

APPENDIX I - PART 4 (APPENDIX 12)

Appendix 12: Table of representations received at publication/submission stage

Organisation	Surname	First Name	Objector Ref
Port of London Authority			119
	Squires	Amanda	123
Thames Water Utilities			127
	Adenwalla	Pauline	178
	Hewitt	Jerry	191
Greater London Authority			196
King's College			248
	Quinton Chelley	Jennifer	491
Environment Agency			643
Sport England			795
Transport for London			842
Rotherhithe and Surrey Docks ward councillors			1074
	Warren	John	1098
British Land			1118
	Holder	Tom	1126
Friends of Russia Dock Woodland			1295
	Fearnley	James	1296
Albion Primary School Governors			1297
What's on in Rotherhithe Group			1298
	Robinson	Beverley	1299

Appendix 12: Table of representations received at publication/submission stage

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
119	722	Part 2	<p>It is noted that 2.1.5 gives details of tube/railway/bus stations but no reference is made to river infrastructure such as the Hilton Docklands Nelson pair which provides a cross river service to Canary Wharf.</p> <p>Given the riparian nature of the borough and London Plan policy seeking to increase the use of the Blue Ribbon network for passenger and tourist services it is considered that 2.1.5 should be expanded to include details of existing piers and the River Action Plan's desire for better piers.</p>	<p>While the adopted AAP was found to be sound without the reference to the existing piers, the council is happy to propose the insertion of text regarding the piers as a minor modification to the RCWAAP.</p>
123	750	Policy 30	<p>I would like to see improved access from N Rotherhithe (station area) to Canada Water shops, library, tube and buses.</p> <p>Better access would particularly facilitate children from Albion Street Primary School accessing their public library---their present route is more like an assault course.</p> <p>This would also provide improved access South to North which would increase footfall to Albion Street area (churches, Brunel Museum, Time and Talents, St Olavs Busines Centre, Sands Studios, new build on old library site and street market which starts in June). There are employment & retail opportunities here---if only people could get to them more easily.</p>	<p>Policy 30 highlights the council's aim to improve links between Albion Street and Canada Water. The links are also identified in Figures 14 and 7.</p> <p>This approach was considered sound by the planning inspector following the examination on the adopted AAP. It is not considered that there has been a change in circumstances which would undermine the council's approach.</p> <p>In paragraph 57 of his report, the inspector stated that:</p> <p>"The AAP, specifically through Policies 6 and 7, identifies that improvements will be made to walking and cycling routes in addition to improvements to public transport. The Council's approach to alternative forms of transport is further clarified within its Sustainable Transport SPD14. Whilst Figure 7 of the AAP is indicative with regard to such improvements, there is sufficient clarity on the intentions of the AAP to enable the delivery of necessary works in conjunction with development proposals. Such details include the objectives of securing improved east-west routes and the aspiration to obtain a better route between Canada Quays Station and Albion Street to the north."</p>
127	753	General	<p>General Comments</p> <p>Thames Water have previously raised some concerns over water and wastewater network capacity in the area during earlier consultations on the Canada Water Area Action Plan.</p> <p>It is noted that the revisions to the AAP set out on page 60 increase the estimated number of homes that could be provided within the AAP area. The existing text included in the Area Action Plan in sections 6.4.12 and 6.4.13 is supported and will be essential to ensure that any development is accompanied by any necessary upgrades to water and wastewater infrastructure.</p> <p>To assist with ensuring that any necessary water or wastewater upgrade requirements are identified at an early stage developers are encouraged to contact Thames Water to discuss water and wastewater infrastructure requirements and identify how these will be delivered prior to the occupation of development.</p>	<p>Revisions were made to the adopted plan to accommodate Thames Water's desire to ensure that the council shares information with Thames Water and that developers contact Thames Water (refer to para. 6.4.12 of RCWAAP).</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
178	833	Policy 20	Housing Associations and other affordable home providers should be ensure that they and their tenants are fully aware of the contractual arrangements and costings policies regarding SDHA.	<p>The council's approach in policy 20 was considered sound by the planning inspector following the examination on the adopted AAP. It is not considered that there has been a change in circumstances which would undermine the council's approach.</p> <p>While the council would encourage Housing Associations to be open and transparent with their tenants, this is a matter for their consideration rather than for a development plan.</p>
178	834	Policy 29	<ul style="list-style-type: none"> •Policy 29 is misleading. As such there is no new – meaning additional – Health Provision within the core area to meet the needs of the increased and continuing to increase population. •A Health Centre is nearing completion at Downtown. It is a replacement Health Centre for the one that has always been on the Downtown site. Para 4.7.20 •There are plans to re locate the existing Albion Street Health Centre in the new build on the former library site. However a new build Albion Street Health Centre will not satisfy the criteria of being highly accessible and close to public transport links unless the Canada Water / Albion Street links are dramatically improved. Vide Policy 30 •Policy 29 must reflect the need for additional whole community health provision on the Harmsworth Quays site. HQ site is central to the area and is well served by public transport. 	<p>Policy 29 states that the council will work with NHS Southwark to ensure that the need for health facilities is met and states that the preferred site for a new health facility is the core area. The need for health facilities will be kept under review as sites are developed. The policy would not exclude provision of a new or replacement facility on Albion Street, which is located in the core area.</p>
178	835	Policy 29a	<ul style="list-style-type: none"> •Policy 29a must ensure that a significant part of Harmsworth Quays site is used for the campus for a reputable higher education institution with exemplary credentials which will enhance the reputation of the area and provide professional long term employment 	<p>The policy aims to support proposals for higher education space.</p>

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
178	836	Policy 13	<p>•Opportunities to reflect heritage led regeneration must link with the need to ensure the area has appropriate infrastructure in terms of</p> <p>Adequate transport and river piers Infrastructure in terms of high speed broadband Signage and interpretation boards Hotels in a range of categories Cafes and restaurants attractive to locals and tourists and visitors to the wide range of events at the CW library</p> <p>•Need to have policies to reflect the significant historic anniversaries on the horizon and to enable the maximisation of the resulting tourist impact on the local economy.</p> <p>Para 4.4.9 / 10 should include many of the churches which are listed / tourist attractions in their own right and host a wide range of concerts.</p> <p>Para 4.4.17 needs strengthening in light of the Hilton being up for sale. A need to strengthen the mention of the YHA as the busiest / largest YHA in UK – significant employer and community player.</p> <p>Para 4.4.14 It is not only the Norwegian and Finnish Churches it is also their cultural centres. They host numerous events, are significant employers, Finland operates a large B & B etc.</p>	<p>The council considered and consulted on the potential for a new pier at St Mary's early in the process of preparing the adopted AAP (at issues and options stage). However the proposal was not taken forward. There were a number of reasons for it, including the presence of an existing pier at Cherry Gardens, which is close to the St Mary's area. A second pier was considered to be duplicating provision. Policy 7 on public transport states that the borough will work with TfL to improve public transport, including on the river. This would provide the flexibility to lobby for a new service in the future if the opportunity arises</p> <p>Paragraphs 4.4.10 and 4.4.11 make mention of the Mayflower and the significance of the docks in local history and policy 13 itself states that the council will use opportunities to promote heritage-led regeneration. This policy would provide a sufficient "hook" for promoting anniversaries on the horizon.</p> <p>Paragraph 4.4.10 makes mention of local churches.</p> <p>Policy 13 already states that the council would like to see provision of new hotel bed spaces. Mention of the Hilton Hotel and YHA is explicitly made in paragraph 4.4.7.</p> <p>Policy 13 was examined in 2011 and found to be sound. The council does not consider that there has been a change in circumstances that necessitate further changes to the policy.</p>
178	837	Policy 16	<p>•Create strong physical and visual links between the Canada Water basin, the shopping centre and Lower Road and ALBION STREET and GREENLAND DOCK AND RUSSIA DOCK WOODLAND.</p>	<p>The policy (policy 16) relates to town centre development and locations within the town centre. The council considers it would be confusing to refer to Greenland Dock and Albion Street in that context.</p> <p>Policy 30 states very clearly that the council would like to promote between routes between Albion Street and the town centre.</p> <p>Policy 14 states that the council would like to strengthen links between the town centre and Greenland Dock, Russia Dock Woodland and other open spaces.</p> <p>The council's view is that these links are adequately emphasised in other policies in the plan.</p>

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
178	838	Policy 19	<ul style="list-style-type: none"> •Children (0-8years) Play provision within new residential developments provided by S106 / CIL should have very clearly defined ongoing maintenance and H & S responsibilities and publically stated criteria for usage and opening hours. 'New' development management companies are sometimes confused regarding the levy of service charges for a public childrens playground. •There is a need for free of charge areas for spontaneous play for 9 – 14 year olds to address the impact the lack of provision in the area for the age group has on anti social behaviour. The very popular outdoor table tennis provision by Decathlon will disappear as a consequence of their re development. There is a need for a formal provision of such spontaneous and casual facilities together with skate boarding, chess as well as table tennis. 	<p>Details regarding hours of use, maintenance and H&S responsibilities for play facilities are too detailed to be covered by a development plan. The Mayor of London provides more detail on play facilities in his SPG on Shaping Neighbourhoods: Play and Informal Recreation, 2012. Proposals for new play provision should follow the guidance set out in the SPG.</p> <p>Our strategy for youth spaces is to co-locate these where possible with other services, including schools. Our approach is set out in paragraphs 6.4.15-6.4.16 of the AAP. Examples of this approach are the Canada Water library which provides exhibition and performance space and a venue for Southwark's Youth Forum and the facilities at the Dockland Settlement which provides a range of sports and community facilities for shared use with Southwark Youth Services.</p> <p>In Figure 11 we show youth spaces which are suitable for older children and Neighbourhood spaces are suitable for all ages.</p>

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
178	839	Policy 18	<ul style="list-style-type: none"> •Include protection for the 'Park with no name' (between Blick House and City Business Centre), Irwell Green, St Olavs Square, the former Civic Square in Albion Street and Commercial Wharf. 	<p>Space with no name:</p> <p>The council considers it too late in the process of revising the AAP to protect this space, especially as the proposal has not been subject to any consultation. The issue can be reviewed through the preparation of the local plan.</p> <p>Irwell Green:</p> <p>Irwell Green is housing amenity land. The council's approach is not to protect housing amenity land. The reasons are set out below:</p> <p>Housing amenity land</p> <p>Our approach is consistent with our Open Space Strategy adopted in January 2013.</p> <p>Both the Open Space Strategy and the Canada Water Area Action Plan recognise that amenity spaces are highly valued by the local community. The Open Space Strategy emphasises the importance of amenity spaces in enabling informal recreation close to residential areas and their potential as a biodiversity and community gardening resource.</p> <p>In preparing the Open Space Strategy we audited a number of amenity spaces and found that generally their quality was below that of the borough's parks. This was also reflected in the perceptions of residents contacted in the Residents' Survey carried out to inform the strategy. In the light of this, the strategy states that we will work with registered providers and other partners to identify opportunities to improve the role and quality of amenity spaces. CGS is a good example of a programme which has helped secure small scale improvements which encourage a range of activities including food growing, nature conservation and recreation.</p> <p>Of course it is also important that provision is made for good quality amenity space in new developments. Our policies in the Southwark Plan, Core Strategy and Residential Design Standards SPD, which require provision of private amenity space for family homes, communal amenity space and children's play facilities in all residential developments, aim to achieve this. The Core Strategy requires developers to improve the overall greenness of development sites and our urban design policies to help preserve amenity spaces which are an integral part of good quality townscapes.</p> <p>We consider that these policies will be more effective in securing good quality amenity space than simply protecting all existing amenity space or applying a per capita standard across the borough. The value of this approach at a neighbourhood level has been reflected in the Aylesbury AAP and Elephant and Castle SPD . Both of these documents aim to ensure that good mix of private and public amenity space is made, while also facilitating</p>

the regeneration of the Aylesbury and Heygate estates. The criteria for protection of open space agreed in the Southwark Plan explicitly exclude housing amenity areas.

St Olav's Square and the squares in Albion Street and Commercial Wharf are public realm. Generally the council's approach has been not to protect public realm using open space policies. For example the Canada water plaza is not a protected open space and neither is the public realm along the river (for example outside Tate Modern.). However there are other policies in Southwark's Local Plan which relate to such spaces and which are likely to be more effective in assessing and preserving where appropriate the quality of those spaces and their amenity function. Saved policy 3.13 in the Southwark Plan requires proposals to consider impacts of development on streetscape, townscape and landscape. It states that proposals must have regard to the local context and make a positive contribution to the character of the area. Using this policy, the council would take account of the contribution which a space makes to the character of an area and its value. In addition , saved Southwark Plan policy 3.29 requires development in the Thames Policy area to integrate into the public realm, provide an appropriate mix of uses, including open space and provide inclusive access to the waterside. This policy would apply to sites such as Commercial Wharf.

Object ref.	Rep ref.	Policy	Details of Representation	Officer Response to Representation
178	840	Policy 8	<ul style="list-style-type: none"> •The evidence to support the reintroduction of two way traffic on Lower Road relieving the almost continuous grid lock in the area is questionable. •There is no evidence that the LBS multi modal study has taken account in the mega developments in Lewisham and Greenwich which will feed into Evelyn Street and Lower Road. •There is a need for more robust policies to address the current Jamaica Road / Lower Road grid lock and have sufficient capacity to accommodate the numerous mega developments in the pipeline at Canada Water. •Restricting car ownership in the new developments has a series of consequences. As does a disproportionate focus on cycle lanes vis a vis an ageing population. The impact of such policies on traffic is questionable. Internet delivery vans and taxis frequent the new developments all day long. <p>Policy 10 needs to also consider the volume of internet delivery vehicles which visit so called 'car free' developments.</p> <ul style="list-style-type: none"> •There is a need to relocate the pedestrian crossing at Seven Islands and introduced a monitored yellow box to improve traffic flow. 	<p>The council considers that the transport strategy proposed in the AAP is robust.</p> <p>The Lower Road project aims to implement the transport improvements set out in the AAP by improving access to the Rotherhithe peninsula for local trip making in order to support development proposals. Traffic modelling is currently being undertaken by TfL in consultation with Southwark with proposals to be brought forward in late 2014. Alongside this work, proposals are being tested for the delivery of Cycle Superhighway Route 4, with the aspiration that this will run along Lower Road in both directions.</p> <p>The council has asked Lewisham to take account of cumulative development in the area in assessing planning applications. It should be noted that the Mayor of London has determined the largest application on Convoys Wharf.</p> <p>Supporting greater use of pedestrian and bikes is consistent with the council's Core Strategy and Transport Plan, as well as the London Plan.</p> <p>Core Strategy policy 2 requires major applications to submit transport assessments with applications. Such assessments need to take deliveries and taxi movements into account. Assessments need to show how impacts on the highway can be mitigated, through for example the use of green travel plans. Further information on transport assessments and green travel plans is set out in the council's Sustainable Transport SPD.</p> <p>As is noted above, TfL are expected to publish and consult on proposals for Lower Road and the cycle superhighway later in 2014.</p>
178	841	Policy 9	<ul style="list-style-type: none"> •□There is a need for short term car parking provision to support the sustainability of Lower Road and Albion Street Shops, the City Business City and the Health Centres. This should be a mixture of free for 1 hour, pay up to 2 hours and residential / business permits. •□There is a need for more disabled bays to support the aging population. •□There is a need to develop further policies and 'health' strategies to encourage people to walk / cycle / take the bus with their children to primary school. Vehicle congestion around primary schools at the start and end of the day is significant. <p>Para 4.3.24 needs to be amended to reflect the planning permission for Decathlon site.</p>	<p>There are over 2000 car parking spaces at Canada Water. The council does not agree that additional short term parking should be provided. Short stay and meter parking is available outside the shops and business premises on Albion Street, Lower Road, Neptune Street, Cope Street and Hawkstone Road and the council considers is sufficient.</p> <p>The car parking standards in the London Plan and the saved Southwark Plan set out requirements for blue badge parking for disabled users (London Plan policy 6.13).</p> <p>Paragraph 4.3.2 of the RCWAAP recognises the health benefits of encouraging people to walk and cycle. Paragraph 4.3.8 states that we also require green travel plans which are designed to boost cycling, walking and travel by public transport.</p> <p>The Decathlon Store remains in place and the permission has not been implemented. The council's view is that paragraph 4.3.24 is still relevant.</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
178	842	Policy 12	<ul style="list-style-type: none"> •The refurbishment of Seven Islands does not provide 'value for money' . The centre is in the wrong place and is not fit for purpose and is constantly being 'patched up'. •A new, state of the art public facility must be built on the Harmsworth Quays site. The residents of CW were promised a modern aqua centre in the Canada Water master plan. •The size of population, the health and well being of the community dictates that this be an urgent and vital need. •New sports facilities in schools and colleges – including Kings should it occupy part of the HQ site – are to be available outside school / college hours for the community at an affordable price. 	<p>Policy 12 indicates that the council will explore longer term opportunities to provide a new leisure centre. King's College have stated that they would also like to explore this. If it were provided by King's College the terms of use for Southwark residents would be set out in a section 106 agreement.</p>

- 178 843 CWAAP 25
- □ CW AAP 25 – Land in Roberts Close is now owned by British Land.
 - □ The land referred to abuts Russia Dock Woodland and the QWIE residential development and is immediately opposite Alfred Salter Primary School Sports area. It is therefore not appropriate that the land is designated residential. (Class 3 C – estimated 28 homes.)
 - □ Alfred Salter is a large fully inclusive primary school. It is a recognised centre of excellence for a range of children with complex special needs. The Mulberry / Kings development will impact on the school's out door areas. It is therefore not appropriate to allow buildings on the 4th side of the school compound as it will be over bearing for the children.
 - □ Uses should include D1 community – community allotments and / or playing fields for Alfred Salter and St Johns or a garden centre / nursery

The council will propose a minor modification relating to the site ownership.

The council considers the land is appropriate for residential development. It is separated from the school by a road and a scheme could be designed which ensures sufficient privacy for the school and which is not overbearing for the school. .

Community use is listed as an acceptable use for the site.

While the council recognises that there is a need for community use in the area, the council considers that the need can be met by the requirement to provide community use on other sites in the area, including the Quebec Industrial Estate, 24-28 Quebec Way, site CWAAP 24 (Harmsworth Quays, Site E, Mulberry Business Park and Surrey Quays Leisure Park), Downtown, CWAAP 9 (Shopping centre, overflow carparks and Decathlon site), Albion Primary school, Surrey Docks Farm and Docklands Settlement.

Several community facilities in the area have recently been provided or are under construction, including:

- A children's day nursery on the Quebec Industrial Estate site;
- Health facilities on Downtown;
- A new community centre at Docklands Settlement which provides a range of community and sports facilities including a multi-purpose sports hall, a gym, clubroom for shared use with Southwark Youth Services and general purpose space;
- The new library provides performance and exhibition space and a venue for Southwark's Youth Forum;
- Flexible community space within Maple Quays (Site A);
- The council has resolved to acquire the former Surrey Docks Stadium for use as a public park;
- The council has resolved to reinstate the St Pauls sports ground as a community football ground, with a new 3G astro turf pitch.
- The council has resolved to publish statutory notices in connection with the permanent expansion of Albion Primary School to accommodate 2 forms of entry. Southwark Plan policy 2.3 requires new school facilities to be made available for public use wherever possible.

The AAP policies on community facilities is set out in policy 27 which explains that the council's strategy is to locate local facilities together so that the services required by the community including, housing services, services for young people, health centres, community space and facilities for the police are provided in accessible locations in a way in which different facilities can complement and support each other. The new library and rebuilding of schools are examples of this approach.

With regard to open space provision, our open space strategy indicates that generally open space provision in the action area is good. There is 44ha of

public park space which equates to 1.53ha per 1,000 people. This is much higher than the borough-wide average of 0.91 ha per 1,000 people. Moreover, almost everyone in the action area lives within 400m of a park. Public park provision will be increased by the addition of Surrey Docks Stadium referred to above. We recognise that there are no allotments in the area, We have amended policy 18 to require all developments to provide opportunities for food growing.

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
178	844	CWAAP 10	<ul style="list-style-type: none"> •□CW AAP 10 – 24 – 28 Quebec Way •□The land referred to abuts CW AAP 25 and the QWIE residential development and is immediately opposite Alfred Salter Primary School Sports area. It is therefore not appropriate that the land could be used for a hotel. (Class C1) nor is it suitable for 50 homes. •□Alfred Salter is a large fully inclusive primary school. It is a recognised centre of excellence for a range of children with complex special needs. The Mulberry / Kings development will impact on the school's outdoor areas. It is therefore not appropriate to allow buildings on the 4th side of the school compound as it will be over bearing for the children using the outdoor areas. •□The nursery within the QWIE development abuts CW AAP 10 •□Uses should include D1 community and low rise business use (B1) 	<p>The council considers the land is appropriate for residential development. It is separated from the school by a road and a scheme could be designed which ensures sufficient privacy for the school and which is not overbearing for the school. .</p> <p>Community use is listed as an acceptable use for the site.</p> <p>While the council recognises that there is a need for community use in the area, the council considers that the need can be met by the requirement to provide community use on other sites in the area, including the Quebec Industrial Estate, 24-28 Quebec Way, site CWAAP 24 (Harmsworth Quays, Site E, Mulberry Business Park and Surrey Quays Leisure Park), Downtown, CWAAP 9 (Shopping centre, overflow carparks and Decathlon site), Albion Primary school, Surrey Docks Farm and Docklands Settlement.</p> <p>Several community facilities in the area have recently been provided or are under construction, including:</p> <ul style="list-style-type: none"> - A children's day nursery on the Quebec Industrial Estate site; - Health facilities on Downtown; - A new community centre at Docklands Settlement which provides a range of community and sports facilities including a multi-purpose sports hall, a gym, clubroom for shared use with Southwark Youth Services and general purpose space; - The new library provides performance and exhibition space and a venue for Southwark's Youth Forum; - Flexible community space within Maple Quays (Site A); - The council has resolved to acquire the former Surrey Docks Stadium for use as a public park; - The council has resolved to reinstate the St Pauls sports ground as a community football ground, with a new 3G astro turf pitch. - The council has resolved to publish statutory notices in connection with the permanent expansion of Albion Primary School to accommodate 2 forms of entry. Southwark Plan policy 2.3 requires new school facilities to be made available for public use wherever possible. <p>The AAP policies on community facilities is set out in policy 27 which explains that the council's strategy is to locate local facilities together so that the services required by the community including, housing services, services for young people, health centres, community space and facilities for the police are provided in accessible locations in a way in which different facilities can complement and support each other. The new library and rebuilding of schools are examples of this approach.</p>

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
178	845	Policy 6	<ul style="list-style-type: none"> •□ Insufficient improvements to the cycle and pedestrian network •□ The pedestrian links for the residents of the Albion Estate, Rotherhithe Village and Albion Street need to be developed so that people have equal easy access to the CW library and transport hub. •□ The catchment for the about to be rebuilt and expanded Albion Primary School will include the new dwellings around Canada Water and the emerging town centre. •□ More dwellings are to be built in Albion Street and the retail and leisure/sports provision enhanced. Hence it is imperative there are adequate pedestrian and cycle routes. •□ The Cycle Super Highway should not be introduced until the very serious congestion problems on Jamaica Road and Lower Road have been resolved. 	<p>AAP policy 6 aims to make improvements to the network of pedestrian and cycle routes. This has been reviewed in the process of preparing RCWAAP, to ensure that the network extends through Harmsworth Quays. Key proposals, such as a green link connecting Canada water Basin and Russia Dock Woodland have been strongly supported during consultation.</p> <p>Policy 30 highlights the council's aim to improve links between Albion Street and Canada Water. The links are also identified in Figures 14 and 7.</p> <p>TfL are leading on the implementation of the cycle super highway. As part of this TfL will also focus on improvements to the roundabout on Jamaica Road/Lower Road.</p>
178	846	Policy 7	<ul style="list-style-type: none"> •□ Policy to improve river transport insufficiently robust. <p>There is a demonstrable need for a river bus pier in / near St Marys Conservation Area. Policy must therefore reflect a need to work with TfL, PLA and other stakeholders to achieve and implement.</p> <p>2020 is the 400 year anniversary of the Mayflower and it is anticipated that it will generate a very significant influx of visitors into the St Marys Conservation Area The Hilton Hotel is for sale. If – as is predicted - the building reverts to residential use there is no guarantee the ferry to / from Canary Wharf will continue to exist.</p> <ul style="list-style-type: none"> •□ Para 4.3.6 A bridge connecting Canary Wharf to Rotherhithe is vital for the implementation of some of the policies within the AAP. To be totally reliant of the Jubilee Line for access to and from Canary Wharf is not appropriate for the long term sustainability of an opportunity area . Buses can not access the Rotherhithe road tunnel, the future of the (expensive) cross river ferry is in doubt. Many Canada Water residents work at Canary Wharf and Canada Water is designated an opportunity area. Hence 24 / 7 access has to be available. •□ A need for the provision of a formal taxi rank at Canada Water tube / bus station. Bus routes on the peninsula do not provide easy access to CW tube / overground for residents with luggage / wheelchairs/ buggies/ etc Hence vehicles collect and drop off people in the very busy Surrey Quays Road and then perform potentially dangerous U turns as the road system is complex. •□ There is a need for a dedicated bus lane and yellow boxes / traffic lights at the Rotherhithe Roundabout to alleviate the almost permanent grid lock of Jamaica Road / Lower Road for ordinary road users as well as emergency services. . 	<p>The council considered and consulted on the potential for a new pier at St Mary's early in the process of preparing the adopted AAP (at issues and options stage). However the proposal was not taken forward. There were a number of reasons for it, including the presence of an existing pier at Cherry Gardens, which is close to the St Mary's area. A second pier was considered to be duplicating provision. Policy 7 on public transport states that the borough will work with TfL to improve public transport, including on the river. This would provide the flexibility to lobby for a new service in the future if the opportunity arises</p> <p>Policy 6 highlights the council's desire to see a bridge between Rotherhithe and Canary Wharf, although it should be noted that the proposal is not funded.</p> <p>Site allocation CW AAP 7 and Figure 14 identify the need for a taxi drop off point (on the overflow car park) to serve the station.</p> <p>AAP policy 7 identifies the need to improve the roundabout on Jamaica Road. The roundabout is managed by TfL who are investigating potential improvements.</p>

Object- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
178	847	Policy 30	<ul style="list-style-type: none"> •□ Provide direct and easily accessible pedestrian, cycle and mobility scooter links to Canada Water to transport hub, <p>Provide direct and easily accessible pedestrian, cycle and mobility scooter links from Canada Water to</p> <p>Support Revitalised Albion Street retail parade and market (Policy 3 & 5) Rebuilt and expanded Albion Primary School Albion Health Centre. Support the Norwegian & Finnish Churches and Cultural Centre in Albion Street who are both significant employers Support the mixed use development on the former Albion Street library site.</p> <ul style="list-style-type: none"> •□ Improve pedestrian and cycle links to St Marys Conservation area to support the growing tourist economy based on the history of the area. •□ Continue to maintain and upgrade links to Rotherhithe Station •□ Work with TfL, PLA and other stakeholders to create a publically accessible river bus pier in or very near St Marys Conservation area to increase the transport provision in the area and to help develop the tourist economy potential •□ Support the re introduction of Albion Street market by improving the pedestrian routes, signage in the area and parking arrangements .(refer Policy 5 Markets) •□ Reinforcing the viability of the shopping parade, St Olavs City Business Centre and the new build on the former library site by providing appropriate infrastructure including high speed broadband. 	<p>Policy 30 highlights the council's aim to:</p> <ul style="list-style-type: none"> - Improve links between Albion Street and Canada Water. The links are also identified in Figures 14 and 7. - Regenerate the shops (policy 3 also reiterates that the council will seek to maintain the status of important shopping parades, such as Albion Street). <p>Policy 13 states that the council will support opportunities to reinforce historic links with Scandinavia and the Baltic region. In addition, AAP policy 5 recognises the potential for Scandinavian themed markets on Albion Street.</p> <p>With regard to the churches, Saved Southwark plan policy 2.1 states that change of use from D class uses (which include faith premises) will not be granted unless it can be demonstrated that they are surplus to requirements. This is reiterated in strategic policy 4 of the Core Strategy.</p> <p>The council considered and consulted on the potential for a new pier at St Mary's early in the process of preparing the adopted AAP (at issues and options stage). However the proposal was not taken forward. There were a number of reasons for it, including the presence of an existing pier at Cherry Gardens, which is close to the St Mary's area. A second pier was considered to be duplicating provision. Policy 7 on public transport states that the borough will work with TfL to improve public transport, including on the river. This would provide the flexibility to lobby for a new service in the future if the opportunity arises</p> <p>The council's approach to Albion Street was considered sound by the planning inspector following the examination on the adopted AAP. It is not considered that there has been a change in circumstances which would undermine the council's approach.</p> <p>In paragraph 57 of his report, the inspector stated that:</p> <p>"The AAP, specifically through Policies 6 and 7, identifies that improvements will be made to walking and cycling routes in addition to improvements to public transport. The Council's approach to alternative forms of transport is further clarified within its Sustainable Transport SPD14. Whilst Figure 7 of the AAP is indicative with regard to such improvements, there is sufficient clarity on the intentions of the AAP to enable the delivery of necessary works in conjunction with development proposals. Such details include the objectives of securing improved east-west routes and the aspiration to obtain a better route between Canada Quays Station and Albion Street to the north."</p> <p>In paragraph 44 he stated that:</p> <p>"The importance of other shopping locations, such as found at Lower Road or Albion Street, is recognised suitably by AAP Policy 3...."</p>

Objec-
tor ref

Rep
ref.

Policy

Details of Representation

Officer Response to Representation

191 702 Policy 18

1. There is robust evidence for the benefits of open spaces, green areas, space and amenity around housing which include health and wellbeing etc (I don't need to give sources for that!). Links also to pollution mitigation. [Note: Southwark houses children high rise blocks, in contrast to Manchester.]

2. "Southwark's Housing Requirements Study 2008 found that certain types of households are over-represented in the borough's social housing, e.g. lone parents and pensioner households. Of pensioner household, for example, 69.1% live in social rented housing. The study also found that 40% of council renters contain at least one person with a health problem and that disadvantaged groups overall are more likely to be living in social housing, for example, certain BME groups." [1][Southwark Council, 2013. para 84]

3. "in order to pay due regard to the Equality Act general duty to "Foster good relations between persons who share a relevant protected characteristic and person who do not share it" it is inappropriate and potentially unlawful for Southwark Council to deny residents living on Estates, blocks and street properties etc it owns the opportunity (right) to seek protection for the green open space and amenity places that they love, cherish and value. The blanket policy is discriminatory, dogmatic and bigoted. The Council refuse to bring forward and recommend amenity and other spaces on it's Estates for designation (under NPPF or otherwise) and even when redevelopment decisions have been made and dismissed in favour of refurbishment. The Council does this because, as Fiona Colley clearly explained to ASSG, the Council may wish to build on the land it owns.

4. The policy to build 10,000 Council Homes in Southwark is on the face of it a good policy however the way it is being implemented is rotten to the core. And there is no fairer future delivered by unjustly treating residents on Estates etc. deceitfully, unjustly or by discriminating against them using dogmatic and bigoted policies and approaches.

All residents need to do is put the Council's own incoherent documents next to each other.

What a disgrace and what mugs some of us have been.

[1] Source: Major Works Status Report incorporating Warm, Dry and Safe, Meeting: Cabinet, 26 June 2013, Cabinet Member: Councillor Ian Wingfield, Deputy Leader and Cabinet Member for Housing Management, Report Author Ferenc Morath, Investment Manager, Major Works.

Para 89. Therefore, in order to pay due regard to the Equality Act general duty to "Foster good relations between persons who share a relevant protected characteristic and person who do not share it" an analysis of the demographics of the people living in the blocks benefiting from investment is recommended. The data will help to ensure the council can robustly explain the basis of the investment strategy decisions and the correlation to the communities and people with protected characteristics that happen to live in the blocks.

Para 84. Southwark's Housing Requirements Study 2008 found that certain types of households are over-represented in the borough's social housing, e.g. lone parents and pensioner households. Of pensioner household, for example, 69.1% live in social rented housing. The study also found that 40% of council renters contain at least one person with a

Our approach is consistent with our Open Space Strategy adopted in January 2013.

Both the Open Space Strategy and the Canada Water Area Action Plan recognise that amenity spaces are highly valued by the local community. The Open Space Strategy emphasises the importance of amenity spaces in enabling informal recreation close to residential areas and their potential as a biodiversity and community gardening resource.

In preparing the Open Space Strategy we audited a number of amenity spaces and found that generally their quality was below that of the borough's parks. This was also reflected in the perceptions of residents contacted in the Residents' Survey carried out to inform the strategy. In the light of this, the strategy states that we will work with registered providers and other partners to identify opportunities to improve the role and quality of amenity spaces. The Cleaner Greener Safer scheme is a good example of a programme which has helped secure small scale improvements which encourage a range of activities including food growing, nature conservation and recreation.

Of course it is also important that provision is made for good quality amenity space in new developments. Our policies in the Southwark Plan, Core Strategy and Residential Design Standards SPD, which require provision of private amenity space for family homes, communal amenity space and children's play facilities in all residential developments, aim to achieve this. The Core Strategy requires developers to improve the overall greenness of development sites and our urban design policies to help preserve amenity spaces which are an integral part of good quality townscapes.

We consider that these policies will be more effective in securing good quality amenity space than simply protecting all existing amenity space or applying a per capita standard across the borough. The value of this approach at a neighbourhood level has been reflected in the Aylesbury AAP and Elephant and Castle SPD . Both of these documents aim to ensure that good mix of private and public amenity space is made, while also facilitating the regeneration of the Aylesbury and Heygate estates.

The Residents' Survey showed that patterns of open space usage do vary in different parts of the borough and between different demographic groups. These findings emphasised the need to ensure that open spaces cater for the needs and priorities of all users and we have included objectives around tackling inequality in the Open Space strategy to help achieve this. In preparing the strategy, we assessed need for open space (taking into account a number of factors including population densities, child densities, the indices of deprivation, health and the proportion of homes which are flats and therefore less likely to have private garden space) and this will inform future consideration around where new open spaces should be provided as part of development. Again, the Heygate estate is a good example of where

health problem and that disadvantaged groups overall are more likely to be living in social housing, for example, certain BME groups.

Para 85. There is increasing evidence of a link between poor housing conditions and ill health.

Attachments:

Albion Street Steering Group Meetings of 19th February 2013 approved on 10th April 2013 save that it would be in respect of the Albion Pub (and not the Little Crown) that efforts would be made to list the building, and extract of same.

we have secured a major new park in an area which has significantly less park provision per capita than other parts of the borough.

191 703 Policy 22

Good to see you at CWF the other day. I am writing to flag up one thing that I'll put into an updated consultation comment later. It seems that Southwark Council's Major Works and linked Mechanical Engineering department are pretty clueless about "sustainability". While we have a lot of good stuff for new homes we're very poor for existing and it's got worse since the last AAP IEP. Its not Southwark's policy to install showers or upgrade kitchen lights so the higher LUX levels, safe levels, can be achieved with modern energy saving bulbs. And so on. As a major land and property owner in the CWAAP area it's really poor. I hoped that having "development" defined to include redevelopment and refurbishment might help but actually some standards have fallen (e.g. Warm Dry Safe has no reference to Lifetime Homes etc). The current CWAAP refers to "new" development repeatedly and does not really have much to say about existing. If we could have some common sense design standards for existing properties then that would be a good thing!

It is also a way to include more people into the CWAAP, and planning policy, because they could get a small direct benefit and help conserve water and save energy and so on.

Promise 3 of the council's Fairer Future Promises Southwark's is to make every council home warm, dry and safe within 5 years. Further details about progress towards this target and the standards involved are set out on the council's website:
http://www.southwark.gov.uk/info/200498/fairer_future_promises/2984/promise_3

Refurbishment standards of existing council homes are outside the scope of the area action plan and are a borough-wide matter for the council.

191 718 Part 6

Sustainability & Innovative and responsive design : Internet, fast internet and “superfast” broadband connections.
Submitted to planningpolicy@southwark.gov.uk by Jerry Hewitt. This is a personal representation and not made on behalf of any group or association.
Southwark ask: “In your representation to us please also let us know if you would like to be notified at a specified address of any of the following”

To the snail mail address above or electronically to [] please notify me:

1. That the Revised Canada Water AAP has been submitted to the Secretary of State in accordance with section 20 of the Act;
2. The publication of the recommendations of the person appointed to carry out an independent examination of the Revised Canada Water AAP under section 20 of the Act;

Dear Southwark,

At Bermondsey and Rotherhithe Community Council on 29th January 2014, 7pm, attended by Mr. Tim Cutts, former Leader of Southwark Council, Cllr Nick Stanton, described – repeating my line from a few years ago – the Canada Water Area Action Plan as an “inaction plan”. Not quite correct: it actively delivers fortunes to many people e.g. the shareholders of BLCQ.

The adoption of the CWAAP by Full Council took place on 28 March 2012 and without much of a peep of objection from the assembled wise souls who waved it through. Subsequently, the local Rotherhithe, Surrey Docks and Canada Water communities have struggled to begin the process of creating a Neighbourhood Area and Neighbourhood Forum so that the aspirations, needs and visions of the Community that were heartlessly censored by Southwark Council from the 28 March 2012 AAP can be better realised. If the Council was at all sensible, and more with it, it would have ensured that the aspirations of the Community were fully integrated into the Canada Water Area Action Plan Review 2014.

This representation focuses on one specific and important issue: the internet and fast internet connections. Local politicians including Valerie Shawcross AM have picked up on the outrage over and it has now become rather unavoidably a political issue. It is also a non-political planning issue.

I also use this issue to submit a detailed comprehensive representation with evidence so that it illustrates how the AAP fails at a level of detail, and I provide approved solutions from Oxfordfordshire (smart people live up there, and it much more difficult to fool them). Again, residents look to other boroughs facing very similar issues and ask “If they can do it why can’t Southwark?” I am impressed what about 1000 homes delivers in Oxfordshire, and I fear that we have delivered far too much money into the pockets of developers.

Southwark also has healthy fetishes for issues such as bicycles, along with TFL, but less regard for other vital issues such as the internet and fast internet connections.

Unless I missed it, the current AAP and the proposed AAP does not include the word “internet”. Nor “fast”, nor “broadband”. It contains no form of words that put in place a policy, aspiration or vision to realise Internet, fast internet and “superfast” broadband connections within a phased delivery plan.

I have heard verbally from Mr. Cutts, at a CWF meeting, that some money has been pencilled for this issue however the Council’s record is one of prevaricating, bluffing and blagging (which

We are proposing a modification to the AAP which identifies the lack of availability of superfast broadband in parts of Rotherhithe and indicates that the council is keen to work with local residents, suppliers, developers and the GLA to secure the investment required to upgrade the area. The need to upgrade broadband infrastructure in the area has been identified in the council’s Infrastructure Plan which is part of the evidence behind the community infrastructure levy and it is a potential recipient of CIL funding.

Officers must front up for their employer whether it makes them feel ill or not) all manner of infrastructure delivery (including social) while charging on with developing thousands of homes. The approach leaves the local community bitter.

The Council is also a major land owner and property owner in the Area and wider Area, owning and managing in excess of 4000 properties through it's Housing Department and properties through it commercial Property Department. The telephone infrastructure into these properties tends to be antiquated and poor with wires spewing out of junction boxes. The Council has shown no interest whatsoever if facilitating the improvement of telecommunications to it's own housing blocks.

The Council's own land, and areas it control's otherwise, provide excellent potential to provide an area wide solution for fast internet and cable services. (Southwark's early foray into Cable TV was a disaster and they never seem to want to talk about it. CATV ducts all over the place but no service to those living in homes).

The Council should be a leader on this issue, however it is a laggard. I hope that changes. Leadership has come from the community and picked up by local politicians. Leadership has also come from the owners and developers of CWAAP proposal sites such as Quebec Way Industrial Estate.

PLANNING POLICY

I submit the Barton Area Action Plan ("BAAP") as evidence into the Canada Water Area Action Plan Review. <http://www.oxford.gov.uk/PageRender/decP/BartonAAP.htm>

This plan has been adopted by Oxfordshire City Council on 17th December 2012 after an IEP by Inspector Shelagh Bussey DIPTP DIPEM MA PHD MRTPI and therefore those who have faith in these proceedings can live by the sword, and die by the sword, and the contents of the Barton Area Action Plan – in place - can only be robust and sound etc.

Now I wish to take some contents out of place.

Page 35 of the BAAP at Section 7 sets out Innovative and responsive design. Page 36 provides Policy Policy BA12: Energy efficiency and section and paragraph 7.8 "7.8 Superfast broadband" and Section 7.9.

In contrast to Southwark, the BAAP is able to present evidence that:

"7.8 Superfast broadband can bring several benefits: • It reduces the need to travel and consequent carbon emissions by enabling flexible and remote working. • It can transform healthcare by helping people to live independently in their own homes and allowing medical monitoring and consultations without the need to travel. • It improves access to leisure and learning and can enable people to improve skills. • It can support business start-ups, helping them to innovate, compete and grow.

7.9 To enable use of products and services that need high broadband speeds, and to make the most of future advances in broadband technology, the community hub, homes and businesses within the development should, as far as possible, have fibre optic cabling installed. There may be an opportunity to extend provision to existing homes in surrounding areas."

This is a starting point for policy that I would like included into the Revised Canada Water AAP and I would be happy, along with others, to agree common ground with the Council.

There is a lot more that could be said referring to equality and social justice etc. Themes that Southwark Council should be at the forefront of promoting given their propaganda output. Oxfordshire own much of the land within the BAAP Area and Southwark has unfortunately lost control of land in the CWAAP Area through sales and long leases.

On the other hand, Southwark does own it's Housing Estates. During 2013 CCTV (link to the Police) was renewed in the Hawkstone Estate by installing a "point to point" wireless system with a central mast on the roof of Brydale House. I contacted the company that owns the mast, InfiNet Wireless, to enquire if I could obtain a service via this infrastructure that Southwark Council has spend many millions installing (direct line of sight from my flat to the receiver).

Mr Adrian Wheeler of ukbroadband.com (web: www.ukbdistribution.com) kindly replied to me as UK distributor off InfiNet Wireless on 04/11/2013 (06:50). He wrote:

"Hi Jerry,

In that case you maybe pleased to know we are rolling out a 4G wireless network in the London area. Please go to www.mynow.co.uk for more information – there's a postcode checker to confirm coverage."

I checked and no service. I checked again today at <http://www.mynow.co.uk/> (the new site) and no service.

So here we have huge investment (Millions) by Southwark Council into it's own property within the Core AAP Area (and others) but it is another "silo" operation. This sums up the hopeless incoherence and silo working at Southwark. And the huge potential lost.

Almost concurrently, agents for the owners of Quebec Way Industrial Estate development are trying hard to find a supplier for Internet, fast internet and "superfast" broadband connections to QWIE. Two options might be BT/Openreach and Virgin Media (Cable).

Keeping in mind how vitally important Internet, fast internet and "superfast" broadband connections have now become across Europe, nationally and of course in "Central London" (where CWAAP is located) a response from Martin Jenns, of British Telecommunications plc Openreach, beggars belief:

"Unfortunately Quebec way has been rejected for Fibre to the premises, we do not have fibre capacity at this time to include this site in future works. You will however be eligible to apply for conventional copper work." (04 February 2014)

So privatisation changed nothing in this respect.

We all wait to hear what Virgin Media can do with cable. However, cable to one development does nothing for the wider community and everyone else with the AAP Core and surrounds. The benefits of development must ripple throughout the Area and benefit all.

The reality is that capacity is zero for "superfast" broadband connections such as BT Infinity, and it is not going to change for a long time unless someone does something. We only get "copper" and at best copper is around 7 MB per second in the area. And can be much less.

Where in the CWAAP Review is this important issue considered and provided for?

This particular issue, set out in some detail, illustrates how an AAP that is supposed to cover a

central London modern "Major Town Centre" and finally pencilled in as an "opportunity area" actually lack what nowadays are considered essential services and basic infrastructures.

I wrote in consultation for CWAAP EIP 2009 onwards how thousands of homes have been built without ensuring money was raised to fund much needed infrastructure, not just frivolities and vanity projects, and now it is far too late to retrospectively return to those developers and therefore current and future developments face substantial costs.

It was, and is, extremely poor management: and it comes with the usual arrogance of being incapable of saying "sorry" and incapable of finding solutions and implementing them. Annex 2, p.55 of the BAAP, provides a clear "Infrastructure schedule" that has estimated costs totalled up. We need this kind of simple clarity for CWAAP. The expenses. And we need this reconciled against robust estimates of S106, CIL and other voluntary contributions. The income.

This we can also relate to the Council's overall infrastructure funding need which last I read were over £900 Million with little chance of being funded. It must not be assumed that just because Labour win an election that money will rain down on Southwark's Labour Council because that's not what happened from 1990. Perversely, Southwark retains one of the highest non-decency rates for social housing and it is one of the largest social housing landlords.

Residents understand viability in relation to individual sites, and residents also understand viability in relation to an overall plan and therefore wish to see evidence that the overall plan is, itself, viable in regards to the needs, aspirations and vision etc. and that it can actually be delivered in reality.

And that not that just chunks of the plan are delivered fairly incoherently which tend to be developments of flats.

Now what we need to see is very clear policy put into CWAAP Review that requires "superfast" broadband connections, cable, or other technology to be provided to all homes (of any tenure or ownership mode) within the Core AAP and the wider Area to those prepared to pay a reasonable charge for it.

191 719 General

Licensing + Safeguarding the amenities of neighbouring residential properties
Submitted to planningpolicy@southwark.gov.uk by Jerry Hewitt. This is a personal representation and not made on behalf of any group or association.

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

To the snail mail address above or electronically to [] please notify me:

1. That the Revised Canada Water AAP has been submitted to the Secretary of State in accordance with section 20 of the Act;
2. The publication of the recommendations of the person appointed to carry out an independent examination of the Revised Canada Water AAP under section 20 of the Act;

Dear Southwark,

Our area has experienced significant change in recent years in terms of increasing population and employment and this trend is expected to continue over the next 15 years and longer. Our area has seen a significant increase in entertainment and leisure premises over the last 15 years (although we have lost some pubs) and the expected growth in this sector needs to be carefully managed to avoid conflict with residents.

We have an Area Action Plan that could help us manage future population and economic growth in the area. Southwark responds to the challenge by encouraging a mixed uses within the area and therefore it must also acknowledge that this approach could cause conflict, particularly where licensed premises (and others) are adversely impacting on local residents. We need to map a cumulative impact for the wider area surrounding the Core / Urban / Town Centre to ensure that any expansion in the night time economy is carefully managed in order to ensure that the licensing objectives are not undermined.

Growth can be harmed by failing to safeguarding the amenities of neighbouring residential properties and undermining plans to build and sell property that generates very high revenues and extremely profitable ventures.

Issue and matter evidence:

I wish to submit this news article because the CWAAP Inspector, Andrew Seaman, was happy to accept journalism as evidence.

<http://www.london-se1.co.uk/news/view/7388> [Friday 7 February 2014]

Title: "Southwark Council could follow the example of neighbouring Lambeth and set out a model list of operating hours for pubs, bars, clubs and off-licences"

Extract

"Cllr Morris said: "Despite its name the Borough and Bankside saturation policy is not able to prevent any new licensed premises from opening.

"The only way to get a licence rejected or modified is if there are objections, and the onus is on local residents to spot an A4 notice about the application in the window of the premises."

"Lambeth's proposals seem like a more effective way of resolving some of the problems of alcohol related late night disturbance that cause misery for residents."

There is a nice pic of Richard Livingstone but I'll leave that out.

Further illustrative evidence:

Having searched through the Revised Canada Water AAP publication submission draft (6.92

The Article on the SE1 website refers to a new licensing policy introduced by Lambeth. It also states that the council will be reviewing its own licensing policies later in 2014 which will provide an opportunity to assess Lambeth's approach.

The approach however is too prescriptive for a development plan. The planning application in Canada Water which is referred to was assessed using policies in the Core Strategy and Saved Southwark Plan: Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007. The council considers that these policies provide an adequate means of assessing impacts of evening and late night uses.

MB PDF) I can find nothing whatsoever within document that provide guidance or policy in regards to safeguarding amenities of neighbouring residential properties and from disturbance from pubs, bars, clubs (as dance studio's or whatever) and off-licences etc. I add pubs, bars, clubs (as dance studio or whatever) and off-licences, and "Student Unions" that might serve primarily a student market.

The Revised Canada Water AAP fails to meet the aspirations of residents including those who objected and supported App no 13-AP-4441 Address UNIT B,BLOCK A2, VANCOUVER HOUSE, SURREY QUAYS ROAD, LONDON,SE16 that change an intending community resource into a "dance and fitness studio" (Class D1 non-residential institution to class D2 assembly and leisure), reportedly using false information that Seven Islands was closing, and reportedly in exchange for a bargain £125,000 paid to the Council.

Residents wrote:

"I understand that the original plan was for this space to be made available to the local community. I feel that there is limited space like this in the area and that it would be detrimental and a lost opportunity of this space was not available for community activities"

Another

"I support this planning application BUT could you make the following considerations when looking at this application?

1. Sound Proofing - as this is a residential area

2.Opening hours - no later than 10pm please - this is a residential area"

<http://planningonline.southwark.gov.uk/AcolNetCGI.exe?ACTION=UNWRAP&RIPNAME=Root.PgeConsultees&TheSystemkey=9552848>

Southwark decided that a condition of permission would be:

"The use hereby permitted shall only be carried out between 07:00-23:00 daily."

Reason:

To safeguard the amenities of neighbouring residential properties in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

The Revised Canada Water AAP is an ideal opportunity to set out a model list of operating hours for pubs, bars, clubs and off-licences etc for the CWAAP Area, and a model list tailed to our specific area that meets the reasonable aspirations of the residents while also balancing – optimising - the necessary growth required from business notwithstanding the huge contribution our area has already made to growth in London.

The phased plan is to develop Canada Water into "Major Town Centre".

SE1 reports:

"Most of Waterloo and the South Bank is classified under the policy as a major town centre where the following end times for licences are suggested:

- Restaurants & cafes: Fri-Sat 1am; Sun-Thu midnight
- Pubs and wine bars: Fri-Sat 2am; Mon-Thu 1am; Sun midnight
- Nightclubs: Fri-Sat 2am; Mon-Thu 1am; Sun midnight
- Off-licences: midnight daily
- Take-aways: Fri-Sat 2am; Mon-Thu 1am; Sun midnight

The hours set out in the new policy will not affect existing licences but will be used as a

yardstick to assess future applications.”

I propose that Lambeth’s model list of operating hours be used as a starting point to discuss and form a model list for the CWAAP Core Area, Town Centre, and wider surrounding Area. There will be residents who do not understand how Southwark’s and the Mayor’s intentions to transform our Area into a Major Town Centre may very well require Southwark’s Planning Committee – who mostly do not live around here – to agree bad planning conditions that harm the amenities of neighbouring residential properties and directly harm the area continuing to be a residential area including for many, including families and children.

This issue illustrates yet again what is not in the CWAAP and why residents and business are acting to bring forward a Neighbourhood Area, Forum and Plan. Again, Lambeth is doing something that is not even being discussed with residents in Southwark.

191 721 Appendices

RCWAAP Glossary

Submitted to planningpolicy@southwark.gov.uk by Jerry Hewitt . This is a personal representation and not made on behalf of any group or association.
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Dear Southwark,

The glossary from CWAAP, as adopted, has been struck out from the Review version.
There is now no glossary?

I have checked consultation comments and feedback to comments and find no comment or response.

I can find no guidance.

I have referred back to the Core Strategy glossary however key terms such as "green infrastructure" are not included in the Core and were taken from The London Plan, agreed by the Inspector Andrew Seaman and found sound etc. Quite considerable time was devoted during the EIP in regards to terminology and issues of glossary. And it is very difficult to comment without a glossary or clear reference to which glossary we should use.

Why have you deleted the glossary?

What glossary should be used as a substitute?

I object to the removal of the glossary, and I object to the likelihood of having to now repeat discussion of terms in EIP. And having to comment without reference to a glossary.

Page 163 Glossary

You have deleted the glossary making comment next to impossible. In this respect you have failed to carry out consultation appropriately and you have not followed the Council's "Fairer Future Principles".

The council's preferred approach is to provide a single glossary for all development plan documents and SPDs. This single glossary is available on the council's website.

191 723 Policy 24

Where did "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" come from?

I have read The Core - its not in there.
I have read the Residential Standards 2011 SPD, and its not in there.
It's not London Plan or LP review is it?
Is there a Southwark Tall Buildings SPD or something?

Where I can get it via Google is from [Appendix_A_-_Blackfriars_Road_SPD_2014](#)
"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"

Same wording.

As far as I am aware our AAP has to confirm with Core and London Plan, and not with copy and pasted text from the Blackfriars Road SPD 2014.

Housing choices for the less wealthy are decreased by making accommodation larger than minimum space standards.

Southwark's key partner Barratts makes it clear in their general trading report:

<http://www.barrattdevelopments.co.uk/barratt/en/investor/fnews/fpress?id=91>
"Further changes in mix have also driven up our average selling price ('ASP') and for the period we expect total ASP on completions to increase by c. 13.7% to c. £211k (2012: £185.5k), with private ASP up by c. 11.4% to c. £225k (2012: £201.9k).
Margins are expected to increase in line with expectations reflecting the higher proportion of completions from newer high margin land, growth in volumes, and the early benefit of lower incentives on completions.
"

And we read that:

"Over the course of the next 15 - 20 years NHHT will work with Barratts to build 3500 new homes for Southwark and London, 50% of which will be new genuinely affordable homes."
<http://cllrpeterjohn.blogspot.co.uk/>

I do not consider NPPF 80% market rent genuinely affordable homes when 50% are on £15,000 or something like that, if not less.

Most people also understand that bigger homes cost more money.

The policy is consistent with Core Strategy policy 5 which states that where developments exceed the upper density threshold (700 habitable rooms per hectare in the urban zone) they must demonstrate an exemplary standard of design. This is also reflected in the adopted Residential Design Standards SPD. Section 2.2 of the latter sets out a number of criteria about the meaning of exemplary design which include significantly exceeding minimum floor standards, providing good storage, including a predominance of dual aspect homes etc.

With regard to affordable rent, the council shares the view that in many parts of the borough the affordable rent product far exceeds what is affordable to the majority of residents who are eligible for social housing. Southwark and other boroughs submitted representations to the Mayor over the London Plan, arguing that boroughs should be able to cap the level of rent significantly below 80%. The inspector agreed with Southwark and other boroughs. The Mayor chose not to implement the inspector's recommendation and the alterations to the London Plan have now been published.
http://wwwLondonPlan.gov.uk/news/article/1480/local_authority_issues_legal_challenge_on_mayors_affordable_rent_decision

The approach we take to assessing planning applications which include affordable rented units is set out on our website:
http://www.southwark.gov.uk/news/article/610/approach_to_affordable_rent_clarified

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	724	Policy 1	<p>Am I wrong to read this that the town centre boundary will be "negotiated through the planning application process"? And therefore the boundary decision would be made by the Southwark's Planning Committee?</p> <p>Will comment separately on deletion and non provision on Table A7.1, page 132, which along with the glossary deletion, is worrying.</p> <p>I attach two show cards for green infrastructure:</p> <p>The plants we get with a glossary. The green post box we get without a glossary! Sponsored by Barratts I expect.</p>	<p>In response to your query about the town centre boundary. The location of the boundary has been shown indicatively. The site allocation for CW AAP 25 requires developers to maximise provision of town centre uses on Harmsworth Quays and the adjacent sites. However, there is still some uncertainty over the quantum and distribution of such uses. In the light of that uncertainty, we did not think it appropriate to identify a definitive boundary at this stage. When a planning application gets to planning committee, members would be assessing whether the approach to provision of non-residential uses meets the criteria which we have set out in CW AAP 25. They would take into account the fact that we have stated in the AAP that there is scope to extend to town centre to the east of Surrey Quays Road and that new town centre uses should be clustered in locations which consolidate the existing centre and which benefit most from good accessibility to existing facilities in the centre. A definitive boundary would be identified through a future development plan, once there is greater certainty about the quantum of non-resi uses and their location.</p> <p>Our comments on the glossary are set out in response to representation no 721.</p>

191 754 General

Representation for Canada Water Area Action Plan Review (various)
"RCWAAP"

UPDATED on Monday, 03 March 2014.

Submitted to planningpolicy@southwark.gov.uk by Jerry Hewitt. This is a personal representation and not made on behalf of any group or association.

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

To the snail mail address above or electronically to -- please notify me:

1. That the Revised Canada Water AAP has been submitted to the Secretary of State in accordance with section 20 of the Act;
2. The publication of the recommendations of the person appointed to carry out an independent examination of the Revised Canada Water AAP under section 20 of the Act;

Dear Southwark,

At para 3.1.1, p.17, you claim that "The vision and objectives [have been] were derived from our Sustainable Community Strategy, Southwark 2016, are consistent with the Council Plan and Fairer Future principles"

I would welcome the opportunity to bring some scrutiny to the "Council Plan" and "Fairer Future Principles". What Council Plan are you referring to?

You refer to FFP principles that you then fail to implement when creating this draft policy. Are you sure you want to insert these rather unthinkingly into a plan and then fail to implement – do – the principles when consulting and creating your plan?

This is similar in a lack of care for "family homes", with our current administration having a different use of "family" to that normally employed in Planning: so that "family homes" become something for members of a class / clique to make money from, and not occupied by needy families. In the 1980's I would just have said that we build family homes so that yuppies can make money.

"We updated our Fairer Future principles in 2012/13 to the following five core principles:

- Treating residents as we would wish members of our own families to be treated
- Being open, honest and accountable
- Spending money as if it were coming from our own pocket
- Working for everyone to realise their potential
- Making Southwark a place to be proud of "

I there object to RCWAAP because it fails to follow Southwark's five core principles a.k.a Fairer Future principles in 2012/13.

I would add – live by the sword, die by the sword. If you copy and paste stuff into your policy then be ready to be challenged on it.

The NPPF Beta National Planning Practice Guidance informs that:

<http://planningguidance.planningportal.gov.uk/blog/guidance/local-plans/what-is-the-role-of-a-local-plan/>

I am invited to comment, and the RCWAAP is not adequately "sound", justified, effective and consistent with national policy. It is founded on an evidence base that is not adequately complete, robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately "effective" because it is not deliverable and flexible enough and we know (by actual outcomes) monitoring is poor.

Southwark is so keep to bend over backwards for particular lobbyists that it fails to look into alternatives again. This would matter less, for me, if this time around we had had a draft plan that delivered to all various interested and did not pander to a few.

The Fairer future promises are set out in the Council plan available on the council's website.

The council considers the RCWAAP to be up-to-date and consistent with the NPPF and London Plan. Revisions to the plan have been informed by a number of matters including consultation and the council's evidence base.

RCWAAP is not up to date.

RCWAAP fails to adequately make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered (and if the money to deliver it will be provided).

RCWAAP fails to identify and address key risks.

RCWAAP fails to plan for key rapid contemporary change e.g. needs such as housing demand cause by the "bedroom tax" and rising rents, wages adjusted for inflation stuck at 2003 levels while house prices go through the roof, or the rapid return of traffic volumes and congestion as the economy picks up.

Change also including migration and demographics.

RCWAAP fails to adequately set out a vision and a framework for the future development of our area.

RCWAAP fails to adequately address needs and opportunities in relation to housing, the economy, community facilities and various infrastructures.

RCWAAP fails to adequately provide a basis for safeguarding the environment, adapting to climate change and securing good design.

RCWAAP fails to adequately provide a critical tool to guide decisions about individual development proposals and is an inadequate starting-point for considering whether applications can be approved.

RCWAAP fails to adequately meet clear expectations as to how a Local Plan must be developed in order to be justified, effective, consistent with national policy and positively prepared to deliver sustainable development that meets local needs and national priorities

RCWAAP fails to adequately make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered.

RCWAAP fails to adequately illustrate designations on a policies map.

RCWAAP fails to adequately tailor to the needs of our area in terms of strategy and the policies required.

RCWAAP fails to adequately focus on key issues that need to be addressed and be aspirational but realistic in what they propose.

RCWAAP fails to adequately aim to meet the objectively assessed development and infrastructure needs of the area, including unmet needs of neighbouring areas where it is reasonable to do so and consistent with sustainable development objectives

And so on...

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	755	General	<p>The Review proposes substantial and significant changes to the AAP. The proposed changes are of such magnitude that changes in one policy or proposal site cannot be isolated from updated and looking again at the plan more generally.</p> <p>The supporting documents, such as the Sustainability Appraisal, are inadequate. And do not allow you to show that alternatives have been adequately considered. This in part because you are under a steer and influence of interested parties who are determined to gain substantially from development in the area. Inattention to alternatives and bias in consultation and AAP wording, by outcome, shows this up.</p> <p>By reading The NPPF and NPPF Beta National Planning Practice it becomes very apparent that a highly selective "pick and mix" approach to NPPF policy has been carried out to author RCWAAP. The document is highly biased, and the bias severely impacts and disadvantages particular groups of Southwark People and Londoners, while it benefits others.</p>	<p>The council consulted on a scoping report and an SA in the process of reviewing the policies in CWAAP. The methodology used to prepare it reflect government guidance and the findings are considered to be robust.</p> <p>The council considers the RCWAAP to be consistent with the NPPF. Further details about consistency with the NPPF are set out in background papers on housing, business and retail and infrastructure.</p>

191 756 Policy 8

For example, NPPF Para 14 is referred to and Para 28 is not:

Before listing particular points, to ensure participation in the EIP, I illustrate with just a few focused issues:

Traffic and congestion / pollution:

Evidence is now damning. While motor vehicle traffic in Southwark has fallen nearly 30% over decade (great news!) unfortunately in our area it has not (appalling news). For 5 years we suffered from increased traffic while the Council's Transport policies simply ignored this type of clear evidence problem. From 2010 we are back towards 2000 levels and no reduction.

This effect is caused by the c-charge and sensitivity to the economy. At the same time we now have evidence of traffic pollution affects including the scandal of diesel particulates – particulates that cover homes along the gyratory and A200. The diesel particulate scandal cohering with the c-charge effect.

Reviewing the Multi Modal Study etc. will not change the need to belatedly take action and risks further delaying action. And I see making a new delay you motivation for yet another review.

Because there is no sign of the money.

That might matter less is you did not ignore and reject projects nrough forward to mitigate current effects of traffic.

Is TFL signalling Rotherhithe Tunnel or not? RCWAAP is contradictory. And so on. There is no indication whatsoever that the £9-10 Million needed will be forthcoming, and particularly if proposal sites are "car free", or do not "net" increase trips / traffic, and applicants argue they do not need to pay anything or very little towards traffic, congestion and roads.

The impact on London's growth and competition is severe as time is lost stuck in congestion:

The whole of the A200 needs to be added to TFL's Red Route network:

A 6PM journey from Surrey Quays to Tooley Street can find traffic queues from Rotherhithe Tunnel to Dockhead, and going the other way, queues continue from Greenwich, through Deptford, to the gyratory – with choas as traffic from Rotherhithe New Road cuts across Rotherhithe Old Road to short cut into Cope Street – and on to Jamaica Road roundabout. Southwarks own information about "traffic counts" is woefully out of date because DFT now also use gps data (75,000 equipped cars).

http://www.southwark.gov.uk/download/7290/information_about_traffic_count_data

And Google tracks gps enabled smart phones to show us a truer picture that Southwark has refused to make explicit. The A200 and gyratory is one of the most congested and polluted routes in the area:

And the live stream shows how Salter Road is relatively peaceful. This image is not just a snap but is also returned over time as "typical".

We will be archiveing Google gps enabled information to provide to the Inspector along with much more data that Southwark refuses to acknowledge and pay attention to as it manufactures sustainability to allow it's plans to proceed.

The Core states:

4.54 "Traffic will be well managed so streets are safer and quiet and there will be good cycling and walking links"

Sadly, CWAAP turned it's back on Surrey Quays Station as it focused around Canada Water.

The council has updated evidence on transport and traffic. Details are set out in the infrastructure background paper.

RCWAAP turns it back further. The injustice of this policy is clearly illustrated by statistics for our GP surgeries for deprivation:

These issues are backgrounded by severe problems in Southwark including children living in poverty and non-decent homes (stuck still at c.60%), our people killed and injured on roads and violent crime. It is a very sorry state of affairs over many statistical indicators.

And NHS / Health data is also returning alarming rates of healthcare requirements in specific areas that have congested and polluted roads. It would be fair to say that London has lower asthma rates overall than England, however it is equally correct to say that some specific areas – along major roads for example – are well above average and an important issue of concern. The UK calculates values for human capital, the younger we are the more valuable we tend to be in these calculations, and in the same way the cost of having to mitigate traffic affects, pollution affects and adverse impacts on health is substantially and significantly damaging to national value, growth and competition.

I have already referred to research from the USA in other comment / consultation in regards to road pollution, and living with 500m of polluted roads, being schooled next to a polluted road, and walking along pavements of particulates to school too. Only to return to a housing block that has walls and ledges covered in particulates as well.

What good is a plan that only amplifies the “haves” and the “have nots”?

I correct your naming because the centre is “Surrey Quays Centre” and I don’t think anyone minds too much with developers spinning a Canada Water brand at the north end of the Car Park to make some cash, however in terms of heritage the name is Surrey Docks or Surrey Quays:

Below I mesh and sketch some of your illustrations and make draft amendments such as:

- Pedestrian routes need active frontages (for safety)
- Additional Landscape edges and greening (your mapping of these is selective and your response to consultation biased and selective.)
- Questions about where the indicative pedestrian routes are going – straight into Surrey Quays (note that it is not Canada Water Road, yet) Road with few active frontages? Mugging alleys?
- I extend the indicative new public realm, the improve areas for cycling and pedestrians etc. You map selectively to presumably ensure that only the locations you preferred and influential lobbyists have highlighted to you will benefit from s106 and CIL money etc.
- I make clear, and highlight, physical connections / links through to our Overground Station at Surrey Quays and through Lower Road Town Centre section to the rapidly growing Lidl supermarket. (Not just feels, or visions – real substantial expensive physical connections that weald Lower Road and Surrey Quays Overground Station, enmesh it, with the Surrey Quays Centre and Harmsworth Quays.

191 757 Part 1

You are "Canada Water" centric, a fetish over it, because of the biased lobbying and specific vested interests that have far too much influence on your plan making in comparison to others who, by outcome, have very little influence at all.

The focus of development within the original AAP was the core area / Town Centre "around" Canada Water which is a very large wide area focus. You have now narrowed and changed the focus, to focus more specifically. That's a significant and substantial shuffle and brings people back into adversarial positions to the plan. Supporters become opponents again. This does not help you plan to be deliverable: the more opposition you created by disregarding people and the more likelihood of legal challenger, the less likely timely delivery of your plan becomes.

Para: "1.2.4 The AAP will set a strategy with a delivery plan to manage this change. It identifies what needs to take place and crucially it sets out how and when we will deliver these changes."

There is a housing crisis and the needs are plain as day and well evidenced. Your plans do not cohere with needs.

All the singles and couples without children, those in temporary accommodation etc, need somewhere affordable to live and where they can work to help sustain our great city of London. And with Southwark informing us that c.£15,000 is the kind of income most people in Southwark actually have, then we need rents at c.£100 a week. Not up to 80% of local market rents, but more like one third.

And because of this, a simple fact from Southwark's own statistical output, it becomes clear that the overall Southwark and London plan is not sustainable unless we can build non-student homes at c.£100 week rent.

You claim that there is only need for one single hotel, and yet if I wrote to Tune Hotels, Travelodge, Premier Inn and so on, say one hundred firms, will I get only one expression of need for a new hotel? How do you know there is only need for 1 hotel?

The major piece of local delivery so far (bar the Overground and the Tube station) is the £14M Library that was about £7 million over budget. The c.£2m "plaza" has real problems and has not become anything like a "heart" or "town centre". You are not delivering, and worse, you have not shown any certainty whatsoever that money will be obtained to deliver what is needed, held out to us, aspired to – and blagged in the previous EIP. RCWAAP potentially reduces s106 and CIL substantially and significantly. This is because developers are avoiding contributions by smart planning, e.g. "car free" developments.

No cars, or less cars, = little or no need to contribute to road changes.

RE Figure 2: The boundaries of the AAP area on page 8:

There is nothing happening on the Hawkstone Estate / the "triangle" bar some road changes and two refurbishments and therefore consideration needs to be given to removing that area from the "core area" as previously requested.

Southwark must also understand that if it's own development as refurbishment fails to implement policy then that lowers the bar for others and reduce justification for keeping such areas in the Core.

The council considers that the Hawkstone triangle area should stay a part of the core area. Although the site for the new school has been deleted, the council is keen to see improvements to the traffic gyratory which affects the Hawkstone area and which is a key part of the plan. The fact that the area around Hawkstone is included signals the need to improve infrastructure in the area.

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	758	Vision	<p>Figure 4: I have amended by stretch figure 4 to show: Mitigation greening, barriers and other infrastructures to help reduce the affects of traffic (this is necessary because you are not going to deliver improvements you set out (either timely or at all) and even if you do the growth, and shunting of traffic, conditions are is such that we require migitation urgently.</p> <p>Projects put forward in consultation and in addition to the Community Council have been ignored.</p> <p>Open Space "ring": I support the principal of higher densities and tall buildings in the larger Town Centre sites provided that enviromental needs and aspirations etc. are met. It is essential that smaller green open spaces form coherent "stepping stone" connections between Southwark Park and Russia Dock Woodlands. Planning for green infrastructure in our area is not about pandering to some while ignoring others.</p> <p>Additional green "fingers" and routes are sketched in. You also need to plan for the aspirations of the whole AAP area, and not just a selection of interested noisy connected and influential parties.</p> <p>I have also amplified the need for intensive greening along the A200 and gyratory. I have already referred to information and research about this in other comments and conrtibutions to the Council. There is a lot that can be done using hedges, fences, trees and walls. And indeed a change in attitude to street and Estate cleaning.</p>	<p>The council does not consider that there has been a change of circumstances since the AAP was adopted that would warrant a review of Figure 4.</p>
191	759	Policy 6	<p>Figure 7: Indicative improvements to the pedestrian and cycle routes. The Network Map does not show the TFL Cycle superhighway following the gyratory which it will have to do at first unless it is delayed. And potentially for a long time, and because changes to roads are under review, as you look again at the traffic studies and models, the TFL Cycle superhighway may become permanent to the gyratory. This has potential to cause significant added chaos on our roads if not planned properly.</p>	<p>The route follows the alignment requested by TfL and was incorporated on the recommendation of the planning inspector who held the EIP on the adopted plan.</p>

Objector ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	760	Policy 18	<p>Figure 10: I have amended this figure to add in the two “local green spaces” (and highlight a few more examples) that I have repeatedly asked the Council to protect. This makes clear how the “ring” of steeping stones can be constructed. Your approach / dogma to refuse the protection of “amenity” spaces and green spaces of all kinds is incoherent and I believe unlawful. It also discriminates.</p> <p>Your illustrations also impoverish and deny the importance of our local area’s greening to mitigate the heavy traffic, congestion and pollution – whether it is London smog, from CHP chimneys, or boiler emissions from 4000+ council homes – and this Google Image that shows GPS traffic data with greening speaks for itself:</p> <p>The Open Spaces that we wished to protect in our area were submitted to you for the Open Spaces Strategy 2013 and now you need to engage with the proposers and come to some kind of agreement of what is reasonable to ensure you deliver a sustainable optimised area which meets the aspirations of all participating in your consultations. You cannot keep blankly rejecting all applications except several brought forward because of bias, lobbying and influence etc.</p> <p>In addition to a list of Open Spaces that we wished to have protected, and already submitted to you several times, residents representatives also provided suggested “standards” for infrastructures e.g. the number of Youth Clubs per 1000 residents. Or the ratio of hectares of open green space we wish to maintain. Substantial amounts of work that need to be taken into account in planning and acted upon.</p> <p>You need to engage with the proposers and come to some kind of agreement of what is reasonable to deliver a sustainable optimised area which meets the aspirations of all participating in your consultations. Not just a select few.</p>	<p>Additional spaces which warrant protection are proposed through the review of the AAP (see policy 18). The spaces identified meet the criteria for establishing open space protection which were agreed through the Southwark Plan. The council does not consider that convincing evidence has been put forward for the protection of other spaces.</p> <p>Policy 18 has been informed by a robust and credible evidence base that was examined through the EIP on the adopted AAP.</p>
191	761	Policy 19	<p>The figure on page 55 (of Cabinet’s pdf file I am using to make this comment) has been amended to show a “local playable space” on John Kennedy House grounds. Far from being improved and enhanced, the play area has deteriorated. The football Pen – hugely successful and very well used – has not been maintained and fallen into disrepair. Either remove the “doorstep playable space” from your map, or plan to substantially improve it. Nearby proposal sites (CWAAP 15) have not generated any funds to improve this public facility. You have now removed the proposal for Rotherhithe Primary School however you retain the “Youth Space” on your map. Please either plan to provide this youth space – and the money for it – or remove it from all RCWAAP maps.</p>	<p>There is a doorstep playable space on the Hawkstone estate hence it is shown on the plan.</p> <p>There is also a multi-games area on the site of Rotherhithe primary school. The council’s strategy is to co-locate youth and neighbourhood spaces on school sites, opening access outside school hours where feasible.</p> <p>The council considers that both the Hawkstone space and the Rotherhithe primary school space should remain on the plan.</p>
191	762	Policy 32	<p>In regards to the “Proposals sites” map (below), I object to it. We also clearly need proposal sites for locations such as the Lower Road Town Centre section. Otherwise no benefits will flow to these areas as posher “Canada Water” turns its back on the South, South West and arguably the North East of the Area.</p>	<p>Lower Road is part of the town centre. Policy 31 provides more detailed policies on Lower Road.</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	763	Part 1	<p>Page 11: The Equalities Analysis Impact Assessment fails to adequately examine how the Canada Water AAP meets the needs of the whole AAP community and makes sure that the core strategy AAP does not disadvantage anyone in the Area / community.</p> <p>There is substantial and significant – huge desperate - need for more “affordable” housing in the area and a three bed property is now around 40 times the average earnings of someone working in Southwark (£600,000 2011 Rowan House – Fiona Colley’s former home and flat divided by £15,000 Southwark’s own statistic). RCWAAP fails to address this issue and makes CWAAP worse and fails to balance against objectives of fostering “mixed” communities. (2.2.1 , p.15), which now appear to include absentee investors from abroad and disproportionate numbers of students – many of whom will not be home or EU students.</p> <p>Let me be clear – the local community did not support finance / banker “homebuyers” moving into the area, getting subsidised mortgages from their banker employers, and then purchasing homes suitable for “families” and then renting rooms to sharers etc, only then to sell on for a massive capital gains tax free profit later on.</p> <p>Family homes need to be occupied by families, families that include children. Not Party Political Family – although I do not suspect that is what the local Labour Party means by its use of “family”, if we are all “family” then we can all live in family homes. If it was not happening, and family homes are not being lived in by children, then there’s a small chance that what I write could be funny. But it isn’t. We are dealing with some people whose used of words are shamelessly slippery.</p> <p>There is a need for Southwark to improve the allocation of it’s existing Council owned and managed accommodation and this can only be achieved by building new homes that allow all kinds of under occupiers to voluntarily free up Southwark’s family homes on our own Estates. This alternative was never put to the “local” community.</p>	<p>The council's housing requirements study and the AAP itself recognise the need for affordable housing.</p> <p>The council's housing allocation policy is a borough-wide matter and not a matter for the Canada water AAP.</p>
191	764	Part 2	<p>2.2.1 p.13, Things like clothes, shoes, music, books and electronic equipment are moving online. RCWAAP is hopelessly out of date. Opportunities do exist as TESCO and BHS are doing to “click and collect”. Shops can be showrooms, some shoppers with always enjoy physical shopping. But Westfield shows us much that we need to know about a balanced mix and walk around weekdays and it’s the food courts, cafes, restaurants and added value food businesses that are buzzing – and they good margins and would create jobs for people living in the AAP Area.</p> <p>You need to increase and make, add, new additional health care provision in the AAP Town Centre. (Current wording is only “ improve” “local” healthcare facilities, p.15)</p>	<p>The council does not consider the AAP to be out-of-date in this respect. A review of retail need and capacity will be carried out through the preparation of the New Southwark Plan. The site allocation for CWAAP 7 which includes the shopping centre includes a requirement for community use, which could comprise health facilities. Policy 29 also signals the need to improve health facilities.</p>
191	765	Part 2	<p>You write at papa 2.3.4 “We are discussing these with TfL and have established regular meetings with Lewisham council to share information and resources”</p> <p>Are you? How regular? No evidence has ever been produced about all the rich discussions between yourselves and Lewisham or Tower Hamlets. I don’t believe it.</p>	<p>Further details are set out in the Duty to Cooperate Statement.</p>

191 766 Vision

At para 3.1.1, p.17, "The vision and objectives [have been] were derived from our Sustainable Community Strategy, Southwark 2016, are consistent with the Council Plan and Fairer Future principles"

The updated Council Plan and updated Fairer Future principles were not part of the consultations were they?

http://www.southwark.gov.uk/info/200494/how_we_work/2960/fairer_future_principles/1

"We updated our Fairer Future principles in 2012/13 to the following five core principles:

- Treating residents as we would wish members of our own families to be treated
- Being open, honest and accountable
- Spending money as if it were coming from our own pocket
- Working for everyone to realise their potential
- Making Southwark a place to be proud of "

And there is also:

<http://www.southwark.gov.uk/fairerfuture>

"In 2011 the council made ten promises, aimed at making Southwark a fairer place to live, where all residents have the opportunity to fulfil their potential."

And there is:

http://www.southwark.gov.uk/info/200293/a_fairer_future/3165/fairer_future_promises

And if you are going to import party political material into planning then it should be examined in the same way as everything else.

Oh, and there's the vision!

http://www.southwark.gov.uk/info/200493/what_we_do/2959/fairer_future_for_all_vision

And we should examine to see if much of this marketing propaganda puff is relevant for planning strategy or has any soundness to it at all. All too often on close examination it falls to pieces and if anything, we find many instances where opposite and perverse outcomes are delivered.

Vision: do not forget you are expected to make it a reality! Not just bits of it that you really want. It's not a selective vision to pick and mix from.

"a new department store" is not what people said they wanted – they want, see p.22, "32% said they would like to see a Marks and Spencer" and others include John Lewis etc. Department Store is a very wide tag, and includes TK Maxx etc. And BHS is a "department store" and I expect that's what will get. Even TESCO could be described as a "department store". The economy has changed a great deal since 2007/8 and includes 60% plus of "middle class" etc. that are shopping in pound shops, outlets, Lidl/Aldi, so your planning is out of date.

"at least 2,500 high quality new homes"

That is an error and it is out of date.

"The action area will provide at least 875*** affordable housing units."

Is out of date, and the *** leads nowhere!

The Vision continues... "Development in the town centre will contribute towards creating an open environment with a high street feel, high quality"

Residents do not want a "feel", they want a real high street that integrates / meshes Lower Road into the Surrey Quays Centre which has been rebranded Surrey Quays Shopping Centre. Now we need to change back to "Surrey Quays Centre" so that less space used for shopping, and more space is used for non-shopping retail such as cafes.

With climate change – do residents still want an open environment with no protection from the elements? Westfield and others provide protection and comfort to shoppers. You are out of

The Fairer future principles are set out in the Council plan available on the website.

Amendments are proposed to the AAP vision that recognise the benefit of diversifying the economy at Canada Water, ensuring that it is not reliant on retail growth alone.

A minor modification is proposed to delete the asterisks, which are a typographical error from a previous version of the adopted plan but which do not form part of either the adopted plan or the RCWAAP.

date after the wettest year for 200 years: you are routinely just not smart. And you are adhering to the whims of individuals who have made suggestions such as having an open environment that means visitors to the centre and cold, wet and miserable before they even get there.

The world is changing – we can click, and we can go to Stratford seamlessly, or Canary Wharf.

The Vision continues... “Rotherhithe should be a desirable place to live”

Would anyone plan for an undesirable place? What does this add? Nothing. Only to live?

Should? What about “much” or “will be”. This is more pertinent now because the new Plaza is not very “desirable” when windswept and wet. We begin to see the outcomes.

The Vision continues... “Development high quality green infrastructure network”

You have deleted the glossary. I have provided to Tim Cutts two show cards to illustrate this point:

Green infrastructures

The Vision continues... “Development will meet the highest possible environmental standards to help tackle climate change, improve air quality and reduce pollution, waste and risk of flooding.”

Possible?

“Development” included refurbishment of Estates owned by the Council, the largest land owner and provider of housing in the AAP Area, and the Council has resolutely failed to meet the vision as set out above.

The “highest possible” is determined by viability and that means high and exemplary standards are just not possible. These issues were discussed at CWAAP EIP and now we have actual outcomes in 2014/15.

191 767 Vision

Figure 4: Canada Water AAP key diagram, page 18, please remove the Hawkstone “Triangle” from the core area because nothing much is going to happen there. What is your justification for continuing to map the Hawkstone “Triangle” in the Core?

The council considers that the Hawkstone triangle area should stay a part of the core area. Although the site for the new school has been deleted, the council is keen to see improvements to the traffic gyratory which affects the Hawkstone area and which is a key part of the plan. The fact that the area around Hawkstone is included signals the need to improve infrastructure in the area.

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	768	Objectives	<p>3.2.1, page 19, "strategic objectives" have not been adequately tested to ensure that they are working together to create a sustainable overall place. Also think about you slippery use of "local" and how you can make "local" into the borough or London. Think then about "needs" for housing, and needs based on demographics (ageing perhaps) and migration too. London is not made "sustainable" by removing people to the rest of the country: growth also needs a workforce able to work and sustainably live on media wages such as £15,000, min wage or London Living Wage. If not, growth will be harmed and competition reduced.</p> <p>T1, page 19 says : "to ease the impact of new development on the transport network and services."</p> <p>Will not be met, and not up to date. I have already commented in some detail. There is nothing SMART about this objective.</p> <p>P5 says "To reduce the impact of development on the environment and on health and help tackle climate change, air quality, pollution, waste and flood risk."</p> <p>P5 will not be met, and is not up to date. Flood risk has become more pertinent and recent applications only increased concerns about design and precautions for flooding.</p> <p>H1 says "To create a mixed community by providing more housing choices and better homes of a high quality. There should be more affordable housing and different housing sizes including larger homes for families." Page 20</p> <p>H1 will not be met, and is not up to date. You mix excludes because of your policies for Tall buildings >30m, and policies to allow rents up to 80% of local area market rents to be call "affordable". High quality is far too loose. We know from the Council's own housing refurbishments in the Core Area that it's own view about "high quality" is for others low quality and poor workmanship. Lots of evidence for that!</p> <p>"including larger homes for occupation by families". And "larger"? do you mean number of bedrooms and/or exceeding minimum space requirements and/or square meters? What do you mean by larger. SMART wording is it?</p> <p>We see "family homes" built that are not lived in by "families". At worst they are used as investments, left empty, or used to make money by contemporary kinds of yuppie.</p> <p>D2: To ensure that physical and social infrastructure needed to support growth at Canada Water is provided in a timely manner. Page 20</p> <p>D2 will not be met, and is not up to date. Just social and physical? Perhaps "infrastructures", plural, is what you meant.</p>	<p>The objectives have been examined through the EIP on the adopted plan and the council considers that they remain up-to-date. The compatibility of the objectives has been tested through the SA process.</p>

191 769 Policy 1

Paragraph 4.2.1 is not up to date, and not sustainable.
Paragraph 4.2.6 "claw back": Not up to date , not sustainable. You can't claw back. You need to address the future. Get some decent advice, stop listening to people stuck in the 70's and 80's. Westfield's sales are UP in the wettest year for 200 years – they are smart.
Paragraph 4.2.7 is not up to date, and not sustainable.
I object to:
"The exact location of the town centre boundary will depend on the amount and distribution of town centre uses brought forward by the development proposals for site allocation CW AAP 24 and will be negotiated through the planning application process."
I have written my objection by email to Tim Cutts in part.
The criteria in the RCWAAP are in adequate to leave this indicative boundary in the Plan. I understand that a definitive boundary would be identified through a future development plan, once there is greater certainty about the quantum of non-resi uses and their location however you do not say when this "development plan" will be produced and adopted, nor who will be involved and consulted in its creation. You have repeatedly given assurances of producing policy and that not done so.
The boundary needs to be set. When the Council wish to change the boundary then review the AAP.
Existing shopping, leisure and transport facilities: If Surrey Quays Road becomes a "service road" will buses / traffic use the indicated "new" road? Will the "open spaces" indicated then actually becoming a "roadway"?
Paragraph 4.2.8 "Substantial" shopping floorspace instead of significant is noted, and this might now be not up to date, and not genuinely sustainable.
Paragraph 4.2.9 Object to 2,500sqm because we will have applications with 2,499 stamped on them or that kind of petty avoidance behaviour. "Large" is what? Recall the NPPF, "what". Can you tell a judge what "large" is? If not, don't use such loose terms in the first place. You are all highly qualified, experienced and professional and therefore I assume it's on purpose and not a mistake.
Paragraph 4.2.10 Object to the limitation to only "retail growth". You must require and ensure that all developments not only mitigate there impact but also provide funds to ensure the "whole" area, the whole accumulation, has it's impacts and adverse affects mitigated and paid for, together with aspirations etc. of the community / those living in the AAP area. Kings College will not be "retail"? Decathlon will be a lot of "replacement" and not "growth"? Sellar have limited retail in their plans? "retail growth" as growth being net of replacement or renewal of what is already existing may deliver growth. Policy is worded deliberately to allow developers to avoid paying for the wider area to be improved and made sustainable overall.

The phrasing of policy 1 has been previously tested through the EIP on the adopted plan. The owner of the shopping centre site is interested in increasing the amount of retail space on the site and recently secured permission for an additional 10,000sqm of retail space as the first phase of a larger development. A review of retail need and capacity will be carried out through the preparation of the New Southwark Plan.

Future retail development will pay CIL where relevant and will mitigate site specific impacts through s106 agreements. The council recently published a draft s106 and CIL SPD.

For comments on the boundary of the town centre, refer to representation 724.

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	770	Policy 2	<p>Policy 2: Cafes and restaurants in the town centre (page 24) Object and suggest: "We will support provision of appropriate new cafes and restaurants" There are plenty of examples of inappropriate cafes and restaurants. Paragraph 4.2.11 development opportunities: You sat in Core EIP and wrote: Core p.206 "Other development plan documents We are proposing to prepare a development management document for development management to provide more detail policies to accompany the core strategy and area action plans. We are also proposing to prepare a development management document on housing to provide more detail policies to follow the housing policies in the core strategy." Then you did not. You blagged two EIPs. And at CWAAP EIP, and you made representations to the Inspector and those attending that your forthcoming Development Management DPD would take care of this, that and the other. Then you failed to produce it. Now you are holding out that you will produce a "New Southwark Plan". When? What? In my view this institutional blagging must stop. RCWAAP needs to provide more detailed policies of it's own to make sure that development does not harm existing or future residents and recent debacles are not repeated. You cannot continue to go into EIP's and keep holding out that will do something and then not deliver. The Inspectors assume you are a competent local authority and planning authority and you habitual non-delivery means that you lose credibility. SPD for Affordable Housing remains the 2008 version doesn't it? http://www.southwark.gov.uk/download/4104/affordable_housing_spd_2008 Residential design standards SPD: Adopted residential design standards SPD 2011 seems to be http://www.southwark.gov.uk/info/200151/supplementary_planning_documents_and_guidance/1253/residential_design_standards_spd http://www.southwark.gov.uk/downloads/download/2666/update_to_the_residential_design_standards-supporting_documents Not updated either. Additional details of policy were supposed to be taken care of in DM DPD etc. and that was then never produced. Now you are trying exactly the same trick by referring to the New Southwark Plan. You do this so that no detail is ever produced at all, or timely. And for the same reason you erect barriers to the community making a Neighbourhood Planning Forum and Neighbourhood Plan. You also resist detailed aspirations being incorporated into the APP unless they are match your aspirations or the aspirations of your partners, or others of influence. Paragraph 4.2.13 "Our policy would restrict further growth of hot food takeaways" – What policy? Where is it? Are you sure about the wording now? Could we not say "inappropriate" hot food takeaways. There are a lot more newer healthier takeaways and many food chains now do takeaways. Would say that Starbucks is a hot food takeaway? Pret a Manger? Waitrose's free coffee offer? Is McDonald's so bad any more?</p>	<p>The council uses policy in the saved Southwark Plan (policy 3.2) to assess impacts on the amenities enjoyed by neighbouring occupiers. Policy 3.2 will eventually be replaced by a policy in the New Southwark Plan. The council considers that borough-wide policies are adequate for assessing impact on amenities and that further details in the AAP are not required.</p>
191	771	Policy 4	<p>Policy 4: Small scale shops, restaurants and cafes outside the town Centre Paragraph 4.2.15 shows that "small" in scale = below around 300 sqm. Large is? Medium is?</p>	<p>The council is not proposing to change this policy from that which was adopted in the 2012 AAP. The council does not consider that there has been a change in circumstances that would warrant a review of the policy.</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	772	Policy 5	<p>Policy 5: Markets CWAAP Harmsworth Quays / Leisure Site could provide a proper market place. The £2M new plaza is not fit for purpose. Market places are very much at the heart of a town centre.</p>	<p>Policy 5 supports the provision of new markets. The suitability of Harmsworth Quays for a market would be assessed in due course and taking into account the range of locations which could host a market.</p>
191	773	Objectives	<p>4.3 Transport: improved connections (p.25) Paragraph 4.3.1 You are failing to plan to make sure that key routes and links across the whole area make parts of the area accessible to each other, particularly by sustainable types of transport, such as walking and cycling. What does “highly” mean? This is not SMART wording. Elevated walkways? I don’t think so! You need to ensure that ALL development (not just “new”), including development as refurbishment, does not negatively impact upon traffic, congestion and pollution etc. and this all development substantially reduces traffic, congestion and pollution etc. or contributes for that to happen across the whole area. T1 “To use a range of measures” What do you mean “measures”? Do you mean that you are going to continue “measuring” (Verb) – as you have been for many years – and actually do nothing much to change the road systems and conditions? Or are these “measures” something you are actually going to do, measures taken, and paid by collecting many many millions of pounds (from £4 Billion of development) to deliver for real transport improvements, green travel plans, road improvements and a restriction on car parking – and so on, to ease the impact of all development on the transport network and services? You measure the congestion but you take few measures to address it. And in the meantime what you will do is push ahead with “car free / low car” CWAAP 24 leaving the CWAAP 7 Shopping Centre site till last? In that way, property stakeholders can gain the maximum benefit with the minimum of outlay, the road improvements will not happen, the changes to the “Shopping” Centre will not happen as held out, the multi-storey car park and decks will be put in, and “Canada Water’s” back will be turned to the relatively impoverished Southwark West and Lower Road, as the focus is now towards the basin. A basin that, once it is finally filled in against the wishes of locals, will become the “Town Centre” that investors expect? Because it is a nonsense to have a “Town Centre” that is water. Isn’t it? When will you realise, admit the mistake, and move on. You have messed about with wording and added a complexity of “phasing” and sub phasing, and this has kind of made likely plans of the lobbyists rather obvious.</p>	<p>The “measures” which are referred to in the objectives are described in AAP policies 6-10 and include improvements to the road network, improvements to public transport and improvements to cycling and walking routes.</p>

191 774 Policy 6

Policy 6: Walking and cycling: object to "should" and suggest "must" "will" etc. We know that you cannot be trusted with "shoulds". All shoulds in RCWAAP need examination. Shoulds are ruled not to be requirements, and not material considerations.

The network on Figure 7 is incomplete.

I have highlighted some routes on the figure below because these major routes, which also include Surrey Quays Bus Station at Rotherhithe Old Road, and will include the TFL Cycle Superhighway Gyratory, need to be mapped for action, and not ignored. Others will have other routes to add that are missing.

Note "4.3.5 (Page 29) CSH4 will follow the Lower Road Gyratory until the scheme to remove the gyratory is delivered. The Lower Road scheme will be designed to incorporate the CSH principles."

There are varying standards of CSH principles and specification and you have not informed what will be implemented in the AAP. Will it be an impoverished / dangerous / cheap CSH or a high quality/ exemplary TFL CSH?

Figure 7: Indicative improvements to the pedestrian and cycle

Paragraph 4.3.4 "Our strategy is based on the Rotherhithe Public Realm report carried out in 2007"

Paragraph 4.3.4 is out of date, and no longer sustainable given rapid change.

Paragraph 4.3.6 Sustrans have proposed a new bridge to connect Rotherhithe with Canary Wharf. A feasibility study has been carried out for this project which recommended Durrant's Wharf as the most suitable location. We will continue to work with neighbouring boroughs and TfL to support this project.

Have you continue to work with others? What progress have you made? There is now a very expensive cycle route terminating here and no bridge. If the bridge is not going to happen maybe you need to add and redirect the cycle route towards the Town Centre / Basin.

Why does nobody propose a new bridge to carry traffic from Jamaica Road, over Salter Road and over the river to the A1026 Westferry Road? Much less busy than the A200. Or why can't we link through to Deptford? Sites that could have helped make routes have been developed out so now it is even more difficult to solve the problems of traffic. Appalling bad planning, and sticking heads in the sand as car prices fall, more cars are sold and on the roads, and a whole new wave of car users enters the Country with aspirations to enjoy being free to drive. Either strangle cars using the A200 in the first place, put in diversions, close roads and turn them into open green spaces and use for housing, and so on, or sort out the traffic.

If you cannot do any of that then start funding the projects proposed to you for mitigating traffic pollution and effects.

I object to Paragraph "4.3.7 The routes shown in Figures 7, 15 and 24-29 22-28 are indicative and show the main routes the Council wish to improve."

Because "main" is ambiguous, and many "main" routes have been excluded. Do you mean main as the main ones you have selected, or main as the primary routes used with the most footfall and cycling etc? The footfall from TFL's Surrey Quays Bus Station on Rotherhithe Old Road is considerable with the Overground, and 1,000s of homes nearby.

The wording of the policy has been agreed through the process of adopted the AAP. The council does not consider that there has been a change of circumstances since the AAP was adopted that would warrant a change of approach in policy 6. A small number of changes are proposed which bring the policy up-to-date.

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	775	Policy 7	<p>Paragraph 4.3.9 With “16 trains per hour through Surrey Quays station” there needs to be a reappraisal of the AAP approach towards the south and south west of the Town Centre, Core Area and Area. All eyes are on Canada Water basic and that needs to change.</p> <p>Paragraph 4.3.10 states “In preparing the AAP, we have created a multi-modal transport model In revising the AAP, we will re-run our testing to make sure that our strategy for improving transport in the area remains robust”</p> <p>I object if this will create any further delay. I am aware that at least one major property stakeholder has reservations about the road schemes however recent statistics show that traffic and congestion is going back towards high unsustainable – much more dangerous - levels. We had several quieter years to makes changes and failed. Now changes are going to cost a lot more and cause a lot more disruption. Because there is no confidence that you will ever raise the required money or deliver, it is also necessary that being to support and fund projects brought to you that mitigate affects e.g. the Hawkstone / John Kennedy Project submitted to CGS.</p> <p>Re “4.3.11 “On Saturdays, we expect both inbound and outbound bus use to increase by around 38%” Is this up to date? Buses are a major source of pollution because we do not have the cleaner buses / or they are running on diesel.</p> <p>I object to</p> <p>“4.3.12 “Redevelopment of the shopping centre should re-provide bus and taxi facilities and use opportunities to improve them.”</p> <p>Needs to be “must” or similar. We also need charging points for electric cars. Shoulds are ruled not to be requirements.</p>	<p>The up-dates to the evidence base which have been made are described in the Infrastructure paper background paper.</p> <p>Policy 10 refers to the need to provide electric charging points.</p>

191 776 Policy 8

I object to Policy 8: Vehicular traffic
"Proposals must make sure that developments can be adequately and safely serviced and through a transport assessment, must demonstrate that they can mitigate their impact on the highway network"
Need to change to words such as "must ensure that they do not adversely impact on the AAP roads as well as the local highway network and ensure they provide positive benefits to enhance and improve roads to ensure driving is enjoyable"
Applicants demonstrate with simulations, models and plans. We need real delivery. So they, and you, need not only demonstrate but also deliver.
You write: "We will work with TfL and Lewisham to make the following improvements to the road network to accommodate growth at Canada Water"
Have you worked with TfL and Lewisham? What have you done? What have you achieved?
Page 30 says "As a part of the TfL plan to signalise the roundabout at the entrance to the Rotherhithe Tunnel."
They are not going to do that, are they? Elsewhere you have struck through signalise. What are they going to do? When are they going to do it?
I object to 4.3.14 "The current gyratory arrangement..."
Because it creates not only "complicated traffic movements" but also severe congestion (that damages growth and competition) for vehicles accessing and leaving the AAP area! And not just the locations focused on by you as steered and influenced by particular individuals.
You choose words carefully to play down reality. You can no longer get away with it.
The dangerous and polluted "poor environment" is located adjacent to roads and research shows within at least 500 metres of the road, and Plough Way / Lower Road are only two affected locations.
It is a dangerous environment. And a dangerous environment is not "poor" it is scandalous.
One of the most demonstrative locations of severe particulate pollution is the Council's own low rise homes along Rotherhithe Old Road, some of them blanketed with a covering of particulate dust. Dust that affects children and vulnerable adults in particular.
I object to paragraph:
"4.3.15 The proposals in the AAP will bring significant growth"
Because it does not capture "substantial" and the other terms you choose to use such as "maximising" often where "optimising" might do better.
You are planning for substantial growth, in total, at least £4 Billion.
I support
"4.3.17 Our testing shows that reintroducing two-way traffic on Lower Road substantially reduces traffic flows on Rotherhithe Old Road which has the potential to significantly improve the environment for residents."
My comment about the Re-run testing is same as above, further delays in delivery are not wanted. You are likely to re-run testing and miraculously find that you do not need to do anything much at all or have no solution. Any outcome that saves money is what I expect you will end up with.
Are you going to test to see if your phasing will have adverse impact? "4.3.18 As a first phase of the improvements, we will ... enable a straight-across movement from Plough Way to Rotherhithe New Road."
There might be no second phase? You need to show that you phase is actually a "phase" and not just an incidence of something that has not continuance.
What triggers this "first phase"? The first sub phase of the first phase of the individual site "surrey quays shopping centre" that is a component of the phased "site" proposal CWAAP 7?

The council agrees that there is a need to improve the gyratory. The improvements have been identified in the infrastructure plan which accompanies the borough's CIL and on the draft Regulation 123 list. It is a potential recipient of CIL income. Traffic modelling is currently being undertaken by TfL in consultation with Southwark with proposals to be brought forward in late 2014. Alongside this work, proposals are being tested for the delivery of Cycle Superhighway Route 4, with the aspiration that this will run along Lower Road in both directions.

For p.32 "We will raise funds to implement the changes set out in this policy through existing s106 planning obligations standard charge on new developments in the AAP area and, after our CIL has been adopted, through that mechanism"

You are not going to raise the money are you? The new developments at CW are going to say, and show, that they are not car based or add no extra traffic and therefore avoid contributing the substantial money needed for roads.

Your plans are contingent on funding that you are unlikely to get. There is no sign whatsoever that the flow of CIL and S106 – and other funds – is sustainable and therefore there is no financial sustainability to the elements of the plan that cost developers money rather than make developers money (or universities as developers). The Trojan horse, as it might become.

Re 4.3.19 "As well as proposals around the gyratory, TfL are planning to signalise the roundabout at the entrance to the Rotherhithe Tunnel in order to improve access to the tunnel for emergency vehicles."

You have struck signalise out elsewhere. Will this help congestion? When?

Re 4.3.20 "As part of their TA, developments will be expected to use the multi-modal study to assess their transport impacts."

Is the MMS and RMMS up to date? There is now other data available.

Re "4.3.22 The action plan area is located in an Air Quality Management Area, indicating that air quality is below national standards. Saved policy 3.6 of the Southwark Plan states that planning permission will not be granted for development that reduces air quality."

You are granting permission for development that reduces air quality and you are failing to adequately monitor air quality / pollution and failing to adequately identify accumulative affects and complex relationships that can impact severely on particular places and particular people.

191 777 Policy 9

I object to Policy 9: Parking for retail and leisure

Because it is limited to "retail and leisure developments within the town Centre". E.g. You no longer see health services as a Town Centre use and push it to the Core, and so now there is no requirement to provide parking for a health centre! You change one thing, but then you do not have the care to change other policy. Or it is entirely deliberate.

What about parking for all the other uses? Are you uses up to date? Are your uses rooted in consultation? Are your uses sensible?

The policy has been adopted in the AAP 2012. the council does not consider that there has been a change of circumstances that would warrant an amendment of the policy. Parking would be available to users of the town centre. This could include shoppers, people visiting a health centre, leisure facilities, the library etc.

191 778 Policy 10

I object to Policy 10: Parking for residential development in the Core Area

The promotion of "Car free developments" will enable new development to avoid substantial / significant (or any) contributions to road and traffic improvements.

I object to 4.3.29 "we would extend the current controlled parking zone" needs to change to "we will".

What does "we would" deliver? Do you mean - We would have done it, but we couldn't?

I would pay my rent, if I could!

Note the same as we "will" or "must ensure", is it?

The council does not consider that there has been a change of circumstances since the AAP was adopted that would warrant a review of policy 10. The wording of the policy was agreed through the process of preparing the adopted AAP.

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	779	Policy 11	<p>Re p.36 4.4 Leisure: a great place to visit, relax in and have fun Paragraph 4.4.1 Change Canada Water to the AAP Area or the Area “has some great leisure facilities which make the area really...” Respect the AAP Area and all those who live and work within it. Be inclusive, don't exclude. This is an AAP for the Area mapped and indicated by you. Time and time again you then, very slippery and with some deceit in my view, slide towards making it a “Canada Water” plan for the area around Canada Water, not the AAP mapped, and then you further slide to specific areas around Canada Water basin, that then look towards the basin. This is all about one thing – money and influence. And it needs to stop. Change the AAP “area” if you wish to carry on with this disrespectful approach and failure of duty to others, and then we can have a “Surrey Quays AAP” too. Or whatever.</p> <p>Re Policy 11: Leisure and entertainment . This also uses your “focussed” and in your old way, not your new way: “We will support provision of additional leisure and entertainment facilities focussed in the town centre.” You have now said that the town centre boundary indicated with a dashed line will not be given in this plan but decided by the Council’s planning committee. There are two dashed lines, one west and one east. I object to this far too flexible boundary making. How can we comment? How can you carry out a sustainability appraisal? And so on. How can you test a plan where the boundaries have not been decided? Or do you think you can get away with just about anything because you got away with so much before? Shall we ask the IEP Inspector to walk the boundary? Oh, she or he can't. Because you have not decided what it will be! Re 4.4.4 See comment re New Southwark Plan / development Management DPD above. New facilities need to have a positive impact on the amenities of nearby local residents. The word “amenities” and “amenity area” is overused in your policy making. Put amenity into a glossary.</p>	<p>Policy 11 establishes a principle that Southwark will support planning applications for leisure uses in the town centre. Comments on the boundary are set out in the response to representation 724.</p>
191	780	Policy 12	<p>Policy 12: Sports facilities, you need to make sure that “new sports facilities provided in schools are made available to the community for use outside school hours” at a range of prices that all residents and those working in AAP can afford. Including the Decathlon Store? Including Southwark’s own Housing Estate new Sports facilities? If schools are not building in the AAP area then there won't be any new facilities from new schools. And if proposals for existing schools come to nothing then there won't be any additional provision that way either. “The new secondary school which is planned for the neighbouring Bermondsey area for the AAP area would also have new sports facilities” This will be a Free School and you have no control over it. It is also outside the AAP Area. No point even referring to it. You need to provide in the AAP Area.</p>	<p>The need to make facilities available outside school hours for the wider community is set out in Southwark Plan policy 2.4. Policy 2.4 would not apply to Decathlon as it is a retail store. The policy would however apply to all schools, whether or not they are a free school.</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	781	Policy 13	<p>Policy 13: Arts, culture and tourism</p> <p>Needs extending so that “We will protect and strengthen arts, cultural and tourism facilities in the AAP” area long with the environment and nature, etc.</p> <p>Paragraph 4.4.10: There is the potential for new development not only conserve or enhance heritage assets but also “enjoyment” etc. Read the NPPF guidance.</p> <p>Paragraph 4.4.17 The GLA 2006 estimated that Southwark needs to provide an additional 2,500 hotel beds by 2031 to meet growing needs in south London is out of date. Your evidence that there may be a current demand for a hotel of between 120-150 bed spaces is way out of line and a lot more hotel / lodge / hostel spaces could be provided. Have you got letters from the main chains saying they are not interested in making a new hotel at Canada Water? Shall I phone them up and ask them?</p> <p>You will include more hotel beds on CWAAP 24? Because the “student” accommodation tends to become “hotel” style accommodation nowadays during in the hols, it’s big business.</p>	<p>Policy 13 was finalised through a statement of common ground agreed with English Heritage. It is considered to be consistent with the NPPF.</p> <p>The council's evidence base on hotels is set out in the GLA's 2006 hotel demand study as well as the 2010 CBRE town centre viability report. It was tested through the preparation of the adopted AAP and was considered to be sound.</p>
191	782	Objectives	<p>4.5 Places: better and safer streets, squares and parks, p.40</p> <p>Objectives P1 green spaces “and the area’s green spaces and heritage should be enhanced, especially the River Thames, the docks and the parks to create a distinctive sense of place.”</p> <p>The area’s green spaces and places, and heritage, also needs protecting as provided for in the NPPF. Not just enhancing. “Enhancing” can be misused and is open to interpretation.</p> <p>P2 To create an attractive, safe, and secure public realm</p> <p>High Quality? Exemplary Quality?</p> <p>P3 and nature conservation</p> <p>High Quality? Exemplary Quality? You are not adequately maintaining the nature we have – e.g. the birds eggs rolling into the docks from pontoons through neglect.</p> <p>P5 “To reduce the impact of development on the environment and help tackle climate change, air quality, pollution and waste and flood risk.”</p> <p>You need to ensure that development has a positive impact. You keep drafting to “reduce impact” which presupposes an adverse impact to begin with. Alternatively it could be read that you are drafting to reduce all impacts and therefore you plan to reduce positive impacts. Since Southwark is considered to be rather “silly” and occasionally bonkers, this reading is also plausible.</p>	<p>The objectives were considered through the preparation of the adopted AAP and were considered to be sound. The council considers the objectives to be up-to-date.</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	783	Policy 14	<p>Policy 14: Streets and public spaces</p> <ul style="list-style-type: none"> • Create practical and logical access routes for motor vehicles. <p>Why not attractive & safe & exemplary design? Wording is incomplete.</p> <ul style="list-style-type: none"> • Create strong physical and visual links between the Canada Water basin, the shopping centre and Lower Road. <p>Why have you struck through this text? I object to that. New high street and public realm that integrated and meshes Lower Road Town Centre shops and Overground with Surrey Quays Centre and Harmsworth Quays development is required. There needs to be a substantial and extensive, and expensive, rethink about the roads, crossings, connections and layout. Tinkering is not adequate.</p> <p>“Strengthen pedestrian and cycle links from the town centre to open spaces including Greenland Dock, Russia Dock Woodland, Southwark Park, the Thames and Deal Porter’s Walk.”</p> <p>Why only “strengthen”? attractive & safe, practical and logical, high quality???</p> <p>What about all the other links you have excluded?</p> <p>What “Town Centre” are you referring to? You’re new Canada Water Basic Town Centre or the original AAP Town Centre?</p> <p>Are the pedestrian and cycle links included in “Provide high quality, safe and inclusive public realm.”?</p> <p>“Incorporate carefully designed public spaces which provide comfortable environments for pedestrians and which are safe with logical paths for vehicles where necessary to avoid conflict with pedestrians and cyclists.”</p> <p>Carefully designed? Is the careful design high quality or exemplary? Design is not providing, because designs can be badly executed. Why comfortable for pedestrians? What do you mean?</p>	<p>The wording of the policy was considered through the preparation of the adopted AAP and the approach was found to be sound. The reference to Lower Road was deleted and added to policy 16 instead.</p>
191	784	Policy 15	<p>Policy 15: (Page 40) Building blocks</p> <p>“Use high quality, durable, robust and sustainable building materials that contribute to a sense of quality and create the impression that development is permanent and built to last”</p> <p>Why “sense of”? Why “create the impression”? Do you mean fake?</p> <p>Conserve or enhancing heritage assets and their settings needs to include enjoying.</p>	<p>The wording of the policy was considered through the preparation of the adopted AAP and the approach was found to be sound.</p>

191 785 Policy 16

Policy 16: Town centre development
 "Development in the town centre should"
 I object to "should". Should's are not requirements and are disregarded by the Planning Committee and Officers.

"These routes should contribute to the creation of an open street environment, rather than a covered or mall style environment.
 I object to should. Should's are not requirements and are disregarded by the Planning Committee and Officers. Do shoppers and town centre users want an open street environment nowadays? Don't they at least want semi-protection from the elements and covered walkways?
 "Enhance the setting of the Canada Water basin and adjacent public spaces as the focal point of the town centre"
 You have changed policy, and I object at this time. You have not made clear what "adjacent" includes, how far it extends. You have not made clear what is not now going to be enhanced.
 • Create strong physical and visual links between the Canada Water basin, the shopping centre and Lower Road.
 Lower Road is a very long road. You have failed to specify a new high street that is connected with, and integrates the Lower Road "shops" section of Town Centre and Surrey Quays Station with CWAAP 7 and CWAAP 24. This "back turning" continues:
 Enable the integration of sites to the east of Surrey Quays Road (CW AAP24 - Harmsworth Quays, Surrey Quays Leisure Park, Site E and Mulberry Business Park) into the town centre
 Lower Road section of the Town Centre also need integrating with CWAAP 24 and other proposal sites through links. You new Town Centre is the basin? And the original AAP Town Centre is being impoverished and disregarded.
 "by providing strong visual and physical connections which link them to the basin, shopping centre and tube station, introducing a new public space on Surrey Quays Road and in the longer term closing the southern end of Surrey Quays Road to through traffic."
 Overground?
 This time it is strong visual and physical connections and not "feelings" or "impressions" I note!
 Visual and physical connections to Overground Station?
 Visual and physical connections to Lower Road "shops" Town Centre section?
 The connection from the Shopping Centre / Overground Station as currently planned are poor for pedestrians and dominated by traffic and multiple crossings.
 You have proposed no adequate solutions to barriers and various "gaps" between Town Centre sections.
 Close Surrey Quays road? Where will the traffic (inc buses) go?
 "A masterplan for the shopping centre and overflow car park will be required as part of a planning application for the first phase of development."
 What is the first phase now? Of what? Sub phase? Sub Sub phases? A master plan was provided before Harmsworth and presumably that needs to be substantially revised.
 RE 4.5.2 We have shown how the principles we set out here should apply in. Figures 24-29
 I object to and amend these figures.
 I object to the striking out of 4.5.5 and 4.5.6.
 4.5.7 The Canada Water basin is filled with water and can a "heart" but cannot be a Town Centre for many uses because it is filled with water and cannot be walked upon by mortals. I expect you plan to fill it in, and this is your long term objective.
 4.5.7b I object to the wording "retail axis" (what is that?) introduced between the basin and Lower Road. I object to the weakly worded "The introduction of" a new high street. Suggest "we

The policy was considered through the preparation of the adopted AAP and the approach was found to be sound.

The amendments which are proposed to the policy respond to the need to review those parts of the policy which relate to Harmsworth Quays.

With regard to the justificatory text, some amendments are proposed to ensure that the text continues to read coherently. This applies to paragraphs 4.5.5 and 4.5.6 which have been moved to 4.5.9a to make sure that the text flows. The text in 4.5.5 and 4.5.6 was agreed in a statement of common ground with English Heritage during the EIP of the adopted plan. It is considered to be consistent with guidance in the NPPF.

4.5.7a responds to the availability of Harmsworth Quays for redevelopment and is informed by the council's evidence base (the Hawkins/Brown study) which identifies the importance of the space on Surrey Quays Road.

4.5.7b is introduced because it was considered that references to the shopping centre and Lower Road in policies 14-16 required some clarification and to ensure that the text remains balanced. The text introduced is consistent with policy 31 which addresses Lower Road specifically and CWAAP 7 (para. 7.8.11) which refers to new high street and also connections with Lower Road..

will provide..." or whatever makes it a surety beyond any doubt.

4.5.9 "Development should aim to make the area around the shopping centre feel like a town centre which has an open, rather than a covered or mall style environment."

Suggest you reconsider having no cover etc. Not up to date. Not sustainable. I object to "should". I object to "feel" and "area the shopping centre" extends how far? Isn't your new Town Centre focus, and where a lot of money is going, around the water filled Canada Water basin?

4.5.9a In line with the NPPF, development should conserve or enhance the significance of heritage assets and their settings.

I object to "shoulds". If you keep using "shoulds" all the way through the plan then it will end up requiring next to nothing.

You need to include other NPPF/guidance words such as "enjoy".

4.5.11 page 44, I object to "maximise": consider "optimise" and this development is not all about maximising the financial returns that are required by the contracts you sign. Contracts that can interfere with your duty of are as a public authority in regards to your other duties and obligations.

The Core Strategy states:

5.114 "we will work with the GLA, English Heritage and CABE to prepare detailed guidance for appropriate tall building locations, heights and design in planning documents covering each of these areas, taking into account characteristics that may make them sensitive to tall buildings, including heritage assets and wider historic context"

Have you done that for RCWAAP? What evidence do you have of working these organisation to prepare detailed guidance?

191 786 Policy 17

Policy 17: "Prevailing building heights in the core area should be between 4 and 8 storeys." Between 4 and 8 is 5, 6 and 7.
I object to this inflexible policy. There is a housing crisis, and some sites may need to be 4 or less, others 8 or more.
4 or 5 becomes a minimum? 7 or 8 becomes a maximum?
Page 121, indicators: "Percentage of approvals that accord with the building heights target"
What is the target? Between x and y? Or x, y and anything between x and y?
It was 5 and 8 storeys in CWAAP 2012.
Reminder of text struck out:
Figure 9 updated shows only indicative area of 20-25 storey buildings.
What do you mean "the periphery" of the core area? Where? Can you please indicate on a map. Do you also mean everywhere that is not "periphery" will not be at the "lower end"? Do mean by lower end 4 or less? Or 5?
Reminder of text struck out:

Why do only variations in height add interest? There are other variations to consider.
Why relate juts to surrounding development? Only development? What about surroundings that are not development?
Tall buildings (above 30m in height)
"the character and function of the centre" is incomplete. What is the character and function you plan? Clarity: "centre" of what? What centre?
a) Centre of AAP
b) Town Centre as mapped currently in AAP
c) Town Centre as mapped in RCWAAP and left to be decided by the planning committee
d) Town Centre around the Plaza
e) Town Center around the Shopping Centre
f) Town Centre around the basin?
And so on....

"In particular, they will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the town centre."
Why "in particular"? The Town Centre extends quite a distance down through Lower Road shops and I do object to the "Canada Water basin and surrounding public spaces" being set as the focal point within the town centre.
"around 20-25" means "around 20 to 25"? What is significantly higher than 25 storeys? Substantially higher?
What do you mean around? 42? "20-25" is a range that 42 is around? Isn't it?
Should not all tall buildings contribute positively to London's skyline?
What does "when viewed locally" mean? What local? What viewing point? Local as our area, local as borough, local as London?
Reminder from Core "Southwark plan Policies and Objectives infrastructure Policy 3.21 Strategic views"
RE: Provide public space at ground level.
Why should Public space be proportionate to the height of the building?
Gerkin / Walkie Talkie? It's not all about height.
[Typo: Contribute to en environment]
P.44 "All tall buildings over 30m must"
A building of 29.99m will avoid the policy?

The council disagrees that the policy is inflexible. The council has not sought to design the skyline or set out a rigid masterplan. The height ranges set out and the approach have been designed to ensure that developers and designers can work within a framework that provides a clear direction but which is not overly prescriptive.

The council considers that the language used in the policy, such as "periphery", "prevailing", "amenity", "low" etc is sufficiently clear. As is noted above, the intention of the council was not to set out a very rigid policy but instead provide a framework that will provide developers with some flexibility while giving the council the tools to rigorously assess proposals.

A key part of this framework is that in the council's view, the basin and surrounding public spaces should be the focal point within the centre. The rationale for this has been informed by the council's urban design study and the Hawkins/Brown masterplanning feasibility study. These tested a number of options for the structure of the centre, including that in the adopted AAP which envisaged the focus lying on a linear axis between the tube station, the basin and Lower Road. The availability of Harmsworth Quays for redevelopment provides the ability to expand the town centre to the east. This dynamic changes the focus of the centre, giving more prominence to the basin, the public realm and shops and cafes around it.

The provision of public space with tall buildings is a key part of the policy. Tall buildings require sufficient space around them to provide a setting which feels comfortable. The taller the building, the more generous this setting should be. Tall buildings also play a useful role in freeing up public space at ground level. The current environment at Canada Water is characterised by large mono use blocks which are difficult to move around. A key objective of the council is to create a much more permeable environment and tall buildings can help deliver this objective.

The council's evidence base work also identified important gateways into the centre. One of these is on Surrey Quays Road, approaching the library and tube station from Lower Road. Other gateways are located at the junction of Redriff Road and Surrey Quays Road and the junction of Lower Road and Redriff Road. Notwithstanding the fact that the town centre extends southwards along Lower Road, buildings at these locations can be used to help identify entry points into the centre, giving definition to the structure of the centre and helping make it easier to find one's way around.

What is the design cannot provide public space at ground level? Decathlon's sports pens are not at ground level. Are you not being too inflexible?

Why only proportionate to height? Girth? Volume?

Easy to move around for cars, disability scooter users, animals such as dogs and guide dogs and so on.

Are you clear about the functions of the town centre that you require applicants to reinforce?

RE: London View Management Framework (LVMF) and strategic views of St Pauls Cathedral from Greenwich and Blackheath and river prospect views from London Bridge.

P.44, I object to wording "Have due regard to" because we know from the Design Review Panel debacle that this is a very grey slippery term that can end up having no power whatsoever.

"Conserve or enhance the significance of heritage assets and their settings, including Southwark Park which is a historic registered park, St Mary's conservation area and King Edward III's conservation area."

Why is there no proposal for a conservation area for Southwark Park and it's setting? You take conserve and enhance from NPPF but not "enjoy".

"Demonstrate a considered relationship with other tall buildings and building heights in the immediate context in views"

What? Just demonstrate or actually perform and deliver? What is a "considered relationship"?

Just height? No girth? What is the "immediate context"?

Why "Be slender and elegant"? – That can also be ugly! And the Walkie Talkie is a very successful building commercially and designed to provide public space around the foot of the building.

I object to the "adequate" and you need to ensure that residents are not robbed of their sunlight.

"Allow adequate sunlight and daylight into streets, public spaces and courtyards – and neighbouring properties"

How many metres away is a neighbour?

"Avoid harmful microclimate and shadowing effects or adverse affects on local amenity"

Harmful effects and wind funnelling must be mitigated.

Grammar: I object to tricky use of grammar. In the sentence above and throughout the RCWAAP.

No glossary: What is amenity?

I object to the following text:

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.

To whom is the exemplary standard of design going to be demonstrated? The Planning Committee? The DRP? The local residents who have to live with the outcome?

Will it be delivered?

Why "significantly exceeds minimum space standards"?

What is wrong with the minimum space standards?

1) RCWAAP Policy 17 - All tall buildings over 30m must: (note the "must" and inflexibility)

"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." (my emphasis)

Outcome: Only the rich will be able to buy and occupy in these tall buildings. Is there something impoverished about the min space standards? The effect is to raise price and reduce viability of "affordable housing". There is no "mix". You do not want "affordable housing" in tall buildings

and this also socially engineers some specific intended blocks. Viability is further reduced by over doing public access for viewing galleries (how many do we need???), and very oddly, given the Walkie Talkie and the Gerkin, requiring tall buildings to be slim and elegant! (Reducing viability of homes and public space at ground level around the building). This wording is not a solution to the ugly tall buildings such as the Barrats Tower.

"Incorporate communal facilities for residents of the development" is objected to because these courtyard type forms of community facility amenity barred to the public become a form of "gated" community. We cannot have one rule for private developments and another rule for our Housing Estates.

Significantly higher than 25 storeys? How many storeys is significant?

"viewed locally and in more distant views" What do you mean locally?

"Include a publically accessible area on upper floors where feasible."

All of them? Needs to be specific. How many do viewing areas do we need? This was taken too far at another Bankside development. Something like £500,000 cost.

Public access needs to be free if provided.

Other special buildings, page 45, "which need not be tall buildings over 30m"

Why is this worded in this way? "Which need not..."

If Lower Road and shops are already included in the "Town Centre" then one "gateway" to the town centre is at the end of the Lower Road Section. There is no need to mark the south-west corner of the shopping centre as a gateway "into the town centre".

This section of text makes clear the truth – you reveal yourselves – that in fact the Town Centre is no longer as mapped in CWAAP and including Lower Road and Lower Road shops into the "Town Centre" map was just a trick to placate those working, living and trading from Lower Road.

Reminder of text struck out – e.g. "road junctions". This was judged sound in 2012 and is it not sound in 2014?

4.5.18, now struck out, referred to "Tube stations", plural.

4.5.19 strikes out a landmark tower at Surrey Quays station.

When did you consult to make all these non Harmsworth Quay south west CWAAP 7 changes?

Figure 9: Tall buildings strategy, page 46

4.5.12a "The AAP vision is to create a strong and vibrant town centre at Canada Water."

Which "Canada Water" is "at" location? Do you mean the AAP Town Centre as already adopted and the proposed revision? Or your new "basin" Town Centre area?

Appropriate "scale" is not just height.

"The range of heights (4-8 storeys) will help ensure the development on the periphery of the core area can be consistent with the lower scale of surrounding development"

There is no "between" before 4-8 storeys? Now it is a range. How does that link to your new indicator "target" on page 122?

Is 4 the minimum?

Is 8 the maximum?

So no buildings of 1, 2 and 3 storeys will be allowed?

Have you set a height for a "storey" clearly?

Policy 17 above: "Prevailing building heights in the core area should be between 4 and 8 storeys."

I object to this inflexible policy. There is a housing crisis, and some sites may need less than 4. Others more than 8.

What do you mean "on the periphery of the core area"? Where? Can you please indicate on a map. Do you also mean everywhere that is not "periphery" will not be at the "lower end"? Do mean by lower end 4?

"(4-8 storeys)" means 4 to 8?

So the core heights will the higher end 7 and 8 storeys?

Or between 4-8 storeys, so the core heights will the higher end 7?

Heights at the upper end of the range seem to be governed by the strategic views and LVMFSV corridors permit – it is nothing much to do with helping define more important streets and spaces. The London wide higher policies are controlling you decision and planning.

You refer to Maple Quays however this development is not at the periphery of the Core Area.

And some like me might say that this development could have been higher and provided more homes. You keep changing the core area, and you muddle it in with the Town Centre too.

Incoherent tinkering.

I have taken the Core Boundary, Town Centre Boundary (2012), Town Centre proposed (2014) and meshed it with Figure 9, and then marked in storeys as best I can from your draft policy:

I welcome your comment on this diagram and you producing your own clear version.

The diagram about is not a suggestion, I have sought to draw what I understand you to be suggesting.

4.5.12b "roughly 10 storeys": object to "roughly" wording.

How rough is rough?

Look back on yourselves:

range of heights on the periphery of the core area = (4-8 storeys)

Prevailing building heights in the core area should be between 4 and 8 storeys

The you write:

there is also the potential for tall buildings roughly 10 storeys in the town centre

That is only 2 storeys more! 10 less 8.

Prevailing means? Generally? Most frequently?

This leaves clear policy, that at the periphery of the core area we may end up with at least all buildings of 4 storeys minimum, maybe 5 storeys, then a few meters later 8 storeys, then 10 storeys and with 40+ storey tall buildings within that too.

Designed well? Don't you mean exemplary etc?

Right locations? What locations? Please map indicatively.

P.47, "The benefits in providing tall buildings include:"

The list provided is very selective and too short. There is also potential to provide affordable homes in tall buildings.

The town centre functions provided are incomplete. A key to a vibrant and successful town centre is proposed it is something that a Corporation might provide. Did British Land write it for you?

Key alternatives might be character (deleted from appendices) or community. An adjective used in other plans is "attractive". For example, a key to a vibrant town centre might be a market as shown by Lewisham.

This kind of vibrancy is not a key that corporate types will bring forward.

"A townscape which is easy to understand: Tall buildings can help way-finding and help signal the importance of a destination"

If you believe this to be true, then you are deliberately planning to hinder way-finding and not signal the importance of some destinations such as Surrey Quays Overground station or Lower Road Shopping Area. You have wiped a tall building at the south west, and will infill with

8,9,10+ storey buildings along the "new high street" so it will only be John Kennedy House that will point the way. And I think we would need to see how John Kennedy House would be obscured by heights of 8,9,10+ storeys.

4.5.12c "important" "reflect" are very weakly worded.

4.5.12d "The basin and public spaces around it have the potential to be the focal point of the town centre and should also be the focal point for the tallest elements of development."

This is a change in plan, substantial and significant, because less money will flow from applications in proximity to Lower Road and Surrey Quays Overground. Not much CIL or s106 will be generated by the car deck, car parking or multi-storey parking that we are going to have forced onto the southwest corner as Canada Water turns it back.

And ensure as much cars, traffic and pollution is push towards us, on the south west, as they possibly can.

"new town centre uses" needs to be clarified. What uses are in, which are excluded. Is the Health use in, or out?

"new public spaces" needs to be clarified because you are already looking at putting a new road through the proposed open public spaces of Harmsworth so that SQSC can get a new service road. You give, then you take, who benefits? British Land et. al., not the public. That is not the vision.

4.5.12e Special buildings can help mark gateways into the centre. Buildings in these locations need not be over 30m but should provide distinctive design, public space and active uses which helps identify the location as a point of transition.

What centre? The Town Centre?

If Town Centre then with integration between sections of the Town Centre there would be no need to identify a point of transition except at a Town Centre boundary.

Of course you have multiple Town Centres which to remake to suit whoever is lobbying you one year to the next.

4.5.12f "While tall buildings may be appropriate in parts of the centre"

What centre? Town centre?

4.5.12f "there are other parts of the centre which are sensitive to tall buildings."

What centre? Town centre? What parts? Please can you provide a map / illustration showing the parts that you have obviously created within the Town Centre AAP area.

4.5.12f "there is a protected view of St Paul's Cathedral and Tower Bridge from Greenwich Park which means that buildings on the shopping centre site should not be more than 30m high (roughly 10 storeys)"

Not just the shopping centre site. And not the whole of the Shopping Centre site.

You provide a fact box on Page 48 that indicates that Tall Buildings are those "which are higher than 30 metres...)

Here you set 'buildings on the shopping centre site should not be more than 30m high' thereby encouraging 29.99 metres and avoidance of all requirements for "tall" buildings: spooky.

Is the viewing corridor actually being used as an excuse and avoidance device?

"should" needs to change to "must" and if you are going to have such inflexible requirements then I think you need to make policy and wording that deals with deliberate avoidance of requirements by lawfully applying at under any trigger level.

4.5.12f "It is also important that proposals do not create a canyon effect on either side of the protected viewing corridor."

This needs to be explained and justified. And linked to storey guidelines. There are a lot of homes originally intended for the shopping centre site, and a huge demand for homes. Local politicians campaigned and encouraged our residents to believe that these homes might be

available for us to move into. Now that is unlikely.
You mention a canyon effect but you do not consider other effects such as a framing effect or a flooring effect. If you designed buildings differently then there might be no harm done to the views and it could actually be enhanced. I think there has been very poor work on this issue that will cost us a lot of money and a lot of homes.

4.5.12g Wording. E.g. "conserve or enhance" needs to include enjoy.

"Tall buildings may be visible from these areas and therefore impacts on these heritage assets and others which may be impacted on should be addressed by proposals."

Must, not should. Southwark Council has shown little regard when refurbishing it's own blocks around Southwark Park and therefore "should" is clearly not working even when it comes to the Council.

4.5.12h "There is a need to ensure that the relationship between tall buildings is considered to ensure"

Who, what, when will perform the "need" to ensure? Is this sentence a dogs dinner?

"Individual buildings should be distinguishable and contribute positively to the local skyline."

Should change to must.

4.5.12h what is significantly taller than 25 storeys?

Not necessarily if the skyline relationship is with the London View Management Framework.

Do you have a diagram of the skyline you are referring to?

4.5.12i "As they will comprise "vertical communities", communal facilities should be provided for residents of the development, such as viewing platforms, winter gardens and flexible meeting spaces."

What is they? A tall building of 10 storeys will not be able to do that because of viability. Be careful you do not make a lot of policy that ensure that all benefits accrue to the developer and subsequent occupiers and next to no, or little, benefit is provided to the AAP area because there is no remaining viability to do so once all your policy requirements are satisfied.

We'll end up with palaces in the sky surrounded by squalor.

4.5.12i "Buildings which are very tall will have spectacular views and should provide a facility for the general public which takes advantage of views."

What is very tall? And how many of these buildings will we end up having? A facility could be small, and need not be large. The 14th Floor of John Kennedy House provide a facility – the window at then of the communal corridor.

4.5.12j "saved policy 3.20 of the Southwark Plan." You are starting to make a New Southwark Plan and what is emerging from that?

Fact box:

Taller buildings are....

"In areas which have a low scale character, any building that is significantly higher than surrounding buildings will be regarded as a tall building even if it is lower than 30 metres.

What is low scale character? What is low?

How does this relate to your urban density zone and other zoning?

Add at the end "(or 25 metres in the Thames Policy Area)"

Significantly is how many storeys of metres?

Just higher? Is height the only factor? The Gerkin and the Walkie Talkie are not just tall. Nor is the Shard. They all have other very important attributes.

Where are the areas which have a low scale character? Have you mapped and updated the maps? Linked to density zones?

Why "regarded"? Why not "will be a tall building" Is it because you want to have the lawyers

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Policy

Details of Representation

Officer Response to Representation

argue about the grey use of "regard"? Or you want to leave the hole open so you can disregard? And the planning committee members can disregard if the Blackberry instructs?

191 787 Policy 18

Policy 18: Open spaces and biodiversity, is not up to date, not adequately “sound”, and not justified, effective and consistent with national policy. It is founded on an evidence base that is not adequately on robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately “effective” because not deliverable and flexible enough and we know monitoring is poor.

By outcome, you are failing to protect and maintain and enhance a network of open spaces, green corridors and habitat for wildlife. Your approach to recommendation and protection of open spaces is unsound, not justified, and not effective and not consistent. I have sent comment to Tim Cutts in regard to this issue that I incorporate herein e.g. protection of amenity space on housing estates, and Southwark’s discrimination (by tenure and otherwise) in regards to this matter.

You do recommend open spaces on housing estates e.g. Neptune Street Park, when it suits you to do so and in response to lobbyists. There is nothing objective about your approach to protection.

What are important spaces?

Your approach is not consistent with or in compliance with the NPPF.

I object to limiting opportunities for food growing to “new” development only. What does it take to get the Local Authority as land owner of 4000+ homes in the Area to take its social responsibilities seriously and apply planning policy to itself? Refurbishments cost many millions of pounds and are also an opportunity to implement many good policies.

Policy 18 refers to the Core Area, and although the boundary of the Core Area has not changed policies such as “storeys” and “zones” have changed. It is therefore only right and just that Policy 18 be opened for comment. Let me know, and I will be happy to comment further. Otherwise see you at EIP.

I object to Figure 10 for the same reasons as 2012 etc – the map is incomplete of open spaces that require protection.

Para 4.5.21, page 52, Why have you deleted “Many of these are protected in the core strategy either as Metropolitan Open Land, Borough Open Land or Other Open Space.”?

Are you planning to remove protection in your New Southwark Plan? And therefore you are already authoring RCWAAP to be in conformity with the New Southwark Plan?

4.5.22, p.52, I object to you deleting:

“We surveyed existing open spaces in 2003 in preparing the Southwark Plan. We are currently updating this survey and preparing an open spaces strategy which will include a capital investment framework. Existing evidence highlights the lack of allotments within Canada Water and the importance attached to amenity green space. We will address these matters through our open spaces strategy and, as necessary, through future planning documents such as the Sites Allocation DPD.”

Capital investment framework? Where is the money? Where will it come from?

Lack of allotments?

“and the importance attached to amenity green space”- deleted out.

“We will address these matters through our open spaces strategy”: you did not.

4.5.24 “The residents’ survey undertaken showed that people in the Canada Water sub area of the Open Space Strategy...” Have you changed the sub area?

4.5.24a

Why does the Open Spaces Strategy recommend Neptune Street Park for protection and also meeting your core strategy criteria for “other Open Space” designation?

Why do other housing estate open spaces, like Neptune, not meet your core strategy criteria?

The approach in policy 18 is consistent with the council's 2013 open space strategy, as well as the saved Southwark Plan and Core Strategy. The approach was considered through the preparation of the adopted plan and considered to be sound.

Amendments are proposed which recognise the need to provide allotments or food growing space in the area and also which identify additional spaces for protection. The spaces identified meet the criteria for establishing open space protection which were agreed through the Southwark Plan. Neptune Street park is managed by Southwark Parks and not by Southwark’s Housing department, hence its inclusion. The council does not consider that convincing evidence has been put forward for the protection of other spaces.

The reasons why the council has not chosen to protect housing amenity spaces is set out in the response to representation 702.

No changes are proposed to the open spaces standard which is set out in the policy and there are no plans to release any public parks for other uses; indeed all public parks are protected open spaces.

Open space improvements are identified on the infrastructure plan which accompanies the CIL and the district parks, which include Southwark Park, are identified on the draft Regulation 123 list. Open spaces are a potential future recipient of CIL funding.

The changes which are proposed to the justificatory text are made to ensure that the text flows and remains coherent, to update references to the 2013 open space strategy, to refer to food growing and to provide additional clarification on housing amenity land.

Are you core strategy criteria in compliance with NPPF?
You do not allow the community to protect open spaces, open green tranquil spaces, on Southwark's housing estates. Why not?

4.5.24b

At 4.5.22 you inform that there is 44ha of public park space in the AAP Area which equates to 1.53ha per 1,000 people and that this is much higher than the borough-wide average of 0.91ha per 1,000 people. Falling in our AAP Area to 1.22 ha by 2026.

At 4.5.24b you say that "The Open Space Strategy sets a borough-wide target of maintaining at least 0.72ha of public park provision per 1,000 people (on the basis of 2026 population levels). This "borough wide" target has no relevance to our planning for our area. You will not be chalking up any "surplus" of open space between the 0.72 and 1.53 ha per 1,000 people. A surplus that on the face of it means that you could build on either Southwark Part or Russia Dock Woodlands.

What you are doing is attempting to get the Inspector at EIP to endorse these ratios for future use. Our area has 1.53ha per 1,000 people, which we share with adjacent Areas including Bermondsey and Lewisham, and that is a ratio to maintain as population rises.

"A new pocket park will be provided on Site A" – is this open to the public

4.5.25 – you need to reinstate the sub-report for Canada Water recommendations for 1.22 ha per 1,000 population based on retaining the existing park provision and taking into account the increase in population in the AAP area and surrounding areas (see NPPF), plus migration (see NPPF) and other factors. However, I am now seeking 1.53 ha per 1,000 as you increase the storeys and substantially and significantly change CWAAP.

At 4.5.26 you need reinstate funding for open space improvements and delivery of the open spaces strategy and delivery of CWAAP/RCWAAP , and the emerging aspirations of the community in a Neighbourhood Plan.

I object to deleting 4.5.28, I object as a resident of the core area. We need new open spaces in additional to existing open spaces. These to deliver functions such as food growing.

4.5.28a I object to "Requiring new development" and suggest "Requiring development". Again the council seeks to policy itself out from the plan and the 4000+ properties it owns and refurbishes as development. There now needs to be retrospective action where the council has been avoiding.

4.5.28b I object to the whole paragraph. You have not said how improvements will be paid for. You have not said that these areas will be protected. You have failed to define "amenity".

4.5.29 Has been changed by you changes to what is "Canada Water" and "within the Canada Water". You do not mean swimming within the Canada Water, but you have no attention to detail – so it could read as swimming in there. The point is that it need to be clear that this is a the AAP Area, and not you "fetish area" around the basin.

Email to Tim Cutts:

Hi Tim,

"Attach two snippets from Southwark's Maps:

1 snippet of Nelson Square (Southwark Housing Estate amenity area? HRA Asset?)

1 snippet of Neptune Street Park (Southwark Housing Estate T&RA Hall Grounds / amenity area? HRA Asset?)

Blackfriars Road Supplementary Planning Document (Jan 2014) states "Ensure that protected open spaces at Christ Church Gardens, Nelson Square and Paris Gardens are maintained and enhanced as part of high quality green infrastructure for residents, businesses and visitors."

(No glossary again, so high quality green infrastructure could be a green post box sponsored by Lend Lease).
 And RCWAAP proposes to protect Neptune Street Park as OOS which I support as a good thing.
 But, in contrast, for many years now, Southwark has consistently responded that it does not recommend, designate or protect open spaces on its own housing estates, including important spaces such as the Hawkstone's public open green spaces and the Osprey Estate's squares. Southwark does provide protection: mostly by using conservation areas. Loads of Estates and their amenity areas are within CA's.
 Nelson Square and Neptune Street Park are both mapped as being included with a Southwark "housing estate" boundaries.
 There are other examples that I'll bring along to the RCWAAP IEP as needs be.
 Is Southwark's mapping system in error? Outdated?
 Of course I'm going to re comment about NPPF Local Green Spaces because Southwark has simply failed to comply with those requirements, but this enquiry is to double check that Southwark still wishes to stand by its previous responses and stated policy - which looks to be untrue.
 Southwark owns a substantial part of Rotherhithe Ward and it depresses me to see how some open space is invested in, and protected, while other space is left. Sometimes to degenerate and rot, as the publically used children's play ground has been on the Triangle. With the new flat development CWAAP15 let off paying anything towards the playground repairs as was babbled years ago.
 I also remain concerned about the newly refurbished square in Albion Street that is also shown as being on a Southwark Housing Estate and therefore denied any chance of protection.
 Regards,
 Jerry"

191 788 Policy 19

Policy 19, p.55
 Children's play space policy, is not up to date, not adequately "sound", not justified, and not effective and consistent with national policy. It is founded on an evidence base that is not adequately robust and credible, and reasonable alternatives has not been adequately considered. RCWAAP is not adequately "effective" because not deliverable and flexible enough and we know monitoring is poor.
 The figure on page 55 (of Cabinet's pdf file I am using to make this comment) has been amended to show a "local playable space" on John Kennedy House grounds. Far from being improved and enhanced, the play area has deteriorated. The football Pen – hugely successful and very well used – has not been maintained and fallen into disrepair. Either remove the "doorstep playable space" from your map, or plan to substantially improve it. Nearby proposal sites (CWAAP 15) have not generated any funds to improve this public facility.
 You have now removed the proposal for Rotherhithe Primary School however you retain the "Youth Space" on your map. Please either plan to provide this youth space – and the money for it – or remove it from all RCWAAP maps.

There is a doorstep playable space on the Hawkstone estate hence it is shown on the plan.

There is also a multi-games area on the site of Rotherhithe primary school. The council's strategy is to co-locate youth and neighbourhood spaces on school sites, opening access outside school hours where feasible.

The council considers that both the Hawkstone space and the Rotherhithe primary school space should remain on the plan.

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	789	Policy 20	<p>Policy 20: Energy, is not up to date, not adequately “sound”, justified, effective and consistent with national policy. It is founded on an evidence base that is not adequately on robust and credible, and reasonable alternatives has not been adequately considered. RCWAAP is not adequately “effective” because not deliverable and flexible enough and we know monitoring is poor.</p> <p>A key to energy is the sun. You have wrongly decided to turn towards Canada Water basin as a focus and you need to ensure you design with the sun:</p> <p>The flaw in the Council’s approach to the district heating network from SELCHP is that it is cheaper (for the end users) to install and run independent heating systems. As long as the charges from the Council exceed the yearly costs of independent heating, or other forms of collective heating, the project is a white elephant for anyone other than those forced to take and pay for it.</p> <p>This time, because the Local Authority wants money, you do not say “new” developments, you say developments. However, you need to say “new developments”. And you need to realise that much of this strategy is hopeless.</p> <p>Policy 20: Energy “When the district heating network is established, major new??? developments will be required to connect to the network” SELCHP also produces dioxins and other emissions that tend to main travel towards the east and north east towards the penninsula. Perversely, at 4.5.35 only “new development” will be required to reduce carbon emissions through implementing the energy hierarchy including reducing energy consumption through building design and efficiency measures . All development needs to be reducing energy consumption through building design and efficiency measures . That includes the Council’s own 4000+ homes. Page. 59, RCWAAP needs to be more inspirational for our area so that all new residential homes should be development must be carbon zero development. Developers and refurbishments also need to source Labour and materials locally in Rotherhithe, Southwark and London. Having tradesmen drive 2 hours to work by car, or from Kent by car just has to stop.</p>	<p>The council's approach was considered sound by the planning inspector following the examination on the adopted AAP. It is not considered that there has been a change in circumstances which would undermine the council's approach.</p>

191 790 Policy 21

Policy 21, page 60.
New homes, Policy 21, is not up to date, not adequately "sound", not justified, not effective and not consistent with national policy. It is founded on an evidence base that is not adequately on robust and credible, and reasonable alternatives has not been adequately considered. RCWAAP is not adequately "effective" because not deliverable and flexible enough and we know monitoring is poor.
I have sent email to Tim Cutts that I incorporate here. I have already referred to NPPF above on this issue e.g. NPPF and migration.
London Plan 2014 emerging states

The Core Strategy shows:

And:

The minimum of 2500 net new homes needs to change to 3300 and the number of "affordable" homes increased to 35% of 3300 or 35% of the minimum net new homes as finally decided.
4.6.2 You have not stated what "local" need you aim to meet and if you have updated for migration etc.
The 800 additional homes outside the Core Area has not been updated and there needs to be 35% of these made "affordable".
4.6.3 is out of date.
4.6.4 changes the new homes figure to 3432 which conflicts with Policy 21 (2,500) The relationship between the 2266 and the London Plan 2014 draft of 3300 is unclear. The 800 has been reduced to 572 which conflicts with Policy 21's 800.
If we are providing 17% of the total housing target then why are we not getting more resources?
4.6.5 is in conflict with 4.6.2 and balancing. You cannot maximise homes and balance with shopping, offices and leisure. You might optimise.
However, there is a housing crisis and you need to reconsider your approach to balancing. You have not protected open spaces that residents have asked you to do.
4.6.6 "We will use design standards..set out in...forthcoming borough-wide New Southwark Plan...
to ensure that new homes are of high quality"
This is the same trick you did with DM DPD that you never produced. The AAP needs design standards for our area to ensure homes are appropriate and "high quality" as determined by the Design Review Panel and the area's residents.

The council's approach to housing was considered sound by the planning inspector following the examination on the adopted AAP. The completion and capacity figures have been updated in the process of preparing the RCWAAP. The Mayor has confirmed that the approach is in general conformity with the London Plan.

The FALP are at draft stage at the moment. The RCWAAP is obliged to be in general conformity with the adopted London Plan, hence the targets have not been updated. A minor modification is proposed which related to the FALP to show the AAP's consistency with that document.

191 791 Policy 22

Policy 22: Affordable homes, is not up to date, not adequately "sound", it not justified, and not effective and not consistent with national policy. It is founded on an evidence base that is not adequately on robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately "effective" because not deliverable and flexible enough and we know monitoring is poor.

3432 x 35% = 1201 affordable homes, not 875.

572 x 35% = 200 affordable homes, not 0.

c.1400 affordable homes.

"Affordable" housing for CWAAP 2011 and by 2026 in the AAP area (Core and Wider Area) = 21.8%. (875/4004)

core area estimate = 3432 (was 2600)

3432 new homes could be built in the period between 2011 and by 2026.

In the wider AAP area, capacity for approximately 572 (was 800, Hawkstone infill has gone out of figures I expect)

3432+572=4004 units (many family sized homes)

I object to the striking out of "social rented" homes, and we need to have at least a 70% "social rented housing" or "affordable rent" housing with rents at no more than 30% of market rent or £110 a week (whichever is lower). This is essential to be coherent with Southwark's own data in regards to income of £15,000 per year.

35% is already too low given the Housning crisis.

I was fortunate to represent "housing" for the Urban Initiatives scenario "game" during consultation event for RCWAAP and as you know I kept my instruction sheet which clearly states 35%.

4.6.7 admits that neither the Core nor the AAP are sustainable in Southwark even before updating for migration etc.

1400 homes less 571 = 829 affordable homes to be provided?

And Harmsworth Quays is a very large site, so how many more homes do you expect from this site and why have you not adjusted the numbers upwards?

Isn't it true to say that the "scope for a substantial incresase" in London Plan 2014 refers to Harmsworth Quays?

Isn't fair to say that by not increasing the affordable homes numbers that you are letting the stakeholders of Harmsworth Quays avoid providing much needed homes?

4.6.9 states that you require 35% of all new homes to be affordable however you do not state clearly whether the percentage of 35% applies to all developments and all applications over 10 units, or whether the figures you give prevail.

However, then Fiona Colley's "Exceptions to policy " instruction to Officers that effectively removed the 35% "must" and the "exception" became the rule:

http://www.southwark.gov.uk/downloads/download/2963/Affordable_rent_planning_committee_report

So we need to know the likely "exceptions" when planning for real and making plans, or it's a fake process. A fake process that uses 35% when in fact we will be very lucky to hit 20%.

The Fact Box informs that "Eligibility is determined with regard to local incomes and local house prices." Local incomes in Southwark set at £15,000 means that any form of affordable homes for rent needs to be about £110 a week .

We cannot wait for you to review your approach to the affordable rent tenure through the

The council's approach to affordable housing was considered sound by the planning inspector following the examination on the adopted AAP. In the light of the revised definition of affordable housing in the NPPF, the council has deleted the reference to the split between social rented homes and intermediate homes. The Mayor has confirmed that the approach is in general conformity with the London Plan.

preparation of your New Southwark Plan because previously you have failed to deliver development plans.

191 792 Policy 23

Policy 23 for Family homes, is not up to date, not adequately "sound", not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately on robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately "effective" because not deliverable and flexible enough and we know monitoring is poor.

This policy needs to be reviewed because of changes including the bedroom tax. I wrote to previous consultations / EIP about you policy of "family" homes and also stressing reform of the Council homes allocation.

Building "family" homes that are not occupied by families (family sized homes) does not deliver any sustainability. Building family homes that can only be afforded by the rich or those on 2x, 3x or 4x £15,000 a year income does not deliver any mix and does not deliver sustainability. We also have c.14% of homes left empty on Census Day 2011 in our local area, and other homes that are investments left empty by their owners.

As I represented previously, the way to ensure a family sized home is built and occupied is to make it a Council owned and managed home or Housing Association.

The situation is not help by sharers, including students and workers, occupying "family homes" in place of families. In addition unfortunately, family homes have been used to make money to move on. An example is Woodland Crescent, Flat 8 Yew House, and Flat 9 Rowan House.

Properties that rose from £159,000 to £271,000 and then from £390,000 to £610,000 respectively making the investor £332,000 before expenses. My objection to this is that accommodation built for family must be provided to families to live in.

4.6.14 Our approach in the core strategy and in this AAP is to provide a mix of housing sizes and types to meet the housing needs of different groups and to provide a range of housing with more family homes of 3 or more bedrooms for families of five or more people of all incomes. This will mean that households of different sizes will people have suitable housing and do not need to move out of Canada Water.

Where you "provide" does not ensure that the housing needs of different groups are actually met unless those groups move into the homes. If other, not intended, move into the homes then you have failed. You refer to "family homes" however you have not control on who occupies many of them.

You insert an "or" "or more people of all incomes" and this permits anyone to occupy the family homes.

4.6.14 "other than for studio units, for which there is no identified need in the affordable sector" This needs to be updated. It was untrue in 2012 and it is untrue in 2014 with the bedroom tax and Southwark's urgency to remove under occupiers from their homes. There are thousands of single people and couples on the waiting lists across London.

"Maximising choice of housing is one of the key objectives of the London Plan (2011)"

You do not maximise housing choice for families by allowing family homes to be sold and occupied by non-families.

Policy 23 is not up to date.

If we have no control of who occupies the homes then we need to rethink the %'s and mix. I object to making all studio flats private. This needs to be reviewed because of the bedroom tax and other demographic changes.

The council's approach was considered sound by the planning inspector following the examination on the adopted AAP. It is not considered that there has been a change in circumstances which would undermine the council's approach. The Mayor has confirmed that the approach is in general conformity with the London Plan.

The council will review housing needs in the process of preparing the New Southwark Plan.

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	793	Policy 24	<p>Policy 24: Density of developments, is not up to date, not adequately “sound”, not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately on robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately “effective” because not deliverable and flexible enough and we know monitoring is poor.</p> <p>What is the density for the “urban density zone”? (Figure 13)</p> <p>You have agreed development that Southwark’s own design review panel found inadequate and therefore you are failing to deliver exemplary design standards.</p> <p>At IEP 2012 the Design Review Panel was an assurance of design standards however the panels findings were then disregarded by the Planning Committee. Lawfully as it turns out, but that was not a honest approach to plan making.</p> <p>4.6.25 and fact box, you may, but you may never. And your Southwark Plan could be a long time coming.</p>	<p>The council's approach to density was considered sound by the planning inspector following the examination on the adopted AAP. It is not considered that there has been a change in circumstances which would undermine the council's approach. The Mayor has confirmed that the approach is in general conformity with the London Plan.</p> <p>The urban density zone is shown on the adopted polices map and its introduction was a specific recommendation of the inspector following the 2011 EIP.</p>
191	794	Policy 25	<p>Policy 25: Jobs and business space, is not up to date, not adequately “sound”, not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately on robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately “effective” because not deliverable and flexible enough and we know monitoring is poor.</p> <p>4.7.1 fails to define “local” and this has become a very serious issue. We have workers driving to the area from a long way away. We have Kings College looking to relocate existing jobs from the “local” area of London, to the local area of Canada Water. Move jobs from one place to another within London, so that properties can then be redeveloped does no necessarily produce additional net jobs for London.</p> <p>C1 is too limited and only states educational, health and community facilities.</p> <p>Policy 25: “A” is singular and not plural. So you intend to promote a (singular) business cluster in the core area? Where? Over what locations? To be a cluster is needs to do (verb) cluster, and be focused.</p> <p>These are big changes to the AAP.</p> <p>There is a housing crisis, right here right now, the notion that large developments might delay development and “phase” the delivery of business space to allow for future growth in demand is, on the face of it, a recipe for site left frozen, car parks kept in place, and property built and left unlet. You have land, freehold of the Council, build homes on the land.</p> <p>4.7.3 “Kings College” is a private school in Wimbledon https://www.kcs.org.uk/ and a college at Oxford University.</p> <p>I am also starting a new business call “Kings College” and I will be approaching British Land to do a deal over a lease for a lot more that KCL will pay (I joke, but I make the point).</p> <p>Your over familiarity with lobbyists has led you to fail to name the lobbyist organisation correctly. In my view you should not put names into the plan because plans need to be flexible. While you have reviewed your Non Residential Uses Study 2012 there is also a housing crisis and the “mix” of uses of the land needs to be looked at much more carefully with updated information.</p>	<p>The evidence base for the policy has been updated in preparing the RCWAAP. Further information is set out in the Non-residential uses study 2013. This is also explained further in the Background paper on business and retail, April 2014.</p> <p>The council considers that its approach to business space is compliant with the NPPF. A minor modification is proposed to the risk section of the plan outlining how risks associated with provision of business space have been mitigated as far as possible.</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	795	Policy 26	<p>Policy 26: Schools, is not up to date, not adequately “sound”, is not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately on robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately “effective” because not deliverable and flexible enough and we know monitoring is poor.</p> <p>Core Strategy: p.46 4.35 “we will build a new secondary school, to complement existing schools in the area”</p> <p>Bermondsey is not in the area, you have no control over the free school and cannot require it to provide its facilities to residents in the area etc.</p> <p>4.7.7.a needs to ensure that places are provided. Not just matters kept under review. You are forever saying that you will “review” this and that, work with whoever, and provide a Development Plan etc, and then you do not do it.</p> <p>4.7.7.b The new school is not in the area. There is no local authority control over the school and therefore no assurance that it will be successful and be sustainable.</p>	<p>Further details on the way in which school places are addressed is set out in the Infrastructure background paper. While the Bermondsey free school is not located in the AAP area, it is capable of serving needs in the AAP area.</p>
191	796	Policy 27	<p>Policy 27: is not up to date, not adequately “sound”, is not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately “effective” because not deliverable and flexible enough and we know monitoring is poor.</p> <p>Space provided for the community has not been occupied by the community. The failings of Southwark’s approach need to be investigated and examined.</p>	<p>The approach has been tested through the adoption of the AAP and was considered to be sound.</p>
191	797	Policy 28	<p>Policy 28: Early years, is not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately “effective” because not deliverable and flexible enough and we know monitoring is poor.</p> <p>I object to Policy 28 because early years child care and schooling is appropriate for all of the core area. There are core areas within the town centre that are being design to be low car and car free, and these areas of low cars and low pollution are ideal. What you want to do is put more young children next to the high levels of traffic and high pollution levels so that they are harmed and damaged in order that you partners can maximise their profits. Anything that does not meet the desires and aspirations of your partners is being designed out. Is 100 places adequate?</p>	<p>The evidence base for the policy has been updated in preparing the RCWAAP. Further information is set out in the Infrastructure background paper, April 2014.</p>

191 798 Policy 29

Policy 29: Health facilities, is not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately "effective" because not deliverable and flexible enough and we know monitoring is poor.

I have commented on health above. I object to you change of wording. Your aim, and that of your partners and lobbyists, is to remove health to the hinterlands of the area so that you can maximise financial return of the centre.

4.7.18 The quantum and number of homes has change however you have not upped the "around 100".

I object to 4.7.18 and what about homes outside the core area?

4.7.20 You have change the phasing. And you have change the components of the phasing. So have you updated the advise from NHS Southwark? You needs to ensure you fully inform organisations about your plans when seeking advise from them.

4.7.21 Which is more accessible from the "wider AAP area" – the Core area or the The Surrey Quays Shopping Centre and overflow car park? Accessible – how? Which is more accessible – Albion Street Library Site or The Surrey Quays Shopping Centre and overflow car park? It depends where in the Core Area you now propose to site additional new or enhanced facilities. And some areas are much less accessible than others.

To say that the "Core" is accessible from the wider area really says nothing much at all. London is assessable from the wider area of England, however more accessible to some over others. Health facilities need to be a town centre use and located in a central town centre location. If you can locate car decks in CW AAP7 then you can locate a health centre.

If a health centre in the "core" area is accessible then so might be car parking. In that case, car parking could be removed from the Surrey Quays Shopping Centre site and relocated into the "core" which is, you say, accessible from the wide area.

I expect that TESCO would object to that, just as I object to moving child care and health to the hinterlands of the core area.

4.7.21 It is recognised that new health facilities may not be delivered in every phase of development in the core area.

Recognised by who? I do not recognise that. And further what is your phasing now? The components of the phases? You have made substantial changes to the AAP and you need to make your phasing crystal clear.

The council has consulted NHS Southwark in preparing the RCWAAP and considers the approach to be sound. Further information is set out in the Infrastructure background paper, April 2014. The core area is in the centre of the action area. Through a planning application, ways of accessing a proposed centre would be explored in more detail and any deficiencies could be improved through mechanisms such as a green travel plan.

191 799 Policy 29a

Policy 29a: Higher education and student housing, is not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately "effective" because not deliverable and flexible enough and we know monitoring is poor.

I object to "higher education". This is inflexible. It can simply say "education" and that includes schooling.

"Proposals for new student housing developments will be supported where they form part of mixed use schemes"

I do not support the policy as it is worded.

Why "supported"? Do you not mean "we encourage"? Appropriate student housing?

There is not clarity on the "mix" and issues of "affordable" housing to rent, affordable to those of c.£15,000 year income, and non-student, non-key worker others cut to the heart.

Will you support the provision of housing development for our over occupying residents so they can move and free up much needed homes? You have not so far.

Will you support the provision of housing development for our over 50's and elderly residents so they can move and free up much needed homes? You have not so far.

What is "student housing" as you are defining it here? You have deleted the whole glossary!

"Large student housing developments in the core area will be supported"

Why "supported"? Do you not mean "we encourage"? Why would you prejudice the decision of the Planning Committee by giving support before an application is made?

Why not add on "as part of a campus development"

You need to define and consider "large" much more carefully,

Other policies are not worded in this way: what did the lobbyists have to do to get this written in?

Design of these developments? You have not set any student bed numbers, why not? How many of the 3300 homes will be "student homes"? And what type / design / layout?

What about Thames Water's infrastructure? And the pressure / supply / flow issue?

4.7.22 Replace "academic and research" with "education facilities". I object to "strong". You have not recognised affects on night / evening economy which is a potential adverse impact.

Education space instead of academic space.

4.7.23 Is what has happened elsewhere in Southwark relevant to the AAP? What does this add? I would prefer to see "student accommodation" to be integrated into any so called

"campus" provision. It needs to be planned properly and with some care. There is no carte blanche to mushroom "student accommodation" all over the area and next to existing residents while "academics" work in peaceful towers at Harmsworth.

Recall that student accommodation also becomes kin to "hotel" accommodation when rented out in the holidays.

4.7.24 I object to "maximise" because in your contracts and agreements this is reduced to maximising financial returns. Optimise is a better word. I object to the "300 bedrooms" because we will have applications for 299 bedrooms elsewhere.

I propose that detail is mapped to set out where student housing will be permitted and where it will not be permitted. This is essential to ensure our area is not taken over and dominated by an academic higher education economy.

I have little doubt that others, not KCL, are already forming up applications for student housing blocks too, and plan to cash in on the KCL factor.

Those of us who genuinely represent social housing, and those in need of homes and housing – other than students – have to be very strong in reply to your policy proposals that are so loaded and biased.

The policy is intended to establish the principle that the council will support planning applications for student housing and high education space, where the criteria are met.

A proportion of housing will required to be affordable in line with core strategy policy 8.

Use of the word "support" is consistent with other policies in the AAP eg policies 2, 5, 11, 12 and 13.

Academic and research - the policy aims to provide guidance for higher education and as such the words academic and research are considered to be relevant and justifiable.

4.7.23 - one of the key aims to the policy is to ensure that student housing and other university facilities are integrated onto the same site.

The word "maximise" expresses the council's aim and is considered to be justifiable.

The council does not consider that further details are necessary. Other policies in the AAP address other aspects such as design, while policies in the Southwark Plan would ensure that impacts on amenities are addressed.

A management plan is a recognised way of helping ensure that impacts are managed effectively.

Site allocation CWAAP 24 includes student housing as an acceptable use. CWAAP 24 includes land owned by British Land. Mulberry Business Park has planning permission for a scheme providing student housing. Site E also has permission although that scheme does not include student housing. Student housing is not referred to in other site allocations in the AAP.

Promises have been made by developers / the Council to provide facilities and they have not been kept.

4.7.25 "should" needs to be "must". "student housing developments must not prejudice the supply of land for general needs homes or harm the amenities of surrounding residents and occupiers"

Recall you have already stated as policy that you "will support" student housing. So "shoulds" are very weak indeed.

Core Strategy 8 is not designed to make policy for such a substantial development as "campuses" and what KCL are proposing. Therefore the AAP needs to make more detailed policy.

We need to specify sub areas, zones, suitable for student housing to ensure that amenities of surrounding residents and occupiers are not harmed. The scope and scale of this is huge.

4.7.25 What neighbourhood? Have you mapped the neighbourhood? Are you sure that a mix is sensible? What mix?

I object to the use of management plans as set out here. How will a management plan "ensure" that harm is not done?

Who will approve the management plan? Alumni of KCL?

I would welcome clarification as to how KCL and others will also control tourists and others who rent out student homes during the holidays.

At the end of the day the law in regards to some forms of nuisance is very weak and therefore the best way for residents to protect themselves from harm is to be NIMBY.

We need to plan where the student housing is going, and let residents and others know at an early stage. RCWAAP is the ideal time to do that.

Looking at it, I do not see why the new student housing blocks cannot be limited to being built within the sites controlled by British Land and the leisure centre site. I expect you have worded the RCWAAP carefully to that like health, early years, and schooling, you can shunt student housing blocks to places other than the sites controlled by British Land and the leisure centre site so that the owners and leaseholders of these sites can maximise their financial returns.

191 800 Policy 30

Policy 30: Albion Street, is not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately "effective" because not deliverable and flexible enough and we know monitoring is poor.

"Working with local stakeholders to create a pocket park on St Olav's Square in front of the Norwegian Church" is supported.

The Council's approach to the issue of the Albion Street library has been appalling.

5.2.7 I object to "redevelop" which implies demolition and a failure to explore the alternatives.

The council's approach to Albion Street was considered sound by the planning inspector following the examination on the adopted AAP. It is not considered that there has been a change in circumstances which would undermine the council's approach.

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	801	Policy 31	<p>Policy 31: Lower Road, is not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately "effective" because not deliverable and flexible enough and we know monitoring is poor.</p> <p>Figure 15: Round circle 2 – is this the location of the public realm improvements? Please indicate more clearly where you will carry out public realm improvements. Round circle 1 – is this the only location where you will create links and a new high street? Please indicate more clearly. I have added a key route to Figure 15 that you somehow neglect to draw:</p>	<p>The council is not proposing to change this policy from that which was adopted in the 2012 AAP. The council does not consider that there has been a change in circumstances that would warrant a review of the policy.</p>
191	802	Policy 32	<p>Policy 32: Proposals Sites, CWAAP 1 to CWAAP 25 inclusive, is not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately "effective" because not deliverable and flexible enough and we know monitoring is poor.</p> <p>5.3.1 "uses required" – you need to ensure that your uses are coherent with your consultation and with sustainability, competition and growth. You say you are making a New Southwark Plan, but here you refer to saved policy SP20. What is your emerging policy? 5.3.3 Refers to you forthcoming (never coming) DM DPD. You need to employ staff who read with care. It is not our job to check you work free for you. 5.3.4 refers to detail and a "development management process", please could you inform, and be clear about, where these matters have been considered and considered to take into account the change of Harmsworth Quays.</p>	<p>The council considers that the proposals sites are up-to-date. They have been updated in the process of preparing the RCWAAP.</p>
191	803	Policy 32a	<p>6.1a Sustainable development Policy 32a: Presumption in favour of sustainable development, is not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately "effective" because not deliverable and flexible enough and we know monitoring is poor.</p> <p>6.1.1a is not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately robust and credible, and reasonable alternatives have not been adequately considered. RCWAAP is not adequately "effective" because not deliverable and flexible enough and we know monitoring is poor</p>	<p>This policy follows a model provided by CLG.</p>
191	804	Policy 33	<p>6.5 S106 Planning Obligations I object to the change of Policy 33 wording. And I object to the striking out of 6.5.1 through to 6.5.6. I object to 6.5.7 and in particular limiting mitigation to site specific impacts of development. You need to explain how you are going to fund all the non-site specific impacts, the more general overall impacts of a c£4 billion development unfolding since the 1980's. I object to the wording of the "fact box" on page 90. 6.6 Regularly reviewing progress</p>	<p>The policy has been updated to ensure that it is compliant with the CIL Regulations. Further information on s106 planning obligations is set out in the draft s106 planning obligations and CIL SPD 2013.</p>

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	805	Appendices	<p>7.5 Appendix 2 (now 5): Monitoring Framework, there are no changes shown / highlighted on page 119. This needs updating. "Transport: Improved connections" page 119 / 120, there are no changes shown / highlighted on page 119/120 except three new indicators. This needs updating. Target = Reintroduce two way traffic on Lower Road in phase 2 of the AAP period? Increase the walking mode share to a third (33%) by 2013/14? New indicators: •Completion of improvements to walking and cycling routes Just completion? Quality? Extent? •Completion of improvements to road network What improvements? What roads? Just completion? Quality? Extent? •% of parking for town centre uses which is publically accessible? Please explain this indicator.</p> <p>"Leisure: a great place to visit, to relax in and have fun" page 120/1, there are no changes shown / highlighted on page 120/1. This needs updating. "Places: Better and safer streets, squares and parks" page 121, there are a few changes shown / highlighted on page 121. This needs updating. When? Phasing? Multistorey car parks to be wrapped by other uses? Car decks? Uses such as? "All development to be on previously developed land; no loss of protected open spaces" You are not allowing us to protect open spaces. "All new development to be within 100m of a doorstep playable space, 400m of a local playable space" – you are not maintaining or improving public access doorstep playable spaces such as the Hawkstone's. New indicators: Completion of improvements to strategic public What improvements? The vital? The non vital? Percentage of approvals that accord with the building heights target Please explain this target. Why a percentage? Is there "targets"? Will all development now be a minimum of 4 storeys? Provision of playable space in new development Why only new development? What about refurbishments? % of development in SDHA designed to connect to district heating This is a waste of time and money if the heating from SELCHP will cost more than alternatives. Homes: High quality homes page 122, there are no changes shown / highlighted on page 122. This needs updating. E.g. Complete a minimum of 2,500 homes E.g. Ensure that 35% of homes are affordable "Community: Enhanced social and economic opportunities" page 123, there is only one change clearly shown / highlighted on page 123. This needs updating. E.g. Complete library to open by 2011 Provide new health facilities in the core area within phases 1 or 2 or the AAP? Time periods?</p>	<p>Several amendments have been made to the monitoring framework to ensure that it is up-to-date. Further changes are not considered to be necessary.</p>

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New indicator: Completed health facilities floorspace?

Why floorspace?

You add a new Policy, but I cannot see where the new objectives or indicators are.

Delivering the AAP, page 123/4, there are only three changes clearly shown / highlighted on page 123/4.

This needs updating.

New indicator: •Committed spending on infrastructure. Committed? What does that indicate?

We produce quarterly reports on s106 expenditure by ward and community council area which we publish on our website: <http://www.southwark.gov.uk>

Do you actually do it? Can it be found fairly easily?

Collect s106 contributions to fund delivery of...

is that a SMART target?

191 807 CWAAP 7

7.8 Appendix 4 (was 8): Schedule of proposals sites. Why is text "CW AAP 17" not struck through?
 CW AAP 7: Decathlon site, Surrey Quays Leisure Park, Surrey Quays
 Required uses are incomplete and need to include health, education etc. and everything that they have sought to carefully exclude.
 As it then says: "health facilities (which complement rather than replace existing facilities) and other community uses."
 The road improvements needs to be triggered by CW AAP 7 or CWAAP 24 (whichever is sooner) and not a particularly site.
 This also because other sites are mix use and include retail.
 Do 1400 residential homes include "student home" capacity? You use different terminology.

7.8.11 These sites comprise a large part of the town centre and have significant capacity for growth. The Canada Water basin and surrounding public spaces should be the focal point in the town centre. Development around the basin should provide a range of town centre uses including shops, cafes, restaurants, and cultural or leisure uses. These should aim diversify the attraction of the centre, creating footfall and expanding its appeal to a range of age and social groups. Development should activate frontages onto the basin and provide uses and activities which bring life and animation to the spaces around it. In addition,
 I object to making a water filled dock the focal point of a town centre.
 I object to shoulds, because so often shoulds are ignored and not a requirement.
 There is an error on "aim diversify".
 I object to "onto the basin" because

7.8.14a It is important that development creates strong pedestrian and cycle linkages between sites on the eastern side of Surrey Quays Road and the shopping centre, the basin and Canada Water tube station.
 You have excluded other Town Centre areas such as Lower Road, and it is important that development creates strong SAFE pedestrian, cycle linkages and green infrastructure links between sites on the eastern side of Surrey Quays Road, Surrey Quays Shopping Centre, Lower Road shops and Surrey Quays Overground.
 You also show an undecided town centre boundary on the west of Town Centre area.
 It is important that is deleted for the next sentence. It is therefore no important? I suggest that "it is important that" before:
 Pedestrian and cycle connections as well as visual links should help shoppers, visitors and residents
 "Visual" links? Perhaps something missing here? Why residents last in the list?
 filter through development to
 What do you mean filter? Sounds as though it will be unpleasant or encounter obstructions and barriers that could impede "visual links".
 Harmsworth Quays and the Leisure Park and more residential neighbourhoods beyond.
 and add "Lower Road shops and Surrey Quays Overground."

7.8.15 As set out in policy 17, there is the potential for tall buildings. The justification for these should be built around their potential to intensify provision of town centre uses, their scope to provide public space and the role in creating a town centre which is easy to understand and move around.

CWAAP 17 will be struck through in the final published version of the AAP.

CWAAP 7 has been tested through the EIP on the adopted plan and the approach was found to be sound. The changes made reflect the fact that the leisure park has been removed from the allocation and added to CWAAP 24. The council considers that uses required and acceptable uses remain up-to-date.

The target for new homes in the AAP includes student bedspaces. However, student housing is not a specified use in the required or acceptable uses on CWAAP 7.

But the focus of the Town Centre is the Basin? So how can you now be arguing that tall buildings help to understand and move around?
 If they are prevailing heights of 8 to 10 storeys that there will be no help.
 Just stop fudging, and reset the town centre focus.
 Because you have restricted, deleted and impoverished the town centre uses I now object to 7.8.15 because you will only be intensify what I object to by using tall buildings.
 7.8.16 If I support a tall building on the South West you remove it. If I object you put it back. So, what can I say? The South west of the car park is an essential area and connections to integrate Lower Road and the Overground Station into the rest of the development, I am not dogmatically against a tall building around here but it must help integrate and link through and not be a further barrier.
 7.8.17 If you have carried out feasibility testing then you will be able to tell us how much affordable housing is likely, at what rents, and how much s106 and CIL will be produced?
 7.8.18 The principles set out here are core principles which should be applied to any development scheme prepared for these sites.
 I object to should.
 7.8.18 How does the "sub phasing" of this site affect your plans to trigger and make road improvements? Isn't the sub phasing a further device to ensure that very expensive road improvements are shunting further and further into the future until they never actually happen. Each sub phase and / or phase needs to be clearly and explicitly linked to actually delivering improvements and infrastructures.
 7.8.20 I object to the deletion of "We envisage that the development of the shopping centre site could take place within the second phase of AAP development."
 And I want to see a clear phasing link to road improvements that were to commence in 2014 and were reportedly delayed for the Olympics! Actually, there was not money. We cannot wait to 2021-26.

 I would like to see a new shopping centre and road improvements delivered 2016. And I am fed up of the slippery behaviour and I am fed up with the lack of vision and lack of investment.
 7.8.21 Are you still confident?
 7.8.22 Why is this deleted because this road change affects the shopping centre service area more than Harmsworth Quays.

191	808	CWAAP 15	Page 151 CWAAP 15 & 16 show that development proximal to play areas may not provide any s106 benefits whatsoever. Therefore this needs to be specified in the AAP.	Site allocations 15 and 16 have consented schemes. Minor modifications are proposed to update the RCWAAP in this respect.
191	809	CWAAP 22	Page CWAAP 22, the historic crane needs to be protected or relocated. A pathway along the river needs to be kept in public ownership so that the Thames Path can be extended and planned for the future.	The council does not consider that there has been a change in circumstances that would warrant a review of the policy.

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	810	CWAAP 24	<p>P.156 CWAAP 24 CW AAP 24: Site E, Mulberry Business Park, Harmsworth Quays and Surrey Quays Leisure Park Required land uses are not site specific. Required land uses are incomplete. I object to maximising the amount of employment. Employment needs to be optimised with Residential use (Class C3) to include affordable housing. I object to the estimated capacity and policy that: The capacity of the site will be assessed through the planning application process. The number of new homes would be dependant on the amount of non-residential floorspace which is provided. Non-residential floorspace must not be allowed to determine housing provision. Housing provision needs to be assessed with housing need. Mixes can then be optimised. There is a housing crisis, there is less of an employment crisis in the area now that the economy has improved. Your plan is a plan for "landowners" to benefit, and it less about benefitting local people in housing need. It is no good if existing jobs are transferred in either, say to KCL because that only deprives AAP Area residents work from the development of the Council's land. Page 159, 7.8.54 is a snippet of the vision and it is not the vision. The uses given are selective. However, I welcome the opportunity to re-examine the "vision" created by this change. "feels" like a town centre? Is this when we're swimming in the basin? 7.8.54 needs to include housing for affordable housing (I do not mean student and key worker housing which I expect KCL already plan) I object to maximising employment because I need to see evidence that the employment will not simply be existing staff relocated and working in a campus that they commute to and from. I do not see great benefits for the whole Town Centre in that outcome, and even less benefit for the "periphery" of the Town Centre and Core Area. What might alternatives provide? Have the alternatives been explored adequately? I do object to policy that "The final mix of uses will be determined through the planning application process." 7.8.55 5,300 sqm of what? Floorspace? Out of? We had 240,000 sqm previously for Harmsworth, now we have nothing. So 5300/240000 is 2%. Recall you are careful to use floorspace for health, you are less careful for business. Don't you mean substantially more space for KCL? How many homes could 240,000 sqm provide?</p> <p>Higher education: How many jobs would be created? How many relocated into CW? A relocated job is of much less benefit to the area. How will the evening and night economy be effected? What is a significant amount of academic space? Is it our vision to be a "London world city offer"? And is it part of our vision to be focused on one particular sector? Maybe – however, it must also work for the existing community and all groups within the community and at the moment the plan is far too dominated by particular interests. Health: CWAAP 24 or CWAAP 7 need to provide new health facilities for the public.</p>	<p>The required land uses are drafted to ensure flexibility, the intent being to support a range of non-residential uses.</p> <p>Affordable housing is required by the Core Strategy and AAP policy 22. A further reference is not required.</p> <p>Maximising the amount of employment space was well supported during consultation, both at informal consultation through the workshop with members of the public and also at draft revised plan stage. The council considers it to be consistent with the AAP vision. The criteria have been designed to ensure that land is not sterilised for uses that will not come forward. The council has no control over whether jobs are relocated or are generated as a result of growth. Irrespective of whether they are new jobs or relocated jobs, they will have benefits for Canada Water.</p> <p>The potential for a new leisure centre and health uses is identified.</p> <p>Proposals have been viability tested to demonstrate that they would be capable of implementation.</p>

Sports and leisure: CWAAP 24 or CWAAP 7 needs to provide a new leisure centre.

Why would "viability" prevent a new primary school? Are you planning out homes so that you do not need to provide schools, health facilities and leisure facilities? Not provided so that you can generate the maximum returns for the "landowners"?

There seems to be a clear pattern.

7.8.56 re student homes – What area? Do you mean the CWAAP 24 as mapped on Figure 29?

Is that an area or a site? Or do you mean the "core area"? What is a significant number? If student homes are not provided where will the students live? Will they become sharers in general needs housing?

What mix of homes?

How will the mix become unbalanced?

7.8.57 makes no use of "area". "New residential homes will also be an acceptable use." Why not required use?

So it could be 35% of 0? And zero general needs homes, and yet student homes could be built!

7.8.57 I object to the wording of "Proposals for new homes and student housing will need to demonstrate that the maximum potential for employment generating uses" because the "employment" has not been specified. The employment is likely to include substantial numbers of relocated jobs and therefore policy is being written as a means to ensure space is provided for these relocated jobs. The employment that does need to be a focus is the employment of residents already living in the AAP and wider AAP area who are unemployed.

I want to see a clearer distinction of difference forms of employment.

7.8.59 Please ensure that support expressed for connections to Lower Road shops and Surrey Quays Overground Station are acted on and integrated into the design. I am very disappointed with the lack of attention to the southwest corner.

7.6.60 Road realign - How much is that going to cost? Where will the buses and traffic be shunted to? Your diagram shows a new "road", not route. Is this for cyclists and cars only?

It needs to have a new direct connection to the south west through the shopping centre site.

I would prefer to see the shopping centre demolished and the area planned properly.

"which in time could allow the shopping centre to expand into the rear of the existing service area."

Let's get on with it and deliver the investment and growth.

7.8.61 Safe, not "feels safe".

The building heights strategy should relate to the hierarchy of streets and spaces.

Can you please set out the hierarchy of streets and spaces so that I can comment on it.

7.8.62 The provision of new public spaces on Surrey Quays Road, which road? The current or the realigned? You show a new road going through open spaces. What will happen to the traffic?

7.8.63 Redevelopment provides the opportunity to increase, add and provide new green infrastructure network.

Green infrastructure? – the glossary has been deleted.

What is large? What is small?

The "site" as you call it – CWAAP 24 – can also be integrated into the open spaces network and green using spaces that humans do not normally enter. Such as tree tops and roofing. The provision of green "stepping stones" from the Park to the Woodlands will create a wheel of connections for wildlife and humans to enjoy.

The route from CWAAP 24 through the south of the Shopping Centre site, to Lower Road and the overground station also needs a green route and substantial change and improvement.

Reading through the CWAAP 24 proposal I urge you to consider going taller to open up spaces

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for the public at ground level. Like the Gerkin or the walkie talkie you should also not just consider height.

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	811	Policy 22	<p>Any comment on this stat? To help us understand the incoherent RCWAAP document before commenting about it?</p> <p>All, please see stat of 21.8%. Not "at least" 35%, or anywhere near it. This is of course what "Planning for Real" was all about, "homes built around you" but not for you, or your family or colleagues. Or the most needy and vulnerable, or the elderly looking to move to smaller more suitable "specialised" accommodation and free up under occupied homes.</p> <p>"Affordable" housing for CWAAP 2011 and by 2026 in the AAP area (Core and Wider Area) = 21.8%. (875/4004)</p> <p>We need the 875 changing to 1400? Old figure was 875/2600, new is 875/4004.</p> <p>Oddly, I don't see anything from our local Rotherhithe Area "Housing Forum" that should be looking out for residents needing housing, and planning policy that sets barriers.</p> <p>The 875 has not been updated for RCWAAP. This is an old trick, change one thing but not the other. Of course it "might" be more than 875, but there is no updated figure.</p> <p>And hopefully at NPPF "social rented housing" that the local Southwark majority on c.£15,000 (or less) can afford, or at NPPF "Affordable rented housing" at a % of "local" market rent that the local Southwark majority on c.£15,000 (or less) can afford, Ray at Housemartins will know better than me, but if a 2 bed flat around CW is around £1400 a month, then that % would need to be about 33% of market.</p> <p>Which is of course because of "exceptions" authorised by The Cabinet Member for Regeneration in 2011 have become the rule. Because these developments are not viable enough to be sustainable for London. I was fortunate to represent "housing" for the Urban Initiatives scenario "game" during consultation event for RCWAAP and as you know I kept my instruction sheet which clearly states 35%. Consultation for CWAAP and RCWAAP took place on a 35% basis. That was then without the upto 80% market rent factor.</p> <p>4004 new homes could be built in the period between 2011 and by 2026 in the AAP area (Core and Wider Area) At para 4.6.8 "Our core strategy states that at least 875 new affordable homes should be provided in the AAP area over the plan period." (875/2600 roughly) The 875 has not been updated for RCWAAP Nor the Vision p.17 "The action area will provide at least 875*** affordable housing units" (search for the *** and you wont find it: no attention to detail).</p> <p>In addition the modes/definitions of "affordable" housing from the NPPF have been inserted at Fact Box page 62. This includes "affordable" housing rented at upto 80% of local market rent. There is no information about what is local. And that was not resolved at last EIP. And para "4.6.6 We will use design standards, including minimum dwelling sizes,..." while Policy 17, p.44, rules that Tall Buildings will "provide high quality accommodation which</p>	<p>The justificatory text to policy 22 has been updated with information regarding the pipeline supply of affordable homes.</p> <p>The council's approach to affordable housing was considered sound by the planning inspector following the examination on the adopted AAP. In the light of the revised definition of affordable housing in the NPPF, the council has deleted the reference to the split between social rented homes and intermediate homes. The Mayor has confirmed that the approach is in general conformity with the London Plan.</p>

significantly exceeds minimum space standards". Policy that makes affordable housing less viable, raises asking prices, and ensure that wealthy have wealthy neighbours.

191 853 Policy 8

Though you might like the attached image from Google tracking phones in traffic. Using typical settings just shows up red, red and more red along Deptford, the gyratory, A200, Jamaica road etc.

It shows what many of experience.

And we're linking this to health and pollution affects as more NHS data becomes available.

I'll put this in a late comment update. The full detailed scandal is unfolding.

c.c. to Councillors because Community Council is forever talking about these issue but nothing much is done to tackle them.

And we hear oh so much about "Elephant" "Elephant" and "Elephant", but you know, data show years ago that we had some of the most congested, polluted roads. And data showed that the c-charge made it worse, much worse in absolute terms and shocking in relative terms.

The council has reviewed the evidence base behind the transport policies in the plan. Further details are set out in the Infrastructure background paper.

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	854	Implementatio	<p>6.2.1 Need to provide a chronology from LDDC to present day so that we can see the big picture of development over time. What do you mean "Canada Water"? There is also Surrey Quays Centre, Lower Road, the AAP Area and wider Area.</p> <p>6.3.3 The Reference to BLCQ should be kept and you might like to inform us how much money was made by the partners companies of BLCQ. This would be good evidence of economic growth.</p> <p>Why are you striking through the text: "A masterplan for comprehensive redevelopment was prepared in 2005 but was not adopted by the council as a planning document. The purpose of this AAP has been to review both the masterplan and previous designations in the Southwark Plan and provide a vehicle for further change and improvement." The what is RCWAAP supposed to be doing?</p> <p>6.3.4 Did you ensure you 2012 was informed by the aspirations of people other than Surrey Quays Ltd? Since you are freeholder. "Surrey Quays Ltd have now secured planning permission for a first phase of development on the shopping centre." Please show clearly how the various phases, sub phases and phasing operates as a whole and in relation to other policy / commitments that are triggers or contingent on phasing. Will your discussions only continue with lease/landowners?</p> <p>6.3.5 Why did you not buy back the leasehold when you had the opportunity? You refer to parties as "Landowners" who are "leaseholders". I am not clear that KCL holds anything at all? So I am unclear why discussions would take place with KCL to any greater extent than any other stakeholder such as local residents, neighbours or community groups. We could all come up with a proposal couldn't we? And then we would "landowners" or treated as such? If your behaviour towards those you see as non "landowners" had been different then I might see it differently. Why should any landowner has a privilege input into adjacent sites that are owned by the London Borough of Southwark, and privileged over any other freeholder, leaseholder of tenant that is also "adjacent" to the site? The fact is that so called "landowners" have dominated the process. And the worst example is the debacle over the Albion Street Library where a "landowner" turn out to actually own nothing at all. And for a considerable time he was able to substantially influence and dominate the approach taken towards to site.</p> <p>6.3.6 I object to the striking out of the text: "A key objective of the AAP is the delivery of new homes". That must remain a key objective along with the refurbishment of homes.</p> <p>6.3.8 I have referred to Lower Road above. A200 and gyratory needs to be part of the TfL Road Network.</p>	<p>The council does not consider that a chronology from the LDDC to the present day is needed.</p> <p>The reference to BLCQ remains at 6.3.3.</p> <p>Para 6.3.7 describes the role of the local community.</p> <p>The council offered to match the highest bid to buy the lease of Harmsworth Quays. However, DMGT chose to sell it to BL.</p> <p>A minor modification is proposed reinstating the information in 6.3.6.</p> <p>Lower Road - the TLRN is outside Southwark's control and the scope of the AAP.</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	855	Infrastructure	<p>6.4 Infrastructure Plan</p> <p>6.4.1 is out of date.</p> <p>6.4.2 The components of the phases have changed.</p> <p>6.4.3 You are encouraging low car, car free, and low traffic developments and therefore additional income from trip generation is going to be low. You have provided no evidence to show that enough money needed to make infrastructure changes will come in. Southwark's over infrastructure requirements are pretty much "bankrupt" and therefore the bigger picture is not sustainable.</p> <p>Leisure</p> <p>6.4.5 I regret the waste of £8 million pounds however there is now no alternative. The money needs to be spent as soon as possible because the leisure centre has been left to fall into a poor condition over a decade of indecision. Please look at Lewisham's new leisure centre and explain to us why you could not have planned to deliver this type of development as part of Decathlon, SQSC extension, Site A, Site B and so on. Or even a redevelopment of Hawkstone / RPS that you considered and then back away from. This issue has been an appalling shambles. I do not believe for one minute that KCL will deliver the facilities that residents aspire to or at a price we could afford to use the facility.</p> <p>6.4.6 "It is anticipated that" is weakly worded and isn't the reality that s106 and CIL will not fund the improvements needed. You use the word "vital", please can you clearly indicated which aspirations and improvements you consider "vital" and which you do not.</p> <p>Open spaces</p> <p>6.4.7 Is there no capital investment strategy anymore? The Open Spaces Strategy you prepared is not justified and effective and not consistent with national policy. It is founded on an evidence base that is not adequately robust and credible, and reasonable alternatives have not been adequately considered. It is also discriminates and disregarded the NPPF including allowing residents to protect open spaces. Open Spaces were excluded from your Open Spaces Strategy and therefore have been excluded from your funding intentions and plans.</p> <p>Energy and Water:</p> <p>Thames Water's comments into the planning application for Sellers development at Decathlon make very clear that substantial improvements to the water supply infrastructure are necessary. Your plan needs updating. It only works if Southwark can force it's leaseholders and tenants to pay under a legal agreement and with threats of court action. You will find that harder to do on private sites.</p> <p>6.4.9 Unfortunately, the cost for the end user makes SELCHP more expensive than independent heating systems. This is because of the rates for heating that Southwark charge per week. You plan needs updating.</p> <p>6.4.12 is affected by Thames water capacity. The internet now also affects values of home by as estimated 25%.</p> <p>6.4.13 Flooding needs to be considered more carefully.</p> <p>Community facilities:</p> <p>6.4.14 You are not providing new youth facilities at Rotherhithe Primary School. SO where are you going to relocated these new facilities? Please remove from illustrations anything you are not now providing.</p> <p>6.4.16 While place planning may be carried out at borough level the Council has lost control of place supply. The new school at Bermondsey is a Free School and may, or may not, be successful and we do not know about entrance policies either.</p> <p>6.4.17 Why not keep using the AAP monitoring framework?</p>	<p>6.4.1 - A minor modification is proposed to update the number of homes.</p> <p>6.4.2 - Where anticipated phasing has changed, the plan has been updated eg in the site allocations appendix.</p> <p>6.4.2 - Transport improvements are a potential recipient of CIL funding. They are identified on the infrastructure plan and draft Regulation 123 list.</p> <p>6.4.7 - Similarly open spaces are also a potential recipient of CIL and are identified on the infrastructure plan and draft Regulation 123 list.</p> <p>6.4.12 Thames Water have been consulted on the RCWAAP and have raised no objection. A minor modification is proposed in respect of broadband infrastructure.</p> <p>6.4.13 The EA were consulted and considered the RCWAAP to be sound.</p> <p>6.4.14 There is also a multi-games area on the site of Rotherhithe primary school. The council's strategy is to co-locate youth and neighbourhood spaces on school sites, opening access outside school hours where feasible.</p> <p>6.4.17 A minor modification is proposed reinstating the reference to the monitoring framework.</p> <p>6.4.18 The changes are proposed to make it consistent with the approach set out in AAP policy 29 and policy 33.</p> <p>6.4.19 A minor modification is proposed updating this information about the police.</p>

6.4.18 I object to the striking out of the text: "There is physical capacity to provide a new site within a development on the shopping centre and overflow car park."
 6.4.18 I object to the striking out of the text: "a significant sum of funding is expected to be generated from s106 planning obligations which ..."
 There is no significant sum of funding expected?
 6.4.19 This is out of date.

191 856 Risk

6.7 Risk
 6.7.1 is incomplete and needs updating.
 Transport infrastructure
 6.7.3 I object to the change of wording. You have change site combinations and that affects works triggered under phasing. It is vital to find solutions to the traffic and/or begin substantial and signification mitigation otherwise.
 6.7.4 needs updating and evidence that you are actually doing it.
 6.7.5 I object to the striking out of text. Clearly you are no longer confident. Please provide evidence of the certainty you refer to.
 6.7.6 I object to the striking out of the text. It is not a small gap, it is a huge gap.
 6.7.7 Policy 1 was not writing to address mixes of development for the other site including KCL and Decathlon. Plans are substantially and significantly changes and Policy 1 needs updating. Developments of other sites also need to be slowed.
 Otherwise, what we will end up with is all sites bar the Shopping Centre built out and still not have the money for the changes. The Shopping Centre is then quite within its rights to then do nothing and just use the asset as a cash cow, or tinker with it, making the odd extension and car deck.
 There needs to be a rethink of infrastructure delivery, sites and phasing.
 Funding will not be available if you are unable to collect from development that avoid trip generation and you fail to ensure that trip generation is fully, correctly and robustly assessed.
 There should be severe fine for a develop that makes claims that it then fails to deliver, so, is a traffic free development then starts generating a delivery traffic, we then fine each of those trips.
 "car free" is not traffic free. Deliveries are a significant factor and not reflected well in historic models because of rapid change.
 Phasing
 6.7.8 There are only complicated leaseholds because you, the freeholders, do not buy back the leasehold. You cannot expect the private sector to make substantial huge investment when they are not the freeholder or their lease is too short. This is a risk of the APP.
 Your refer to "sites" which is not the same as "CWAAP x" proposal sites.
 You allow a component site of a "CWAAPx" to be developed independently of the other component sites. So actually linking all this to phasing and infrastructure pretty much fails.
 6.7.9 Why only housing?
 6.7.10 How? What? When? Where?
 6.7.11 How regularly?

6.7.4 has been updated with regards to CIL and s106 planning obligations and the revised role of the latter, as prescribed by the CIL Regulations.

A minor modification will be proposed setting out risks around delivery of non-residential space.

Object ref.	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	857		<p>7.6 Appendix 36: Infrastructure projects Table A6.1 Timescales / periods are phases? Jamaica Road roundabout improvements signalisation (including new crossing between Southwark Park and King Stairs Gardens) Timescale 2011-15? Where is the evidence that any improvements, bar advertising signage, will take place?</p> <p>Where is the evidence that you TfL bid will be successful? Or a likelihood of success? You have a funding gap of £7,000,000. Where is the money going to come from?</p> <p>This is welcome however where will the CPZ be? It is no good putting in a CPZ in one location and not then extending it to others. We need a comprehensive area solution for controlling parking.</p> <p>Barclay's are no longer paying. Why anticipated? Have you still not collected any funds? Page 126, "Leisure: a great place to visit, relax and have fun" Who is involved? That's the column heading. Who are "End Users"? Although commitment is welcome, where is the actual money? We are interested in the timescale that the actual work will be delivered and not the timescale of commitment. Page 127, Places: better and safer streets, squares and parks "Southern and western sides of Canada Water sasin, new high street and open space 2016-20" What development on the shopping centre site? It is a phased site. So will the high street etc be provided in chunks? And if BL decide to do nothing? Just cash cow the asset? Then what? No new High Street and no public realm either. These are some of the first key part of the original plan for the area and now they look to be some of the most unlikely and late to be delivered. "improvements to open spaces and play facilities in accordance with Open Spaces Strategy" The Open Space Strategy excluded a great number of open spaces. I would strike out "in accordance with Open Spaces Strategy" "Establishment of district heating network Link from SELCHP" Phase 1 is irrelevant to CWAAP. How does SELCHP increase competition? And how does overcharging customers for energy add to growth? It is another scheme of one of your partners, Veolia, that is being overly privileged in planning. Page 129 "New health facilities at Canada Water"... "Implementation of development of shopping centre site or alternative sites in the core area" What will trigger the new health facilities? What development? This needs to be in a central location, not at the periphery (as you call might call it). Nothing about health from Harmsworth???? KCL???</p>	<p>A number of minor modifications are proposed to Table A6.1 to bring it up-to-date.</p> <p>126 - End users refers to users of the facility.</p> <p>127 - The timescales represent the best estimate at present. Delivery of infrastructure will be monitored over the life of the plan.</p> <p>129 - Reference is made to the core area. Harmsworth Quays is within the core area.</p>
191	858	Appendices	<p>Page 131 7.7 Appendix 7: Community infrastructure levy and s106 Planning obligations – I object to the deletion of 7.7.3 through to 7.7.9</p> <p>I object to the deletion of Table A7.1 You need to provide a new updated table that clearly shows your funding gaps.</p>	<p>Table A7.1 was deleted to be consistent with changes to the AAP policy on s106 planning obligations. In the future CIL can be used to fund strategic infrastructure needed to support growth. The infrastructure items referred to in Table A7.1 are all identified in the infrastructure plan which accompanies Southwark's CIL.</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	859	CWAAP 25	<p>CW AAP 25: Land on Roberts Close This should be removed from the Core Area and be added to Russia Dock Woodlands and provide allotment and food growing space. A few extra floors on a tall building can reprovide 28 residential homes and free up this space for everyone to enjoy.</p>	<p>The council considers that a residential allocation is consistent with surrounding land uses. Policy 18 has been updated to require all development to provide space for food growing. It is not considered that there is a need to allocate a development site for food growing.</p>

191 860 Policy 15

Dear Southwark,

Please find attached an artists impression of the Town Square proposed for Royal Wharf across the river. I am happy that Royal Wharf shows that aspirations of residents in Rotherhithe are entirely reasonable and viable. Royal Wharf also sets open space at 45% and I think we should have a statistic / percentage agreed for RCWAAP. And it makes clear that on 15 hectares, with 45% Open Space, with 3300 homes, that approximately 10,000 residents may come to live. With at least 3300 general housing needs homes already pencilled in for RCWAAP plus student housing plus scope for a great many more homes at CWAAP 7 and CWAAP 24 etc, Southwark needs to plot the increase in residents and let us know.

Canada Water "Basin" Dock (Dock as heritage remains of the old Canada Dock):

The Mayor of London has written new 2014 policy (7.103, p.281) to guide about developing the Royal Docks. I find no policy for Canada Water "basin" Dock, but I do see a proposal to make us into an "opportunity area".

Royal Wharf shows you what is normally meant by a "town square" at the "heart" of a community / area, and while Canada Water "basin" Dock may be a focus and open space (of heritage and biodiversity etc) it is not currently suitable as a "town centre", or a focus of a town centre, because it is full of water.

That is why we are waiting on a new high street, and a new high street is also being planned by Royal Wharf.

Canada Water "basin" Dock is an area that fails to provide for a substantial and sustainable market or the active play water features as fountains already suggested by residents and ignored (see comments for SQSC Masterplan application).

I do understand why profit seeking corporations (or greedy educational organisations) may wish to push Canada Water basin Dock as a focus of and try to pass it off as a "town centre", "focus" or otherwise. It allows them to build more densely elsewhere and make more money.

However, like docks in other places you need to respect Canada Water "basin" as a historic dock and place of biodiversity and nature - and leave it at that. Or re-consult on the future of the "basin".

I recall from CWAAP EIP that Canada Water "basin" was taken as part of the Blue Ribbon network however I do not see it specified in on London Plan Map 7.5 "Blue Ribbon Network" and I do not find it listed on the Environment Agency database for the Thames River Basin Management Plan, and I find it excluded from MOLs Thames Policy Area too -which does not even cover the whole of Greenland Dock although it includes the whole of Greenwich Park!

Greenwich presumably more able to take part in MOL consultation and gain protection for their heritage.

Of course I know Canada Water basin-dock is covered a BOL designation by Southwark, but that's very weak indeed. And it's becoming an opportunity area. And the lack of other

Canada Water basin is a protected open space. There is no intention to fill it in. The council considers that the urban design policies in the AAP and site allocations put in place a framework that will secure high quality public space.

recognition leads me to conclude that you're planning to infill Canada Water basin - aren't you? - and that is why you are so aggressive in policy to surround with active frontage and have the basin as a focus.

I think it would be good for Southwark to set out clearly the protection that Canada Water currently enjoys and also refresh the Council's commitment not to infill the Canada Water "dock" basin. Or remove the water. Since you may not fill in, you might put shops or bicycle parking under and town square on top, or something like that.

In addition, it would be a good idea for Southwark to confirm the status of other heritage docks and dockland infrastructure, and for Southwark to let us know how hard it has been working with MOL and the Environment Agency to increase designation and protection of docklands heritage assets, or, not doing much at all. E.g. Surrey Water "basin" dock, and Greenland Dock - which is plotting on the Ribbon diagram.

We need to see clear robust protection of what is left of heritage remains of old docks in our area.

This comment is a personal comment and not submitted on behalf of any other person or body.

191 861 Policy 21

Dear Planning Policy,

Please find attached an extract from Southwark Key Housing Data 2012-13 which is a little out of date so I hope Southwark will update it but I submit it here as a link, and would refer to it in an EIP and undated stats:

http://www.southwark.gov.uk/download/8761/southwark_key_housing_data_2012-13
(February 2013, no sign of February 2014)

The point I want to make is that RCWAAP states "...than for studio units, for which there is no identified need in the affordable sector"

This was incorrect in the last EIP and it is more incorrect now.

Southwark own Southwark Key Housing Data 2012-13 shows demand of 10,855 applicants and transfers in April 2012 for a "one bedroom" and that is more than 50% of the 20,555 people waiting.

In John Kennedy House we have large bedsits that might also be called a "studio" and CIEH Standards for Housing In Multiple Accommodation 2 adults may occupy a bedsit / studio.

http://www.southwark.gov.uk/downloads/download/3705/standards_for_houses_in_multiple_occupation

RCWAAP is not clear how many one bed flats will be built as a %, or an absolute figure. Studios are given a 5% figure for Policy 23 but then you state there is "no identified need in the affordable sector" which is false because the 10,855 applicants waiting in 2012 was comprised of single people and couples appropriate for a bedsit / studio.

The majority of applicants waiting on the list do appear to be ruled out from housing in the AAP.

And I expect the situation is no better, and possibly substantially worse since I last objected to your policy (that was before the bedroom tax debacle).

Southwark's Policy in previous years was to sell off bedsits and one bed flats on the basis that there was no demand for them and this has made matters worse. Your policy needs to reflect the real actual housing need. Even if you then decide to prioritise some over others.

Statistics submitted to the Government show the high number of allocations made to homeless people over those, including families, waiting on the list and I think there needs to more careful consideration of housing need.

Student Homes: I also note page 10 of Southwark Key Housing Data 2012-13 (February 2013)

"1.10 Students Southwark provides housing for students studying in educational establishments within Southwark but also to educational establishments across London. Goldsmiths in Lewisham is close to the border with Southwark, and students of this as well as of Central London institutions will often reside in Southwark. In 2011 there were 27,044 full time students

The council will review housing needs in the process of preparing the New Southwark Plan. The information in the policy is consistent with the last housing requirements study undertaken by Southwark.

18-74 resident in Southwark. This was 11.5% of the population compared to 5.4% in England. There are over 5,000 purpose built student bedspaces in Southwark. Over 350 student bed spaces have been completed in the past five years and planning permission has been granted for over 3,000 new bedspaces, around half of which are already under construction."

Added to this might be Mulberry of 770? Making 9,000 bedspaces. Plus all the student "sharers" occupying what can often be "family housing". How much of our new "family housing" stoke (social/public/private) is actually now occupied by families? Census 2011 might give some clues.

With such a high housing need, including temporary accommodation, isn't even more homes in scarce Southwark Land taking things too far?

Objector ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	862	Policy 18	<p>Dear Southwark,</p> <p>NPPF: http://planningguidance.planningportal.gov.uk/ is now online and no longer Beta. This supersedes previous NPPF guidance. I referred to it in my comment for RCWAAP however I plan to refer to it more extensively for EIP.</p> <p>LOCAL GREEN SPACES - already requested</p> <p>I have written to you many times about Local Green Spaces and my repeated requests are in compliance with NPPF / NPPF Guidance. I look forward to hearing from you about the green spaces I have already asked to become Local Green Spaces being included for RCWAAP EIP.</p> <p>LOCAL GREEN SPACES - additional</p> <p>I request that the Canada Water dock / basin and SINC be designated a Local Green Space and in addition Surrey Water dock/basin, and in addition the channel linking Surrey Water to Canada Water dock / basin. This is shown in blue on the attachment "local_green_space".</p> <p>PROPOSAL CWAAP 7 and CWAAP 24</p> <p>I object to CWAAP 7 and CWAAP24. I attached a new proposal site. Indications are that Aviva/Frogmore have no intention to implement the current planning permission for the Leisure site and no intention to make a new planning application either. They seem very happy to continue collecting the rent and sitting on the asset. Without Aviva/Frogmore taking action CWAAP 24 is not realistic. The Council needs to CPO the leisure site or plan otherwise.</p> <p>My proposal site map makes it clear that development of the Harmsworth Quays Site must be concurrent and integrated with the Town Centre plan and Surrey Quays Shopping Centre development. The Town Centre focus - the long awaited "High Street" must be provided without further delay and prevarication. In addition new routes through the existing Shopping Centre building (or a replacement) are necessary with the development of Harmsworth Quays or sooner.</p> <p>What we cannot have is another site developed far too independently, and we will end up with the money extracted from Harmsworth Quays leaving us with a dilapidated shopping centre and car park that will never be viable enough for substantial and significant improvement - so it will be left. Which will suit TESCOs very well, because they want to keep the parking.</p> <p>To help redevelop the Shopping Centre the Council must CPO leases of retailers and ensure all barriers to the redevelopment of the Shop Centre are removed.</p> <p>This whole things is dragging on for decades and it is all quite ridiculous. There is a housing crisis apparently!</p>	<p>Canada Water basin is protected as borough open land. A further level of protection is not considered to be necessary.</p> <p>The leisure park site remains a development site that is likely to come forward for development at some point in the lifetime of the plan.</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	863	Policy 21	<p>Hi Tim, attach a pie chart of housing need (demand) as at 31/04/2013 which shows how many bedroom households need.</p> <p>I also attach a snip of a Freedom of Information Request I just filed via WhatDoTheyKnow.com</p> <p>The purpose of the FOI Request is to get info on the 5307 that are in a reasonable preference category including 1,044 homeless households.</p> <p>Then another pie chart can be produced that will show what reasonable preference category housing need (demand) existed as at 31/04/2013.</p> <p>This can then inform the RCWAAP.</p> <p>You will hopefully note that far from studio / bedsits and one bedroom flats being in low demand they are in fact 63% of demand.</p> <p>Clearly, a breakdown of the 5307 housing need is essential.</p> <p>So it is with grave concern that I read Southwark's Planning Policy to make all "studios" private.</p> <p>And with grave concern that I read Southwark's newer policy for tall building that reduces viability of affordable housing in those blocks and therefore specific locations.</p> <p>I am told that somewhere in Southwark Housing there is a team of people who focus on issues including planning and I really do wonder what they do all day. If they can find five minutes perhaps they could produce the stats ASAP to help everyone understand the situation. And hopefully stats for 1/04/2014 very soon too.</p> <p>I will not be lost on many people that as we house 9000 students and plan to house many 1'000s more that people in need will have to wait 25 or 30 years for a chance of a home they can afford.</p> <p>Supporter of Kings College London - including those who cannot stop tweeting on twitter, might have some explaining to do!</p>	<p>The council will review housing needs in the process of preparing the New Southwark Plan. The information in the policy is consistent with the last housing requirements study undertaken by Southwark.</p>

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
191	864	Appendices	<p data-bbox="423 217 629 236">Dear Planning Policy,</p> <p data-bbox="423 268 1330 363">Southwark has published a new iteration of the its Capital Programme 2013/14 - 2023/24 for Cabinet on 18th March 2014 and this is available at http://modern.gov.southwark.gov.uk/documents/s45059/Appendix%20H%20General%20fund%20capital%20programme%20by%20schemes.pdf</p> <p data-bbox="423 395 1330 459">There is a £38,978,000 gap. This is part of the huge infrastructure gap that we're waiting to see updated so the full horror of the unsustainable planning can be made open and transparent for us.</p> <p data-bbox="423 491 1330 539">Seven Islands is one project that was listed in the 2011 programme, and now listed for £3M in 14/15 and £5M 15/16. Why four more years delay already? On top of decades of delay?</p> <p data-bbox="423 571 1330 639">Given a £40 Million funding gap please can the Planning Policy team update the CWAAP to ensure that "commitments" are delivered. Having commitments from a plan that has a £40M gap is not very sound.</p> <p data-bbox="423 671 1330 711">And please can the phasing for Seven Island be adjusted because the current phasing would allow works to stretch into 2020 (see attached).</p> <p data-bbox="423 743 1330 783">Works needed to be completed this year, and need to be completed in year 14/15 and by 15/16 at the latest.</p>	<p data-bbox="1352 217 2011 264">Funding for the refurbishment of the 7 Islands Leisure centre and the Southwark Park sports centre are identified in the capital programme.</p>

191 865 Policy 23

Dear Planning Policy,

I attach a recent Freedom of Information request that I wish to add to the comments below and my comments about Blackfriars SPD re designing out affordable housing by exceeding the minimum dwelling space required for tall buildings. This is particularly relevant to "studio" "bedsit" and "one bedroom" flats that are over 50% of Southwark Housing need. Accommodation that can be designed to a very high standard, and very well located, and might potentially be chosen under occupiers.

In the response Southwark Council say that:

"A bedsit/studio is not considered to be a one bedroom property as such, however, in the case of this report housing applicants requiring bedsits/studios were included in the figure for one bedroom dwellings."

Recall the policy:

P.63, Policy 23: Family homes

"4.6.14 Our approach in the core strategy and in this AAP is to provide a mix of housing sizes and types to meet the housing needs of different groups... Other than for studio units, for which there is no identified need in the affordable sector,"

"Other than studio flats which must be private, homes of all sizes should provide a mix of private, social and intermediate housing."

Policy 21: New homes (p.107)

Unsound then, unsound now. There is high demand for bedsit, studio and one bed flats. The majority of demand.

Also Southwark have made it very clear that it is a "choice" based systems and in reply to me, and to requests made by others, the authority is clear that it does not have data about where people wish to live. Unless you have a rabbit out of a hat, it does look as though all you have is an overall demand / needs for Southwark borough and nothing for AAP areas.

While I am writing, I also wish to remind that Planning Inspector Andrew Seaman made decisions about the Core Plan and Canada Water Area Action Plan based on representations by the Council. Representations, that included what the Council said it would do following the EIP. Participants also trusted that what you said you would do, that you would do - and in a timely way.

For example:

Southwark Council Canada Water Action Area Plan DPD, Inspector's Report October 2011

http://www.southwark.gov.uk/download/6821/inspectors_report

61. "AAP Policy 10 indicates maximum parking standards within the Core Area and is an approach that accords with the thrust of, amongst other publications, Planning Policy Guidance Note 13 'Transport', the CS and the LP. The AAP makes clear that this approach is linked to the relatively good accessibility of the Core Area to public transport and will, in time, be supplemented by the detailed parking guidance of the intended Development Management

The council's LDS commits the borough to preparing a local plan, the New Southwark Plan, to replace the core strategy and saved Southwark Plan policies. The council will review housing needs in the process of preparing the New Southwark Plan. The information in the AAP housing policies is consistent with the last housing requirements study undertaken by Southwark.

DPD. The submitted approach is sound."

The approach is no longer sound of the DM DPD is subsequently scrapped and a New Southwark Plan is due approximately six years after 2011's EIP (in 2017).

Or the Core Strategy report

<http://modern.gov.southwark.gov.uk/documents/s17821/Appendix%20B%20Inspectors%20Report.pdf>

"34. The Development Management DPD (DMDPD) will set out details of where the loss of business space in certain centres may be acceptable and this approach is neither unreasonable nor ineffective. "

"36. Tourism is recognised by the CS as important to the Borough economy. SP10 strikes a strategic balance between the provision of hotels within certain established centres, the need to avoid harm to local character and the maintenance of stable residential communities, for example in Bankside and Borough. The Council's intention to provide further details of potential hotel locations and assessment criteria through its DMDPD"

"108. In advance of the intended DMDPD, the policy objectives of the CS will be achieved with sufficient flexibility via the saved policies of the UDP and associated guidance."

"119. I heard and received a number of detailed submissions which sought to identify targets for the Borough in terms of low carbon building stock... Nevertheless ,the CS provides sufficient strategic direction and a number of potential policy 'hooks' upon which more detailed policy and guidance can be devised and suitable targets secured, for example the DMDPD"

And then:

"6. Lessons learnt from the Core Strategy. We have introduced a Site Allocations Development Plan Document (DPD) and we have moved housing into the Development Management DPD. This will also include open spaces, economic issues and waste."
<http://modern.gov.southwark.gov.uk/documents/s21516/Appendix%201%20Local%20Development%20Scheme.pdf>

The DM DPD has been wiped, and wiped from LDS 2013-2018

http://www.southwark.gov.uk/download/6395/2013-2018_local_development_scheme

What might a reasonable person make of your approach?

And at the next EIP, when the next Planning Inspector comes from Bristol, would it not be fair to point the above out?

I recall clearly during EIPs that both objectors and the Inspector resolved matters by your assurances about what you would do.

191 866 Policy 18

Request for an open space to be designated and protected as Local Green Space under the NPPF

"Canada Estate" will no doubt get the attention of ward councillors too busy to attend Hawkstone! Keep reading councillors...

I attach, and uploaded to <https://www.flickr.com/photos/hawkstonetra/13734843904/in/photostream/>, a map of "Rotherhithe" provided by Southwark - I think to the Planning Inspector in 2010. I hope this helps clarify about what is "Rotherhithe" and what is not. Having a tube station named "Rotherhithe" seems to lead to some misunderstanding. This adds to "Surrey Docks"; "Surrey Quays"; "Surrey Centre"; "Canada Water"; "Canada Water Basin"; failed "Plaza Town Centre"; Sellars newer Site C +E "Town Centre" the "Town Centre" that is a red boundary - solid and dashed - and the fun that my nearby station has been called "Deptford Road Station", "Southwark Park Station", "Surrey Docks Station" and Surrey Quays Station over the years. Phew, anything I forget?

Following on from the deforestation of the Canada Estate (on twitter feed and attached) I also attach an image that has snippets from four of Southwark's own maps.

One map visually contradicts the other: there is a green open space that is either part of the Canada Estate or it is not. Therefore one of the maps is wrong.

I take the map submitted to the CWAAP EIP as correct, and therefore at this time I do not consider the open space annotated in red on the first attachment to be part of the Canada Estate. But I welcome clarification from Planning Policy who gave the "Rotherhithe" "peninsula" map to the CWAAP EIP in the first place.

It is not 100% clear on scan, but clear in the A3 original, that you can see the Rotherhithe Map also maps and names "Housing Estates". Southwark's online mapping service is riddled with errors and omissions.

What these collectively show is that a green open space adjacent to (east of) Clegg House and Murdoch House and Neptune House has been excluded from Southwark's online mapping service as an "open Space". The maps clearly show it, although not designated as an open space / park. One of the many places disregarded by the Open Space policy: because Southwark unlawfully, and with malicious tenure discrimination, refuses to protect valued open green spaces on most Housing Estates (except oddities that break their own blanket rule at the behest of lobbyists).

I am writing to Tim to request, along with the Hawkstone Estate open spaces and other open spaces referred to, that the open space indicated in red on the attachment "local_green_space_for_protection", located east of Clegg House, Murdoch House and Neptune House be designated Local Green Space and protected (the CWAAP Review being a good opportunity for this).

I do not normally interfere in other Estates, however the news from Canada Estate is so appalling that wider residents need to act on behalf of the community and residents not living

The council does not consider that the spaces referred to meet the criteria for local green space designation set out in the NPPF and NPPG. Paragraph 77 states that local green space designation will not be appropriate for most green spaces. It should only be designated where it is demonstrably special to a local community. While housing amenity land has a very important role, the council does not consider that this criterion is met. The council's reasoning for not generally protecting housing amenity land is set out in the response to representation 702.

on the Canada Estate, but next to it and in the wider area. And where there is any doubt whatsoever that a valued green open space is part of an "Estate" or not.

I have already written into CWAAP how important these green open areas are for animal wildlife and nature. We also have more recent media attention on their essential role in pollution mitigation.

I expect that Councillors that are genuinely and sincerely determined to protecting our green and open spaces will support this request, and will also enquire why so many open and green spaces were not recommended for designation when Southwark's Open Spaces policy was agreed by Cabinet / Fiona Colley. A discussion I also look forward to having at CWAAP Review.

Traffic - It is great news that ward Councillors are still hassling TFL about the appalling conditions on Jamaica Road and Rotherhithe Roundabout. Google, using android phones, logs congestion from Greenwich through Deptford, through the gyratory / A200 Lower Road, and also back into Bermondsey too. I hope Southwark is busy working on a comprehensive solution because for the last decade the Transport Department have been pretty hopeless and not delivered much at all.

We did plan to put webcams cameras on our towers to count all traffic for CWAAP however with new technology it's not needed: the damage to "growth" in our area caused by the loss of time stuck in traffic is huge. Damage to growth is one of the strongest argument because the NPPF now rules.

191 867 Policy 18

Dear Tim and Planning Policy,

On 6th March 2014 the Department for Communities and Local Government updated the National Planning Policy Framework and relevant planning practice guidance.

It is now crystal clear that residents can request open space they value to be Local Green Space.

I welcome this from the Government to clear away what I considered to be unlawful malicious tenure discrimination against Southwark's Housing Estate residents. Something I noted a lack of action from our Councillors to do anything about.

I have already repeatedly requested protection of open spaces for many years however I write to refresh the Hawkstone Estate request (Hawkstone Estate a.k.a Silwood a.k.a Silwood 2 a.k.a Hawkstone Estate North - and so on)

Attached is a map (Lgs_hawkstone.jpg) clearly showing two open spaces that I value and wish to be designated and protected as Local Green Space.

Planning Inspector, Andrew Seaman, kindly visited them and there was a clear expectation that Southwark's post EIP policies and activity would address the matter/issue: Southwark failed to do so.

One open space is shown in red and "belongs" to John Kennedy House and comprises of the original grounds for this high rise tall block (as clearly shown on LCC/GLC photographs).

The intention is to further improve this area as a play area (already mapped on the Area Action Plan) and resource for the block, Estate and wider community living in private homes / new affordable housing in Rotherhithe Old Road who have no such resource (and no gardens etc). The area has potential for food growing and improved communal gardens too. All kind of activities we see on other Estates, but never our own.

The other site is shown in blue and "belongs" to Brydale House and is comprised of the original designed grounds for this high rise tall block. Residents in this block are considering how the potential for this place should be optimised.

Both high rise blocks intend to seek funding to improve these areas for community use.

A few years ago over 120 signatures were hand delivered to Tooley Street - our requests were ignored and disrespected.

In the run up to CWAAP Review we will also refresh support - door to door.

The council does not consider that the spaces referred to meet the criteria for local green space designation set out in the NPPF and NPPG. Paragraph 77 states that local green space designation will not be appropriate for most green spaces. It should only be designated where it is demonstrably special to a local community. While housing amenity land has a very important role, the council does not consider that this criterion is met. The council's reasoning for not generally protecting housing amenity land is set out in the response to representation 702.

196 741 General

Southwark Council Local Development Framework: Canada Water Area Action Plan Review – Publication/Submission draft

Statement of general conformity with the London Plan (Planning and Compulsory Act 2004, Section 24 (4) a)

Thank you for consulting the Mayor on the above document and requesting an opinion on general conformity. The Mayor has delegated authority to me to respond. As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004.

On 30 July 2013 my officers provided initial comments, reference D&P/LDF28/LDD04/DW05 on the preferred option document. The Council has responded positively to the issue raised on affordable housing and it is my opinion that the proposed submission document is now in general conformity with the London Plan.

However, in light of the publication of the Further Alterations to the London Plan that identifies Canada Water as a potential new opportunity area, it can be questioned whether the quantum of jobs and minimum new homes identified in the core area of the Area Action Plan is ambitious enough to realise its full potential and at the same time make a significant contribution towards meeting London's housing needs.

Regarding transport, officers from Transport for London are very keen to work with the Council to deliver its aspirations for sustainable growth in the AAP area. However, certain aspects of the AAP need to be amended (e.g. factual updates) to reflect the current position on certain projects. A separate representation on the AAP will be sent separately by TfL.

The council notes the GLA's confirmation that the RCWAAP is in general conformity with the London Plan.

The council's view is that the RCWAAP is consistent with the ambitions in the FALP and the proposed opportunity area designation.

The opportunity area designation raises the minimum homes target from 2,500 to 3,300. The indicative employment capacity remains at 2,000. It also signals the centre's potential to move up the town centre hierarchy to become a major centre and the potential to develop a new science cluster linked to Kings College.

- Homes: The potential number of homes identified in policy 21 exceeds the 3,300 identified in the FALP. The figure identified in Policy 21 does not include any homes which might be provided on Harmsworth Quays. While the council wishes to maximise non-residential use on that site, it is likely that residential homes or student accommodation will also be provided which would further boost the supply. The council will propose minor modifications to the plan which recognise the proposals in the FLAP and the new target which would apply if the FALPs are confirmed.

- Jobs: the opportunity area designation does not increase the jobs estimate above 2000. This figure is explicitly identified in the AAP vision. Moreover, the vision has been strengthened to emphasise that the council wishes to broaden the appeal of the town centre and diversify and strengthen the local economy. AAP policy 25 indicates that the council will promote a business cluster, requiring provision of around 12,000sqm of business space. In his report on the adopted AAP following the EIP, the planning inspector commented that:

"...this accords with the thrust of the Council's Economic Development Strategy and the LP which contains an indicative employment capacity of 2,000 new jobs to 2031." (para 46).

The RCWAAP strengthens this further through the allocation policy for CWAAP 24 which requires proposals to maximise the amount of non-residential space. The 12,000sqm of business space referred to in the adopted AAP can be supplemented by other employment generating uses, such as higher education, which would take the number of jobs much higher than the 2,000 identified in the LP and FALP.

- Major centre: The vision for the AAP states that the council wants to strengthen Canada Water's role as a shopping destination, expanding the retail space by around 35,000sqm. AAP policy 1 states that Canada Water will move up the hierarchy of centres to become a major town centre.

- Science cluster: The AAP vision has been amended to ensure that it specifically refers to higher education facilities as part of the mix that the

council would like to see developed in the area. Policy 29a states that proposals for higher education facilities will be supported. CWAAP 24 seeks a mix of uses, such as higher education and other uses. Para 7.8.55 explicitly identifies the potential for new academic and research facilities and the benefits that these would bring.

The council notes that TfL have submitted comments separately and will respond to their comments.

248 823 General

On behalf of our client, King's College London (King's), we are pleased to submit representations on the Publication Version of the Revised Canada Water Area Action Plan (CWAAP). King's is a key stakeholder in Canada Water, having acquired the former Mulberry Business Park site (the Mulberry site) and having an interest in delivering campus-led regeneration of a wider area including part of the Harmsworth Quays site with the encouragement of Southwark Council.

In November 2012, a high level masterplan exercise was carried out to illustrate the extent and nature of a new university-led development that could be provided at Canada Water and the regeneration impacts that this would have. The masterplan was prepared as an illustrative tool to inform discussions with LBS and other stakeholders and, in particular, to inform the Council's development of new policies for the area in its current review of the CWAAP.

King's undertook consultation on the masterplan and it was met with broad support from all sectors of the community. In May 2013 the College submitted a planning application on the Mulberry Site for a mixed-use development comprising student residential, affordable housing, office and retail uses and public realm. Planning Permission was granted in November 2013 with unanimous support from the Council's Planning Committee.

This is a standalone development, which will help meet King's urgent operational need for student accommodation, but would also function as the first phase of a wider university led regeneration scheme if King's is able to pursue this. The development consented for the Mulberry site will be undertaken by King's whether or not the wider masterplan is taken forward, as the student accommodation proposed is a critical element of the College's Estates Strategy. Applications have been submitted to discharge the pre-commencement conditions and Section 106 obligations and construction work is targeted to begin in Spring/early Summer.

Canada Water, as an acknowledged regeneration priority area and Intensification Area in the adopted London Plan – and as a proposed Opportunity Area in the London Plan Further Alterations (2014) – is deemed suitable for a new university environment and could provide King's with:

- new space to meet its teaching and full student accommodation needs – specifically the objective to grow student and academic staff numbers by c. 2,000 and 150 respectively in coming years;
- the potential to create a vibrant university environment with new infrastructure and facilities;
- a convenient location that is only ten minutes by tube to Central London and to other King's campuses;
- an opportunity to further embrace world leading collaborations such as the Francis Crick Institute and London Life Sciences, all of which will require additional spatial capacity near Central London; and
- an opportunity to extend public-private partnerships such as Imanova, a new state-of-the-art imaging centre formed collaboratively by King's, University College London, Imperial College London and the Medical Research Council and CUSP in association with Warwick University, New York University and private sector partners.

In order to achieve this, King's has been actively engaged with Southwark Council as the majority freeholder of Harmsworth Quays and British Land as the leaseholder. Given this position, the revisions to the CWAAP are of great interest to King's. It is important that the new or revised policies provide a supportive context for King's to bring forward its

The council welcomes King's College's engagement.

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
			<p>proposals for the wider area if this proves possible, otherwise the very significant regeneration benefits that the university uses will bring will not be delivered. The remainder of this letter comments on the Publication Version Revised CWAAP policies in detail.</p>	
248	824	Vision	<p>King's welcomes the acknowledgment in the CWAAP that higher education uses will play a role in transforming Canada Water in to a town centre and creating a new destination around the Canada Water Basin as a new heart for Rotherhithe.</p>	Support for the vision is noted.

248 825 Policy 1

Policy 1 and Figure 5: Town Centre Boundary

This policy sets out that Canada Water will become a major town centre and areas for new retail development are identified including part of Harmsworth Quays. Figure 5 identifies an "indicative change to the town centre boundary". This takes in Site E, part of Harmsworth Quays and the southern fringe of the Mulberry site.

The text at 4.2.7a explains that the exact location of the boundary extension will depend on the amount and distribution of town centre uses brought forward by the development proposals for site allocation CWAAP 24 and will be negotiated through the planning application process.

Whilst King's welcomes the inclusion of CWAAP 24 as suitable for retail uses, we consider the approach to the town centre boundary an unusual one to take – at what point will the actual town centre boundary be defined? If it is to be defined after planning permissions have been granted for town centre uses, the policy will provide a very ambiguous context for the determination of those applications.

We consider this lack of clarity is not helpful and a firm town centre boundary should be established in the CWAAP. We consider that the boundary should take in the whole of Harmsworth Quays, the Surrey Quays Leisure Park site and the Mulberry site. Uses appropriate to town centres exist, or are likely to be proposed, on all of these sites and including them all within the town centre will allow for a comprehensive approach to their planning and the distribution of uses across them.

Core Strategy Strategic Policy 8 Student Homes states that appropriate locations for student homes are within town centres and other places with good access to public transport. As such, the entire Mulberry Site should be included in the town centre. Establishing this wider town centre boundary will also be consistent with new Policy CWAAP 24 which covers Site E, Mulberry, Harmsworth Quays and the Surrey Quays Leisure Park. This policy states that proposals in this area should:
"maximise the amount of employment which can be generated and the contribution to the regeneration of the town centre resulting from:

- The economic benefit of proposals, including their potential to increase the turnover of the town centre and attract inward investment into other businesses;
- Diversifying the range of employment generating and town centre uses;
- Increasing the number of visitors that would be attracted to the town centre at different times of the day and its potential to appeal to a wide range of age and social groups;
- The creation of a town centre and urban environment providing a network of streets and open spaces....." (our emphasis)

The wording of this policy suggests that all the sites concerned are suitable for town centre uses and will contribute in various ways to the function of the town centre. As such, it would be logical for the sites to form part of the town centre and we request that the boundary is adjusted in Figure 5 accordingly.

The council's view is that the approach in the AAP is positive and represents an appropriate means for managing the growth of the town centre, in accordance with NPPF paragraph 23. Paragraph 23 states that it is important that the needs for retail, leisure, commercial, office, cultural, community and residential development are met in full and ensure that these are not compromised by site availability. The council's stated willingness to extend the town centre to the east into Harmsworth Quays will achieve this aim of providing sufficient land. It provides certainty for developers that the council will support provision for town centre uses on Harmsworth Quays.

Town centres are defined by the NPPF as an "Area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area". Main town centre uses are defined by the NPPF as retail development, leisure, entertainment and recreation uses, offices, and arts, cultural and tourism development. CWAAP states explicitly that the council will support provision of such uses on Harmsworth Quays.

While the AAP requires maximum provision of town centre uses on Harmsworth Quays and the adjacent sites, there is still some uncertainty over the quantum and distribution of such uses. In the light of that the council does not consider it appropriate at this stage to include the whole of Harmsworth Quays within the town centre. The boundary of the town centre will be defined in the future to cover that area which is predominantly occupied by town centre uses, in accordance with the NPPF.

The council considers that this approach supports NPPF guidance on promoting sustainable travel by seeking to focus town centre uses in those areas which are most easily assessable by public transport and which maximise opportunities to link trips and walk and cycle. It also supports the NPPF objective of creating a strong sense of place. Creating an identifiable town centre in which town centre uses predominate will be reinforced by creating a hierarchy of streets and spaces which reflects the importance of the town centre as a destination. This is also consistent with the tall buildings strategy. Part of the rationale for focusing tall buildings within the town centre is that such buildings can accommodate uses which animate the surrounding environment and which contribute to the vibrancy of the centre.

Objector ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
248	826	Policy 12	<p data-bbox="421 217 674 236">Policy 12: Sports Facilities</p> <p data-bbox="421 268 1317 387">The consideration of long term options for the provision of sports facilities alongside the redevelopment of Seven Islands is welcomed by King's, as both of these strategies will complement the King's planning application and masterplan. We consider that the new town centre is the better location for the provision of modern sports facilities such that the Seven Islands site could be redeveloped to provide say affordable housing.</p> <p data-bbox="421 419 1317 512">As a point of information, the masterplan includes sports facilities and King's would intend that these are delivered in association with a wider campus development. It is envisaged that these facilities would also be available for public use and therefore this aspect should be considered as part of the Council's long term options and strategy for the area.</p>	<p data-bbox="1352 217 2078 288">King's College's willingness to explore this matter further is welcomed. Policy 12 signals the council's intent to consider long term options for the provision of sports facilities.</p>
248	827	Policy 16	<p data-bbox="421 544 779 563">Policy 16: Town Centre Development</p> <p data-bbox="421 595 1267 643">This policy sets out objectives that development in the Canada Water town centre should deliver. These include:</p> <p data-bbox="421 675 1330 794">"Enable the integration of sites to the east of Surrey Quays Road (Site E, Harmsworth Quays and the Surrey Quays Leisure Park) into the town centre by providing strong visual and physical connections which link them to the basin, shopping centre and tube station, introducing a new public space on Surrey Quays Road and in the longer term closing the southern end of Surrey Quays Road to through traffic."</p> <p data-bbox="421 818 1317 916">The indicative extension to the town centre boundary includes part of Harmsworth Quays, part of the Surrey Quays leisure park and part of the Mulberry site. We support the modification of the text to include Harmsworth Quays and the Mulberry Business Park site. This is now consistent with Policy CWAAP 24.</p>	<p data-bbox="1352 544 1554 563">The support is noted.</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
248	828	Policy 17	<p data-bbox="423 217 965 236">Policy 17 and Figure 9: Building Heights in the Core Area</p> <p data-bbox="423 268 1328 363">This policy sets out an approach to height which gives guidance for prevailing building heights across the whole of the core area (4-8 storeys), for tall buildings (above 30m in height – broadly 10 storeys) and then refers to a specific area shown in Figure 9 where tall buildings of 20 – 25 storeys will be appropriate.</p> <p data-bbox="423 395 1328 491">Figure 9 then shows a zone where “tall buildings will be appropriate”. The policy text and supporting text makes it clear that this zone is the area where it is considered that 20 – 25 storey buildings may be appropriate (rather than being the only place where buildings of above 30m will be appropriate – the core strategy definition of a tall building).</p> <p data-bbox="423 523 1328 563">Therefore, to add clarity we consider that the annotation to Figure 9 should be amended to read “indicative area where tall buildings of 20 storeys or above will be appropriate.”</p> <p data-bbox="423 595 1328 810">In terms of the general prevailing heights, we consider that these should be amended to read between 4 and 9 storeys as this seems more appropriate in the context of existing height benchmarks in the core area such as the Water Gardens and the print works. The view modelling and townscape analysis work undertaken by King’s consultants in relation to the Mulberry planning application demonstrates that building heights of up to 9 commercial floors are appropriate in the existing context. We are also aware that the local context will change significantly if and when schemes for “very tall” buildings of 20 storeys and above (or significantly above in the case of the current application for Site C) are permitted in the defined zone.</p> <p data-bbox="423 842 1328 957">It is also considered that the indicative zone for tall buildings of 20 storeys or more should be extended to include the southern part of the Harmsworth Quays site (that part currently shown as being in the indicative town centre boundary) as it is considered this area would be appropriate for taller buildings which would support the expansion of the town centre in this direction.</p>	<p data-bbox="1352 217 2078 312">Following King’s College’s representation at the previous stage, the council amended the text in Figure 9 in the publication version of the plan to read “indicative area where tall buildings of 20 storeys or above will be appropriate.”</p> <p data-bbox="1352 344 2078 488">The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the core of the new town centre.</p> <p data-bbox="1352 520 2078 663">The extension of this zone of heights around 20-25 to the south of the area illustrated in Figure 9, is not considered appropriate, as the focal point of the new town centre is around the basin and not the Harmsworth Quays site. However, it should be borne in mind that the zone is indicative and the detail locations and heights of buildings will be assessed through a planning application.</p> <p data-bbox="1352 695 2078 786">The 4-8 storeys is a benchmark considered acceptable by the Inspector who examined the adopted AAP and is consistent with our evidence base. Any proposed development exceeding this would be assessed at the planning application stage.</p>
248	829	Policy 25	<p data-bbox="423 994 770 1013">Policy 25: Jobs and Business Space</p> <p data-bbox="423 1045 1328 1157">The promotion of a business cluster in the core area on the sites identified is supported. The supporting text at paragraph 4.7.3 notes that demand could also be boosted by the requirements of end users such as King’s and this acknowledgement is welcomed. The King’s planning permission for the Mulberry site includes an office building that would bring some 300 jobs to the area.</p> <p data-bbox="423 1189 1328 1260">We also support the acknowledgement in paragraph 4.7.3 of, ‘the impact of regeneration and the potential to provide complimentary uses, such as retail, hotels and higher education will substantially increase the attractiveness of business space in the area.’</p>	The support for policy 25 is noted.

248 830 Policy 29a

Policy 29a: Higher Education and Student Housing

King's welcomes the inclusion of Policy 29a and its support for the provision of higher education uses at Canada Water. King's also welcomes the acceptance that new student housing developments will be supported where they form part of mixed use schemes.

The current policy wording stipulates that large student housing developments (defined in the supporting text as over 300 bedrooms) in the core area will be supported provided that the development:

- "Is part of a campus development which also provides a significant amount of teaching and/or research facilities and supporting infrastructure.
- Is part of a mixed and inclusive community.
- Includes a range of student housing types such as a cluster flats, studio flats and accommodation for couples and staff.
- Is accompanied by a satisfactory student management plan."

King's welcomes the acknowledgement that proposals for new student housing developments should be accompanied by a satisfactory student management plan to help address amenity concerns on surrounding land uses.

King's welcomes the inclusion in bullet point 3 that accommodation for staff is supported. However, we still feel that the level of 300 bed spaces seems to be a somewhat arbitrary figure at which to make a policy distinction on acceptability. Schemes of over 300 bed spaces, even if not located in the CAZ and/or close to campuses could still greatly contribute to regeneration in an area.

We do not see the need for major student developments necessarily to be part of a campus development. The reason that King's acquired the Mulberry site is that this location is very well linked by public transport (Jubilee Line and buses) to all of the College's other campus locations. Therefore, there will be easy access for students to all of King's teaching and other facilities. As you know, King's has aspirations to bring forward its wider teaching campus in the area if it can be delivered. However, should it not be possible to do this, standalone student housing schemes of over 300 bed spaces should still be recognised as being able to deliver significant regeneration benefits.

Therefore we consider that the wording of the criteria in Policy 29a should be amended to read:

- "Is part of a campus development which also provides a significant amount of teaching and/or research facilities and supporting infrastructure, or is linked to a campus by good public transport services.
- Is part of a mixed and inclusive community.
- Includes a range of student housing types such as a cluster flats, studio flats and accommodation for couples, families and staff.
- Is accompanied by a satisfactory student management plan."

We also consider that paragraph 4.7.24 should recognise that in cases where student housing is being provided directly by or for a university or named higher educational institution, the accommodation is likely to be offered at sub market rents. It should also be acknowledged that

King's College's support for the changes made to the policy in the publication version of the RCWAAP is noted.

Southwark's view is that the policy is important if large student housing developments are to contribute to the AAP vision of diversifying and reinforcing the town centre. The majority of student housing developments in Southwark have less than 300 bedspaces and all the larger developments are either in the CAZ and/or close to campuses, where they can benefit from a direct access to university facilities and a range of supporting infrastructure. The Council considers that 300 is suitably high to have a significant impact on the character and function of Canada Water and the AAP core given that it is predominantly residential apart from the town centre.

While provision of higher education uses in the action area will be supported, the council also wants to ensure that there is a mix of uses as well as new residential development. This is consistent with the AAP vision as well the proposals in the Further Alterations to the London Plan (2014) which identify significant capacity for homes and jobs and the potential development of a new science cluster linked to an academic institution (King's College) . In this light of this, council considers that it is necessary to require other uses and facilities alongside large student housing proposals. Student accommodation alone does not support the improvements Southwark want to make to the town centre or help to meet the vision for the wider area.

Paragraph 4.7.24

As set out in the Core Strategy policy 8, student housing will be subject to the requirements of our affordable housing policies. The definition of affordable housing is provided in the Core Strategy and the NPPF. The viability of individual schemes will be assessed on a case by case basis so we do not agree that a reference to sub market rents should be made in the policy.

**Objec-
tor ref**

**Rep
ref.**

Policy

Details of Representation

Officer Response to Representation

in this case the student accommodation will provide a form of affordable housing to a sector of the housing market (students) and this point should be recognised in viability studies and the application of affordable housing policies.

Object- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
248	831	CWAAP 24	<p>Proposal Sites: CWAAP 24 and Figure 29: Site E, Mulberry Business Park, Harmsworth Quays and Surrey Quays Leisure Park</p> <p>CWAAP 24 represents a new single allocation for Site E, Mulberry, Harmsworth Quays and Surrey Quays Leisure Park to ensure a joined up strategy for bringing forward development on these sites. King's welcomes this new policy but has some detailed comments on it, Figure 29 and the supporting text.</p> <p>King's welcomes the introduction within the first paragraph of the policy of the wording "higher education."</p> <p>King's acknowledges and supports the policy recognition in paragraph 7.8.53 that once Harmsworth Quays is vacated by the Daily Mail Group, a non-residential noise buffer will no longer be needed on the Mulberry Site.</p> <p>King's supports the aspiration stated in paragraph 7.8.54 to "create an environment which feels like a town centre". This supports our request that the whole area covered by policy CWAAP 29a is included within the town centre definition.</p> <p>King's supports the recognition of the role that higher educational uses could play in strengthening the economy and delivering jobs (second bullet point of 7.8.55).</p> <p>In terms of student housing, paragraph 7.8.56 states:</p> <p>"Student homes can contribute to widening the mix and choice of homes in the area and would also be an acceptable use. However, the appropriate level of student housing will depend on the accompanying mix of uses. The number of student homes should not unbalance the mix of homes in the area. If a significant number of student homes are proposed, this should be justified by other benefits associated with university campus development."</p> <p>For the same reasons as set out in response to policy CWAAP 29a above, we consider that the final sentence of this paragraph should be deleted as large scale student accommodation may be acceptable where it is well linked to an existing campus by public transport and is well managed in terms of impacts on residential amenity. We also request that student housing is recognised as a required use in the area, not just an acceptable one. Therefore, we consider that this paragraph should refer back to Policy29a and the revised wording we have suggested for this policy is as follows:</p> <p>"Student homes can contribute to widening the mix and choice of homes in the area and would also be an acceptable required use. However, the appropriate level of student housing will depend on the accompanying mix of uses. The number of student homes should not unbalance the mix of homes in the area. If a significant number of student homes are proposed, this should comply with the criteria in Policy CWAAP 29a for large student housing developments."</p> <p>King's welcomes the approach at paragraph 7.8.58 which provides guidance on the location of residential uses and which has been amended to read:</p> <p>"The distribution of uses across the site requires careful consideration. Non-residential uses</p>	<p>King's College's support for much of the policy is noted.</p> <p>The council does not agree with changes regarding student accommodation for the reasons set out in the response to representation no. 830 regarding Policy 29a.</p> <p>Minor modifications will be proposed to reflect the planning permission on Mulberry.</p>

should be concentrated in locations which help consolidate the town centre and which benefit most from good accessibility to the existing shopping, leisure and transport facilities.”

The Phasing and Implementation section of CWAAP 24 should be updated to reflect the planning permission for the Mulberry site granted in October 2013.

248 832 CWAAP 10

Proposals Sites: CWAAP 10

This current policy considers that required land uses on CWAAP 10 – 24-28 Quebec Way are residential and business and/or community use. The Plan considers that other acceptable land uses on CWAAP 10 include hotel use.

We believe that the policy should recognise that higher education or student residences use would also be an acceptable land use on the CWAAP 10 site. In the context of the broad support given to King’s following the high level masterplan exercise for Canada Water in November 2012; we recommend that the Council extends the range of acceptable uses on the CWAAP 10 site to include higher education use and/ or student residences. This would strengthen the established principle of these uses being acceptable in the Canada Water area whilst also creating the opportunity to support the possible delivery of King’s higher education led masterplan at CWAAP 24 and the very significant regeneration benefits that this would deliver.

CWAAP 10 states that business use (Class B1) and or community use (Class D) are required uses for the site. Higher education use, such as teaching or academic space would generally fall within Class D and would therefore be an acceptable use of the site. It is considered that this would provide sufficient flexibility for King’s College.

Previous consultation responses have not suggested student accommodation as a potential use of the site. Were an application to be made, the council would need to consider it on its merits as a departure to the plan and take into account any material considerations. The council’s view is that the CWAAP 24 site allocation is capable of providing sufficient student accommodation in the area. The council is keen to ensure that a mixed community develops at Canada Water, and that in the light of that, a residential (Class C3) allocation is appropriate for CWAAP 10.

491 704 Part 6

Re Canada Water planning and investment
How come this area is getting MORE investment after all the new changes over recent years?
Poor old Peckham Town Centre is still waiting for its first round....!?

Details of the levels of investment directed towards Peckham town centre are set out in the Peckham and Nunhead Area Action Plan.

643 752 General

Thank you for consulting the Environment Agency on the above which we received on 13 January 2014. We responded to the Draft Revised Canada Water Area Action Plan in our letter of July 29, 2013 reference SL/2009/104986/AP-09/PO1 pointing out the need to see the revised plan aligning with the Environment Agency Thames Estuary 2100 (TE2100) Plan which was approved by DEFRA in November 2012.

In our response we supported the incorporation of the Harmsworth Quays site but we had no specific comments to make in regard to the consultation questionnaire. However, we provided further comments to the draft revised plan. It is therefore incorrect to state in the revised Canada Water Area Action Plan Consultation Report that we had no comments to the draft revised plan. Indeed we provided our comments addressing Flood Risk, Thames Estuary 2100 (TE2100) Plan and Surface Water Management.

We are concerned that out of the 33 policies in the Revised Canada Water Area Action Plan, none specifically address flood risk management or mentions Thames Estuary 2100 (TE2100) Plan which will have major impact in the development of the area. The wider Canada Water Area Action Plan area fronts the river Thames and lies within the TE2100 Policy Unit – Wandsworth to Deptford. 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.’

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.

Developers will be required to demonstrate how the tidal flood defences protecting their site can be raised to the required TE2100 levels in the future. We will not request that they raise them now. However, we will encourage developers if they wish to raise the defences now and assuming the council are happy to accept any aesthetic/wider impacts of raising.

Developers will also needs to demonstrate that the development will be safe, resilient and not increase risk elsewhere for its lifetime – achieving this may or may not rely on defences. The developer needs to ensure that the development is consistent with (and not an impediment to) TE2100 aspirations if those aspirations are being relied upon to make the development acceptable. For example, if the future safety of a site relies on defences being raised in 30 years time, then the developer would need to ensure that sufficient space is available for this to happen.

The borough Strategic Flood Risk Assessment (SFRA) indicates that much of the AAP area lies in flood zone 3a -high probability of flooding in the event of a breach of flood defences. We are keen to ensure that TE2100 Plan informs the development and revision of the SFRA and other flood plans.

The Revised Canada Water AAP should recognise the importance of the Thames Estuary 2100 (TE2100) Plan whose findings and recommendations will impact on the delivery of the plan. We hope the London Borough of Southwark will support the flood risk management measures

The council notes the EA's view that the RCWAAP appears to be sound and meets legal requirements.

The policy proposed by the EA is not considered necessary. Policy 13 in the Core Strategy requires allows development to occur in the floodplain of the Thames, as long as it is designed to be safe and resilient to flooding and meets the exceptions tests.

It also requires development to help reduce surface water run-off using sustainable urban drainage systems, avoiding paving over gardens etc.

The council's Sustainable Design and Construction SPD provides further guidance. Sections 11.8 and 12.7 and appendix 5 provide guidance relating to building in flood risk areas and reducing flood risk.

The council considers it more appropriate to provide policy on this matter in the Core Strategy/Local Plan and SPD, rather than in an AAP, given that a large part of the borough is located in the floodplain of the Thames.

The EA was content with this approach in the adopted AAP. The summary of the EA's representation on the publication version of the adopted AAP is set out below:

"The Environment Agency supports the vision for Canada Water and the environment you are seeking to deliver. We looking forward to continuing to work in partnership with you and developers to ensure new development deliver multiple environmental benefits."

identified by the TE2100 Plan.

Overall the Revised Canada Water Area Action Plan appears to comply with the legal requirements and appears 'sound'. It meets the requirements of the Planning and Compulsory Purchase Act 2004, complies with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and is positively prepared, justified, effective and consistent with national policy as explained in the National Planning Policy Framework 2012 paragraph 182.

However, we would recommend inclusion of the following policy: The council will seek to minimise the impact of flooding in the Canada Water Area Action Plan area through:

- taking account of the flood risk management measures identified by the Thames Estuary 2100 Plan.
 - ensuring development does not increase flood risk and where possible reduces flood risk for all forms of flooding;
 - For developments adjacent to the River Thames, maintenance, remediation and improvements to the flood defence walls will be required where necessary.
-

795 743 General

Further to our consultation response dated 30 July 2013, thank you for consulting Sport England on the above document. Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our national and regional priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.

Noted.

In response to the consultation, Sport England would like to make the following comments on the consultation document:

795 744 CW AAP 2

7.8 Appendix 4: Schedule of proposals sites – CW AAP 2: Land adjacent to Surrey Docks Stadium

Sport England objects to the proposed loss of sports facilities and car parking ancillary to the use of the adjacent playing field and therefore recommends that this site is removed from the schedule of proposals sites.

The proposed development would result in the loss of ancillary facilities that supported the former Fisher Athletic Football Ground. On-site ancillary facilities are essential to support the use of the site as a football ground. Therefore the ancillary facilities directly support the principal use of a site as a playing field.

Sport England's adopted Playing Fields Policy, 'A Sporting Future for the Playing Fields of England (1996)' (http://www.sportengland.org/facilities__planning/playing_field_3.aspx), sets out a policy presumption against development that would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field.

The aim of this policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demands of the pitch sports within the area (whether the land is in public, private or educational use). This policy objective is also embodied within the National Planning Policy Framework.

Sport England will, therefore, oppose development on playing fields in all but exceptional circumstances. These exceptional circumstances are where, in the judgement of Sport England:

E1 - A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.

E2 - The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use.

E3 - The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of, or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facility on the site.

E4 - The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development.

E5 - The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.

Policy 3.25 within Southwark's saved Unitary Development Plan (2007) designates the playing field and ancillary facilities (excluding the main ancillary facility block to the north of the playing field) as Metropolitan Open Land. There is a general presumption against inappropriate development on metropolitan open land. Planning permission will only be permitted for appropriate development including for the 'essential facilities for outdoor sport and recreation, for cemeteries, and for other uses of land which preserve the openness of MOL and which do not conflict with the purposes of including land within MOL'. Furthermore, Strategic Policy 11 – Open spaces and wildlife within Southwark's adopted Core Strategy (2011) states that 'we will improve, protect and maintain a network of open spaces and green corridors that will make

The sports pitch itself is metropolitan open land. The provision of ancillary facilities are required by CWAAP 2. The policy has been examined through the 2011 EIP and the council are not proposing to make any substantive changes to the policy, other than amending the estimated number of homes to make it consistent with the designation of the surrounding area as suburban, as agreed following the 2011 EIP. The original figure was based on a density corresponding with an urban designation.

The council recently agreed to acquire the metropolitan open land for use as a public park. It is proposed that Fairview Homes transfers the freehold of the stadium to the council for nil consideration, after having set it out as a public park, together with a cash endowment to fund its future maintenance. In addition, the council will sell the northern car park site to Fairview at market value for residential development and transfer the eastern car park land for use as public space.

Fisher Athletic Football Club who used the stadium are no longer in existence having been replaced by Fisher FC who are a totally new supporter-owned club that continue to play in East Dulwich. To facilitate their return to Rotherhithe it is proposed that the St Pauls ground on Salter Road which requires considerable investment will be fully renovated by Fairview Homes with a new 3g astro-turf pitch. Discussions on this proposal have taken place with Sport England and the Football Association (FA) who have suggested that further funding may become available to provide changing facilities.

It is proposed that St Pauls remains a community facility with Fisher FC having priority use at certain times each week and it becoming their home ground. The council is in discussion with a substantial organisation with a growing presence in the Canada Water area who have expressed interest in running the facility to ensure that any receipts are ring-fenced to replace the playing surface when required. Substantial public access is a pre-requisite for this new facility both through the management organisation and the Fisher FC use.

A planning application for the Fairview Homes proposal has been submitted to the council.

Objector ref.	Rep ref.	Policy	Details of Representation	Officer Response to Representation
			places attractive and provide sport, leisure and opportunities for a growing population'	
842	812	General	Please note that these comments represent the views of Transport for London (TfL) Borough Planning officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision and they do not necessarily represent the views of the Greater London Authority (GLA). Any views or opinions are given in good faith and relate solely to transport issues.	Noted.
842	813	General	<p data-bbox="421 416 1155 440">Thank you for consulting TfL Borough Planning on this draft policy document.</p> <p data-bbox="421 467 1317 616">Firstly I would like to reiterate that TfL is very keen to work with the Council to deliver aspirations for sustainable growth in the AAP area and this aspiration is very much shared by the Mayor. The 2011 London Plan identifies Canada Water as an Area for Intensification and the recently published draft further alterations proposes that the area becomes an Opportunity Area. However certain aspects of the AAP should be amended to reflect the current position on certain projects and / or to factually update.</p> <p data-bbox="421 643 1317 687">I only have comments on the main document, not on the changes to the adopted policies map or background paper update on infrastructure.</p>	TfL's support is welcomed.
842	814	Policy 6	<p data-bbox="421 719 797 743">Page 26, Policy 6 (walking and cycling)</p> <p data-bbox="421 770 1317 815">Regarding the addition of the text 'We will work with the Mayor to extend the Barclay's Cycle Hire scheme to Canada Water'.</p> <p data-bbox="421 842 1317 967">The Mayor currently has no plans to extend the cycle hire scheme to Canada Water, however it is considered the prerogative of the borough if they wish to include such statements in their policy documents, provided it is made clear that delivery of such a scheme will require the support of the Mayor and funding to be identified. Reference to Barclays should be deleted as it's sponsorship of the cycle hire scheme ends in 2015.</p>	<p data-bbox="1352 719 1715 743">Reference to Barclay's will be deleted.</p> <p data-bbox="1352 770 2074 794">The policy states Southwark will work with the Mayor to extend the scheme.</p> <p data-bbox="1352 821 2074 866">A cycle hire station has been agreed as part of the approved scheme on the Decathlon site.</p>
842	815	Policy 6	<p data-bbox="421 999 1317 1043">Pages 28 and 29 (figure 7 and paragraph 4.3.6) - promotion of a new bridge to connect Rotherhithe with Canary Wharf.</p> <p data-bbox="421 1070 1317 1171">The Mayor currently has no plans to promote such a link, however, as above, it is considered the prerogative of the borough if they wish to include such statements in their policy documents, provided it is made clear that delivery of such a scheme will require the support of the Mayor and funding to be identified.</p> <p data-bbox="421 1198 1317 1270">It is noted that this bridge link is not specifically mentioned in Appendix 3: Infrastructure projects or the borough CIL draft regulation 123 list, which potentially weakens policy support and funding opportunities.</p>	<p data-bbox="1352 999 2074 1070">This aspect of the plan has not been varied from the adopted AAP. Non-implementation of the bridge would not undermine the AAP. This is explained in para. 4.3.6 of the AAP.</p>

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
842	816	Policy 7	<p data-bbox="423 217 663 236">Page 30 Paragraph 4.3.9</p> <p data-bbox="423 268 1323 363">Factual correction (text to be added underlined and to be removed struck out)- Phase 1 of the incorporation of the East London line into the London Overground provided access to 12 trains per hour running between West Croydon, Crystal Palace, New Cross, Dalston Junction and Highbury and Islington.</p> <p data-bbox="423 395 1323 488">TfL is currently lengthening trains on the London Overground network from four to five carriage, and the Highbury & Islington to West Croydon/Clapham Junction line passing through the AAP area will benefit from this from December 2014. This should be included in the AAP supporting text as it will need to feed into the revised modelling the AAP commits to in paragraph 4.3.10.</p>	<p data-bbox="1352 217 2063 236">Noted. The council will propose minor modifications to correct these errors.</p>
842	817	Policy 7	<p data-bbox="423 520 676 539">Page 30 Paragraph 4.3.10</p> <p data-bbox="423 571 1323 762">This states that modelling has predicted that the incorporation of the East London line into the London Overground would absorb many trips being made by tube. However, TfL's own modelling undertaken during development of the Mayor's Transport Strategy (MTS) in 2011 has shown that the Jubilee Line, particularly between London Bridge, Canada Water and Canary Wharf, will remain extremely crowded in 2031 (over 4 people per square metre standing in the AM peak towards Canary Wharf), even with committed investment such as Crossrail. This crowding is likely to be exacerbated with a greater than predicted population growth as set out in the draft further alterations to the London Plan.</p> <p data-bbox="423 794 1323 887">Therefore the commitment to re-run the modelling to make sure that the strategy for improving transport in the AAP area remains robust is strongly supported and TfL would welcome, and strongly recommend, involvement in this, particularly as the area could become an Opportunity Area.</p>	<p data-bbox="1352 520 2063 711">The council notes the outcomes of TfL's modelling and expectation that the Jubilee line will remain crowded in 2031. This is broadly consistent with the findings of the council's Development Impact Report 2010 which found that found that the extension of the East London Line is expected to result in an increase in public transport capacity and use both into and leaving the study area. Notwithstanding that, it also recognised that the Jubilee line between Canada Water and Bermondsey is forecast to have a significant growth in passengers in both directions within the time horizon of the study (2024).</p> <p data-bbox="1352 743 2063 887">While there is little that the AAP can do about general growth in passengers on the Jubilee line (there does not appear to be an issue with the capacity of the station itself, which was built in the expectation of significant increases in the local population), the AAP does signal that the council will seek to mitigate site specific impacts to pump prime or enhance improvements to bus services.</p> <p data-bbox="1352 919 2063 1206">Having reviewed the evidence base on transport, the council has decided not to undertake a re-run of the previous testing in the multi-modal study. However, assumptions about trip generation from growth on the Harmsworth Quays site are set out in the Infrastructure Study update, along with recent data which show that levels of traffic have generally stayed constant or fallen, since the development impact study was undertaken. While the council does not plan to re-run the RMMS, all major planning applications will be required to undertake transport impact assessments, which take into account cumulative levels of growth in the area. The council is keen to work with TfL on the Cycle superhighway and Lower Road gyratory proposals and in sharing data submitted with planning applications. A minor modification is proposed to paragraph 4.3.10 of the plan to reflect the current situation.</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
842	818	Policy 7	<p>Page 30 Paragraph 4.3.11</p> <p>The commitment to work with TfL to assess and monitor the need for increased bus frequencies or new services and to secure additional s106 funding is strongly welcomed as this will be a key to increasing public transport capacity in Canada Water area. However additional text is requested (underlined) in order not to be unduly restrictive: 'to pump prime new or enhanced bus services is welcomed'.</p>	The council will propose a minor modification on the lines that TfL suggest.
842	819	Policy 7	<p>Page 30 Policy 8: Vehicular traffic</p> <p>Policy 8 states that 'TfL plan to signalise the roundabout at the entrance to the Rotherhithe Tunnel'. However, full signalisation of the roundabout is not currently part of cycle superhighway (CS) 4 proposals and there are currently no further proposals beyond that. Therefore it should read 'As a part of the TfL plan to signalise improve the roundabout at the entrance to the Rotherhithe Tunnel associated with cycle superhighway 4 (CS4) proposals'. Paragraphs 4.3.19 and 6.4.3 should also be altered along similar lines. This will make the wording consistent with Table A6.1 on page 125, which has replaced 'signalisation' with 'improvement'.</p>	The wording in the adopted AAP was agreed by TfL. However, the council will propose a minor modification on the lines that TfL suggest.
842	821	Policy 17	<p>Page 44 - Policy 17: Building heights in the core area</p> <p>Siting of tall buildings around Canada Water station must consider loading on subsurface railway lines – the Jubilee line and, in particular, the ex-East London Line, which is very shallow at this location. This constraint should be reflected in the policy and supporting text, for clarity and avoidance of doubt. A plan showing the broad location of the tunnels can be provided on request.</p>	A reference to the lines will be proposed as a minor modification to the plan.
842	822	Part 6	<p>Page 125 - Appendix 3 6: Infrastructure projects</p> <p>Regarding Jamaica Road roundabout improvements, as mentioned above, this should be linked to delivery of CS4.</p> <p>Cycle Superhighway 4 delivery is scheduled for 2015, but not April.</p> <p>Extension of the cycle hire scheme to Canada Water, as mentioned above, is not being actively promoted by the Mayor. Therefore a delivery timescale of 2016-2020 would be more realistic, rather than by 2015.</p>	The council will propose minor modifications on the lines that TfL suggest.

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
1074	705	General	<p>I write on behalf of myself and my Surrey Docks ward council colleagues in response to the latest consultation on the revised Canada Water Area Action Plan.</p> <p>As you will know from our previous submission, we have some concerns around transport infrastructure and the development of tall buildings in the area.</p> <p>We are also concerned about the absence of detail in firming up sites for new education and health facilities, as well as a location for a new leisure centre.</p> <p>Having led the original development of the AAP, I, and my ward colleagues, welcome many aspect of the Plan but we would like to highlight the following detailed concerns which we feel have not been addressed by the Council:</p>	<p>We have addressed issues relating to transport infrastructure, tall buildings, education, health and leisure in our responses to representation numbers:</p> <p>707 (tall buildings) 708 (schools) 709 (health facilities) 710 (leisure facilities) 711 (transport infrastructure)</p>
1074	706	Policy 16	<p>On page 41 there is a reference to closing the southern end of Surrey Quays Road at its junction with Redriff Road. We would welcome clarification of the reason for this proposal.</p>	<p>This is in connection with the idea of realigning Surrey Quays Road to the east of the Leisure boxes which would then enable the southern part of Surrey Quays Road to be converted into service access only into the shopping centre service yard and rear of the leisure boxes. We have set out the benefits on p. 155 of the AAP. These include providing better connectivity between the shopping centre and leisure uses, safer and more attractive routes and better links to Greenland Dock. It was shown as a possible option in the evidence work we published in support of the adopted AAP. Now that Harmsworth is available, it becomes less complicated to implement, although if it did not happen, it would not undermine the AAP ie. things could carry on as they do at present. The idea was supported during the consultation event we held back in November 2012.</p>

Object- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
1074	707	Policy 17	We continue to have significant reservations about the development of tall buildings in the area, and note the similarity of the new proposals within the AAP to proposals put forward by developers.	<p>The availability of Harmsworth Quays for development and the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, provide an opportunity to rethink the approach to town centre development. Following the EIP, the planning inspector recommended that the council review opportunities for tall buildings in the light of the availability of Harmsworth Quays.</p> <p>The adopted vision in the AAP emphasises the desirability of creating a network of streets and spaces that have a town centre and urban feel and which are not dominated by cars. Provision of some tall buildings, provided that they are of the highest design quality and avoid harmful microclimate impacts can help deliver the AAP vision in three important areas:</p> <ol style="list-style-type: none"> 1) Contribution of tall buildings to public realm: Currently the footprint of the existing large sheds in the centre make it difficult to move around the area. With the exception of the plaza outside the library the public realm is uninspiring and offers little to residents, visitors or shoppers. A key advantage of tall buildings is that they can utilise much smaller footprints, enabling the creation of more public realm and making it easier for pedestrians to move around. The design policies in the AAP have been revised to make provision of new public realm a crucial element of new development. 2) Tall buildings and provision of town centre uses: The key to a vibrant and successful town centre is a range of shops, leisure opportunities and businesses which create a destination. Tall buildings can provide a range of uses to help animate the base of the building and contribute to the vibrancy of the centre. They are an important source of capacity and will help deliver the range of non-residential uses which are sought by the AAP vision. 3) Tall buildings and creating a focal point in the town centre: Policy 17 in the revised AAP states that buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular, they will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the town centre.

1074 708 Policy 26

We continue to be concerned that no detail has been provided about how the need for both more primary and secondary school places will be addressed in the area, and fear that given the need for sizeable pieces of land to accommodate up to 8 primary school forms of entry by 2016 and potentially a new secondary school the omission of ring-fenced land to achieve these expansions is storing up a major problem for the future.

Secondary

The council's cabinet recently considered an update on the need for school places (18 March, 2014). The report noted the potential to expand a number of schools in the north of the borough including Bacon's College, St Michael's Catholic College and COLA. It also stated that although it may be theoretically possible to meet all the longer term demand from within the existing estate it is unlikely that this approach would be the best way to do so and indicated that consideration should be given to establishing a new school in the south of the borough and from 2018 a school which can meet borough-wide needs.

While the AAP is generating a significant number of new homes, the majority of these are likely to be flats and the extent to which these will drive need for secondary places is still unclear. Any growth in the need for secondary places and the potential to expand existing schools or establish a new site will need to be kept under review.

Primary

In July 2013, Southwark's cabinet approved a primary investment programme. The cabinet report notes that in keeping with the experience of local authorities across the country, Southwark has experienced rising demand for reception places over recent years. As a result of the primary places and investment strategies, the council has met this demand through a programme of expansions, creating 1,080 additional reception places in 25 schools from September 2009 to September 2013 (paragraph 12).

The report proposes a target of progressing 14FE of permanent expansions in order to meet demand up to and including September 2015, subject to further review annually. It notes that it is likely that up to 4 FE of demand in September 2014 can be met within the schools to be permanently expanded; in addition up to 5 FE may be met from emerging Free Schools. This is anticipated to leave a shortfall of up to 3 FE that will need to be met from further temporary expansions (paragraphs 25-26).

Permanent expansions to meet need in 2015 in the Phase 1 investment programme include 5.5 FE in schools in Bermondsey and Rotherhithe (Southwark Free school, Albion, Grange and Galleywall) (paragraph 43).

Phase 2 of the programme assumes delivery of a further 5 FE of places by 2016, which is considered a reasonable target. Considering the pattern of demand, this additional capacity will be targeted on three areas which include the Bermondsey and Rotherhithe planning area.

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
1074	709	Policy 29	We are also concerned about the continued absence of detail with regard to expanding local health facilities.	<p>AAP Policy 29 addresses the need for health facilities. The thrust of the policy has not been changed from that which was in the adopted AAP. We have worked with NHS Southwark both in preparing the AAP and in reviewing the AAP and examining the implications of a redevelopment of Harmsworth Quays.</p> <p>NHS Southwark has a strategic plan for the period 2010/11–2014/15. This plan focuses on making better use of existing premises, rather than investing in significant numbers of new facilities. NHS Southwark 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.</p> <p>In addition, the NHS Southwark Clinical Commissioning Group (CCG) is committed to the delivery of the Community Based Care Strategy drawn up with other SE London CCGs, which will expand the range and volume of health service activity taking place in community settings. More recently, the CCG Governing Body have approved a Primary and Community Strategy, which will strengthen the delivery of services in the community, and ensure greater equity of access.</p> <p>NHS Southwark CCG acknowledges a need for additional facilities to serve growth areas in Southwark. This includes Bankside, Elephant and Castle and at Canada Water. At this stage, plans are at an early stage, and so therefore no detailed costed schemes are available. AAP policy 29 states that Southwark will work with NHS Southwark to meet the needs generated by the increased population by providing new health facilities in the core area. The need for new facilities will be kept under review and information about the provision of new homes will be shared with NHS Southwark.</p>
1074	710	Policy 12	Paragraph 4.4.7 outlines an aspiration to explore a site for a potential new leisure centre. A new leisure centre was a major part of the 2005 SPD and, as with the absence of ear-marking of sites for additional school places, we are concerned that failure to identify a site for a new facility is running the risk of non-delivery of this community priority.	<p>The council has committed to refurbish 7 Islands to extend its life by up to 10 years. The council is exploring whether a new leisure centre can be provided in the town centre in the longer term. King's College have proposed a new centre as part of a campus development and the council is keen to explore this option with King's College and British Land.</p>

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
1074	711	Policy 8	<p>We are pleased to see our view, and that of our constituents, on the right turn into Surrey Quays Road from Lower Road reflected in the AAP. However, we feel that a clear timeframe for the change should be set out within the revised document.</p>	<p>With regard to timing, 2016-2020 is the timescale set out in the adopted AAP for delivering improvements to the highway network. This was based broadly on when we expect development to occur and trigger the need to carry out improvements and when sufficient s106 funding may be available.</p> <p>The Lower Road project aims to implement the transport improvements set out in the AAP by improving access to the Rotherhithe peninsula for local trip making in order to support development proposals. Traffic modelling is currently being undertaken by TfL in consultation with Southwark with proposals to be brought forward in late 2014. Alongside this work, proposals are being tested for the delivery of Cycle Superhighway Route 4, with the aspiration that this will run along Lower Road in both directions.</p>
1074	712	Part 6	<p>We would also like to take this opportunity to reemphasise the need for much improved broadband infrastructure, both for residential and commercial use, given the increasing number of residents who work from home and the number of new businesses that we all hope will establish themselves locally.</p>	<p>We are proposing a modification to the AAP which identifies the lack of availability of superfast broadband in parts of Rotherhithe and indicates that the council is keen to work with local residents, suppliers, developers and the GLA to secure the investment required to upgrade the area. The need to upgrade broadband infrastructure in the area has been identified in the council's Infrastructure Plan which is part of the evidence behind the community infrastructure levy and it is a potential recipient of CIL funding.</p>
1098	701	Policy 17	<p>Thank you so much for all your hard work and the excellent document.</p> <p>Perhaps the greatest planning debate at present involves high rise; it is so fashionable. We see huge towers in the Middle East in the middle of the desert where there is no shortage of land.</p> <p>I visited recently Hong Kong, Adelaide, Melbourne and Sydney, which like London are cities on the waterfront. In all of these some beautiful architecture and considered town planning is dominated by ugly new towers.</p> <p>We have Ontario Point at Canada Water where the wind can give an air of desolation. The view from this building is currently terrific, but where multiple towers are built the view becomes one of the floors of the buildings opposite, the ground level is denied light.</p> <p>I do hope that most of Rotherhithe can be restricted to 4 storeys. Between 4 and 10 storeys it is possible to taper floors to reduce the impact on light.</p> <p>I looked at Regent's Street and Oxford Street yesterday and imagined how the restriction of most buildings to 7 floors has such a beneficial impact on this very densely populated area.</p> <p>Walking from Woolwich to Chiswick indicates how many waterfront towers have been built in the last five years, or are being built, with overseas money. Rather than create a community, the principal drive is to provide a safe investment for overseas cash. The designs are as monotonous as those I saw abroad. I do hope this fate can be avoided.</p>	<p>Policy 17 in the Revised Canada Water AAP includes two criteria which require tall buildings to allow adequate sunlight and daylight into streets public spaces and courtyards and avoid harmful microclimate and shadowing effects or adverse affects on local amenity. The extent to which these criteria are met would be assessed through a planning application.</p> <p>The rationale for allowing tall buildings in set out in policy 17 itself. The opportunities for tall buildings, sensitivities and potential impacts are set out in the Revised AAP urban Design Study.</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
1118	725	General	<p>We write in response to the Revised Canada Water Area Action Plan – Publication/Submission Version (the “draft AAP”). These representations are submitted to Southwark Council (the “Council”) on behalf of British Land and supplement the previous representations dated 30 July 2013 to the Draft Revised Canada Water Area Action Plan. These representations should be read in conjunction with the representations of 30 July 2013 which are appended to this letter, a number of points remain outstanding with no clear response from the Council on the matters raised.</p> <p>The evidence base for the draft AAP includes a number of supporting documents which are used by the Council to underpin the assumptions, vision and objectives for Canada Water. These documents have been reviewed and commentary provided throughout the representations where necessary.</p> <p>As the Council is aware, British Land is a principal landowner in Canada Water, as such the draft AAP is of significant importance to its development aspirations and vision for the area.</p>	Noted.

1118 726 General

Strategic changes since the previous AAP draft

As the Council will be aware, the Mayor of London has published the Draft Further Alterations to the London Plan (FALP). The FALP have been prepared primarily to address key housing and employment issues emerging from an analysis of census data released since the publication of the London Plan in July 2011. The census data indicates a substantial increase in the capital's population.

The FALP revises housing targets on a borough level throughout London. The annual monitoring target for Southwark has been increased by some 36% from 2,005 to 2,736 with the minimum ten year target increasing from 20,050 to 27,362 new homes. Southwark now has the second highest housing targets of all the London boroughs.

In addition, the FALP promotes Canada Water as a new Opportunity Area and reinforces its potential as a Major Centre, upgrading its previous allocation as an Area for Intensification. Opportunity Areas are London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.

The draft AAP allocation for Canada Water has an indicative employment capacity of 2,000 (unchanged from the previous allocation) whilst the minimum number of new homes has increased from 2,500 to 3,300 demonstrating that Canada Water has the potential to provide a significant and substantial amount of new housing and is one of London's principal areas for future growth.

It is within this emerging context that these representations are made.

The GLA have confirmed that the RCWAAP is in general conformity with the London Plan.

Consultation on the FALP commenced on 15 January 2014. As yet, it is only a consultation draft and therefore has limited weight.

Notwithstanding that, the council has welcomed the revised designation for Canada Water in the FALP and considers that the RCWAAP is fully consistent with the revised designation as an opportunity area and the draft guidance for Canada Water.

This is explained further below.

The opportunity area designation raises the minimum homes target from 2,500 to 3,300. The indicative employment capacity remains at 2,000. It also signals the centre's potential to move up the town centre hierarchy to become a major centre and the potential to develop a new science cluster linked to Kings College. We comment below on each of those 4 elements in turn.

- Homes: The potential number of homes identified in policy 21 exceeds the 3,300 identified in the FALP. The figure identified in Policy 21 does not include any homes which might be provided on Harmsworth Quays. While the council wishes to maximise non-residential use on that site, it is likely that residential homes or student accommodation will also be provided which would further boost the supply. The council will propose minor modifications to the plan which recognise the proposals in the FLAP and the new target which would apply if the FALPs are confirmed.

- Jobs: the opportunity area designation does not increase the jobs estimate above 2000. This figure is explicitly identified in the AAP vision. Moreover, the vision has been strengthened to emphasise that the council wishes to broaden the appeal of the town centre and diversify and strengthen the local economy. AAP policy 25 indicates that the council will promote a business cluster, requiring provision of around 12,000sqm of business space. In his report on the adopted AAP following the EIP, the planning inspector commented that:

"...this accords with the thrust of the Council's Economic Development Strategy and the LP which contains an indicative employment capacity of 2,000 new jobs to 2031." (para 46).

The RCWAAP strengthens this further through the allocation policy for CWAAP 24 which requires proposals to maximise the amount of non-residential space. The 12,000sqm of business space referred to in the adopted AAP can be supplemented by other employment generating uses, such as higher education, which would take the number of jobs much higher than the 2,000 identified in the LP and FALP.

- Major centre: The vision for the AAP states that the council wants to strengthen Canada Water's role as a shopping destination, expanding the retail space by around 35,000sqm. AAP policy 1 states that Canada Water will move up the hierarchy of centres to become a major town centre.

- Science cluster: The AAP vision has been amended to ensure that it specifically refers to higher education facilities as part of the mix that the council would like to see developed in the area. Policy 29a states that proposals for higher education facilities will be supported. CWAAP 24 seeks a mix of uses, such as higher education and other uses. Para 7.8.55 explicitly identifies the potential for new academic and research facilities and the benefits that these would bring.

1118 727 General

Scale of Regeneration
Canada Water is being promoted by the Mayor as an Opportunity Area which indicates the amount of growth expected for the area and the scale of change being planned at a strategic level.

The draft AAP should reflect this change and reflect the aspiration for high density development in the wider area. In this context, we welcome the revised estimated capacity for Site CWAAP 24 which states that the capacity of the site will be assessed through the planning application process.

The other principal site within Canada Water is CWAAP 7: Decathlon, Surrey Quays Shopping Centre and overflow car park. This site has the potential to accommodate significant retail, leisure and residential growth. It is unhelpful to refer to a specific quantum of development within the site allocation as proposals should be assessed on a case by case basis. This should be reflected in the draft AAP and references to specific quantum or caps should be removed from the policies and supporting text. We request that the text is amended to be consistent with CWAAP 24. We set this out below.

The draft AAP needs to recognise the potential for high density development. We are concerned that the evidence base underpinning the draft AAP does not fully explore the scale of change that is possible for Canada Water and as a result the policies are overly restrictive. Detailed commentary on these policies is included below.

The Harmsworth Quays and Adjacent Sites Study (April 2013) is outdated and reflects the adopted AAP (March 2012) rather than the current context. The study has been used to inform policy and impacts on densities, heights and the overall aspirations for the area. As an example, Option 3 is the sole option which comes close to town centre densities of 800-1,110 hr/ha which should be seen as the starting point for development in an Opportunity Area.

We are concerned that the April 2013 study does not reflect current growth aspirations and has been overly relied upon.

The Canada Water AAP: Urban Design Study (November 2013) is a recent addition to the evidence base and there is greater positivity to higher density development than the April 2013 study. Notwithstanding this, the conclusions from the November 2013 study are not reflected in the draft AAP.

One particular area of concern is the tall buildings strategy and testing. The rationale for the placing of test heights in the November 2013 study is unclear and does not take into account the consented 40-storey building on Site C. It is equally unclear as to why the assessment tests one tall building only or why it is located on the eastern side of the Canada Water basin. Clusters of tall buildings are seen as an appropriate response and it seems to us unsound for the Council to exclude tall building development in other parts of the AAP area without having tested it. A more appropriate assessment would be to accept the constraints of the LVMF and test the whole AAP core area, which is considered as a location that is suitable for tall buildings. Otherwise policy should acknowledge that the suitability of tall buildings will be assessed on a case by case basis.

With regard to scale, see the Council's response to representation no. 726.

Comments on CWAAP 7 are set out in the response to representation no. 737.

Density: The approach set out in policy 24 is fully consistent with London Plan policy 3.4 (Optimising housing potential). This policy is not amended by the FALP. The GLA have confirmed that the RCWAAP is in general conformity with the London Plan. The planning inspector who held the EIP on the adopted AAP considered all the policies in the plan against the London Plan, including policy 3.4. His view was that the policy and approach to density was sound. He concluded: "The Mayor of London considers the AAP to be in general conformity with the LP with regard to housing matters and, in short, I agree" (para 96). As is noted above, London Plan policy 3.4 has not been amended by the FALP and the FALP, if they are adopted will not undermine the council's approach to density.

The Core Strategy designated Canada Water as an urban density zone and a core area. Both Core Strategy policy 5 as well as RCWAAP policy 24 state that in urban zones, densities should generally be up to 700 hr/ha. However, they also state that within core areas, higher densities are also acceptable, provided that development demonstrates an exemplary standard of design.

The Core Strategy approach to density reflects the approach set out in London Plan policy 3.4. Through the Core Strategy the council sought to apply the character settings set out in the London Plan to the various parts of Southwark, hence the Core Strategy identifies a central character zone (the Central Activities Zone), urban zones, as well as suburban zones. The density ranges set out in Core Strategy policy 5 reflect the density ranges for the character settings in the London Plan matrix. The examination of the Core Strategy found the approach to be sound and capable of providing sufficient flexibility to deliver the objectives of the Core Strategy and London Plan.

Enabling densities above the upper threshold of 700 hr/ha in core areas acknowledged the dynamism of core areas and their potential for change and growth. In its evidence base (the Hawkins/Brown study) the council assessed a range of options, including different combinations of development and different quantum of uses. This included higher densities up to an average of 1,100hr/ha across the 4 sites assessed (Site E, Harmsworth Quays, Surrey Quays Leisure Park and Mulberry Business Park) as well as medium and lower densities. This evidence base helps underpin the changes to the AAP. In policy 24 the council has purposely maintained the flexibility inherent in the policy, which allows densities above the threshold of 700hr/ha in appropriate circumstances. The recently approved scheme on the Decathlon site and Site E has a density of 1,006 hr/ha, demonstrating that the Core Strategy and AAP are sufficiently flexible to support higher densities where justified.

The draft AAP should also recognise the associated benefits that tall buildings can provide. The draft AAP places an overreliance on public realm delivery and tall buildings. Public open space is only one of a number of public benefits that a tall building may offer. Additional public open space may not always be appropriate adjacent to a tall building. CABE EH joint guidance on Tall Buildings states as one of its criteria for evaluation of tall buildings as 'the contribution to public space and facilities, both internal and external, that the development will make in the area, including the provision of a mix of uses, especially on the ground floor of towers, and the inclusion of these areas as part of the public realm...' Policy should be amended to reflect the potential linked benefits of social infrastructure and community facilities delivery associated with tall buildings.

Evidence base for tall buildings: The preparation of the urban design study (Nov 2013) followed best practice guidance provided by CABE and English Heritage, using a methodology that the council has tried and tested in other areas, such as Elephant and Castle, Blackfriars Road and Peckham and Nunhead. The methodology was established in consultation with English Heritage and represents a robust approach to testing tall buildings. The approach comprises a number of stages. The first of these involves a characterisation assessment of the area to identify constraints, sensitivities and opportunities. The findings of this stage are then used to inform a number of options for building heights, which are modelled in three dimensions. The way in which options were identified is described in section 5 of the urban design study. An approach which tested tall buildings everywhere, as proposed by BL, would not be consistent with the CABE/EH guidance and ignores the importance of making a character assessment at the first stage of the process of identifying constraints, sensitivities and capacity for change. The options which the council tested are shown in appendix 2 of the urban design study. The options included the strategy in the adopted AAP, as well as options with additional tall buildings of varying heights. The tall buildings tested included a tower of 148m (approx 42 storeys) on the Decathlon site, as well as lower buildings on that site. The reason why the area to the east of the basin was identified for testing of tall buildings was the opportunities in this area. It is outside the LVMF viewing corridor which limits height on much of the shopping centre site, it has good accessibility to public transport and is located some distance from the lower scale development outside the core area.

It is important to note that while the options have informed the building heights policy, they do not comprise a masterplan which stipulates the number of tall buildings that can be built or their height. The council has not sought to design the skyline. The policy provides a framework which gives some flexibility for developers, while providing overall direction and criteria which can be used to help develop schemes.

The reasoned justification refers to a number of benefits of tall buildings. As well as the contribution which they can make to public space, para 5.12.b also refers to the contribution which they can make to improving legibility and their ability to provide a range of uses which enhance the vitality and viability of the centre. The council consider that the benefits of tall buildings are already sufficiently stated and do not require further amendment.

1118 728 General

Land Use

The definition of 'required uses' and 'other acceptable land uses' and the allocation of residential uses as an 'other acceptable land use' for Site CWAAP 24 remains a key concern with the draft AAP. We made detailed representations on this point in the July and our position remains.

We support the allocation for a mix of town centre uses and recognise that this is important in delivering the wider vision for Canada Water yet the draft AAP fails to adequately recognise the role that residential uses will play in enabling development and delivering alternative uses. As a minimum residential uses should be seen as being equally important for place making and delivery to ensure that the AAP vision is achieved. Policy needs to recognise residential uses and should be positive about them forming a key part of the mix of uses for the site.

The importance of residential uses is identified in the Harmsworth Quays non-residential land uses study (October 2012) which acknowledges that the demand for employment space in the short-term is likely to be lower with demand picking up in the medium to long term period once Canada Water becomes more intensely developed for retail and residential uses.

Given the low demand and the low value non-residential uses in this area, we believe residential, delivered as part of a broad mix of uses, will be a key driver to enable sites to come forward for redevelopment. This is acknowledged in both the Canada Water Viability Analysis (February 2013) and the Hawkins Brown Study (April 2013). The site allocation should reflect this.

We have previously asked the Council to clarify the reasoning behind education being included as a required use. Whilst we are aware of the interest from Kings College London this represents the sole demand in the area for such uses. Should this interest fall away there would be no requirement. As such we consider education should be listed as an acceptable alternative use.

Any references to the testing of future demand should be removed. It is vitally important that developers have sufficient certainty before proceeding with a scheme and a requirement to test future phases of a planning permission at an unknown point in time is unworkable and unreasonable.

Proposals should seek to provide the appropriate amount of employment floorspace taking account of the scale of development proposed but having regard to the market at the point at which an application is made. A requirement to test for an unknown and unquantifiable future demand is unreasonable and unworkable in practice.

Residential use:

The availability of CWAAP 24 site gives rise to an opportunity to provide non-residential uses. The Non-Residential Uses study 2012, the Retail Capacity study and the interest from King's College provide evidence of demand for such uses. The policy sets out criteria that will be used by the council to assess whether the maximum amount of non-residential use has been or can be provided and which developers can use to frame their proposals. In drafting the criteria, the council has been cognisant of the guidance in the NPPF. Paragraph 22 of the NPPF states that where there is no reasonable prospect of a site being used for employment use, alternatives can be considered on their merits and having regard to market signals. The council has no interest in sterilising land for employment uses that may never come forward. Hence, criteria are set out which allow the council to assess the merits of the proposal, taking account of factors such as demand for floorspace and financial viability. Residential use is cited as an acceptable use of the site and where it is demonstrated that land is not required for employment generating use, it can be used for residential.

The AAP acknowledges throughout that a significant amount of residential uses will be provided in the core area and on the proposals sites. Policy 21 specifically refers to the number of homes we want to see developed over the life of the plan. The capacity figures set out in policy 21 show that the council expects that the minimum homes targets in both the adopted London Plan and the draft Further Alterations to the London Plan will be exceeded, even without housing on Harmsworth Quays.

Higher education use:

The council's view is that CWAAP 24 does not require higher education use. It requires a mix of employment generating uses, such as, business use, retail use etc. The publication/submission version of the plan was amended to make it clear that CWAAP was designed to be flexible and lists some of the uses that might be provided to meet the vision set out in the AAP (para. 7.8.54).

Future demand and employment uses:

See the council's response to representation 738.

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
1118	729	General	<p data-bbox="423 217 669 236">Quantum of Development</p> <p data-bbox="423 268 1323 387">An updated evidence base has been prepared by URS and Hawkins Brown to support the draft AAP. The Harmsworth Quays non-residential uses study (October 2012) assesses the potential for non-residential uses that could be accommodated on Harmsworth Quays and the adjacent sites (broadly reflecting CW AAP 24) whilst Hawkins Brown have undertaken a masterplanning analysis of various development and massing options for the site.</p> <p data-bbox="423 416 1323 587">The CW AAP 24 site allocation refers to 'around 240,000 sqm' of new floorspace. This does not represent an appropriate quantum of development for the site, nor does it acknowledge the scale of development that is permitted (Leisure Surrey Quays Leisure Park) or proposed (Site E and Mulberry Business Park). It is unhelpful to refer to a specific quantum as proposals should be assessed on a case by case basis. This should be reflected in the draft AAP and references to specific quantum or caps should be removed from the policies and supporting text.</p>	<p data-bbox="1352 217 1966 236">This change was incorporated in the publication draft of the AAP.</p>
1118	730	General	<p data-bbox="423 619 607 638">Application Format</p> <p data-bbox="423 667 1323 815">The draft AAP should recognise the level of detail required and options available for the format of future planning applications within the AAP boundary. The recent decision on the Decathlon site (Site C) and at Elephant and Castle demonstrates that outline planning applications are appropriate for tall buildings. The draft AAP should make it clear that outline applications for tall buildings may be acceptable subject to the level of detail provided which should include the following:</p> <p data-bbox="423 844 1323 1114">A design strategy which: Specifies parameter plans containing descriptions and plans of: Plot layout. The spaces between plots. Vertical massing (maximum and minimum heights and their distribution). Quantum of floorspace (maximum and minimum). Vehicular, pedestrian and cycle access routes. Circulation routes. Hard and soft public and private open space. Contains 3 dimensional wire-line analysis of the maximum parameters which tests the proposals in appropriate views.</p> <p data-bbox="423 1142 1323 1214">A design and access statement which provides illustrative material showing how the maximum parameters might take effect and which describes the relationship of each plot and its proposed development with the surrounding context.</p> <p data-bbox="423 1243 1323 1313">This approach is similar to that adopted in the Elephant and Castle Supplementary Planning Document and Opportunity Area Planning Framework and was key in facilitating large scale regeneration and is similarly appropriate here.</p>	<p data-bbox="1352 619 2074 815">The council considers that the approach set out in policy 17 is sufficiently flexible to cover a range of circumstances and application formats. The council has recently approved an outline scheme for a 40 storey tall building (150.86m AOD) on the Decathlon site. The approval of the Heygate outline application which contains tall buildings, also demonstrates that the council recognises that outline proposals for tall buildings are appropriate in some circumstances. The council's view is that the changes sought are unnecessary.</p>

1118 731 Policy 15

All development on all sites in the core area should:

Make sure that new blocks have a fine grain, that is they should:
'Fine' should be defined. The grain of a proposed development should be appropriate to the design of the proposed development and its context, which may not necessarily be 'fine' and is likely to vary.

Present a choice of interesting routes through development; Pedestrians and cyclists should find them easy to move around

The use of the term 'interesting' is ambiguous and subjective. Legible routes or routes that reflect the pedestrian desire line would be more appropriate. By Design states 'promote accessibility and local permeability by making places that connect with each other and area easy to move through, putting people before traffic and integrating land uses and transport.

Have an interesting and varied roofline
Incorporate frequent shifts in architectural design
Frequent shifts in architectural design could be very contrived; changes in architectural treatment should be appropriate to the design and use of the proposed development and its response to the existing context.
Contain frequent entrances on to the street
Use high quality, durable, robust and sustainable building materials that contribute to a sense of quality and create the impression that development is permanent and built to last.

Use shifts in height, design and layouts to avoid creating a canyon effect in streets.
Again this could be contrived. The height and articulation of street frontages should relate to the width of the street, the use and character of the proposed development and the scale and character of the existing context. By Design promotes the creation of continuity and appropriate definition and enclosure of public realm.

Conserve or enhance designated heritage assets and their settings.

Those aspects of setting that make a positive contribution to or better reveal the significance of the designated heritage asset. This point should also refer to the NPPF requirement that any loss or harm should be weighed against the public benefits of the proposal.

- Minimise the visual impact of car parking. Car parking should be located within buildings, basements, or where appropriate above new development. Multi storey car parking should be designed to incorporate ground level activities and other uses, such as shops, should wrap around it.

The terms "interesting" and "fine" and reference to "shifts in architectural design" are part of the adopted AAP. They were previously examined and the plan was found to be sound. The council has not sought to set out a rigid masterplan which development must follow. Instead it has sought to provide a framework which provides a clear direction for developers and designers while giving some flexibility. The terms are considered to be sufficiently clear to enable the council to make an assessment of schemes and have been used to determine planning applications such as those on the Mulberry Business Park site and the Decathlon site.

The council does not agree that the word "designated" should be added to policy 15. Paragraph 126 of the NPPF states that local planning authorities should set out a positive strategy for the conservation and enjoyment of heritage assets [both designated and undesignated], recognising that they are an irreplaceable resource and conserve them in a manner appropriate to their significance. Para 128 indicates that should require an applicant to describe the significance of heritage assets, including the contribution made by their setting. The requirement to conserve or enhance heritage assets will ensure that such assets are preserved in a manner consistent with their significance.

**Objec-
tor ref**

**Rep
ref.**

Policy

Details of Representation

Officer Response to Representation

1118 732 Policy 15

In the early 20th century, the docks extended over 85% of the Rotherhithe peninsula. The legacy of the docks, including basins and dock walls, bridges, lifting equipment and dock offices, is still evident today. The design of new development and the public realm should address this historic asset which is an important part of the character of the area and which should help drive its regeneration. In line with the NPPF, development should conserve or enhance the significance of designated heritage assets and their settings. those aspects of setting that make a positive contribution to or better reveal the significance of the designated heritage asset. Any loss or harm will be weighed against the public benefit of the proposal. Where development may impact on archaeological remains of the former docks and associated features, applications should carry out archaeological assessments to ensure that these remains are preserved and where possible be made accessible for public display. The geoarchaeology of the Canada Water area is also of local significance and should be considered when preparing archaeological assessments.

Reason

To be consistent with the NPPF.

The wording of the policy was agreed through the preparation of the adopted plan and following a statement of common ground with English Heritage. The text proposed was recommended for inclusion in the plan by the planning inspector. The council considers it to be consistent with the NPPF. For the council's response on the word "designated" refer to representation no. 731.

1118 733 Policy 17

The contribution of taller buildings to town centre legibility and as gateways or focal points for the town centre is noted.

All tall buildings over 30m must:

- Provide public space at ground level. Public space should be proportionate to the height of the building and the importance of the location in the town centre.

Public open space is only one of a number of public benefits that a tall building may offer.

Additional public open space may not always be appropriate adjacent to a tall building. CABE EH joint guidance on Tall Buildings states as one of its criteria for evaluation of tall buildings as 'the contribution to public space and facilities, both internal and external, that the development will make in the area, including the provision of a mix of uses, especially on the ground floor of towers, and the inclusion of these areas as part of the public realm...' Policy should be amended to reflect this.

- Contribute to an environment which is easy to move around for pedestrians and cyclists.
- Provide town centre uses that reinforce the function of the town centre and help animate the space around the building.

- Address the hierarchy of spaces and streets in the area.

It is unclear that this requires applicants to do. Does it require applicants to connect with or extend existing hierarchy of spaces in the area or create a new hierarchy within their site?

- Have due regard to the London View Management Framework (LVMF), including the strategic views of St Pauls Cathedral from Greenwich and Blackheath and river prospect views from London Bridge.

- Conserve or enhance the significance of designated heritage assets and their settings, those aspects of setting that make a positive contribution to or better reveal the significance of the designated heritage asset including Southwark Park which is a historic registered park, St Mary's conservation area and King Edward III's conservation area. Any loss or harm will be weighed against the public benefits of the proposal.

In order to be consistent with the NPPF.

- Demonstrate a considered relationship with other tall buildings and building heights in the immediate context in views, including views along the River Thames and in the background of views of Tower Bridge. The location, orientation and massing of tall buildings should be articulated to ensure that cumulatively, tall buildings remain distinguishable as individual elements on the skyline.

This is only possible for very tall or very isolated tall buildings, particularly in distance views. In a dense urban situation when tall buildings are viewed in the round there may be more sensitive views in which this is considered important but to enforce this in views from all directions is unreasonable. Key views should be identified in the draft AAP.

- Be slender and elegant; the tops of buildings should be well articulated and recessive.

This is overly prescriptive. Not all tall buildings should have a recessive top which may not be appropriate. The design of the top should be articulated to respond positively to its visibility in long distance, medium and close views and its relationship to other tall buildings and heritage assets.

- Allow adequate sunlight and daylight into streets, public spaces and courtyards.
- Avoid harmful microclimate and shadowing effects or adverse affects on local amenity.
- Demonstrate an exemplary standard of design, the highest architectural standard, provide high quality accommodation which significantly exceeds minimum space standards and promote housing choice by providing a mix of unit types.

In order to be consistent with adopted planning policy (Saved UDP Policy 320).

"The contribution of tall buildings to town centre legibility..." The council does not consider that the insertion of this text would improve the policy. The role which tall buildings can play in contributing to legibility is described adequately in the reasoned justification (paras 4.5.12b and 4.5.12e).

For the council's response on the word "designated" refer to representation no. 731.

Exemplary standard of design: This reference to exemplary is consistent with Core Strategy policy 12 which uses the same word.

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
			<ul style="list-style-type: none"> • Incorporate communal facilities for residents of the development. 	
1118	734	Policy 17	It is not clear as to what has informed the strategy. Please note above comments on the evidence base, specifically the November 2013 Urban Design Study.	Refer to the council's response to representation no. 727.
1118	735	Policy 17	<p>Proposals for tall buildings should demonstrate that in accordance with the NPPF they will conserve or enhance the significance of historic environment and designated heritage assets and their settings those aspects of setting that make a positive contribution to or better reveal the significance of the designated heritage asset and wider historic environment particularly when located in the immediate context of these assets. There are a number of heritage assets locally including Southwark Park which is a historic registered park and also St Mary's and King Edward III's conservation areas. Tall buildings may be visible from these areas and therefore impacts on these heritage assets and others which may be impacted on should be addressed by proposals. Any loss or harm will be weighed against the public benefits of the proposal.</p> <p>Reason: To be consistent with the NPPF.</p>	For the council's response on the word "designated" refer to representation no. 731.
1118	736	Policy 17	Key views should be identified within the draft AAP.	The council does not consider it necessary to identify key views in the policy. The council has used a number of views to test the potential impacts of tall buildings in its evidence base and the findings have informed the criteria in policy 17. The council considers that the criteria set out will help establish impacts of tall buildings on the character of the area and are sufficient for the council (and a developer) to make an assessment in this regard.
1118	737	CWAAP 7	<p>1,530 residential homes (600 units on the shopping centre and overflow car park, and 800 units on the Decathlon site); 33,000sqm of retail uses; business use; health facilities (which complement rather than replace existing facilities) and other community uses.</p> <p>The capacity of the site will be assessed through the planning application process.</p> <p>Reason To provide sufficient flexibility within the AAP and to reflect the recent planning permission on Sites C and E.</p>	The capacity of the shopping centre site has been assessed through the process of preparing the adopted AAP. In the process of revising the AAP it has been updated to exclude the Surrey Quays Leisure Park (not part of CWAAP 24) and in the light of the approved scheme on the Decathlon site. The existing approach was found to be sound on examination of the plan and the council does not consider that there has been a change of circumstances that would require a further change, other than the factual updates, referred to above, which have been made..

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
1118	738	CWAAP 24	<p>A mix of employment generating uses such as business use (Class B1), retail use (Class A), community use and leisure (Class D), including which could include education, higher education and health uses and/or hotel use (Class C1). Proposals should maximise the amount of employment which can be generated and the contribution to the regeneration of the town centre resulting from:</p> <ul style="list-style-type: none"> •The economic benefit of proposals, including their potential to increase the turnover of the town centre and attract inward investment into other businesses. •Raising the public profile of Canada Water. •Diversifying the range of employment generating and town centre uses. •Increasing the number of visitors that would be attracted to the town centre at different times of day and its potential appeal to a wide range of age and social groups. •Positive impact on health and well-being. •The potential to promote walking, cycling and sustainable modes of transport and minimise car parking and impact on the highway network. •The creation of a town centre and urban environment providing a network of streets and open spaces. •Provision of employment generating uses which are compatible with sensitive uses, such as residential use. <p>In assessing the maximum amount of employment which can be generated and contribution to regeneration, we will take into account:</p> <ul style="list-style-type: none"> •Demand for floorspace. •Phasing: the ability of the market to absorb new floorspace and also the potential for demand to change over time. •Financial viability. <p>Public open space. Reason For the avoidance of doubt and to ensure that whilst employment uses are required, the designation is not prescriptive on the type of employment uses being proposed and that no one specific use is required. As currently drafted the site allocation is contrary to paragraphs 14 and 150-182 of the NPPF which require a flexible approach based on evidence. To be clear that in assessing demand for employment uses that future demand cannot be relied upon. See above comments in the main text.</p>	<p>The council considers the change with regard to the word "including" is unnecessary. The first part of the sentence states that a mix of employment generating uses are required "such as...". Having used the words "such as" it is not then necessary to follow that up with "which could include". The words "such as" imply that the following are examples of what could be included.</p> <p>The council disagrees with the proposal to delete the reference to phasing. The nature of Canada Water will change over the life of the plan. Redevelopment and regeneration will change perceptions of the area, making it a more attractive area for businesses. Improvements in the physical environment and the provision of amenities which can complement business uses including shops and restaurants, hotels, higher education and leisure facilities will help change perceptions of the area. This has been the conclusion of a number of studies, including the council's Non-residential uses study 2012 (refer to sections 6.3 and 4.2) and the Southwark's Employment Land Review 2010.</p> <p>Annex 2 of the London Plan indicates that Canada Water has high capacity for growth with moderate levels of demand for office floorspace. The draft FALP (2014) refer to scope for a substantial increase in employment capacity and the potential for a new science cluster.</p> <p>Due to the scale and nature of the changes that are going to take place in the area and if the area is to achieve the potential set out in the AAP vision and the draft FALP designation, the council considers that the policy should be flexible and must allow the area to grow. It is essential that the site allocation recognises the dynamism of the area. Development on CWAAP 24 will be implemented over 10-15 years and during that time the demand for business floorspace in the area may increase significantly.</p>
1118	739	CWAAP 25	<p>Given the nature of the site and potential for a range of uses there should be no absolute requirement to provide residential uses in advance of any other uses on the site.</p> <p>We agree the site is suitable for residential use but this should not be an absolute requirement. Reason To provide sufficient flexibility within the AAP.</p>	<p>A residential-led scheme is under construction on the site to the south (Quebec Industrial Estate) and the adjacent site to the south-west (24-28 Quebec Way) has also been allocated for residential use. A residential use could also be designed in a way that was compatible with the adjacent Metropolitan Open Land, as has been demonstrated by the Quebec Industrial Estate scheme. The site lies outside the town centre and given the surrounding uses, a residential use would be appropriate and should remain a requirement for the site. The allocation also allows provision of non-residential uses, including business and community use.</p>

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
1118	740	Vision	<p data-bbox="423 217 517 233">Summary</p> <p data-bbox="423 268 1317 363">We welcome the Council's vision for Canada Water and the role that the draft AAP will play in delivering growth in the area. Concerns remain over some elements of the drafting. The draft AAP needs to fully recognise the potential for future growth and for the demand for housing in the area and acknowledge the strategic shift in direction for Canada Water.</p> <p data-bbox="423 392 1330 459">We request that we are kept informed with the progress of the draft APP and reserve our right to prepare additional representations as they may be required and to appear at the Examination in Public in due course.</p>	Support for the vision is noted.
1126	713	Policy 7	Very glad to see a bridge considered between Rotherhithe and canary wharf - I think this should be a crucial part of the implementation of the AAP.	Support noted. This has not been changed in the revisions to the adopted AAP.
1126	714	Policy 12	Refurbishment of Seven Islands leisure centre should include squash courts.	Noted. At this stage however, it is too early to know the precise details of what would be included in the refurbished leisure centre.

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
1126	715	Policy 17	<p>Building heights should remain lower than 4 storeys around the Canada Water Basin so as not to prevent it being viewable from other buildings and to ensure lots of light in the area.</p> <p>A substantial collection of buildings above 4 storeys would create an eyesore in the area and block views from West of the basin to Canary Wharf's iconic skyline.</p>	<p>The availability of Harmsworth Quays for development and the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, provide an opportunity to rethink the approach to town centre development. Following the EIP, the planning inspector recommended that the council review opportunities for tall buildings in the light of the availability of Harmsworth Quays.</p> <p>The adopted vision in the AAP emphasises the desirability of creating a network of streets and spaces that have a town centre and urban feel and which are not dominated by cars. Provision of some tall buildings, provided that they are of the highest design quality and avoid harmful microclimate impacts can help deliver the AAP vision in three important areas:</p> <p>1) Contribution of tall buildings to public realm: Currently the footprint of the existing large sheds in the centre make it difficult to move around the area. With the exception of the plaza outside the library the public realm is uninspiring and offers little to residents, visitors or shoppers. A key advantage of tall buildings is that they can utilise much smaller footprints, enabling the creation of more public realm and making it easier for pedestrians to move around. The design policies in the AAP have been revised to make provision of new public realm a crucial element of new development.</p> <p>2) Tall buildings and provision of town centre uses: The key to a vibrant and successful town centre is a range of shops, leisure opportunities and businesses which create a destination. Tall buildings can provide a range of uses to help animate the base of the building and contribute to the vibrancy of the centre. They are an important source of capacity and will help deliver the range of non-residential uses which are sought by the AAP vision.</p> <p>3) Tall buildings and creating a focal point in the town centre: Policy 17 in the revised AAP states that buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular, they will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the town centre.</p>
1126	716	Policy 22	New housing around the basin should maintain 35% affordable housing	Noted. The council is not proposing to change the 35% requirement.
1126	717	Part 6	There was no mention of upgrading the broadband infrastructure in the area - this would be essential for a new regenerated Canada Water in a digital age. There must be fibre optic broadband throughout the Canada Water area.	We are proposing a modification to the AAP which identifies the lack of availability of superfast broadband in parts of Rotherhithe and indicates that the council is keen to work with local residents, suppliers, developers and the GLA to secure the investment required to upgrade the area. The need to upgrade broadband infrastructure in the area has been identified in the council's Infrastructure Plan which is part of the evidence behind the community infrastructure levy and it is a potential recipient of CIL funding.

1295 720 CWAAP 25

We strongly propose the above mentioned land for Community Use (CLASS D)

Russia Dock Woodland is a Site of Importance to Nature Conservation (SINC). It has won several awards over the past five years including the coveted National 'Octavia Hill Award' 2013 ' + 'Green Flag Award' four years in succession and the 'Mayor of London's Safer Parks Award'. We are also on the verge of upgrading the Woodlands to Local Nature Reserve Status (LNR).

Land at Roberts Close is described in the CWAAP (attached) as " a green link which connects Canada Water Basin with RDW - well supported and would help integrate the site into the open space network" it is physically attached to RDW on its eastern boundary. And is also overlooked on two of its other boundaries by two Junior schools (St Johns and Alfred Salter) and the adjoining Catholic Church.

Land at Roberts Close will soon be adjoined and overlooked by the Development at Quebec Way Industrial Estate (QWIE) which is already underway through developers (London Quadrant). QWIE development is also adjoined to RDW on its Western Boundary which runs over half the length of Quebec Way.

With the projected massive increase in the peninsulas population by 2020 it is imperative that 'extra' well thought out open space and community space is provided to accommodate the impending increase. Therefore our proposal is for Land at Roberts Close to be designated as 'Community Use (Class D)' Our proposal is for the site to be Community Garden/ Allotment Space, with a purpose built 'Green Classroom' and Teaching Facility' mainly to be use by all local schools in growing competitions. Section 106 money could/should be made available for this build?

The CWAAP has increased significantly in size, height, and density since 2010 it is only right and fair that the communities demands for well thought out open green space and sustainable community facilities is also increased significantly to meet the extra demand.

Community use is listed as an acceptable use for the site.

While the council recognises that there is a need for community use in the area, the council considers that the need can be met by the requirement to provide community use on other sites in the area, including the Quebec Industrial Estate, 24-28 Quebec Way, site CWAAP 24 (Harmsworth Quays, Site E, Mulberry Business Park and Surrey Quays Leisure Park), Downtown, CWAAP 9 (Shopping centre, overflow carparks and Decathlon site), Albion Primary school, Surrey Docks Farm and Docklands Settlement.

Several community facilities in the area have recently been provided or are under construction, including:

- A children's day nursery on the Quebec Industrial Estate site;
- Health facilities on Downtown;
- A new community centre at Docklands Settlement which provides a range of community and sports facilities including a multi-purpose sports hall, a gym, clubroom for shared use with Southwark Youth Services and general purpose space;
- The new library provides performance and exhibition space and a venue for Southwark's Youth Forum;
- Flexible community space within Maple Quays (Site A);
- The council has resolved to acquire the former Surrey Docks Stadium for use as a public park;
- The council has resolved to reinstate the St Pauls sports ground as a community football ground, with a new 3G astro turf pitch.
- The council has resolved to publish statutory notices in connection with the permanent expansion of Albion Primary School to accommodate 2 forms of entry. Southwark Plan policy 2.3 requires new school facilities to be made available for public use wherever possible.

The AAP policies on community facilities is set out in policy 27 which explains that the council's strategy is to locate local facilities together so that the services required by the community including, housing services, services for young people, health centres, community space and facilities for the police are provided in accessible locations in a way in which different facilities can complement and support each other. The new library and rebuilding of schools are examples of this approach.

With regard to open space provision, our open space strategy indicates that generally open space provision in the action area is good. There is 44ha of public park space which equates to 1.53ha per 1,000 people. This is much higher than the borough-wide average of 0.91 ha per 1,000 people. Moreover, almost everyone in the action area lives within 400m of a park. Public park provision will be increased by the addition of Surrey Docks Stadium referred to above. We recognise that there are no allotments in the area, We have amended policy 18 to require all developments to provide opportunities for food growing.

Objec- tor ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
1296	746	Policy 30	<ul style="list-style-type: none"> •The plan needs to incorporate the provision of direct and easily accessible pedestrian and cycle and links to Canada Water hub •The plan should make explicit support for the regeneration of Albion Street retail parade and market (Policy 3 & 5), specifically support the mixed use development on the former Albion Street library site. •Support the reintroduction of Albion Street market by improving the pedestrian routes, signage in the area and parking arrangements .(refer Policy 5 Markets) •Reinforcing the viability of the shopping parade, St Olavs City Business Centre and the new build on the former library site by providing appropriate infrastructure including high speed broadband. •Develop the former library site in an exemplary Scandinavian / Nordic style so as to capitalise on the strong links the street has with these countries and thus help stimulate the local economy. •Work with the governors and staff of Albion Primary School to provide a new school building incorporating Scandinavian / Nordic design principles. •Work with the existing Albion Street health centre to ensure new health centre facilities are incorporated in the new build at the Old Library site. 	<p>Policy 30 highlights the council's aim to:</p> <ul style="list-style-type: none"> - Improve links between Albion Street and Canada Water. The links are also identified in Figures 14 and 7. - Regenerate the shops (policy 3 also reiterates that the council will seek to maintain the status of important shopping parades, such as Albion Street). Work with governors to expand the school. The council has since committed to rebuild the school to provide 2 forms of entry. It would be too prescriptive to state that the design must be Nordic. However, policy 13 states that the council will support opportunities to reinforce historic links with Scandinavia and the Baltic region. - use the opportunity provide by the library to regenerate the street. Again it would be too prescriptive to say the design must be Nordic. <p>In addition, AAP policy 5 recognises the potential for Scandinavian themed markets on Albion Street.</p> <p>With regard to health facilities, AAP policy 29 states that the council will work with NHS Southwark to meet the needs generated by an increase in the local population. Saved Southwark plan policy 2.1 states that change of use from D class uses (which include health facilities) will not be granted unless it can be demonstrated that they are surplus to requirements. This is reiterated in strategic policy 4 of the Core Strategy.</p> <p>The council's approach to Albion Street was considered sound by the planning inspector following the examination on the adopted AAP. It is not considered that there has been a change in circumstances which would undermine the council's approach.</p> <p>In paragraph 57 of his report, the inspector stated that:</p> <p>"The AAP, specifically through Policies 6 and 7, identifies that improvements will be made to walking and cycling routes in addition to improvements to public transport. The Council's approach to alternative forms of transport is further clarified within its Sustainable Transport SPD14. Whilst Figure 7 of the AAP is indicative with regard to such improvements, there is sufficient clarity on the intentions of the AAP to enable the delivery of necessary works in conjunction with development proposals. Such details include the objectives of securing improved east-west routes and the aspiration to obtain a better route between Canada Quays Station and Albion Street to the north."</p> <p>In paragraph 44 he stated that:</p> <p>"The importance of other shopping locations, such as found at Lower Road or Albion Street, is recognised suitably by AAP Policy 3...."</p>

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
1297	748	Policy 30	<p>On Albion School in policy 30 it should say:</p> <p>Working with the governors and staff to rebuild and expand the school using leading-edge Scandinavian/Nordic design principals and incorporating facilities for community use.</p> <p>Improve pedestrian access from Canada Water station to Albion School</p>	<p>It would be too prescriptive to state that the design must be Nordic. However, policy 13 states that the council will support opportunities to reinforce historic links with Scandinavia and the Baltic region.</p> <p>Saved policy 2.3 of the Southwark plan requires new school facilities to provide wider community use where possible.</p> <p>Policy 30 highlights the council's aim to improve links between Albion Street and Canada Water. The links are also identified in Figures 14 and 7.</p> <p>The council's approach to Albion Street was considered sound by the planning inspector following the examination on the adopted AAP. It is not considered that there has been a change in circumstances which would undermine the council's approach.</p> <p>In paragraph 57 of his report, the inspector stated that:</p> <p>"The AAP, specifically through Policies 6 and 7, identifies that improvements will be made to walking and cycling routes in addition to improvements to public transport. The Council's approach to alternative forms of transport is further clarified within its Sustainable Transport SPD14. Whilst Figure 7 of the AAP is indicative with regard to such improvements, there is sufficient clarity on the intentions of the AAP to enable the delivery of necessary works in conjunction with development proposals. Such details include the objectives of securing improved east-west routes and the aspiration to obtain a better route between Canada Quays Station and Albion Street to the north."</p>
1298	749	Policy 7	<p>Policy to improve river transport needs to be much more robust.</p> <p>There is a need for a river bus pier in or near to St Marys Conservation Area. There is a need to work with TfL, PLA and other stakeholders to achieve this particularly as 2020 is the 400 year anniversary of the Mayflower. This event will generate a very significant influx of visitors into Rotherhithe . A river pier would alleviate demands on already over subscribed transport in the area</p> <p>As the Hilton Hotel is for sale there is no guarantee that the new owners will carry on with the Canary Wharf Ferry</p> <p>There is a need for a dedicated bus lane and yellow boxes / traffic lights at the Rotherhithe Roundabout to alleviate the almost permanent grid lock of Jamaica Road / Lower Road for ordinary road users as well as emergency services. Rotherhithe residents are unable to exit Jamaica Road for Brunel Rd as it is always blocked by tunnel traffic. Rotherhithe needs a dedicated left filter lane .</p>	<p>The council considered and consulted on the potential for a new pier at St Mary's early in the process of preparing the adopted AAP (at issues and options stage). However the proposal was not taken forward. There were a number of reasons for it, including the presence of an existing pier at Cherry Gardens, which is close to the St Mary's area. A second pier was considered to be duplicating provision. Policy 7 on public transport states that the borough will work with TfL to improve public transport, including on the river. This would provide the flexibility to lobby for a new service in the future if the opportunity arises.</p> <p>Policy 6 highlights the council's desire to see a bridge between Rotherhithe and Canary Wharf, although it should be noted that the proposal is not funded.</p> <p>Site allocation CW AAP 7 and Figure 14 identify the need for a taxi drop off point (on the overflow car park) to serve the station.</p> <p>AAP policy 7 identifies the need to improve the roundabout on Jamaica Road. The roundabout is managed by TfL who are investigating potential improvements.</p>

Object ref	Rep ref.	Policy	Details of Representation	Officer Response to Representation
1299	751	Policy 7	<ul style="list-style-type: none"> •Policy to improve river transport insufficiently robust. <p>There is a demonstrable need for a river bus pier in / near St Marys Conservation Area. Policy must therefore reflect a need to work with TfL, PLA and other stakeholders to achieve and implement.</p> <p>2020 is the 400 year anniversary of the Mayflower and it is anticipated that this event will generate a very significant influx of visitors into the St Marys Conservation Area and interest in the River and would use river transport.</p> <p>The Hilton Hotel is for sale. If – as is predicted - the building reverts to residential use there is no guarantee the ferry to / from Canary Wharf will continue to exist.</p> <ul style="list-style-type: none"> •Para 4.3.6 A bridge connecting Canary Wharf to Rotherhithe is vital for the implementation of some of the policies within the AAP. To be totally reliant of the Jubilee Line for access to and from Canary Wharf is not appropriate for the long term sustainability of an opportunity area . Buses can not access the Rotherhithe road tunnel, the future of the (expensive) cross river ferry is in doubt. Many Canada Water residents work at Canary Wharf and Canada Water is designated an opportunity area. Hence 24 / 7 access has to be available. •A need for the provision of a formal taxi rank at Canada Water tube / bus station. Bus routes on the peninsula do not provide easy access to CW tube / overground for residents with luggage / wheelchairs/ buggies/ etc Hence vehicles collect and drop off people in the very busy Surrey Quays Road and then perform potentially dangerous U turns as the road system is complex. •There is a need for a dedicated bus lane and yellow boxes / traffic lights at the Rotherhithe Roundabout to alleviate the almost permanent grid lock of Jamaica Road / Lower Road for ordinary road users as well as emergency services. 	<p>The council considered and consulted on the potential for a new pier at St Mary's early in the process of preparing the adopted AAP (at issues and options stage). However the proposal was not taken forward. There were a number of reasons for it, including the presence of an existing pier at Cherry Gardens, which is close to the St Mary's area. A second pier was considered to be duplicating provision. Policy 7 on public transport states that the borough will work with TfL to improve public transport, including on the river. This would provide the flexibility to lobby for a new service in the future if the opportunity arises</p> <p>Policy 6 highlights the council's desire to see a bridge between Rotherhithe and Canary Wharf, although it should be noted that the proposal is not funded.</p> <p>Site allocation CW AAP 7 and Figure 14 identify the need for a taxi drop off point (on the overflow car park) to serve the station.</p> <p>AAP policy 7 identifies the need to improve the roundabout on Jamaica Road. The roundabout is managed by TfL who are investigating potential improvements.</p>