building heights (page 27) Development Securities notes and welcomes the Council's acceptance that Southwark Tube is an appropriate site for a tall building "A tall building, of a height of up to 70 metres should provide a focal point at Southwark tube station". Development Securities however question the appropriateness of including a prescriptive height of up to 70m as being appropriate for the site. It is not considered appropriate to cap the height of a tall building but instead note that Southwark Tube represents a step down in height from the very tall buildings at the north end of Blackfriars Road and at Elephant and Castle which are up to mid 40 storeys in height. The appropriateness of the height would then be tested as part of pre-application discussions with the Council and a planning application which would include a detailed analysis of townscape and design. "Buildings which are significantly higher than 50 metres must demonstrate that they contribute positively to London's skyline, when viewed locally and in more distant views, particularly on the river front and	The SPD sets out clear building heights guidance. The policy approach within the SPD is considered to be consistent with the NPPF (2012), the London Plan (2011), the Core Strategy (2011) and the saved Southwark Plan (2007), taking into account changes in the surrounding context since developing the Core Strategy vision in 2009/2010. The London Plan, Core Strategy and saved Southwark Plan form the development plan for Southwark, with the NPPF setting out national guidance. The development plan sets out the policies for tall buildings. Key policies are: London Plan policy 7.7 which identifies that tall and larger buildings should generally be limited to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. Blackfriars Road lies within the Central Activities Zone, is an opportunity area and a town centre with good access to public transport. Core Strategy strategic policy 12 requires tall buildings to have an exemplary standard of design and identifies locations where tall buildings could go. The Core Strategy vision for Bankside and Borough refers to the council setting out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework. Saved Southwark Plan policy 3.20 sets out criteria for considering applications for tall buildings and

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					that they make exceptional contribution to the regeneration of the area." "All tall buildings over 25 metres / 30 metres must: Demonstrate an exemplary standard of design, provide high quality accommodation which significantly exceeds minimum space standards and promote housing choice by providing a mix of unit types." Achieving high quality urban design is a key planning objective throughout all levels of policy and a key driver for delivering height along Blackfriars Road. This objective is therefore supported and the potential for tall building and high quality architecture to act as a catalyst for wider regeneration is recognised.	applies across the borough. The approach is supported by our evidence base including the Blackfriars Road Urban Design Study which has been prepared in accordance with CABE and English Heritage "Guidance on Tall Buildings", 2007. This evidence base reveals that heights above those outlined in the guidance would have an adverse impact on heritage assets, amenity or local character. The Residential Design Standards SPD sets out minimum space requirements for the borough. The SPD provides further guidance to existing planning policies in the London Plan, our Core Strategy and saved Southwark Plan. It does not repeat borough wide policies and so the SPD must be read alongside our other planning documents
1788	907	c/o Agent		Development Securities Plc	SPD 5 Building heights (page 28) "In addition to the above criteria, buildings which are significantly higher than 70 metres must: Include a publicly accessible area on upper floors where feasible in the tallest buildings in the north of Blackfriars Road." This requirement is considered to be overly prescriptive, in particular, consideration needs to be made to points such as security issues associated with allowing access to upper floors which require considerable management. This would also impact significantly on the amount of usable floorspace as a result of the need to provide a dedicated core which would unduly constrain the final design. We therefore object to the proposed required provision of public areas at upper levels.	This requirement is consistent with London Plan 7.7. The viability and feasibility of a publically accessible space would be assessed at planning application stage. The SPD has been updated to change the word "must" to "should".
1789	907	c/o Agent		Development Securities Plc	Building heights (page 29, paragraph 3.33) "The amount of public space at the base of the building should relate to its height" Although there is a relationship between height and the amount of public space at the base of a building this statement is queried because it is also affected by other factors such as the constraints of the site and the context of	Noted. This matter would be assessed at the planning application stage.

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					surrounding buildings and public realm. It is not always possible to provide a significant amount of public space at the base of every tall building, however, this may be consistent with the character of an area or complemented by open spaces available nearby.	