

APPENDIX 2

A SUMMARY OF THE RESPONSES TO THE SOUTHWARK PLAN 2002 (FIRST DEPOSIT UDP)

PART ONE - GENERAL

Number of Submissions: 23 **Number of Objections:** 22 **Number of Supporters:** 1

How many address the same issues? 9 (2 x 2) (1 x 5) (17 different issues to deal with)

What are the issues raised?

1. Objections – need further work

1. Lack of historic environment as an asset in the vision; (2) CPCA, Eng Her (SC link)
2. Too many qualifying phrases, ambiguous; (2) DSWC, Lawson
3. Recognition that residents and workers need more communications; BRF
4. Identifying social programmes; GoL
5. Lack of account of owner occupiers views; Dewar (LO)

2. Objections – put in

1. Need to minimize conflicting policies and have a clear framework; BBP
2. Inadequate business representation in the LSP, community strategy and other Southwark Strategy making; BBP
3. Cross Referencing is unclear; BOST
4. Repetitive in parts; GoL

3. Not relevant

1. Delayed receiving a copy of the plan or associated form; (5) Addis, BBP, Es TRA, Lon Town, Roup
2. Lack of plans to deal with enforcement; Camb
3. Information on planning applications needs to be more micro level; BRF
4. Contractors needs to listen to local views; BRF
5. Councillors should be more involved in the process; BRF
6. Reverse the decision taken to take draft SPG and Southwark Plan into account for planning applications because of incorrect land use designations; CWC
7. Demonstrating the view of the BDRP is documented in accordance with statutory procedure; BBP

4. Support

1. General Welcome of the Plan (PoL)

Access Search Reference:

Section: Part 1

Policy: General

Responsible Officer: JT

Representee Names

Brian Addis 180, Bankside Open Spaces Trust 170, Bankside Residents Forum 201, Bermondsey and Rotherhithe Development Partnership 166, Canada Water Consultative Forum 159, Crystal Palace Community Association 185, Gordon Dewar 208, Dulwich Society Wildlife Committee 174, English Heritage 182, Esmeralda T&RA 142, Government Office for London Peter Lawson 121, London Town PLC 9, Pool of London Partnership 11, Roupakia, Sofia Draper Tenants Association 44, Jean Sackur (resident) 67.

Representation References

7029 7069 7030 7048 7049 6868 6635 5654 7108 6774 6127 6267 6651 7096
7042 7037 6938 7035 7038 6477 7113

PART ONE – SECTION 1

Number of Submissions: 38 **Number of Objections:** 27 **Number of Supporters:** 11

How many address the same issues: (1 x 21) (1 x 8) 11 different issues to deal with

What are the same issues raised:

Objections that need further work

1. New style format with P1, P2 and SPG; (20) BW, BH, BG and ST J, BHC&E, Fairv, GW, St G, BH, GoL, GLA, Cap KR, City Est, Min, RLAM, Def Est, Esm, Harn Quays, Land Sec, LBL, St Mtns, Will;
2. E&C CDF as SPG; PB;
3. Lack of clarity and detail for open spaces and historic importance; Eng Nat. (SC)

Objections – put in

1. Clarity of objectives; FoE
2. Clear time horizon; GoL
3. Reference to housing provision and target; GoL (LO)

Not relevant

1. Quality of life as objective; Dul Soc (SB),

Support

1. General welcome; (8) BBP, BOST, Camb Soc, M Dav, Eng Her, Eng Nat, GoL, Old Lin TA,
2. Improved sustainability; FoE
3. Strategy context and explanation of purpose; GoL
4. Policy approaches; GoL

Access Search Reference:

Section: Part 1

Policy: Section 1

Subject: Introduction

Responsible Officer: JT

Objectors Names (addresses or agents not required):

Bankside Business Partnership 38, Bankside Open Spaces Trust 170, Barton Willmore 6, Bellway Homes 4, Berkeley Group PLC and St James Group Ltd 5, Berkeley Homes (City & East London) 153, Fairview Homes 7, George Wimpey Central London 3, St George (South London Ltd) 2, Pauline Bennington 57, Berkley Homes plc 51, Camberwell Society 67, Capcount Kings Reach 20, City Estates 19, Minerva Plc 18, Royal London Asset Management 14, Michael Davis 140, Defence Estates 110, Dulwich Society Wildlife Committee 174, English Heritage 182, English Nature 183, Esmerelda T&RA 142, Friends of the Earth Southwark 59, Government Office for London 52, Greater London Authority 68, Harmsworth Quays Printing, Ltd 21, Land Securities 25, London Borough of Lambeth 90, Old Lindley TA 35, St Martins Property Investments Ltd Willowbrook.

Objection Numbers

6937	7033	6730	6255	5651	6153	6142	5653	5650	5640	6945	6773	6124	6126
6125	6136	7109	6178	6370	7076	7077	7078	7079	7080	7081	6668	6316	6669
6850	6319	6323	6330	7085	5655	6770	6989	6992	6694	6146	6148	6331	6985

PART ONE – SECTION 2

Number of Submissions: 10 Number of Objections: 6 Number of Supporters: 4

How many address the same issues: (3 x 2)

What are the same issues raised:

Objections – need further work

6. Economics not being put above social and environmental; (2) Cook, CoL (SAB)
7. Objectives should be scrapped and made more rigorous. Taylor (SAB)

Objections – put in

5. More clear about implications of unsustainable development; Dul So; (SAB)
6. More clear definition, objectives and measurement GoL (SAB)
7. Unclear about Sustainability Appraisal methodology and comparisons; Trinity New (SAB)

Not relevant

8. Spending more on general services; Camb

Support

2. General Support; (2) FoE, Sport Eng (SAB)
3. Support objectives; (2) FoE, Trinity New (SAB)

Access Search Reference:

Section: Part 1

Policy: Section 2

Subject: Sustainable Development

Responsible Officer: JT

Objectors Names (addresses or agents not required):

The Camberwell Society 67, Martin Cook 13, Corporation of London 24, Dulwich Society Wildlife Committee 174, Friends of the Earth 59, Government Office for London, Sport England 195, J Taylor 16, Trinity Newington Residents Association 82.

Representation References

6575 6314 6296 6660 6643 6775 6646 6403 6659 6645

PART ONE – SECTION 3

Number of Submissions: 18 Number of Objections: 16 Number of Supporters: 2

How many address the same issues: (1 x 2) 16 different issues

What are the same issues raised:

Objections – need further work

8. Living Places, cleaner, greener, safer reference; BOST (SAB)
9. Questionable economic development policy; Cook, (LO)
10. Seeking intensification; Kinrade (LO)
11. Community Cohesion guidance references; Lee (PB)
12. Unbound retail in E&C; LBL (PB)
13. Unbound retail in Canada Water; LBL (SC)
14. EU Sixth EAP; Trin New (SAB)
15. Only retain essential sites; Access (EM)

Objections – put in

8. Refer to SDS as the draft London Plan. GLA

Not relevant/wrong

9. Unclear on how documents comply with SDS; Add
10. Documents should comply with SDS; CWC
11. Lack of guidance on historic environment and archaeology; CPCA
12. Developed within context of London Plan and other mayors plans; SBEG
13. Only retain the best sites for employment – review designation. Oak

Support

4. Good job of picking up aspirations of Tate Conference; BBP
5. Heritage and architecture references. (2) CPCA, Eng Her

Access Search Reference:

Section: Part 1

Policy: Section 3

Subject: External Influences

Responsible Officer: JT

Objectors Names (addresses or agents not required):

Brian Addis 180, Bankside Business Partnership 38, Bankside Open Spaces Trust 170, Canada Water Consultative Forum 159, Martin Cook 13, Crystal Palace Community Association 185, English Heritage 182, Greater London Authority 68, Derek Kinrade 93, Richard Lee 43, London Borough of Lambeth 90, Oakmayne Properties 76, South Bank Employers Group 198, Trinity Newington Residents Association 82, Access Storage Solutions 75.

Representation References

7028 6939 7034 7111 5659 6867 6479 6636 6637 6452 6419 6311 6209 6993
6995 7073 6604 6647

PART ONE – SECTION 4

Number of Submissions: 6 **Number of Objections:**2 **Number of Supporters:** 4

How many address the same issues:

What are the same issues raised:

Objections – need further work

16. Against views of Canada Water local community; Add (SC)

Objections – put in

Not relevant/wrong

1. Planning applications for deposit in libraries. FoE

Support

6. Linking jobs with local people; BBP (EM)
7. Empowering local residents; FoE, SDMBHA
8. Partnership working and taking into account local people's views; SBEG

Access Search Reference:

Section: Part 1

Policy: Section 4

Subject: Local Influences

Responsible Officer: JT

Objectors Names (addresses or agents not required):

Brian Addis 180, Bankside Business Partnership 38, Friends of the Earth 59, South Dock Marina Berth Holder's Association 173, South Bank Employers Group 198.

Representation References

6935 6940 6661 6662 6355 6640

PART ONE – SECTION 5

Number of Submissions: 125 **Number of Objectors:** 110 **Number of Supporters:** 15

Main Points of Representations:

- Canada Water is treated in the same category as London Bridge as far as development and housing density is concerned. Canada Water could usefully become a district centre, but nothing on the scale that might be seen at London Bridge or Elephant & Castle (39)
- Canada Water should be considered a "district centre" and trend neutral. The whole of the peninsula should retain the protection and development levels afforded by their suburban nature
- Rephrase paragraph 5.4.1 (ii) in relation to Bankside and Borough
- The exact route of the Cross River Link as map must be changed to reflect other possible options for the route (based on community opposition and local decision making) (4)
- Need an assessment of the impact of development at Elephant and Castle on the commerce of Walworth Road/East Street
- All developments should be required to submit Traffic Impact Assessments. Oppose the proposed increase up to 75, 000 square metres at the Elephant and Castle as this seems much too big and unlikely to permit balanced development.
- Would like to see a stated policy protecting existing commercial frontages by refusing planning permission to commercial enterprises if they would damage existing local shops (2)
- Dog Kennel Hill lies outside the District Centre labelled Lordship Lane and Dog Kennel Hill and should just be labelled Lordship Lane
- The tram route decided must protect Burgess Park by going round it or using the existing route across it – Wells Way.
- Support Camberwell being designated as a Town Centre and hope it will lead to increased funding and investment (2)
- New Rail Station is welcomed but doubt its anticipated regenerative effect unless it forms part of a major public transport interchange (2)
- The proposed London Tram Route terminating in Peckham and Brixton needs an interconnecting link via Camberwell proposed public transport interchange and its two internationally renowned Hospitals, Magistrates Court and Art College (2)
- Object to the unclear designation of Canada Water as an Action Area particularly as this is not a recognised area in the London Plan and is included as a locally identified area, yet is set out along with the Regeneration areas identified by the London Plan – should be termed "Borough Development Areas" (2)
- Object to the designation of Canada Water as an 'action area' in the Southwark Plan
- Welcomes Elephant and Castle as an area of Opportunity
- The newly dubbed ' London South Central' area is put forward for having the ability to contain large numbers of new jobs and homes, without any particular justification - modest piecemeal scale development is more appropriate.
- Should specifically oppose further large-scale car based retail developments – steer developments to town centres well served by public transport
- The London Bridge/Borough High Street areas should be cherished as primarily valuable for their setting and historic fabric, with no large scale developments beyond those currently in train including no high office blocks, developments to be piecemeal and small to medium in scale
- Elephant & Castle - replace the section seeking to replace high rise 1960s developments (over time) with a mixture of building types and uses, which overall would serve to reduce job/housing densities
- Southwark must be seen and supported not only as a high quality environment in which to live, but also to work and do business.
- Recommend that the roles of the regeneration partnerships and the importance of the linkages between Southwark and the City in achieving the objective receive explicit recognition in the background to the objective
- The term interchange has been misunderstood - this is generally understood to mean a station served by more than one underground line or by both underground and national rail
- Label the Tram route as Cross River Transit proposal
- London South Central to cover the whole of the Borough of Southwark, Lambeth, City and Westminster (2)

- We support the idea of defining opportunity areas and the principles set out in the London Plan – although unconvinced of the arguments for their sustainability for tall buildings.
- Supports the principle of defining Opportunity Areas and the broad strategy for them set out in the Mayor's draft London Plan and support the preparation of SPG and a Masterplan for such areas. However, masterplans should include detailed analysis of the character and sensitivity of such areas and the suitability or otherwise of the location for development of tall buildings in the context of this analysis
- Object to the statement as it implies that there is potential for further car based retail development along the Old Kent Road.
- Paterson Park fulfils the criteria for designation as Borough Open Land and should be designated as such
- A primary objective is missing for London Bridge which is to protect and enhance the unique historical nature of the area.
- We welcome the limiting of car-based developments along the Old Kent Road which as explicit in this statement (2)
- We are pleased that a site for a waste transfer station has been identified within the Plans
- Like to see greater assurances that the retail mix will be such that it meets the needs of local people and encourages local businesses rather than just large high street chains.
- Re-introducing at least the basic content of the Elephant and Castle proposal in the SPG and showing the proposal on the Proposals Map - one of the most major proposals for the borough can thus not be discussed formally at the Plan Inquiry
- Indicates that Town Centre Statements will be prepared for certain centres. However these are in an SPG and therefore the Plan does not provide any clear advice in line with the guidance in PPG6
- Discussion of Opportunity Areas in the Plan could do more to discuss how it proposes to limit environmental degradation at the same time as development these areas economically and socially
- Identify areas for Regeneration on Key Diagram and Proposals Map
- The key diagram should identify all strategic transport proposals and respective safeguarding lines
- Add text seeking to extend the cultural, entertainment and leisure offer of the northern part of London South Central, and especially the riverside Strategic Cultural Area, to complement and extend that of the West End/Soho through carefully managed mixed use planning framework meeting both local and strategic needs
- Concern about the impact that the scale of retail provision proposed at the Elephant & Castle would have on nearly existing centres including those in adjoining boroughs (2)
- London Bridge is identified as an area of mixed uses with strong arts, cultural and entertainment character - this should be reflected in the primary objectives set out in this paragraph
- Amend text in relation to the Old Kent Road retail function to make it explicit that further development should be located and designed to ensure efficient use of land and reduce the need for travel by private car
- Extend the Old Kent Road Action Area to include the entire Standard Wharf site
- Essential that a regional policy of the scale and importance of London South – Central is reflected in a UDP policy along the lines of policy 2 of the proposed Lambeth replacement UDP
- Plan would benefit from a policy implementing the strategic cultural area in the north of the borough (Bankside) in line with the SDS and compatible with the proposed revised deposit alterations to the Lambeth UDP to bring it more into line with the SDS
- Object to the failure to mention the comprehensive development framework for the Elephant and Castle, which Council has agreed will replace the SPG (planning committee report)
- Object to the exclusivity given to the new retail development and the omission of other aspects of mixed use development
- Support the identification of Old Kent Road as an Action Area. Note that reference is also made to the possible preparation of master plans where appropriate. We support the preparation of a master plan focused on the Cantium Retail Park
- Support the potential for further retail development on the Old Kent Road
- Both the Key Diagram and Proposals Map that accompanies the UDP are unsatisfactory - they are of a poor quality design, inappropriate scale and of poor quality finish
- Accept that the Elephant and Castle area is in need of regeneration. However it is often assumed that the area is based around good public transport. In reality the area is severely over-congested and a bottleneck. These issues need to be addressed in any regeneration of the area

- Do not support the London Bridge Tower Development; the public transport infrastructure is already operating at capacity and will be unable to cope with such an increase in demand for its use
- Account should be taken of the need to protect existing open space in the Bankside and Borough areas and also of the need for more open space to be provided as part of new development
- Account should be taken of the impact of arts, culture and visitor attractions to residential communities in this area
- Should not seek to increase the amount of open space in Dulwich - if land cannot be managed appropriately, alternative uses should not be wholly ruled out of consideration
- Agree that an overall strategy has to be developed so that piecemeal developments are not brought about only to undergo a change of strategy later e.g. Peckham Leisure Centre
- Appear to be some errors and omissions which require correction - London Bridge is omitted as a tube/rail/bus transport interchange and some of the existing Thameslink 2000 routes are missing including the proposed new station (entrance) at Blackfriars. Borough tube is also omitted. The Bankside and Borough Action Area/Town Centre would also appear to be in the wrong place on the diagram.
- Supports the creation of the two Special Policy areas and also the London Bridge Opportunity area. It is right that London Bridge is identified as a regeneration area of strategic importance for the whole of London. However, it is not clear whether the London Bridge SPG now supersedes the draft Planning Framework
- Support the general thrust of the draft plan as it affects the Pool of London areas
- We object to narrow perception of the Elephant and Castle area as simply a park and ride retail and educational place under the mixed uses - no mention of arts, cultural and entertainment uses for the Elephant & Castle
- London Bridge Station is identified on the key diagram as a designated Town Centre although it appears that this is not the case on the Proposals Map. Refers to the intention of the council to prepare Town Centre Statements. However the text does not refer to the production of such a statement for London Bridge
- Key Diagram omits important annotations for London Bridge Station, which should indicate the existing interchanges with national rail and Underground and Bus Termini. The Key Diagram also fails to identify the Thameslink 2000 proposals for London Bridge Station
- Key diagram should mark London Bridge Station as an existing area with a cluster of tall buildings and with the opportunity for future development of tall buildings in accordance with the policy.
- Key Diagram fails to identify the station as within an Action Area as identified in the London Bridge Framework document and within the text
- Have made objections to the draft London Bridge Framework document. We object to the LBOA proposals and associated policies to be applied thereto in the draft Southwark Plan
- Reference should be made to the Railtrack Masterplan proposals for London Bridge Station in this section and the general support of Southwark Council for these projects should be confirmed
- Caution over placing an over-reliance on the regeneration benefits that could spread to the area, particularly having regard to the current uncertainties over the delivery of the redevelopment project
- Concern that the growth of the District Centre at Elephant and Castle could be at the expense of other centres, which have an important role to play in developing the retail offer at a local level and maintaining the vitality and viability of the Borough
- Support Canada Water's Action Area status
- Clarification as to whether Canada Water is defined as a Town Centre or a District Centre earlier on in plan/key diagram
- Consideration should be given to the designation of a linear urban park along the Thames Walkway throughout the London South Central Area
- Recognise the importance of Bankside as part of the heart of London's Cultural Quarter as well as a growing residential district
- Consideration needs to be given to improving access to the river bus service and the hinterland and linking it to other transport modes
- The goals of the SBEG Urban Design Strategy could usefully be reflected in the Bankside and Borough Action Area
- Welcome the London Bridge objective in relation to improvements to the distribution and quality of public open space in the area – but consider that this aim should also apply more widely in the borough

- We support identifications of London Bridge as an Opportunity Area as shown on the Key Diagram and Proposals Map. Area suitable for major new development due to its close proximity to major rail termini and other facilities and services and the regenerative benefits that such developments can secure.
- Strange title for this section. - suggest that it be reworded to 'Strategic Areas'
- With regard to the Elephant and Castle we have to record our disappointment at the failure of the redevelopment proposals of the last few years
- With regard to London Bridge we advise you should also allow for the possibility of no change in respect of London Bridge station redevelopment proposals as well as redevelopment and also consider the possibility of much delayed implementation of Thameslink 2000 (whose name is rather suggestive of delays in railway infrastructure improvements)
- Consider an active policy of creating a boulevard along the Old Kent Road with paving, provision for pedestrians, cyclists and public transport given this is a major arterial approach to London.
- The Cross River Transit (Tram) Project could similarly be a catalyst for urban improvement of the Walworth Road
- Seems that there is much greater concentration of benefits for the Bankside/London Bridge area, which already attracts investment compared to the Elephant and Castle.

Access Search Reference:

Section: Part 1

Policy: Section 5

Subject: Key Diagram

Cross Reference: Various

Objectors Names (addresses or agents not required):

Brian Addis 180; Pauline Adenwalla 113; Bermondsey and Rotherhithe Development Partnership 165; Blackfriars Investments 65; Henry Bottomley 123; Brunswick Quay Residents' Association 154; The Camberwell Society 67; Camberwell Traders Assn 54; Canada Water Campaign 187; Canada Water Consultative Forum 159; Castle House 60; Church of the Immaculate Conception 186; M Cook 13; Corporation of London 24; Miss J A Coxon 144; Creekside Forum 32; Cross River Partnership 12; Crystal Palace Community Association 185; English Heritage 182; Esmerelda Tenants and Residents Association 142; Dr Mark Farrugia 181; Forgotten Corner of Camberwell 63; Friends of the Earth 59; Government Office for London 52; Greater London Authority 68; Hays Plc 50; Derek Hill 34; Toby James 149; Gwen Jones 177; Norman Khambatta 168; Mr and Mrs Stan Koura 168; Lambeth Council 90; Richard Lee 43; Legal and General Assurance Society 83; Beatrice Leung 134; Kam Hong Leung 133; Mr T Long 139; Elizabeth Marsh 188; Lisa Murray 191; Drs M & T Michaelides 178; The Newington Trust Estate 157; North Southwark Community Development Group 58; David R Novak 153; John Padmore 146; Mark Parker 147; Cllr Michelle Pearce 141; Peckham Society Mrs B Phillips 111; Donald Phillips 94; Hannah Picken 155; Mercedes Pingarron 152; Gina Pinnick and Robert Spencer 136; Pool of London Partnership 13; Cllr Lisa Rajan 17; Redriff Tenants Association 143; James Rigg 132; Sophia Roupakia 44; Royal London Asset Management Ltd 14; Sainsbury's Supermarkets Ltd 163; Shopping Centres Ltd 27; Graham Smith 151; South Bank Employers Group 198; Sport England 195; Jon F Staunton 137; Mr R. M & Mrs SM Stewart 190; Surrey Docks Farm 138; A F Thomas 145; Threadneedle Property Investments Ltd 70; Trinity Lock Residents Association 125; Trinity Newington Residents Association 82; United House 161; P Watson 167; Mr R Webb 135; Laura Wirtz 189; M Wyman 207; Jean and Peter Ziehfrend 150

Access Representation Reference:

6435	7110	6305	5701	6229	5565	5679	5680	5697	6623	6493
6624	6491	5664	5703	5467	6312	5665	5666	6159	6745	5459
5458	5662	6638	6650	6651	6443	6826	6630	5547	6663	6664
6665	6666	6667	5678	5518	6196	5568	5670	5677	5691	5705
5457	6195	6554	6357	6367	5663	5684	5667	5700	5708	5706
6101	6097	6133	5719	6517	6400	6862	5681	5687	6334	6631
6359	5676	6421	6278	6366	6236	6216	6110	6852	5757	5673
5688	6270	5689	5475	6532	6837	6774	6772	5660	6212	6641
6612	6614	6642	6644	6840	6114	6513	6128	6164	5690	5661
5669	5682	5692	5707	6201	6327	6305	6507	6188	6864	6865
6466	6586	6587	6496	6584	6865	6466	6586	6587	6496	6584

6859 7072 6466 5704 7112 7100 7101 7099 7094 7003 6238

PART ONE – SECTION 6

OPEN SPACE DESIGNATION

Number of Submissions: 26 Number of Objectors: 22 Number of Supporters: 4

Main Points of Representations:

- Red cross gardens made should be designated as MOL due to historic significance
- Nelson square playground should be designated as BOL
- Copperfield gardens should be designated as BOL
- The new open space at Gambia Street be designated as BOL
- Cathedral Sq should be designated as BOL.
- 3 distinct areas on the estate in Park Street should be designated as BOL
- Proposed new Tate community garden to the east of the Tate be designated BOL
- The site at the junction of King James St and Milcote St be designated Open space in order to create a new open space in this area
- St George's Church not be designated as BOL as is shown on the proposals map
- Concerned to see that there is no proposed plan showing all open space, both current and proposed rather just a plan which shows the current usage.
- The Marlborough Playground should be designated as BOL.
- The open space around the Tate should be designated BOL (from the North side Tate building to the edge of Sumner St and all the area fronting Holland Street) (4)
- The river walk should be designated BOL (2)
- The boundary of the MOL encompassing the green chain walk at canal head appears to have been expanded from that presently specified in the existing UDP to include a small strip of land to be utilised by Baylight and the Council for its new mixed-use development scheme
- Support the inclusion of the Mary Datchelor Site in the Camberwell Town Centre (thought designated for housing) (2)
- The proposal map should identify sites of Nature Conservation Importance (in particular Nunhead Cemetery). These should use the criteria and hierarchy adopted by the GLA (as required by policy 3D.1Z in the draft SDS)
- Support the designation of the Haberdashers Askes School Playing field, St Asaph Road as MOL
- Request that Greendale be removed from MOL designation
- The boundaries of land designated as Sites of Metropolitan, Borough and Local Importance for Nature Conservation (SINCS) and Local Nature Reserves should be shown on the proposals map under the category 'Conservation Areas'. These sites should be differentiated to reinforce their importance as areas of the highest value for biodiversity conservation within the borough.
- Text within UDP describing the Proposals Map should also define the category 'Conservation Areas'
- A list of these sites (Conservation Areas) should be included in an appendix of the UDP.
- Designated Paterson Park as BOL
- Designate the public house and portion of Addington Square Road adjoining new church road opposite Edmond street as MOL, as in 1995 UDP map
- Designate the current architectural salvage yard and vehicle parking on corner of New Church Road and South Hampton Way as MOL, as in 1995 UDP map
- Designate all of Wells Way where it passes through the park as MOL, as in 1995 UDP map
- Designate the forecourt of the sub-station/cooling station on wells way at the southern most end of the park as MOL, as in 1995 UDP map
- Designate the plot of open land between Glengall road and the surrey canal path adjacent to the terrace of housing on Glengall road as MOL, as in 1995 UDP map
- All MOL should lose the Action Area or Industrial designation.
- Areas shown in red shading on the map should be designated MOL
- Include Sites of Importance for Nature Conservation on Proposals Map
- Reinstate the land known as Grace Kimmins Gardens as BOL or other open space (2)

- Designate the undeveloped green space in the area boundary by Harper Road, Falmouth Road, Trinity Square and Brockham Street not being designated as BOL
- Designate the green space around Tabard Square as BOL
- Support the designation of McDermott Grove Community Garden as BOL
- Include within the UDP a list or chart of sites by name recognised as BOL or MOL- chart to include recognition of value of each site. Chart to be available for consultation before approval.
- Designate the following new sites as BOL:
 - The Gardens SE15
 - London Wildlife Trust SE15
 - The Sainsburys Park – SE22
 - East Dulwich Railway corridors
 - McDermott Grove – SE15
 - Goldsmith Nature Garden – SE15
 - Goose Green – SE22
 - Bellenden Nature Garden – SE15
 - Kirkwood Road Nature Garden and Railway corridor – SE15
 - South Bermondsey Railway embankments
 - Nunhead Railway embankments
 - Grove Park wood and railway cuttings
 - East Dulwich railway sidings
- Extend the green chain route from the river Thames to Peckham square to Peckham Rye common and beyond to the un-adopted part of Homestall Road.
- Southwark Council should negotiate with Thames water to obtain a right of way along the southern end of the western boundary of the water works so that this route can link with Brantley Gardens and One Tree Hill
- Designate Potters Field Park as MOL as opposed to BOL (considered to be of National and Strategic importance)
- Consult with the residents of South Dock Marina (Also covering part of Greenland Dock) over the designation of BOL
- Trinity Church Square Garden should be designated Borough Open Land and therefore benefit from the same status as the Merrick Square Gardens (2)

Access Search Reference:

Section: Part 1

Policy: Proposals Map

Subject: Open Space

Cross Reference: Various

Objector Names (addresses or agents not required):

Bankside Open Spaces Trust; Bankside Residents Forum; Baylight Properties Plc; Camberwell Traders Association; Carr, Justin; Cliveden Estates Limited; English Nature; Esmeralda Tenants' & Residents Association; Falcon Point Management Group; Friends of Burgess Park; Forgotten Corner of Camberwell; Greater London Authority; Greenwood, Adrian; Hughes, Simon MP; London Wildlife Trust; McDonald, Simon M. G. L; The Peckham Society; Pool of London Partnership; South Dock Marina Berth Holder's Association; Trinity Newington Residents Association

Access Representation Reference:

6343	6806	6818	6256	5699	6022	6803	6250	6462	6766	6929
6224	6787	6741	6318	6226	6190	6738	6245	6003	6443	7106
6358	6371	6722	6725							

PREFERRED INDUSTRIAL LOCATIONS

Number of Submissions: 14 Number of Objectors: 11 Number of Supporters: 3

Main Points of Representations:

- Remove 2 Old Jamaica Road from the Bermondsey PIL I
- Remove the proposed ASDA site from the Old Kent Road PIL II
- Support the designation of the current industrial land around Quebec Way (2)
- Remove the eastern portion of the Six Bridges Trading Estate from the Old Kent Road PIL I
- Object to the designation of the land at Parkhouse Street, Camberwell as PIL I
- Remove the PIL from the Newington Industrial Estate to enable mixed use development (3)
- Welcome the identification of the two strategic employment locations in the Proposals Map I
- Amend the boundary of the Old Kent Road PIL to exclude Standard Wharf and allocate the site for residential development (2 – same objector)
- Object to the land along Enid Street and between Spa Road & Enid Street (where there are garages and former factory) not been designated for industrial use I
- Remove the PIL designation from the site adjoining the Cantium Retail Park
- Identify the existing shopping facilities and the proposed ASDA store on Old Kent Road as a district centre (2)

Access Search Reference:

Section: Part 2

Policy: Proposal Map

Subject: Preferred Industrial Locations

Cross Reference: Policy 1.4

Objectors Names (addresses or agents not required):

ASDA Stores Ltd; Bevington, P & J, Pickford, J. M; Canada Water Campaign; Co-Operative Insurance Society Limited; Ebury Management; GLA; GLE Properties; Hays Plc; Hughes, Simon MP; Legal and General Assurance Society Ltd; Pidgeon, Cllr Caroline; Trinity Lock Residents Association; Unite

Access Representation Reference:

5593 5603 5604 5605 5608 5614 5616 5718 6080 6497 6588
6620 6740 6978

PREFERRED OFFICE LOCATIONS

Number of Submissions: 17 Number of Objectors: 17 Number of Supporters: 0

Main Points of Representations:

- Bankside should be designated as a 'mixed use area' rather than a POL (2)
- Remove the designation of the POL over parts of the Bankside & Borough as this does not facilitate or encourage a strategic approach to redevelopment.
- Ensure the text in Part 1 in relation to Preferred Office Locations is consistent with the policy in Part 2 (5)
- Remove Milcote House from the Preferred Office Location
- Give consideration to expanding the extent of the Preferred Office Locations (2)
- Review the boundary of the POL to include the area south of the railway as this area has a mixed use character
- Refer to the typical pattern of development in POL – residential abutting retail and office uses
- Enough office development in the North Southwark Area and object to the designation of the area as a Preferred Office Location (2)
- Remove the Potters Field Development site from inclusion within the Preferred Office Location
- The London Bridge Opportunity Area should not be stated as a Preferred Office Location

Access Search Reference:

Section: Part 2

Policy: Proposals Map

Subject: Preferred Office Locations

Cross Reference: Policy 1.3

Objectors Names (addresses or agents not required):

Bankside Residents Forum; Blackfriars Investment Ltd; Capcount Kings Reach (Jersey) Limited; City Estates; Cook, Martin; Corporation of London; GOL; Lake Estates/Union Street Ltd/Dorrington Properties Plc; London Transport Property; Minevra Plc; North Southwark Community Development Group; Paxton, John; Pool of London Partnerships; Threadneedle Property Investments Ltd

Access Representation Reference:

5549 5556 5587 5710 5711 5723 5724 5725 5726 5727 5728
6246 6530 6804 6815 6816 7137

CATEGORIES FOR CARPARKING AND DENSITY

Number of Submissions: 10 **Number of Objectors:** 9 **Number of Supporters:** 1

Main Points of Representations:

- Locate the transport development area in Camberwell on the Walworth Bus Garage site adjacent to the railway and along a widened Medlar Street.
- Confirmation is required as to the precise definition of a Transport Development Area as shown on the Proposals Map.
- The bus/road hierarchy is not shown on the Proposals Map in accordance with PPG13 (2)
- Amended the proposals map to designate a much wider area for the Transport Development Area identified at London Bridge in order for the designation to be effective
- In accordance with the policy 3C.3 of the draft London Plan, the Proposals Map should indicate the route and land requirements for proposed transport improvements (3)
- Parking and density levels in these Action Areas should be sufficiently flexible to take into account operator demand as highlighted in PPG3 and PPG13.
- Should be a reference on the Proposals Map to widen pavements along Walworth Road as this could impact on building lines or useable road widths.
- A PTAL map produced for the borough order for densities and car parking levels to be appropriately related to public transport accessibility.
- Show main proposed cycle paths in red as 'Transport Development Areas'. Specifically the Millennium Path near South Bermondsey Rail Station.
- Support the proposed allocation of Walworth Bus Garage as part of the proposed designated Camberwell Town Centre.

Access Search Reference:

Section: Part 1

Policy: Proposals Map

Subject: Transport

Cross Reference: Various

Objector Names (addresses or agents not required):

Camberwell Traders Association; Cyclists Touring Club; Esmeralda Road Tenants & Resident Association; Forgotten Corner of Camberwell; Greater London Authority; Government Office for London; Hays Plc; London Borough of Lambeth; London Transport Property; Pool of London Partnership

Access Representation Reference:

5563 5575 5668 5805 6205 6556 6744 6746 6764 6768 6970
7121

THE WASTE SITE

Number of Submissions: 9 Number of Objectors: 7 Number of Supporters: 2

Main Points of Representations:

- Relocation of waste transfer station from Manor Place to the former Gas Works site on Old Kent Road needs further consultation (with the local community) (2)
- Look for appropriate actual or potential sites adjacent to railway lines (railway-served waste terminal sites)
- Object to the designation of the former gas works site for use as a new waste transfer station as there has been no planning brief written for the site
- We object to the allocation of the former gas works site at the Old Kent Road as a waste management site as it is an important strategic site for a natural gas filling station and used by a wide range of vehicle operators across London
- Develop the gas works site into a state of the art recycling centre as opposed to a waste transfer station per se. Residents are already severely affected by being adjacent to a Preferred Industrial area
- Remove the National Grids landholding from the allocation as part of the proposed waste management site (the substation is part of its national system and forms part of the important ring of substations serving central London)
- Development of the site in the future (currently operation as a gas holder station) would be best suited to a mixed development, capitalising on the existing local employment provision and providing residential and other associated development
- Good to put the waste management site near enough to a railway line for waste to be taken out of the borough by rail
- Pleased that a site for a waste transfer station has been identified within the Plan

Access Search Reference:

Section: Part 1

Policy: Proposals Map

Subject: Proposed Waste Management Site

Cross Reference: Various

Objector Names (addresses or agents not required):

Bonamy Tenants Association; Cook, Martin; Esmeralda Tenants' & Residents Association; GB Gas Holdings; Mills, Mairi; National Grid Company Plc; SecondSite Property Holding; Southwark Friends of the Earth; Whitehead, Jim

Access Representation Reference:

6596 6299 6747 6737 6351 6303 6349 6788 7131

STRATEGIC AREAS (OPPORTUNITY AREAS, ACTION AREAS & TOWN CENTRES)

Number of Submissions: 16 Number of Objectors: 15 Number of Supporters: 1

Main Points of Representations:General – Opportunity Areas

- Support the identification of two Opportunities Areas

Elephant & Castle Opportunity Area:

- The Opportunity Area should coincide with the emerging Comprehensive Development Framework boundary (2)

- Extend the Elephant & Castle Opportunity Area to include the NE quadrant of St Georges Circus including Milcote and Erland House
- Include the whole of the Newington Industrial Estate within the Elephant & Castle Opportunity Area
- Identify Areas for Regeneration on the Proposals Map

Old Kent Road Action Area:

- Include the derelict properties fronting St James's Road in the Old Kent Road Action Area
- Include the entire site known as Standard Wharf (plan attached) in the Old Kent Road Action Area
- Remove the Trafalgar conservation area from the Old Kent Road Action Area
- Extend the boundary of the Old Kent Road Action Area to include the Cantium Retail Park as a whole and the adjoining sites

Old Kent Road District Centre:

- The Cantium Retail Park as whole and adjoining sites should be identified as a retail based mixed-use development opportunity, including the development of large retail sheds

General – Town Centres:

- Would like a town centre at The Cut

Lordship Lane Town Centre:

- It is requested that the Proposals Map be updated appropriately to include the retail presence along Dog Kennel Hill within the Town Centre designation. This amendment will ensure consistency between the text of the first deposit UDP and the proposals map designation for the Lordship lane and Dog Kennel Hill District Centre (2)

Camberwell Green Town Centre:

- The inclusion of the Warner Bus Garage and surrounding housing in the Town Centre designation could encourage interest from warehouse-type outlets which is totally inappropriate adjacent to the Camberwell conservation area (2)

Access Search Reference:

Section: Part 2

Policy: Proposals Map

Subject: Action Areas

Cross Reference: Policy 1.2

Objectors Names (addresses or agents not required):

Access Storage Solutions; Bankside Residents Forum; Camberwell Traders Association; City Estates; Cliveden Estates Limited; Co-Operative Insurance Society Limited; Forgotten Corner of Camberwell; GLA; GLE Properties; Hays Plc; Hill, Derek; Legal and General Assurance Society Ltd; Oakmayne Properties

Access Representation Reference:

5674 5695 5675 5676 5720 6222 6535 6558 6739 6743 6786
6813 6980 6977 7132 7136

PROTECTED SHOPPING FRONTAGES

Number of Submissions: 11 **Number of Objectors:** 11 **Number of Supporters:** 0

Main Points of Representations:

- The protected shopping frontage should be extended to the west side of Borough High Street (only the East Side currently identified)
- Union Street, The Cut and Great Suffolk Street should be protected shopping frontages
- More retail facilities
- Proposed Shopping Frontages policy is inflexible - does not recognise the potential for comprehensive redevelopment to improve retail provision (through reconfiguration, relocation and improved retail unit sizes)
- The Proposals Map only identifies 'Town/District Centres' and 'Shopping Frontages' and therefore object to a policy which seeks to create an embargo on other uses within all 'shopping centres' and 'small

shopping parades' - identify specific areas on the Proposals map where a policy of restraint would be appropriate

Access Search Reference:

Section: Part 2

Policy: Proposals Map

Subject: Protected Shopping Frontages

Cross Reference: Various

Objectors Names (addresses or agents not required):

Bankside Residents Forum; Capcount Kings Reach (Jersey) Ltd; Sainsbury's Supermarkets Ltd; Trinity Newington Residents Association

Access Representation Reference:

5722 5732 6536 7023 7024

HERITAGE - PROTECTION OF STRATEGIC VIEWS, AIR QUALITY MANAGEMENT AREA (AQMA), CONSERVATION

Number of Submissions: 15 **Number of Objectors:** 15 **Number of Supporters:** 0

Main Points of Representations:

- Protection of Strategic Views is not clear on the map provided (particularly which side of the line the protected area lies)
- Designate the Thames as a conservation area like the huge areas in the south of the borough
- Concern over the Archaeological Priority Zone at Camberwell being greater in area than the designated town Centre - with respect to delays to future developments
- Strengthen policy to protect views from Camberwell/Denmark Hill
- Support the intent in relation to strategic views - but it would be valuable to also refer to the St Paul's Heights code of height restrictions as well
- The view of the dome of St Paul's from Camberwell Road must be protected
- The text to the proposals map should refer to conservation areas and archaeological priority zones being included on the map
- There is no reference to the views or policy for dealing with applications affecting them in the written statement - contrary to the advice in RPG3A
- Part of the Roupell Street and Waterloo Conservation Areas within the Hatfields area of Lambeth have been shown on the Proposals Map and should be deleted as proposals maps cannot lawfully designate land within another borough (2)
- Tall buildings policy states these may be appropriate when located in the central Activities Zone (outside strategic viewing corridors). However, the key diagram and the proposals map does not seem to identify a CAZ
- The Tower Bridge Conservation Area should probably be extended to include Potters Fields Park
- The Tooley Street North and South Conservation Areas should probably be revised to East and West to better reflect the changing character of the Street away from the Station
- The boundaries of Conservation Areas are almost impossible to read on the proposals map
- The text to the proposals map does not adequately reflect the Council's aspirations for tall buildings in particular locations e.g. London Bridge – needs to have some flexibility
- Strategic Views policy is limited to views of St Paul's. Develop a far wider ranging policy of valuing landmarks, skylines and prospects throughout the whole of Southwark

Access Search Reference:

Section: Part 1

Policy: Proposals Map

Subject: Heritage
Cross Reference: Various

Objector Names (addresses or agents not required):

Addis, Brian; Bankside Residents Forum; Camberwell Traders Association; Cook, Martin; Corporation of London; Eckersley, Cllr T; English Heritage; Government Office for London; London Borough of Lambeth - Les Brown; London Borough of Lambeth Planning; Phillips, Donald; Pool of London Partnership; Royal London Asset Management Ltd; Trinity Newington Residents Association

Access Representation Reference:

6522 6817 6673 6322 6283 7062 6445 6974 6767 6264 7125
7105 7104 6268 6372

HOUSING

Number of Submissions: 5 **Number of Objectors:** 5 **Number of Supporters:** 0

How many address the same issues: 2 (Total of 1 grouping(s))

What are the same issues raised:

- Map does not designate housing sites

Main Points of Objection:

- Sites such as Potter's Field should be designated for housing
- Map inappropriately designates too small an area as "suburban"
- The PIL at Parkhouse Street should be for residential
- Site at Queens Road, on either side of Lugard Road, should be residential

Access Search Reference:

Section: Part 1

Policy: Proposals Map

Subject: Housing

Cross Reference: Various

Objectors Names (addresses or agents not required):

Berkeley Homes Plc; Bradbury, Councillor David; Ebury Management; Hays Plc; London & Cleveland Investment

Objection Access Representation Reference:

5606 5919 5927 6553 7127

OTHER

Number of Submissions: 22 **Number of Objectors:** 22 **Number of Supporters:** 0

Main Points of Representations:

- It should be clearly stated that the proposals map may be subject to change following consultation in each individual SPG.
- Request that the Musset Paper works site at 44 Holland Street, SE1 be designated for a Category D land use
- Review the boundary of the Thames Policy Area to more closely accord to the Thames policy area referred to in the town and country paper (Mayor of London 2000)
- Objection to the quality of the draft Proposals Map as it is insufficient to identify the various proposed designations (in relation to the Kings Reach development on the north side of Stamford Street)
- Quality of the Proposals Map (similarity of colourings, shadings, and hatchings used to denote different areas, scale) makes it difficult to distinguish sites, boundaries and designations (4)

- Show the boundary of the borough at London Bridge and Blackfriars Bridge correctly
- The Proposals Map should indicate the adjacent areas (neighbouring boroughs)
- Show Thames Special Policy Area on the Proposals Map
- Include railway lines and stations on the Proposals Map
- Include mean high water on the Proposals Map
- The boundary line of the Dulwich Estate's scheme of management should be shown on a map in the replacement UDP
- More detail should be included on the map in respect of the relevant policies and proposals to which designations apply
- The plan contains no policies on flooding and the handling of applications in areas liable to flooding and there is no SPG covering this issue
- Object to the proposals map as far as it is identified for the London Bridge Area
- Designate access routes to Barge Moorings along Southwark Riverside
- A 'Proposed Area for Tall and Large Scale Buildings', should be included on the Proposals Map and cross-referred to relevant policies covering the London Bridge Opportunity Area
- Seek allocation for a new prison with the borough

Access Search Reference:

Section: Part 1

Policy: Proposals Map

Subject: Other

Cross Reference: Various

Objector Names (addresses or agents not required):

B&Q Plc; Bankside Residents for Appropriate Development (BROAD); Capcount Kings Reach (Jersey) Ltd; Corporation of London; Dulwich Estate; Ellson, Bill - Creekside Forum; Government Office for London; Greater London Authority; H M Prison Services; London Town Plc; The Newington Trust Estates; Phillips, Donald; Royal London Asset Management Ltd; Squires, R; Teighmore Ltd; Threadneedle Property Investments Ltd

Access Representation Reference:

5712	6208	6259	6244	6275	6277	6273	6272	6439	5454	6261
6262	6326	6981	6253	6274	7126	5714	6600	6241	6564	7124

PART ONE – SECTION 7 - OBJECTIVES

Number of Submissions: 46 Number of Objections: 25 Number of Supporters: 21

How many address the same issues?: (4 x 2) (2 x 3) 38 issues

What are the issues raised?:

1. Objections – need further work

1. Compulsory production of a masterplan for mixed use sites, BI
2. Also policies which restrict range of uses to be judged against objective 9; BI (PB)
3. Adding without impacting on MOL, BOL or open space into objective 8; FoE (SAB)
4. Should be objectives on waste disposal, tourism, sport, leisure, sustainability, energy through renewable energy; GoL (SAB, EM)
5. To encourage and support community involvement and enterprise and social equity; Lee (PB)
6. Promote off street car parking underground – in context of CCZ;N Car P (RW)
7. IS objective 12 enough to reduce congestion and pollution; S Eng (RW)

2. Objections – put in

1. Definition of development included in the glossary; EC (KT)
2. Addition of roles of regeneration partnerships and links between authorities; CoL
3. Riparian matters in objectives; CFx2, Tay x 2 (SC, SAB)
4. Historic environment in wording; CPCA (SC)
5. Design in objectives; DE (SC)
6. Add biodiversity and increase open space to objective 8; DSWC (SAB)
7. Put that objectives are not in the order of priority; FoE
8. Put easily accessible particularly by foot and public transport in objective 3; FoE (RW)
9. Strengthen objective 7 to say protect and improve; FoE (SC)
10. Add enabling into objective 7; FoE (SC)
11. Objective 7 should include water and energy management; FoE (SAB)
12. New objective to enable full public participation in the planning process and to remove barriers which hinder access to that process; FoE
13. Biodiversity should be mentioned in objective 8; GLA (SAB)
14. Objective 8 should be preserve or enhance; Teig (SAB)

3. Not relevant/wrong

1. A new objective to create open space; BOST (SAB)
2. Traffic Management; DE (RW)
3. To improve quality of life in the borough as an objective; DSWC (SAB)
4. The first 4 objectives are not planning; Tay

4. Support

1. Support sustainability objectives and regeneration; BH (SAB)
 2. Support general objectives; Cas Hse, D Phil, Trin New RA
 3. Support more quality and affordable housing; CH (LO)
 4. Support objective 7; E Conn
 5. Support objective 2; CoL (EM)
 6. General and 8; CPCA, EH, SEng (SAB, SC)
 7. Support objective 3; DE (PB)
 8. Support objective 9; DSWC, EN (LO)
 9. Support objective 2; DSWC (EM)
 10. General and particularly 9; Hays, LTP (LO)
 11. Support environmental thrust of objectives; D Phil
 12. Support of sport and recreation increasing employment mention; SE (SAB)
 13. Plan's support of SMEs; Tay (EM, PB)
-

Access Search Reference:

Section: Part 1

Policy: Section 7

Subject: Objectives

Responsible Officer: JT

Respondee Names

Bankside Open Spaces Trust 170, Berkley Homes Plc 51, Blackfriars Investments 60, Castle House 60, Eileen Conn 95, Corporation of London 24, Creekside Forum 32, Crystal Palace Community Association 185, The Dulwich Estate 15, The Dulwich Society Wildlife Committee 174, English Heritage 182, Friends of the Earth 59, Government Office for London 52, Greater London Authority 68, Guys and St Thomas 104, Hays PLC 50, Richard Lee 43, London Transport Property 46, National Car Parks Ltd 39, Donald Phillips 94, Sport England 175, JH Taylor 16, Teighmore 10, Trinity Newington Residents Association 82.

Representation References

5743	6625	6629	6639	6652	6160	6143	6347	5460	6344	6632	6653	6654	5470
6384	6308	6648	6348	6731	6655	6656	6387	6391	6866	6973	6145	5744	6657
6658	6779	6780	7066	6949	7045	6615	5738	6149	6781	6438	6557	5899	6324
6407	6634	6633	5462										

PART ONE – SECTION 8

Number of Submissions: 4 Number of Objections:4 Number of Supporters: 0

How many address the same issues?: 0

What are the issues raised?:

1. Objections – need further work

1. Several of the targets - social housing, CO2 emissions and recycling are unambitious. Dul Soc (SAB, LO)

2. Objections – put in

15. Recognise the overlap of areas when formulating OA and TC SPGs. SBEG

3. Not relevant/wrong

1. Canada Water and action areas should not have SPG; Shop Cent (SC)
2. Section on implementation with all of the council powers and services. PoLP

4. Support

Access Search Reference:

Section: Part 1

Policy: Section 8

Subject: Implementation

Responsible Officer: JT

Respondee Names

Dulwich Society Wildlife Committee 174, Pool of London Partnership 11, Shopping Centres Ltd 27, South Bank Employers Group 198.

Representation References

5533 6616 6364 7107

POLICY 1.1 – ACCESS TO EMPLOYMENT OPPORTUNITIES

Number of Submissions: 12 **Number of Objectors:** 12 **Number of Supporters:** 0

Main Points of Representations:

- Not clear what is meant by 'better access' to employment opportunities (only physical and locational accessibility are relevant to land use planning) (4)
- A 'lack of skills' is not a land use planning matter (4)
- Planning agreements should only be sought where they are necessary, relevant and fairly and reasonably related to a proposed development (4)
- Detailed requirements arising from this policy should be stated in the UDP – not relegated to SPG (4)
- Guidance on how planning agreements can achieve real results in terms of people accessing jobs required (2)
- Link to the explicit policy context of the Southwark Employment Strategy (1)
- Incentives for local employers to employ local people (1)
- Policy is weak in ensuring removal of employment barriers (1)
- Agreements could be unduly onerous on applicants (as details of what will be requirement in planning agreements is not clear) (1)
- Unreasonable to seek to impose an obligation on otherwise acceptable development in land-use terms (1)
- The Southwark labour market is not self contained – not all 'local people' (1)

Access Search Reference:

Section: Part 2

Policy: Policy 1.1

Subject: Access to Employment Opps

Cross Reference: N/A

Objectors Names (addresses or agents not required):

Bankside Business Partnerships, Bankside Residents Forum, Barton Willmore, Bellway Homes, Cross River Partnerships – Westminster City Council, Fairview New Homes Ltd, Galliard Homes, George Wimpey Central London, Lee, Richard, Roupakua, Sofia, Sainsbury's Supermarket Ltd

Access Representation Reference:

5483 5485 5486 5487 5488 5489 5490 5491 5492 6537 7043
7088

POLICY 1.2 – ACTION AREA PLANS

Number of Submissions: 17 Number of Objectors: 13 Number of Supporters: 4

Main Points of Representations:

- Is a 'statement of intent' to prepare SPG's, rather than a policy in its own right (8)
 - Support the proposed creation of Action Area Plans – outright(3)/with stipulations (8)
 - Policies or proposals to guide development in the identified areas should be clearly stated in the UDP (7)
 - No explanation as to how the specific characteristics of an area will be identified in the development frameworks (1)
 - Support policy which recognises the importance of small and medium size enterprises (1)
 - Make reference to the sustainability benefits of providing employment in close proximity to residential areas – reducing the need to travel (1)
 - Policy needs to refer to flexible growth and explicitly state that the SPG will be updated when circumstances dictate (1)
 - Support Canada Water's Action Area status and the identification that there is significant potential for growth in employment and population (1)
 - London Bridge, Elephant and Castle and Bankside and Borough are already overdeveloped and therefore the phrase 'significant growth' should not apply to these locations (1)
-

Access Search Reference:

Section: Part 2

Policy: Policy 1.2

Subject: Action Area Plans

Cross Reference: N/A

Objectors Names (addresses or agents not required):

Aylesbury NDC, Barton Willmore, Bellway Homes, Berkeley Group Plc and St James Group Ltd, Berkeley Homes (City and East London), Cook, Martin, Corporation of London, Fairview New Homes Ltd, Galliard Homes, George Wimpey Central London, Hays Plc, London Town Plc, London Transport Property, Network Rail, Shopping Centres Ltd, St George (South London) Ltd

Access Representation Reference:

5493 5494 5495 5496 5497 5498 5499 5500 5501 5503 5504
5505 5506 5507 6831 6832 7091

POLICY 1.3 – PREFERRED OFFICE LOCATIONS

Number of Submissions: 29 Number of Objectors: 27 Number of Supporters: 2

Main Points of Representations:

- Retention of Class B1 uses, or provision of 50% of the floor area in any new development for Class B1, only where appropriate (6)
- The circumstances where a change of use may be granted is not clear (5)
- Policies or proposals with respect to the POL should be clearly stated in the UDP (5)
- The requirement for existing B2 and B8 uses to include 50% B1 Business Use in an redevelopment is unreasonable and inflexible – pays no attention to market conditions (oversupply of office space in London and continuing downward trend) (5)
- Policy 1.3 should more closely accord with the proposed SDS policy (not limited to protecting the exiting stock of office floorspace) (5)
- Policy should promote other employment and wealth generators as being appropriate such as visitor amenities and attractions, hotels and training facilities, retail (make office locations more attractive – particularly important at street level) (4)
- The requirement for existing B2 and B8 uses to include 50% B1 Business Use in an redevelopment is unreasonable and inflexible – pays no attention to unsuitable building space (small sites, existing single floor uses, not well served by public transport) (4)
- Policy lacks flexibility (4)
- Conditional support for policy (4)
- Restricts the development potential of two major areas (London Bridge – Opportunity Area and Bankside and Borough – Action Area) – prejudices strategic regeneration (3)
- Object to the blanket restriction against the loss of B1 use (3)
- The principal of preferred industrial locations should not be used as a means to resist alternative development – encourage mixed-use development (more sustainable pattern of development) (3)
- Runs contrary to Policy 3B.5 of the draft London Plan (3)
- Is the 50% of the floor area of any new development gross or net? (3)
- Release of sites for non-employment purposes, such as residential, should be supported and reflects the guidance contained in PPG3 (3)
- Policy inadequate for the promotion of commercial office floorspace in POL (2)
- Policy does not have regard for premises that are no longer suitable for office development (small outdated office stock) (2)
- Silent on the preferred locations for hotel development (London Bridge) (2)
- Wording to the second part of the paragraph is ambiguous – make clear that the reference to 50% of floor area in any redevelopment relates only to sites that currently or most recently contained B2 or B8 (2)
- Important to establish a demand for the continuing use of commercial/ industrial space (2)
- Not clear the position where there is a proposed increase in B1 office use (2)
- Support the policy of identifying and protecting Preferred Office Locations in the Borough (2)
- No need for more office space (1)
- Office employment is particularly valuable at/near public transport nodes and needs higher protection (1)
- Policy is overly restrictive and constrains the development of hotel and residential development around London Bridge (an area with high accessibility) (1)
- Policy should be more positive in order to reflect the Council's aspirations for areas designated for office development (1)
- Not clear that the whole of Policy 1.3 and its reasons only relate to PIL (1)
- Policy should specifically identify live/work units as being appropriate – acceptable B1 use (1)
- Supporting leisure and tourist uses should be acceptable in the vicinity of the Thames Special Policy Area, while retail and A3 uses are necessary throughout Bankside to serve the new office growth (1)
- Policy is a barrier to mixed-use development (1)
- Southwark Plan should promote dense mixed-use development (1)
- Specifically object to Bankside and Borough as PIL – the effects of Policy 1.3 will be felt the strongest here because of the mixed-use character (1)

- Designated as part of London's Central Activity Zone (CAZ) – vision for this area is much more than a pure office location (1)
 - No reason given to suggest a lack of office premises in Southwark or London (1)
 - Ignores the potential for increases in office space on different footprints than currently exist (1)
 - Protects retail uses in existing retail areas, but unlikely to provide much protection for retail uses outside these areas or encourage provision (1)
 - B1 Office uses are effectively protected but B1(c) and B8 are not (1)
 - Concerned about the balance of policy in the context of other policies and also local objectives of achieving a rich mixture of uses in the area (1)
-

Access Search Reference:

Section: Part 2

Policy: Policy 1.3

Subject: POL

Cross Reference: N/A

Objectors Names (addresses or agents not required):

Bankside Business Partnerships, Bankside Residents Forum, Barton Willmore, Bellway Homes, Berkeley Homes (City and East London), Berkeley Homes Plc in relation to Lambeth College and Coach Park Site, Blackfriars Investments Ltd, BT Plc, Capcount Kings Reach (Jersey) Ltd, City Estates, Cook, Martin, Corporation of London, Fairview New Homes Ltd, George Wimpey Central London, GLA and TfL, Lake Estates Ltd, Union Street Ltd, Dorrington Properties Plc, London Electricity Group, London Transport Property, Minerva Ltd, Network Rail, Pool of London Partnerships, Royal Asset Management Ltd, Sainsbury's Supermarkets Ltd, SOUHAG (C/- Wandle Housing Association), St Martins Property Investments Ltd, Teighmore Limited, Threadneedle Property Investments Ltd, Whitehead, Jim

Access Representation Reference:

5548	5550	5552	5553	5554	5558	5559	5561	5562	5577	5578
5579	5580	5581	5582	5583	5584	5586	5588	5589	5590	5591
6538	6539	6834	6835	6836	6917	7092				

POLICY 1.4 – PREFERRED INDUSTRIAL LOCATIONS

Number of Submissions: 18 Number of Objectors: 17 Number of Supporters: 1

Main Points of Representations:

- Need more flexibility in allowing other employment uses (such as retail) (7)
- Should allow for alternative uses (non-employment uses) where there is no demand or need for B1, B2 and B8 (6)
- Need to include in UDP any relevant guidelines in SPG (5)
- The policy is not clear where uses other than B Class Uses will be permitted in the Preferred Industrial Locations (4)
- No evidence of a review of the extent of employment land and future levels of demand and formulated policies on this basis (2)
- Policy 1.4 should relate solely to PIL's which are of strategic importance (2)
- Indicate that policy will not apply where part of the Borough has been designated as an Opportunity Area (2)
- Need a separate policy for Strategic and Local Preferred Industrial Locations (allow mixed use in 'local' PIL) (1)
- There is no indication that the plan has considered the issue of problem industries and the safeguarding of land where it can be accommodated (1)
- Require much greater protection for industrial land (protection of jobs) (1)
- Separate policy for warehouse clubs (1)
- Number of areas defined on the proposals map as PIL are made up of an assortment of uses – the blanket allocation of these areas fails to recognise the nature of existing operations (1)

Access Search Reference:

Section: Part 2

Policy: Policy 1.4

Subject: PIL

Cross Reference: N/A

Objectors Names (addresses or agents not required):

Access Storage Solutions, B&Q Plc, Barton Willmore, Bellway Homes, Bevington P & J (Messrs) & Pickford J. M (Mrs), Bottomley, Henry, The Camberwell Society, Costco Wholesale UK Limited, Ebury Management Ltd, Fairview New Homes Ltd, George Wimpey Central London, Government Office for London, Harmsworth Keys Printing Ltd, Legal and General Assurance Society Ltd, Network Rail, Oakmayne Properties, Presentation Housing Association, WTA Specialist Architectural Metalworks

Access Representation Reference:

5594 5596 5597 5599 5600 5601 5602 5607 5609 5610 5612
5613 5615 5716 6871 6988 7052

POLICY 1.5 – MIXED-USE DEVELOPMENTS

Number of Submissions: 36 **Number of Objectors:** 30 **Number of Supporters:** 6

Main Points of Representations:

- Loss of employment land (B Class Use) should be permitted in certain circumstances and when it is appropriate (19)
- Need to include in UDP any relevant guidelines in SPG (7)
- Policy is too restrictive and prescriptive, does not allow proposals to be treated on their merits (site-specific circumstances – like where an existing employment use has been relocated within the Borough) (as required by PPG1) (5)
- Release of sites for non-employment purposes, such as residential, should be supported and reflects the guidance contained in PPG3 (5)
- Does not take into account whether B Class uses are viable in the particular location (3)
- In favour of mixed developments – outright (3)/conditional (3)
- Need to make allowance for uses other than B Class use that are employment generators, for example, live/work, A1 Retail, A3 Restaurant, tourism, leisure (2)
- The amount of employment floorspace should be able to be decreased if it results in a more efficient use of land (2)
- Appears to preclude the provision of housing as part of a mixed-use scheme (2)
- Does not take into account potential for residential use as proposed by Policy 3B.5 of the draft London Plan in the context of mixed-use development in the CAZ (2)
- Instead of floorspace, use the number of jobs as a benchmark (1)
- Not necessary to protect all business sites outside of designated areas (POL, PIL, Town Centres) (1)
- Mixed use could cause land use conflicts (single use alternatives should not be prevented where appropriate) (1)
- Does not include provision and/or extension of retail uses within mixed-use developments (1)
- There should be no policy impediment to the expansion of cultural, tourism and leisure facilities on previous employment sites (1)
- Any opportunity to utilise underused and non-protected employment land for residential should be taken (1)
- Important to establish demand for the continued use of commercial/industrial sites (1)
- Vague with regard to what uses will be acceptable within mixed-use developments (1)
- Drop the requirement that there should be no net loss of Class B floorspace (for sites that currently or recently contained such use) (1)
- Policy is inappropriate given the other employment protection tools in the Plan – the point of creating areas for employment land is undermined by this Policy if all employment land/floorspace is protected (1)

Access Search Reference:

Section: Part 2

Policy: Policy 1.5

Subject: MUD

Cross Reference: N/A

Objectors Names (addresses or agents not required):

Access Storage Solutions, Aylesbury NDC, Bankside Residents Forum, Barton Willmore, Bellway Homes Ltd, Berkeley Group Plc and St James Group Ltd, Berkeley Homes (City and East London), Berkeley Homes Plc in relation to Lambeth College and Coach Park Site, Blackfriars Investments Ltd, Bottomley, Henry, BT Plc, Castle House, Walworth Road, City Estates, Dulwich Estate, The, Ebury Management Ltd, Fairview New Homes Ltd, Galliard Homes, George Wimpey Central London, GLA and TfL, Laing Homes South East Thames, Land Securities, London & Cleveland Investment, London Electricity Group, London Town Plc, London Transport

Property, Newington Trust Estate, The (x 2), Oakmayne Properties, SOUHAG (C/- Wandle Housing Association) (x 2), St George (South London) Ltd, St Martins Property Investments Ltd, Tate, Whitehead, Jim

Access Representation Reference:

5618	5619	5620	5621	5622	5623	5624	5625	5626	5627	5628
5629	5630	5631	5632	5633	5634	5635	5636	5637	5638	5639
5641	5642	5644	5645	5646	5940	6841	6842	6845	6846	6847
6916	6918	7054								

POLICY 1.6 – TOWN CENTRE STATEMENTS

Number of Submissions: 10 Number of Objectors: 9 Number of Supporters: 1

Main Points of Representations:

- Support the proposed preparation of town centre statements with the aim to guide development and identify specific attributes which need to be enhanced and developed
- Plan fails to set out the Council's policies and proposals in respect of town centre - is a 'statement of intent' to prepare SPG (5)
- Contrary to the guidance & advice in PPG12 for the Council to seek to delegate town centre policies to SPG (4)
- Detailed response will be made to the Camberwell Green SPG as some major influences on the area have been missed out and others miss-stated
- Plan does not provide any clear advice in line with PPG6 – including an overall strategy for centres within the borough, information on the hierarchy of centres etc.
- Quality shops should be encouraged into Peckham Centre – the southern gateway to Peckham requires an imaginative scheme to encourage the shoppers

Access Search Reference:

Section: Part 2

Policy: Policy 1.6

Subject: Town Centres

Cross Reference:

Objectors Names (addresses or agents not required):

Aylesbury NDC; Barton Willmore; Bellway Homes Ltd; Camberwell Traders Association; Fairview New Homes Ltd; Galliard Homes; George Wimpey Central London; Government Office for London; London Transport Property; Peckham Society;

Access Representation Reference:

5510 5511 5513 5512 5515 5519 6861 6892 6894 7004

POLICY 1.7 – PROTECTING THE RANGE OF SERVICES AVAILABLE

Number of Submissions: 19 **Number of Objectors:** 18 **Number of Supporters:** 1

Main Points of Representations:

- Allow redevelopment to residential if the premises are vacant and there is no prospect of viable A uses on the site or the existing use is detrimental to the amenity of residents
- Allow for comprehensive retail redevelopment within the policy (3)
- Declare the Mussett Site in Holland St D1
- Provide a clearer framework for retail development in the body of the Plan rather than in SPG (2)
- Protection of A1 uses in town centres and along protected shopping frontages in not strong enough – particularly with the clause ‘unless it can be shown that the proposed use enhances the range of services available locally’ (2)
- Wording too vague – could be detrimental to small retail businesses
- PPG6 specifically identifies health care uses as appropriate for Development Plans to include in Town Centres – this is not facilitated by the policy (2)
- Increase flexibility in relation to changes of use to non retail uses above ground floor level
- Re-draft as a criteria based policy
- Prepare Management Frameworks for Neighbourhood and Local centres and other commercial frontages
- Impose a moratorium on hypermarkets over 20,000 square feet

Access Search Reference:

Section: Part 2

Policy: Policy 1.7

Subject: Protecting Range of Services

Cross Reference: N/A

Objectors Names (addresses or agents not required):

Aylesbury NDC; Benington, Pauline; Capcount Kings Reach; City Estates; Cook, Martin; Dulwich Estate; Falcon Point Management Group; Guy’s and St Thomas’ Hospital; Newington Trust Estate; NHS Estates (Department of Health); Sainsbury’s Supermarkets Ltd; Shopping Centres Ltd; Southwark Chamber of Commerce; Southwark Friends of the Earth; Tesco Stores Ltd

Access Representation Reference:

5524 5525 5526 5529 5530 5532 5534 5537 5539 5541 5722 5730 5831 6173
6207 6542 6546 6893 6895

POLICY 1.8 – MIXED-USE IN TOWN CENTRES

Number of Submissions: 3 **Number of Objectors:** 3 **Number of Supporters:** 0

Main Points of Representations:

- Housing should be allowed in Town Centres in order to encourage mixed use.
 - Inflexible and restrictive approach in relation to the no net loss of commercial or community floorspace – should be based on recognised need (2)
-

Access Search Reference:

Section: Part 2

Policy: Policy 1.8

Subject: MU in TC

Cross Reference: N/A

Objectors Names (addresses or agents not required):

Greater London Authority; London Electricity Group; Royal London Asset Management Ltd

Access Representation Reference:

5936 6523 6541

POLICY 2.1 – EDUCATIONAL ESTABLISHMENTS

Number of Submissions: 4 Number of Objectors: 4 Number of Supporters: 0

Main Points of Representations:

- Only new locally orientated educational institutions are required
 - Realistic approach should be taken towards the preservation and enhancement of existing educational establishments, with support being given to proposals that seek to enhance an existing facility, albeit through partial redevelopment
 - Support decision to preserve and enhance existing educational establishments and to provide new facilities in areas of deprivation, but it is important that a realistic approach is taken to redevelopment of sites which can achieve this whilst at the same time facilitate an element of alternative development (in relation to Potters Field specifically)
 - Object of the policy should be to protect purpose built accommodation, such as teaching and research buildings (not leased commercial space etc.)
-

Access Search Reference:

Section: Part 2

Policy: 2.1

Subject: Education Establishments

Cross Reference:

Objectors Names (addresses or agents not required):

Berkeley Homes (City & East London); Berkeley Homes Plc; City Estates; Cook, M

Access Representation Reference:

6544 6568 6574 6953

POLICY 2.2 – EDUCATIONAL DEFICIENCY

Number of Submissions: 2 Number of Objectors: 2 Number of Supporters: 0

Main Points of Representations:

- Should be an all age/race/ religion initiative rather than something adults talk to children about
 - Concerned about how educational applications will be prioritised.
-

Access Search Reference:

Section: Part 2

Policy: 2.2

Subject: Education Deficiency

Cross Reference:

Objectors Names (addresses or agents not required):

Bankside Business Partnerships; Southwark disability Forum

Access Representation Reference:

6873 6874

POLICY 2.3 – ENHANCEMENT OF COMMUNITY FACILITIES

Number of Submissions: 11 Number of Objectors: 9 Number of Supporters: 2

Main Points of Representations:

- Include refer to 'expanded where possible' in addition to 'preserve and enhance'
 - Protection of Southwark Playhouse
 - Designate Holland Street for D uses with provision for linked B use
 - Support the aims of the Policy (preserve & enhance community facilities) 2
 - New policy concerning the retention of public houses as they are important community facilities
 - Desperate shortage for facilities for children & young people in the Old Jamaica Road, Spa Road, Ness Street and Frea Street area – designate for community facility (2)
 - Include provision to protect and promote community resource centres (particularly the existing Community Health Council offices)
 - In terms of replacement provision of a community facility – regard should be had to the function and usage – not the scale
 - The two criteria with respect to replacing a community facility contradict each other
-

Access Search Reference:

Section: Part 2

Policy: 2.3

Subject: Community Facilities Enhancement

Cross Reference:

Objectors Names (addresses or agents not required):

Bankside Open Spaces Trust; Bankside Residents Forum; Berkeley Homes plc; Cook, Martin; Greenwood, Adrian; Hughes, Simon MP; Justice for Patients; Legal and General Assurance Society; Mount Anvil plc; Taylor, JH

Access Representation Reference:

5747 5845 5858 6342 6336 6339 6519 6875 6955 7017 7021

POLICY 2.4 – PROVISION OF COMMUNITY FACILITIES

Number of Submissions: 7 Number of Objectors: 6 Number of Supporters: 1

Main Points of Representations:

- Include reference to expanded on top of 'preserve and enhance'
 - Protection of Southwark Playhouse
 - More youth facilities required
 - More sports facilities required
 - Lack of local facilities – particularly primary care, leisure centre, public swimming pool, crèches, community centre
 - Support aims of Policy with respect to the creation of new facilities
 - Need for public investment in existing facilities at Camberwell – a public transport interchange would kick-start the regeneration
 - Desperate shortage for facilities for children & young people in the Old Jamaica Road, Spa Road, Ness Street and Frea Street area – designate for community facility (2)
 - Include provision to protect and promote community resource centres (particularly the existing Community Health Council offices)
-

Access Search Reference:

Section: Part 2

Policy: 2.4

Subject: Community Facilities Provision

Cross Reference:

Objectors Names (addresses or agents not required):

Bankside Residents Forum; Berkeley Homes plc; Camberwell Traders Association; Greenwood, Adrian; Hughes, Simon MP; Justice for Patients

Access Representation Reference:

5848 6887 6888 6889 7115 7020 7022

POLICY 2.5 - PLANNING OBLIGATIONS

Number of Submissions: 29 **Number of Objections:** 28 **Number of Supporters:** 1

How many address the same issues: 21 (Total of 5 grouping(s))

What are the same issues raised:

- Residents and community groups should be involved in agreeing S106
- The process should be more transparent
- The Project Bank should be in the public realm
- Planning agreements can not be mandatory, but rather are sought
- The 5 tests of Circular 1/97 should be included in and restrict the policy
- Conditions might be more appropriate
- Requirements should not be relegated to SPG
- The list of improvements in each area should be in the UDP not SPG

Main Points of Objection:

- Need to spread improvements
- Planning obligations should not be sought to improve existing shortcomings in an area
- Improving transport facilities for cycling and walking should be included
- Section 106 should not be used to allow projects which adversely affect nature conservation
- Second part reads wrong as implies that you can buy permissions, whereas it should say that a planning agreement enable a development to go ahead which would otherwise be unacceptable.
- Remove reference to "not of direct relevance to the site"
- Need to be specific about when, what sites, and what will be sought
- Infrastructure such as hospitals should also be specified
- Community development trusts and cultural development should also be specified
- Infrastructure for housing and employment targets should also be specified
- Policy does not distinguish between positive and negative impacts
- Policy should not include cumulative effects

Access Search Reference:

Section: Part 1

Policy: 2.5

Cross Reference:

Subject: Planning Obligations

Objectors Names (addresses or agents not required):

Bankside Residents Forum, Barton Willmore Partnership, Bellway Homes Plc, Berkeley Homes (City and East London), Berkeley Homes Plc, Berkeley Group Plc & St James Group Plc, Creekside Forum, Cyclists Touring Club, Dulwich Society, Esmeralda Tenants' & Residents Association, Fairview New Homes, Galliard Homes, George Wimpy Plc, Government Office for London, Harmsworth Quays Printing LTD, Department of Health, Lee, Richard, London Town PLC, North Southwark Community Development Group, Peckham Voluntary Sector, Pool of London, Sainsbury's Supermarket Ltd, South Bank Employer's Group, St George (South London) Ltd, Teighmore Limited, Willowbrook Centre

Objection Access Representation Reference:

5849 5856 5859 6177 6234 6235 6254 6284 6286 6287 6292 6328 6335 6337
338 6394 6545 6573 6592 6749 6808 6854 6855 6928 6956 6975 7015 7026
7070

POLICY 3.1 - ENVIRONMENTAL EFFECTS

Number of Submissions: 8 Number of Objections: 7 Number of Supporters: 1

How many address the same issues: 2

What are the same issues raised:

- Lack or no obvious reference to air quality or the air quality action plan.

Main Points of Objection:

- Insufficient emphasis of the capacity of the environment to promote human health
- No reference to the likely affects of development on air quality
- The word 'significant' is subject to interpretation
- Codes of construction practice are not discussed
- Alternative refuelling is not discussed
- Traffic management is not discussed
- Home zones are not mentioned
- More robust policy requiring an air quality impact assessment should be included.
- Anti-pollution measures which can be achieved through negotiation within the framework of section 106 agreements
- No reference is made to discouraging car use dependency
- No discussion of travel plans

Access Search Reference:

Section: Part 2

Policy: 3.1

Cross Reference: Various

Subject: Environmental Effects

Objectors Names (addresses or agents not required):

Taylor, JH, Dulwich Society, GLA, Southwark, Friends of the Earth, Esmarelda TRA, Whitehead, J

Objection Access Representation Reference:

5915 5913 6377 6423 6459 6750 6830 6984

POLICY 3.2 - AMENITY

Number of Submissions: 14 **Number of Objections:** 13 **Number of Supporters:** 1

How many address the same issues: 9 (divided into 7 and 2)

What are the same issues raised:

- Wording is not sufficiently precise and fails to guide developers
- Policy too weak and vague as it stands

Main Points of Objection:

- Policy too weak and vague as it stands
- Wording is not sufficiently precise and fails to guide developers
- Substantial loss of amenity needs to be defined or quantified in some way as it is subjective and open to interpretation
- Unduly onerous
- Areas of open space within housing estates are not given appropriate protection

Access Search Reference:

Section: Part 2

Policy: 3.2

Cross Reference: Various

Subject: Amenity

Objectors Names (addresses or agents not required):

Southwark Green Party, Royal London Asset Management Ltd, Roupakia Sophia, London Town Plc, City Estates, Minerva Plc, Capcount Kings Reach (Jersey) Ltd, Bennington, Pauline, Willowbrook Centre, Dulwich Society, Esmarelda TRA, North Southwark Community Development Group, Bankside Open Spaces Trust, Taylor, JH

Objection Access Representation Reference:

5917 5918 5920 5921 5922 5923 5924 5926 6350 6380 6752 6797 7058 5925

POLICY 3.3 - ENERGY EFFICIENCY

Number of Submissions: 13 **Number of Objections:** 12 **Number of Supporters:** 1

How many address the same issues: 7 (divided by 2, 2, 3)

What are the same issues raised:

- Does not adequately address policies in the draft London plan
- Exploiting renewable energy has not been fully exploited

Main Points of Objection:

- Does not adequately integrate land use and transport policies
- Does not meet the standards of best practice
- Does not identify sites for renewable energy production and provision
- No mention of daylight and sunlight considerations
- Energy efficiency and the use of renewable energy are two separate issues and should be treated as such
- Wish to see the phrase 'and constraints deleted from the policy
- No statement in support of wind energy
- Does not adequately address policies in the London Plan
- No mention of BREEAM
- No mention of Combined Heat and Power
- Word 'encourage' is too weak
- Listed building may not be capable of achieving energy saving targets

Access Search Reference:

Section: Part 2

Policy: 3.3

Cross Reference: Various

Subject: Energy

Objectors Names (addresses or agents not required):

Creeside Forum, London Assembly, St Martins Property Investments Ltd, Department of, Trade and Industry, Dulwich Society , Wirtz, Laura, McCarthy, Donnachadh, GLA, Southwark Friends of the Earth, Whitehead, Jim

Objection Access Representation Reference:

5928 5929 5930 5933 5935 6199 6290 6294 6382 6426 6461 6598 5937

POLICY 3.4 - WASTE

Number of Submissions: 14 **Number of Objections:** 12 **Number of Supporters:** 2

How many address the same issues: 3

What are the same issues raised:

- Policy does not adequately cover a waste local plan and there is a absence of key details

Main Points of Objection:

- Data is missing from the policy, such as waste arisings, waste management facilities, waste sustainability and construction and demolition waste.
- Polluting impacts of landfill and incineration need to be removed as these forms of disposal form part of the governments waste strategy.
- Impacts should include unsightly location of waste facilities
- Commercial and retail developments should contribute to the capital costs of good quality litter/recycling bins
- Amend policy to reflect a preferred waste hierarchy

Access Search Reference:

Section: Part 2

Policy: 3.4

Cross Reference: Various

Subject: Waste

Objectors Names (addresses or agents not required):

Kinrade, Derek, Dulwich Society, St George (South London Ltd), McCarthy, Donnachadh, GOL, GLA, Southwark Friends of the Earth, Esmarelda, TRA, Camberwell Traders Association, Bankside Residents Forum, Whitehead, Jim, Addis Brian

Objection Access Representation Reference:

5941 6081 5939 5945 6297 6298 6383 6412 6429 6463 6562 6753 6966 7025
5955 6431

POLICY 3.5 - WATER

Number of Submissions: 6 Number of Objections: 4 Number of Supporters: 2

How many address the same issues: 11 (Total of 4 grouping(s))

What are the same issues raised:

- Relationship to protection of open space
- "Highest reasonable" could result in too high density, not at human scale
- "Highest reasonable" only in accordance with local wishes
- Needs to be compatible with local context
- Density should not have upper limit

Main Points of Objection:

- Negative definition referring to the Thames value in historical and environmental terms.
 - The phrase recycle grey water should also include rainwater.
 - Policy should include reference to encouraging environmentally innovative schemes to conserve water through appropriate location, design, layout, landscaping, materials and by using water efficient products
-

Access Search Reference:

Section: Part 2

Policy: 3.5

Cross Reference: Various

Subject: Water

Objectors Names (addresses or agents not required):

Thames Water Property Services, Creekside Forum, Dulwich Societ, Whitehead, Jim, GLA

Objection Access Representation Reference:

5953 5954 6385 6868 5955 6431

POLICY 3.6 – HERITAGE CONSERVATION

Number of Submissions: 20 **Number of Objectors:** 18 **Number of Supporters:** 2

How many address the same issues: 4

What are the same issues raised:

- The policy is unduly onerous

Main points of objection:

- Clearer guidelines are needed on heritage conservation and conservation areas.
- We consider that this policy is too general and should specifically refer to and endorse the various tests and criteria presented for example in s.54a and s70 of the town and country planning act 1990
- Clearer wording and terminology that is in line with that used in PPG15 and PPG16 in this section would help in clarifying and understanding the connection with the built historic environment.
- 'Planning proposals that will adversely affect heritage resources will not normally be acceptable'. This statement needs to be defined further and clarified as to its meaning and the special circumstances that would allow for such proposals to go ahead.
- Policy fails to address the importance of historical but non-listed buildings in non-conservation area.
- This policy should be more positive in its approach to conservation areas. It should actively encourage redevelopment where this would result in more appropriate uses or a more appropriate design/layout than presently exists in a conservation area.
- There are too many qualifying phrases, e.g., "where practical", "where appropriate".

POLICY 3.7 – ARCHAEOLOGY

Number of Submissions 12 **Number of Objectors:** 11 **Number of Supporters:** 1

How many address the same issues: Most

What are the same issues raised:

- Unduly onerous

Main points of objection:

- The policy is unduly onerous and unreasonable and fails to reflect the advice set out in PPG16.
- It is not clear from this policy as to the level of information which is required to be produced by the application in an archaeological assessment.
- The words “important archaeological remains” is the first paragraph of paragraph 3.7 and is too vague.
- Archaeology is spelt incorrectly

POLICY 3.8 - MOL

Number of Submissions: 23 **Number of Objections:** 23 **Number of Supporters:** 0

How many address the same issues: 5 2

What are the same issues raised:

- Policy fails to reflect the advise in PPG17 regarding the need to maintain an adequate supply of open space and sports and recreational facilities.
- It is unreasonable and onerous for a proposed development to meet all of the criteria set out in the first half of the policy
-

Main Points of Objection:

- Areas of MOL should not be included in other designated zones such as Action Zones that have a contradictory purpose
- MOL needs to be protected increased and enhanced, not just protected.
- There is no mention of providing new open land of any kind
- There is an abundance of MOL in the South of the borough and a deficiency of other forms of open space. Consideration should be given to diversifying the range of open space in this part of the borough.
- Absence of any indication that there will be presumption against development other than for, and in relation to, the appropriate uses set out in PPG2.
- Policy does not make provision for scenarios where modest development could be promoted on a site in exchange for an appropriate package of planning benefit.
- Public and Private Playing fields have particular value and importance and need additional protection
- Policy does not mention the value of the general purpose of public highways in the borough

Access Search Reference:

Section: Part 2

Policy: 3.8

Cross Reference: Various

Subject: MOL

Objectors Names (addresses or agents not required):

Network Rail, Berkeley Group Plc & St James Group Plc, Bellway Homes Ltd, Geroge Wimpey Central London, Fairview New Homes, Barton Wilmore, Alvey Tenants and Leaseholders Association, Whitehead Jim, London Wildlife Trust Centre for Wildlife Gardening, McCarthy, Donnachadh, London Electricity Group, Dulwich Society, Dulwich Estates, GOL, Bonamy TA, BACC '84 TRA, Sport England, North Southwark Community Development Group, Peckham Voluntary Sector Forum, Willowbrook Centre, Bankside Open Spaces Trust

Objection Access Representation Reference:

5973 5974 5975 5976 5977 5978 5979 5980 6231 6302 6320 6392 6408 6413
6596 6599 7006 7039 7050 7053 7082

POLICY 3.9 - BOL

Number of Submissions: 21 **Number of Objections:** 19 **Number of Supporters:** 2

How many address the same issues: 6 (4 and 2)

What are the same issues raised:

- Relationship to protection of open space
- "Highest reasonable" could result in too high density, not at human scale
- "Highest reasonable" only in accordance with local wishes
- Needs to be compatible with local context
- Density should not have upper limit

Main Points of Objection:

- BOL needs protection and enhancement not just protection
- There is no reasonable or statutory basis for seeking to apply a policy to protect BOL which is effectively as onerous as the policy to protect MOL. It is unreasonable and onerous for a proposed development to meet all of the criteriaset out in the policy
- The plan should state the council's intention to undertake a robust and up to date assessments of BOL and other open spaces in accordance with PPG17
- The legal status of BOL should be clarified
- There is no mention of providing new open land of any kind
- Draft policy should recognise that development within or adjoining BOL may be desirable to allow small scale structures where they would support the existing recreational uses
- There should be a map and schedule of the MOL
- Both public and private playing fields have particular importance and need additional protection
- A more flexible approach to open space provision should be taken and pockets of open space should not be protected for their own sake.
- Public highways are not referred to.

Access Search Reference:

Section: Part 2

Policy: 3.9

Cross Reference: Various

Subject: BOL

Objectors Names (addresses or agents not required):

Southwark Green party, Network Rail, London Town Plc, Barton Wilmore, Bellway Homes Ltd, Fairview New Homes Ltd, Dulwich Estate, Friends of Dulwich Station, Whitehead Jim, Tate, South Dock Marina Berthholder's Association, Pidgeon, caroline, North Southwark Community Development Group, Peckham Voluntary Sector Forum, Cook, Martin, Sport England, Willowbrook Centre, Bankside Open Spaces Trust, Dulwich Society Wildlife Committee, Paxton, John, McDonald, Simon

Objection Access Representation Reference:

5991 5992 5993 5994 5995 5997 5998 5999 6001 6310 6362 6621 6800 7007
7013 7036 7051 7055 7083 6002 6003

POLICY 3.10 - OTHER OPEN SPACES

Number of Submissions: 62 **Number of Objections:** 59 **Number of Supporters:** 3

How many address the same issues: 50 (43, 3, 2, 2)

What are the same issues raised:

- Any open land currently designated under the 1906 act protecting open spaces should have no worse protection within the new Southwark Plan
- Retain the existing protections under the 1906 public open spaces act for all public open space
- Concern over the very broad approach that is being taken in this policy
- There is no schedule of other open spaces in terms of what open spaces this policy protects

Main Points of Objection:

- There is no requirement for the creation of new open space in the areas that are deficient
- Any open land currently designated under the 1906 act protecting open spaces should have no worse protection within the new Southwark Plan
- Retain the existing protections under the 1906 public open spaces act for all public open space
- There is no mention of providing new open land of any kind
- Land of local importance could be put to better uses including housing or community facilities
- The types of open spaces which could be included are not defined.
- The exceptional circumstances which could make development appropriate are not defined
- Better protection of open land is required
- Concern over the very broad approach that is being taken in this policy
- Object to limited number of open spaces shown on the proposals map
- There is no schedule of other open spaces in terms of what open spaces this policy protects
- The UDP should not seek to control the use of open spaces in private ownership as public open spaces

Access Search Reference:

Section: Part 2

Policy: 3.10

Cross Reference: Various

Subject: Other Open Space

Objectors Names (addresses or agents not required):

Threadneedle Property Investments Ltd, Dulwich Estate, Berkeley College Homes, Adenwalla, Pauline, SOUHAG, Trinity Lock Residents Association, Lee, Richard, Khambatta, Norman, Cook, Martin, Bennington, Pauline, Rigg, James, Leung, Kam Hong, Leung, Beatrice Webb, R, Pinnick, Gina and Spenser, Robert, Staunton, John F, Long, T (Mr), Redriff TA, Coxton, JA, Thomas, AF, Padmore, John, Parker, Mark, Ziehfrend, Jean and Peter, James, Toby, Smith, graham, Pingarron, Mercedes, Novak, David R, Brunswich Quey Residetns Association, Picken, Hanna, Untied House Residents Association, Koura, Stan (Mr and Mrs), Tate, Watson, P, Willowbrook Centre, Phillips, B, Jones, Gwen, Michaelides, M and T (Drs), Dulwich Society, Foot, David Adrian, Land Securities, Addis, Brian, Farrugia, Mark, Gilbert, Ray and Dautroy, Beatrice, Church of the Immaculate Conception, Canada Water Campaign, Marsh, Elizabeth, Wirtz, Laura, Stewart, SM (Mr and Mrs), Murray, Lisa, St Martins Property, Investments, Todd, Peter, North Southwark Community Development Group, Bankside Business Partnership, Eckersley, Toby (Cllr), Peckham Voluntary Sector Forum, Cook, Martin, Bankside Residents Forum, Taylor, JH, Whitehead Jim, Surrey Docks City Farm

Objection Access Representation Reference:

5989	6004	6007	6008	6009	6011	6013	6014	6016	6017	6091	6095	6099	6103
6108	6112	6134	6154	6157	6161	6169	6174	6185	6193	6204	6214	6219	6227
6232	6280	6291	6315	6321	6353	6361	6386	6397	6399	6405	6416	6425	6441
6468	6476	6498	6500	6505	6511	6515	6566	6593	6801	6941	6944	7008	7019
7027	7044	7095	6012	6018	6132								

POLICY 3.11 - BIODIVERSITY

Number of Submissions: 13 **Number of Objections:** 12 **Number of Supporters:** 1

How many address the same issues: 4

What are the same issues raised:

- Policy does not meet the requirements of the Mayor's biodiversity strategy and the draft London Plan
- Failure to refer to the promotion of biodiversity in all new developments.

Main Points of Objection:

- Policy does not meet the requirements of the Mayor's biodiversity strategy and the draft London Plan
- Does not protect species or species under threat in London
- No direction or encouragement given for revitalising depressed sites or areas by identification.
- No commitment to a local biodiversity action plan or proactive habitat creation.
- Failure to refer to the promotion of biodiversity in all new developments.
- Lack of recognition of sites of nature conservation importance.
- Wording implies that only areas of recognised or designated importance are protected

Access Search Reference:

Section: Part 2

Policy: 3.11

Cross Reference: Various

Subject: Biodiversity

Objectors Names (addresses or agents not required):

Whitehead, Jim, Taylor, JH, London Wildlife Trust Centre for Wildlife Gardening, London Assembly, Carr, Justin, Southwark Green Party, McCarthy, Donnachadh, Dulwich Society Wildlife Committee, Lawson, Peter, GLA, English Nature, Bankside Open Spaces Trust

Objection Access Representation Reference:

6023 6019 6020 6021 6022 6024 6025 6304 6401 6427 6433 6464 7056

POLICY 3.12 – TSPA

Number of Submissions: 15 **Number of Objectors:** 10 **Number of Supporters:** 5

How many address the same issues: None

What are the same issues raised: N/A

Main points of objection:

- A 100m wide strip should be designated all along the South Bank to enhance the river in the long term future and not allow office development on the riverside.
- Legislation requires boroughs to declare a Thames policy area the word special is superfluous.
- The phrase 'reflect the strategic importance of the river Thames' is pretty meaningless and fails to convey the need for developments to respect the river.
- There is nowhere for people to sit and relax undisturbed along the riverwalk any more.
- Policy refers to RPG3b/9b, however, reference should also be made to the draft London Plan (in particular Annex 2), and to the promotion of the Thames for transport, tourism and recreation in line with the draft London Plan. The importance of the River Thames for biodiversity should be reflected in the 'reasons' section of the policy.
- More riverside areas should be included in the TSPA to enhance not just preserve. This would prevent intrusive development along the river in the future.
- There is no designation of access routes to barge moorings along Southwark Riverside.
- There is no policy evident for the designation, retention and repair of the former ferrymans stairs.

POLICY 3.13 - SUSTAINABILITY

Number of Submissions: 13 **Number of Objections:** 12 **Number of Supporters:** 1

How many address the same issues: 4

What are the same issues raised:

- The requirement for a sustainability appraisal to be submitted with every planning application is unreasonable and onerous and not based upon any statutory or legislative requirement
- Policy is cast too generally and should specify thresholds as criteria

Main Points of Objection:

- The requirement for a sustainability appraisal to be submitted with every planning application is unreasonable and onerous and not based upon any statutory or legislative requirement
- Policy is cast too generally and should specify thresholds as criteria

Access Search Reference:

Section: Part 2

Policy: 3.13

Cross Reference: Various

Subject: Sustainability

Objectors Names (addresses or agents not required):

Whitehead, Jim, Southwark Green Party, Berkeley Group Plc & St James Group Plc, Bellway Homes Ltd, George Wimpey Central London, St George (South London Ltd) , Fairview New Homes, Barton Wilmore, Harmsworth Quays Printing Ltd, Galliard Homes, GOL, Southwark Friends of the Earth, Sainsbury's Supermarkets

Objection Access Representation Reference:

6043 6033 6034 6035 6036 6037 6038 6039 6040 6042 6414 6467 6547

Policy 3.14 – Design Quality

Number of Submissions: 7 Number of Objectors: 6 Number of Supporters: 1

How many address the same issues: N/A

What are the same issues raised: N/A

Main points of objection:

- We object to the reference to the need for developments to enhance the quality of the built environment.
- Good design should not just be about grandiose buildings, it is also about intimate spaces and protecting local character.
- References to preserving and enhancing the historic environment should be made as most development is set within the physical context of sensitive areas.
- More emphasis should be given to attaining high standards of design.
- Suggest including a reference to preserving and enhancing the historic environment, where appropriate within them as this provides the physical context for a significantly large proportion of development in the borough.
- This is glib 'flavour of the month'. Architects provided the 'Parker Morris' standard for housing but it was later thrown out for theoretical more economical developments. We now have a spate of 'gimmick', painted architecture - plus glass.

POLICY 3.15 – URBAN DESIGN

Number of Submissions: 16 **Number of Objectors:** 13 **Number of Supporters:** 3

How many address the same issues: 7

What are the same issues raised:

- We consider it inappropriate to suggest that it is not possible to design a satisfactory building that dominates its surroundings.
- References to preserving and enhancing the historic environment should be made as most development is set within the physical context of sensitive areas.

Main points of objection:

- The plan should not stifle responsible innovation, originality or innovative design. Rather it should seek to ensure that all new developments are informed by the wider context.
- We consider it inappropriate to suggest that it is not possible to design a satisfactory building that dominates its surroundings
- Consider that the greater emphasis should be given to the need to promote the enhancement of the public realm as an urban design consideration.
- References to preserving and enhancing the historic environment should be made as most development is set within the physical context of sensitive areas.
- We request part vi. Be amended with the inclusion of the following text:
“vi. Landscaping – Where appropriate developments should include..”
- The contribution that urban design can make to enhancing biodiversity should be mentioned.
- Whilst there will be a need to consider the urban context it may not be necessary to reflect the local pattern of development particularly when applying increased densities.
- It cannot be expected that proposals will make a positive contribution to the character of the area. Only in conservation areas are developments required to either preserve or enhance the character or appearance of the area.
- It should spell out the council's opposition to blank walls being added to the streetscape and require a decent standard in doors and window details that ensures that new residential housing does not appear institutionalised.

POLICY 3.16 – SAFETY IN DESIGN

Number of Submissions: 2 Number of Objectors: 1 Number of Supporters: 1

How many address the same issues: 0

What are the same issues raised: N/A

Main points of objection:

- The inclusion of good lighting is important in maintaining safety in design but we recommend that a statement should be included to recognise that this needs to be carefully balanced against the potential for increased light pollution and increased energy consumption.
- Support policy

POLICY 3.17 – DESIGN STATEMENTS

Number of Submissions: 17 **Number of Objectors:** 11 **Number of Supporters:** 6

How many address the same issues: 7

What are the same issues raised: Unreasonable and onerous

Main points of objection:

- The requirement for a design statement to be submitted for all new developments or significant alterations or extensions to existing buildings is unreasonable and onerous.
- Where the words “live” or “live and work” or similar formulations occur in the policy and reasons, they be replaced by the phrase “live, work, and do business” or appropriate similar formulations.
- The policy should require an access statement to be submitted with development proposals.
- The draft London Plan requires all development to meet the highest standards of accessibility and inclusion. While the justification part of the policy mentions accessible design, this is not sufficient to meet the aspirations of policy 4B.5 of the draft London Plan.
- We object to the implications that formal design statements might be required for applications other than those where design might be a significant issue and present an exclusive burden on minor applications.
- The design statement should incorporate details of how the design treatment overcomes orientation issues to take advantage of natural daylight to reduce energy use and maximise solar resources.

POLICY 3.18 – TALL BUILDINGS

Number of Submissions: 30 **Number of Objectors:** 25 **Number of Supporters:** 5

How many address the same issues: 6

What are the same issues raised:

- It is inappropriate for the plan to limit the development of tall buildings to specific parts of the borough
- Consider that the definition of what constitutes a tall building is arbitrary.
- We support the statement that tall buildings are inappropriate in most parts of Southwark.

Main points of objection:

- It is inappropriate for the plan to limit the development of tall buildings to specific parts of the borough. Not only does this potentially prejudice the quality of design, but also the developer's ability to maximise the efficient use of the site.
- The policy is imprecise (and thus fails to meet the guidance for the formulation of policy contained in the DETRs good practice guide).
- Consider that the definition of what constitutes a tall building is arbitrary.
- The use of the word tall to describe anything from over 100 feet up to 1000 feet or more is confusing.
- We support the statement that tall buildings are inappropriate in most parts of Southwark.
- We object to tall buildings in Bankside as they would change the character of Southwark, especially historically, along the river and blight the view of Southwark from the River and the North bank.
- We object to the statement that all tall buildings are considered to be inappropriate in most parts of the borough.
- Tall Buildings may be appropriate in the CAZ, but not in the Goose Green/East Dulwich/Peckham area, which is a well balanced suburban community supported by office space,
- This should contain the additional provision 'providing they do not have an unacceptable impact from listed buildings or conservation areas or on the setting of or views to or from'
- We object to the definition of a tall buildings as one approximately 30m in height. A more appropriate definition would be to remove reference to a specific height and to produce a definition that relates proposals to the character of the surrounding townscape.
- I object to the exemption made for the old Kent Road and Peckham action areas from the statement that tall buildings are considered inappropriate in most parts of Southwark.
- There should not be a presumption against development of tall buildings. Each case can and should be determined on its own merits with reference to the design policies in the UDP.

POLICY 3.19 - TELECOMMUNICATIONS AND ADVERTISEMENTS

Number of Submissions: 7 **Number of Objections:** 5 **Number of Supporters:** 2

How many address the same issues: 3 (Total of 3 grouping(s))

What are the same issues raised:

- There should be separate policies for telecommunications and advertisements
- Policy needs to encourage/require mast sharing
- Policy needs to reflect PPG and recognise benefits to be weighed against disbenefits, providing a suitable framework for telecoms installation

Main Points of Objection:

- Guidance on telecoms should be in UDP not SPG
- Masts should not be allowed above residential premises, or community facilities, or business facilities close to employees
- It is unduly restrictive to adopt such a limiting blanket approach to all advertisements, and should be limited to amenity and public safety
- Distraction by advertisements should include all road users, not just motorists

Access Search Reference:

Section: Part 2

Policy: 3.19

Cross Reference: Telecommunications OR Advertisements

Subject: Telecommunications OR Advertisements

Objectors Names (addresses or agents not required):

BT Plc., Crystal Palace Community Association, English Heritage, Orange Personal, Communications Services Ltd, Outdoor Advertising Association, Sport England, Storm Poorun

Objection Access Representation Reference:

6075 6076 6078 6457 6489 6605 6933

POLICY 4.1 - HOUSING DENSITY

Number of Submissions: 28 **Number of Objections:** 25 **Number of Supporters:** 3

How many address the same issues: 19 (Total of 5 grouping(s))

What are the same issues raised:

- Should be in UDP not SPG
- Flexibility (greater restriction) needed in relation to design and open space
- Should refer to density matrix in London Plan
- Should not necessarily increase, need to regard actual circumstances and context
- Need to relate to transport accessibility

Main Points of Objection:

- Student accommodation and similar will exceed and need higher/excluded from thresholds
- Southwark should not bow to pressure from external agencies eg GLA
- Targets not necessarily accurate, trends may not continue
- Southwark should not bear brunt of increase in density
- Increase in density should be no more than prevailing norm
- Increase in density should be preceded by infrastructure
- Negative impact on Bankside residents
- Need to reduce density, not increase
- Upper limit should not be maximum
- 3 areas too simplistic
- Should be criteria based

Access Search Reference:

Section: Part 2

Policy: 4.1

Cross Reference: Mostly Density

Subject: Housing Density

Objectors Names (addresses or agents not required):

Aylesbury NDC, Bankside Business Partnership, Barton Willmore Partnership, Bellway Homes LTD, Berkeley College Homes, Berkeley Homes (City & East London) PLC, Berkeley Group PLC & St James Group PLC, Bottomley, Henry, The Camberwell Society, Castle House, Conn, Eileen, Cook, M., The Dulwich Society, Esmeralda Tenants' & Residents Association, Fairview New Homes Ltd, Falcon Point Management Group, Friends of the Earth Southwark, George Wimpey Central London, Greater London Authority, Hays PI, Hughes, Simon, London Town PLC, McCarthy, Donnachadh, Network Rail, Nunhead Action Group, Phillips, Donald, St George (South London) LTD, St Martins Property Investments Ltd

Objection Access Representation Reference:

5749	5751	5752	5753	5754	5755	5756	5759	5760	5762	5763	5764	5765	5772
5773	5981	5982	6000	6005	6006	6015	6385	6569	6581	6682	6759	6930	6931

POLICY 4.2 - RESIDENTIAL DESIGN STANDARDS

Number of Submissions: 19 **Number of Objections:** 19 **Number of Supporters:** 0

How many address the same issues: 13 (Total of 4 grouping(s))

What are the same issues raised:

- Standards should be in UDP not SPG
- Lifetime Homes requirement is unreasonable
- Minimum standards for internal layout should be left to Building Regs
- Need to secure open space as part of developments
- Add building separation standards

Main Points of Objection:

- Add cycle parking standards
- Should refer to sustainable building materials
- Standards should be flexibly applied
- Lifetime Homes and avoidance of on-site car parking are at odds

Access Search Reference:

Section: Part 2

Policy: 4.2

Cross Reference: Various

Subject: Residential Design

Objectors Names (addresses or agents not required):

Aylesbury NDC, Barton Willmore Partnership, Bellway Homes LTD, Berkeley Homes (City & East London), Berkeley Homes Plc, Berkeley Group PLC, Cook, M., Cyclists Touring Club, Esmeralda Tenants' & Residents Association, Fairview New Homes Ltd, Falcon Point Management Group, Friends of the Earth Southwark, George Wimpey Central London, Greater London Assembly, London Town PLC, North Southwark Community Development Group, Nunhead Action Group, SOUHAG, St George (South London) LTD

Objection Access Representation Reference:

5782 5812 5813 5814 5815 5816 5817 5818 5847 5860 5952 5985 6010 6618
6671 6683 6925 6946 6962

POLICY 4.3 - COMBINING RESIDENTIAL AND COMPLIMENTARY USES

Number of Submissions: 4 **Number of Objections:** 2 **Number of Supporters:** 2

How many address the same issues: 0 (Total of 0 grouping(s))

What are the same issues raised:

- N/A

Main Points of Objection:

- Should not allow open air car parking

Access Search Reference:

Section: Part 2

Policy: 4.3

Cross Reference:

Subject: Combining Residential

Objectors Names (addresses or agents not required):

The Camberwell Society, Kinrade, Derek Esq, McCarthy, Donnachadh, Whitehead, Jim

Objection Access Representation Reference:

5819 5820 5821 6684

POLICY 4.4 - AFFORDABLE HOUSING

Number of Submissions: 57 **Number of Objections:** 54 **Number of Supporters:** 3

How many address the same issues: 50 (Total of 11 grouping(s))

What are the same issues raised:

- Low provision, should be 50%
- Should not apply to commercial development
- Object to floorspace target, should be habitable room
- Object to floorspace threshold, should be 0.5ha
- Affordable housing should not be sought on all sites, but should have regard to economics and other S106 provision
- Conditions should also be referred to for securing affordable housing, not just S106
- Requirements including targets, thresholds and whether on-site etc should be in UDP not SPG
- 25% target should not be in UDP so it can be easily changed
- Targets for rented vs intermediate housing should be stated
- Need to make provision for health workers as key workers
- Need background justification for thresholds in UDP not SPG

Main Points of Objection:

- Affordable Housing can not be left to developers
- "Affordability" is not a matter for policy but should be dealt with by other mechanisms
- Target needs to change in relation to site value to achieve maximum
- Remove threshold and require on all sites
- Problem with London Plan is that it does not differentiate between subsidised and non-subsidised
- Need to address 14 unit schemes
- Need to ensure genuine affordability
- Developers should be made to provide it where there is little affordable housing already, including outside borough
- No mention of shared ownership
- Does not make clear if the Council will seek affordable housing on schemes of other types of affordable housing eg require 25% rented on a 100% shared ownership scheme

Access Search Reference:

Section: Part 2

Policy: 4.4

Cross Reference:

Subject: Affordable Housing

Objectors Names (addresses or agents not required):

Aylesbury NDC, Bankside Business Partnership, Bankside Residents Forum, Barton Willmore Partnership, Bellway Homes LTD, Benington, Pauline, Berkeley Homes (City & East London), Berkeley Homes Group and St James Group, Berkeley Homes Plc, BT plc., The Camberwell Society, Capcount Kings Reach (Jersey), City Estates, The Dulwich Society, Cllr T Eckersely, Esmeralda Tenants' & Residents Association, Fairview New Homes Ltd, Galliard Homes, George Wimpey Central London, Government Office for London, Greater London Authority, Greenwood, Adrian, Guy's & St Thomas' Hospital, GVA Grimley, Hays PLC, Department of Health, Hughes, Simon MP, Laing Homes, Lambeth, London Borough, Lawson, Peter, Lee, Richard, London Electricity Group, London Town PLC, McCarthy, Donnachadh, Minerva PLC, North Southwark Community Development Group, Oakmayne Properties, Paxton, John, Sofia Roupakia, Royal London Asset Management Ltd, Sainsbury's Supermarkets LTD, SBEG (South Bank Employers Group), SOUHAG, Sport England, St George (South London) LTD, Taylor, J.H., Unite, Whitehead, Jim, Wirtz, Laura, Wyman, M

Objection Access Representation Reference:

5647	5766	5767	5768	5769	5770	5771	5774	5775	5776	5777	5781	5783	5786
5787	5788	5789	5790	5791	5794	5795	5796	5797	5799	5800	5801	5803	5804
5808	5810	5844	5871	5983	5984	5986	6079	6082	6083	6084	6509	6526	6543
6548	6552	6606	6622	6698	6699	6700	6702	6703	6760	6765	6809	6963	6982
7098													

POLICY 4.5 - LOSS OF RESIDENTIAL ACCOMMODATION

Number of Submissions: 5 **Number of Objections:** 5 **Number of Supporters:** 2 (also comment for changes)

How many address the same issues: 3 (Total of 1 grouping(s))

What are the same issues raised:

- There should be specific protection for affordable housing

Main Points of Objection:

- All sites coming forward should be for housing

Access Search Reference:

Section: Part 2

Policy: 4.5

Cross Reference: Some Affordable Housing

Subject: Loss of Residential

Objectors Names (addresses or agents not required):

Aylesbury NDC, Esmeralda Tenants' & Residents Association, Greater London Authority, Lee, Richard, The Newington Trust Estates

Objection Access Representation Reference:

5825 5827 5990 6680 6761

POLICY 4.6 - MIX OF DWELLINGS

Number of Submissions: 20 **Number of Objections:** 20 **Number of Supporters:** 0

How many address the same issues: 14 (Total of 3 grouping(s))

What are the same issues raised:

- Mix should only be sought where appropriate
- Should be clear in UDP not in SPG
- Need at least 50% family

Main Points of Objection:

- Should have houses with gardens as part of all development
- Should only allow more social housing and special needs housing where there is not much already
- Mix of dwellings should also reflect regional need, not just borough need
- Contradicted by Appendix 4
- Lack of comment on ethnic/cultural needs
- What is "improved"?

Access Search Reference:

Section: Part 2

Policy: 4.6

Cross Reference:

Subject: Mix of Dwellings

Objectors Names (addresses or agents not required):

Aylesbury NDC, Barton Willmore Partnership, Bellway Homes LTD, Berkeley Homes (City & East London), Berkeley Group PLC And St James Group PLC, Berkeley Homes Plc, Cook, M., Evelina Family Trust, Fairview New Homes Ltd, Forgotten Corner of Camberwell, George Wimpey Central London, Greater London Authority, Greenwood, Adrian, Hughes, Simon MP, Lee, Richard, Roupakia, Sofia, Sport for England, St George (South London) LT, Teighmore Limited, Unite

Objection Access Representation Reference:

5828 5829 5830 5832 5834 5835 5836 5837 5838 5839 5840 5841 5842 5843
5854 6559 6607 6709 6950 6964

POLICY 4.7 - SPECIFIC HOUSING NEED

Number of Submissions: 11 **Number of Objections:** 10 **Number of Supporters:** 1

How many address the same issues: 7 (Total of 5 grouping(s))

What are the same issues raised:

- Need to clarify supported or specific
- Need to state standards for this accommodation
- No account of BME needs
- No provision for new travelers sites
- Need to make specific provision for student hostels

Main Points of Objection:

- Should include Lifetime Homes standards
- Not clear whether the Council will identify sites to meet objective

Access Search Reference:

Section: Part 2

Policy: 4.7

Cross Reference: Some HMO

Subject: Specific Housing Needs

Objectors Names (addresses or agents not required):

Aylesbury NDC, Berkeley College Homes, Esmeralda Tenants' & Residents Association, Department of Health, Lee, Richard, The Newington Trust Estate, Roupakia, Sofia, Southwark Travellers Action Group, Sport for England, Unite, Willowbrook Centre

Objection Access Representation Reference:

5862 5863 5864 5865 5866 5867 5868 5869 5870 6686 6762

POLICY 4.8 - HOUSES IN MULTIPLE OCCUPATION

Number of Submissions: 2 **Number of Objections:** 0 **Number of Supporters:** 2

How many address the same issues: 0 (Total of 0 grouping(s))

What are the same issues raised:

- N/A

Main Points of Objection:

- N/A

Access Search Reference:

Section: Part 2

Policy: 4.8

Cross Reference:

Subject: HMO

Objectors Names (addresses or agents not required):

Greater London Authority, Sport for England

Objection Access Representation Reference:

6687 6688

HOUSING BACKGROUND AND OBJECTIVES

Number of Submissions: 6 **Number of Objections:** 6 **Number of Supporters:** 0

How many address the same issues: 4 (Total of 1 grouping(s))

What are the same issues raised:

- Need to include targets and state how it is intended to achieve these

Main Points of Objection:

- No provision for new gypsy sites
- Need reference to BME housing needs

Access Search Reference:

Section: Part 2

Policy: Section 4

Cross Reference:

Subject: Various

Objectors Names (addresses or agents not required):

Government Office for London, Greater London Authority, Sofia Roupakia, The Newington Trust Estate

Objection Access Representation Reference:

5709 5931 5932 5947 5988 6972

POLICY 5.1 – TRANSPORT IMPACTS

Number of Submissions: 10 Number of Objectors: 9 Number of Supporters: 1

What are the same issues raised:

- The policy is unduly onerous. Plan Requirements should not be relegated to SPG. **(8 Submissions)**

Points of objection:

- The policy is unduly onerous. Plan Requirements should not be relegated to SPG
- Exercise, mainly unnecessary, vehicles in Southwark cause delays, imposing unnecessary costs on essential users, including busses and people on foot. People deterred from walking and cycling suffer in health, especially children and old people. Good walking conditions are essential to ready use of busses, which make efficient use of inherently open space

POLICY 5.2 – PUBLIC TRANSPORT PROGRAMMES

Number of Submissions: 11 Number of Objectors: 9 Number of Supporters: 2

What are the same issues raised:

- Objects to proposed tram route **(2 Submissions)**
- The policy omits reference to the proposals for London Bridge Station **(2 Submissions)**

Points of objection:

- The tram could be supplemented by a broader network heading south to link with Croydon Tramlink, maybe using parts for the former track bed from Nunhead to Crystal Palace High Level
- Thameslink station, awful construction noise and extra pedestrian congestion.
- The alignments and land required for these schemes should be identified on the Proposals Map.
- Objects to proposed tram route.
- The policy omits reference to the proposals for London Bridge Station.
- The text fails to refer to transport development areas identified on the proposals map at Camberwell and London Bridge
- Present bus services will be undermined by other infrastructure improvements mentioned. The Plan should promote improved walking conditions to facilitate access to public transport.

POLICY5.3 – PEDESTRIANS AND CYCLISTS

Number of Submissions: 19 Number of Objectors: 18 Number of Supporters: 1

What are the same issues raised:

- The policy is unduly onerous. Plan policies should not attempt to delegate the criteria for decisions on planning applications to SPG or to development briefs. **(9 Submissions)**

Points of objection:

- The policy is unduly onerous. Plan policies should not attempt to delegate the criteria for decisions on planning applications to SPG or to development briefs.
- Maintained access to all traders' premises throughout any works enshrined in a policy would be appreciated
- Do not feel the number of cycle security rails are excessive and care needs to be exercised in their positioning to avoid obstructing existing often-narrow pavements
- Token cyclist facilities are more of a hindrance to pedestrians than a benefit to cyclists.
- The policy should take more account of a number of issues identified in Policies 3C.18 and 3C.19 of the draft London Plan
- There should be a policy that states that any development along the local or London designated cycle routes must make land provision where necessary for cycle paths.
- Reasons statement: walking and cycling **are** the healthiest modes of transport available
- Further encouragement should be given to the development of an integrated transport plan throughout the borough.
- Cycling and walking should not be linked together

POLICY 5.4 – INFRASTRUCTURE CONTRIBUTIONS (17 Submissions)

Number of Submissions: 17 Number of Objectors: 16 Number of Supporters: 1

What are the same issues raised:

- The policy is unduly onerous and does not reflect guidance set out in Circular 1/97. Detailed requirements should be set out in the UDP and not relegated to the SPG. **(6 Submissions)**
- The policy is not clear as to the likely level or reasons for developer contributions. **(4 Submissions)**

Points of objection:

- The policy is unduly onerous and does not reflect guidance set out in Circular 1/97. Detailed requirements should be set out in the UDP and not relegated to the SPG.
- Additional reference should be included to this policy, seeking improvements to the public realm.
- The Mayor welcomes the requirement for developers to contribute towards and assist in facilitating improvements to the full range of transport infrastructure, although additional reference should be included to seeking improvements to the public realm
- Would require developers to contribute towards and assist in facilitating improvements to, inter alia, public transport infrastructure and services.
- Object to the requirement to contribute towards and assist in facilitating improvements in the transport infrastructure where development increases the movement of people. This takes no account of the scale/type of development, nor site-specific conditions
- SBEG support the use of development contributions to ensure improvement and mitigation of any impact on the elements identified within the Plan. We also recognise that all the elements must be supported through the principals of high quality design and sustainability, which underpin all the elements, identified. SBEG would recommend the use of the Design Guide to ensure that negotiations with future developers are undertaken considering the issues of high quality and sustainability.
- Non-car modes of travel should be prioritised in this policy. Contributions should not benefit car drivers.

POLICY 5.5 - DENSITY

Number of Submissions: 15 **Number of Objections:** 14 **Number of Supporters:** 1

How many address the same issues: 11 (Total of 4 grouping(s))

What are the same issues raised:

- Relationship to protection of open space
- "Highest reasonable" could result in too high density, not at human scale
- "Highest reasonable" only in accordance with local wishes
- Needs to be compatible with local context
- Density should not have upper limit

Main Points of Objection:

- Should be cross-referenced to 4.1
- Information should all be in UDP not SPG
- High densities will reduce quality of life
- Density should increase. particularly in Rotherhithe
- Needs to relate to transport accessibility
- Same as 4.1, so they should be combined

Access Search Reference:

Section: Part 2

Policy: 5.5

Cross Reference: Various

Subject: Density

Objectors Names (addresses or agents not required):

Berkeley Homes Plc, Cook, Martin, The Camberwell Society, Dulwich Society, Esmeralda Tenants' & Residents Association, Foot, David Adrian, Greater London Authority, Greenwood, Adrian, Hughes, Simon MP, The Newington Trust Estate, North Southwark Community Development Group, Oakmayne Properties, Whitebread, Jim

Objection Access Representation Reference:

5906 5908 5909 5911 5912 5987 6385 6406 6763 6952 6954 6961 6965 6986
7086

Transport Policy - Other Issues

Number of Submissions: 23 Number of Objectors: 21 Number of Supporters: 2

What are the same issues raised:

- Suggest that powered two wheelers (PTWs) should be treated in the plan in the same way as cars. **(2 Submissions)**

Main Points of objection:

- Public consultation on the tram route. Don't accept the TfL 'preferred route' through the park.
- Blocked off rights of way to the river.
- Better bus facilities
- Proper pedestrian crossing (Southwark Bridge Road).
- Closing down Borough High Street, not viable option
- Cyclists to be kept off pedestrian areas stick to cycle routes (not on river walk)
- Need for enforcement of planning conditions that are being ignored. For example, vehicles reversing on the public highway into loading area when approval was conditional on this not happening.
- Road transport congestion, inadequate capacity on the Jubilee Line and the need for the Southwark Plan and SPG to recognise this shortfall in transport provision.
- Crossovers create danger to pedestrians and can increase parking stress.
- Although Central, Urban and suburban areas are defined on the proposals map, appropriate densities and car parking levels should also reflect public transport accessibility (PTAL Map).
- More reliable and appropriate public transport routes. Need for transport management proposals to consider the impact of the considerable regeneration construction work that is likely to occur around the Guy's site.
- P52/55 – Peckham, Elephant and Castle and Waterloo all on the same side of the river, so why is this called Cross River Transit?
- Concerned about consultation and effected party issues as they related to new development effecting National Rail land and infrastructure
- Include the river as a potential major public transport artery, and for a policy, which looks to both increase use of existing piers, and in some cases, seek access improvements as part of the wider transport interchange (eg London Bridge).
- Clear transport policy for Southwark, incorporating all main features, identifying which seems the best value for Southwark and establish priorities.
- Insufficient treatment of the likely impact of the Congestion Charging Zone. Alternative means of transport considered reducing effects on Camberwell. Welcome the mention of the station and regret the lack of any mention of an extension of the underground to Camberwell.
- Improvements to pedestrian and cycle ways in South Bank
- Powered two wheelers (PTWs) should be treated in the plan in the same way as cars.
- CPZ's, a good method of controlling congestion and the use of the private motorcar by limiting on-street parking.
- Southwark should consider to promote less car dependency. For example, promoting car free housing developments and safer routes to schools and leisure facilities.

POLICY 5.6 - PARKING

Number of Submissions: 24 Number of Objectors: 22 Number of Supporters: 2

What are the same issues raised:

- Parking standards should be applied flexibly. Access to public transport varies across each zone and this should be taken in to account **(2 Submissions)**
- Oppose the setting of maximum parking standards **(2 Submissions)**
- The proposed car parking standards are too restrictive **(4 Submissions)**

Points of objection:

The proposed car parking standards are too restrictive.

Private car parking should still be provided in the central zone.

Alarmed by the rigidity of the setting of maximum parking standard.

Parking standards should be applied flexibly.

It is not considered appropriate for hospitals and other healthcare facilities to be subject to rigid car parking standards.

The proposed car parking standards do not recognise people's preference for car ownership.

Oppose the setting of maximum parking standards.

It is important that there is not an under provision of car parking.

The parking SPG should include details of servicing arrangements and disabled car parking provision.

The policy makes no distinction between different scales of development and is not in accordance with PPG13.

The standards should relate to PPG 13. With regard to non food retail development PPG states that the maximum provision should be 1 space per 20sq metres

Object to the requirement, set out in draft Policy 5.6 for development to 'not exceed the car and reduce the cycle parking standards set out in the Parking SPG and Appendix 5.

The policy does not specifically refer to residential standards. Policy should be more flexible.

A thorough parking evaluation needs to be done in the Rye Lane south area for the existing and new businesses and the churches.

New cycle parking technology should be used in Plan.

Avoidable car use damages health of people and the boroughs economy.

APPENDIX 2 – GLOSSARY

Number of Submissions: 23 **Number of Objectors:** 23 **Number of Supporters:** 0

Main Points of Representations:

- Definition of affordable housing fails to include shared ownership housing (7)
- Definition of open space is too broad in that it includes all undeveloped areas
- Provide a definition for sustainable transport
- Reword the definition of Preferred Office Location
- Amend definition of Tall Buildings so that the assessment relates to its particular local context
- Definition of Waste Hierarchy – the levels of the waste hierarchy form a list of preference and should be made explicit in the definition
- Definition of Waste Hierarchy – the ‘recovery’ level should be broken into separate categories of composting, recycling and energy recovery
- Include definition for Archaeological Priority Zone (2)
- Include definition for Listed Building (2)
- Include definition for Historic Environment (2)
- Include definition for Scheduled Ancient Monuments (2)
- Include supported housing (special needs housing) in the definition for Affordable Housing (2)
- Amend definitions of social exclusion & inclusions to include reference to the physical environment
- Term habitable room is not easy for lay people to understand
- Amend definition of community facilities
- Define Transport Development Area
- Amend definition of Affordable Housing
- Amend definition of Ecosystem

Access Search Reference:

Section: Part 3

Policy: Appendix 2

Subject: Glossary

Cross Reference: Various

Objectors Names (addresses or agents not required):

Barton Willmore, Bellway Homes, Berkeley College Homes; Berkeley Group Plc and St James Group Ltd, Berkeley Homes (City and East London); Corporation of London, Crystal Palace Community Association; Department of Health; English Heritage; Fairview New Homes Ltd, George Wimpey Central London, Greater London Authority; Guy’s & St Thomas; The Newington Trust Estate; Nunhead Action Group; Peckham Voluntary Sector Forum; Royal London Asset Management; SOUHAG; Sport England; St George (South London) Ltd

Access Representation Reference:

Appendix 5 – Parking Standards (14)

Number of Submissions: 14 Number of Objectors: 13 Number of Supporters: 1

What are the same issues raised:

- Object to the principal of residential car parking standards and cycle parking standards being 'maximum'. **(4 submissions)**
- The parking standards are not consistent with current Government guidance contained within PPG 13. Therefore frustrates/deters beneficial proposed retail development **(3 submissions)**

Points of objection:

- We object to the principal of residential car parking standards and cycle parking standards being 'maximum' unless otherwise stated
- Restricting residential car parking provision to less than 1 place per unit will fail.
- Questions a blanket wide parking restriction within CPZs as it does not allow for circumstances where parking can be justified
- Clarification is required of how parking standards are linked to public transport accessibility by demonstrating how the zonal definitions relate to PTAL scores
- Maximum parking standards for A1, A2 and A3 uses should more closely reflect public transport accessibility.
- Object to the proposed car parking standards.
- This policy goes beyond the guidance on residential parking provision provided in Table 4B.1 of the Mayor's Draft London Plan.
- The parking standards are not consistent with current Government guidance contained within PPG 13.

OMISSIONS

Number of Submissions: 20 Number of Objectors: 20 Number of Supporters: 0

What are the same issues raised:

- The plan should take a more radical stand on transport issues **(2 Submissions)**
- The Plan does not set a target for cycle use **(2 submissions)**
- The plan is not ambitious enough on road safety. Safer roads and less intimidation by traffic will contribute of the vision of a better life in Southwark **(2 submissions)**
- The plan should include some sell-offs of road space (owned by the Council) **(2 Submissions)**

Points of objection:

- There are no provisions in the UDP to deal with coach parking.
- The transport section of the plan does not promote water borne or rail based freight as an alternative to road transport.
- The plan should promote a new river crossing between Rotherhithe and Docklands.
- The plan should include some sell-offs of road space (owned by the Council).
- The plan should take a more radical stand on transport issues
- The Plan does not set a target for cycle use.
- The plan is not ambitious enough on road safety.
- Object to a lack of policy dealing with the establishment of helipads or landing strips.
- No mention of the need to accommodate up to 50% increase in the capacity of public transport network.
- There is no policy on the allocation of street space in accordance with Policy 3C.15 of the draft London Plan
- The plan does not make reference to the needs of the disabled and this must be addressed.
- The plan refers to the environmental effects of traffic but fails to propose any action
- The plan should promote a new river crossing between Rotherhithe and Docklands
- The proposals map has identified Transport Development Areas, but the Plan does not explain what they are expected to achieve
- The Plan contains no policy on freight, and should be promoting the removal of lorries from the road by encouraging freight on rail or water, in line with government policy.