



Heritage Supplementary Planning Document (SPD)

Consultation Report

September 2021

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1. Introduction

1.1. What is the Heritage Supplementary Planning Document (SPD)?

- 1.1.1. The Heritage SPD provides guidance on how to apply the relevant policies of the Southwark Plan and the emerging New Southwark Plan concerning the historic environment. It gives advice on how to conform to the additional and local legislature and polices, within which the council must operate.
- 1.1.2. The Heritage SPD will help people to understand heritage matters and provide advice on the conservation, preservation and enhancement of the historic environment.
- 1.1.3. It is designed for a wide readership, including applicants, owners, residents, planners, community groups and developers.
- 1.1.4. This document is a Supplementary Planning Document (SPD), which means that is supplementary to the saved policies of the Southwark Plan and the emerging New Southwark Plan. SPD's can be a material consideration in planning decision but are not part of the Plan.

1.2. What is this Consultation Report?

- 1.2.1. A consultation report explains the consultation that has been undertaken as part of the preparation of the Heritage SPD. Consultation for the Heritage SPD opened on Monday 11 January 2021 and was due to close on Monday 5 April 2021. However, as a result of the New Southwark Plan (NSP) going through Examination in Public (EiP), the closing date was extended to Monday 10 May 2021.
- 1.2.2. The consultation report also sets out how the comments received from individuals and organisations have been considered and how they have influenced the final version of the Heritage SPD.
- 1.2.3. This report sets out how we have met statutory requirements as well as our local requirements for consultation on supplementary planning documents.
- 1.2.4. The statutory requirements can be found in our Statement of Community Involvement (SCI) (2008) which sets out how the Council will consult on our planning policy documents and planning applications. The SCI refers to several legal and regulatory requirements, both in terms of methods of consultation and particular bodies that we must engage with. When the SCI was produced it was done so with regard to the Town and Country Planning (Local Development) (England) Regulations 2004 and the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. In April 2012, both sets of regulations were replaced by the Town and Country Planning (Local Planning) (England) Regulations 2012. We have subsequently ensured that consultation on the SPD meets the requirements of the SCI and the updated regulations. More information is set out within section 4 of this report.

1.3. How to find your way around this document?

1.3.1. The consultation report is structured in the following way:

- Section 1 - Introduction
- Section 2 - Heritage Supplementary Document Consultation
- Section 3 - Monitoring our Consultation
- Appendices

1.4. Where to get more information

1.4.1. The Heritage SPD can all be viewed on our website:

<https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/supplementary-planning-documents-spd/spd-by-planning-topic?chapter=2>

1.4.2. Copies are also available by contacting the Planning Policy Team using the following methods:

- **Email:** planningpolicy@southwark.gov.uk
- **Telephone:** 020 7525 0146
- **Post:** Planning Policy, Chief Executive's Department, Southwark Council, FREEPOST SE1919/14, London SE1P 5LX

1.5. What happens next?

1.5.1. The Heritage SPD is being taken to cabinet on 19 October 2021. Once adopted, the Heritage SPD will be monitored through the Authority's Monitoring Report (AMR).

1.5.2. The emerging New Southwark Plan will replace the Core Strategy (2011) and the Saved Southwark Plan (2007) and is likely to provide updated policies relevant to the Heritage SPD. For current information on the progress of the New Southwark Plan please see our webpage at:

<https://www.southwark.gov.uk/planning-and-building-control/planning-policyand-transport-policy>

2. Heritage SPD consultation

2.1. Who was consulted and how?

2.1.1. We consulted a wide range of residents, developers, landowners and planning agents on the Heritage SPD and as such, have met the requirements of our Statement of Community Involvement (2008) (SCI).

2.1.2. In addition, the Localism Act 2011 requires co-operation between local authorities and a range of other bodies and organisations during the preparation of planning policy and guidance. This is called the "Duty to co-operate". The

Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (2012) set out these prescribed bodies and further information on the need for local authorities to work with their neighbouring boroughs on strategic planning issues and cross boundary issues. Appendix A of this report sets out both the prescribed bodies and our neighbouring boroughs. All of these organisations were consulted as part of the SPD consultation.

2.1.3. The consultation carried out for the Heritage SPD is detailed in the following tables. We have set out how this has met the minimum SCI requirements as well as additional consultation undertaken.

2.1.4. In accordance with our SCI, the Heritage SPD was available for comment for a period of 12 weeks, from Monday 11 January 2021 to Monday 10 May 2021.

Table 1: Minimum consultation as required by our SCI

Method of Consultation	Consultee	Date	Comments
Send a mail out to all statutory consultees informing them of the consultation and inviting comments	Statutory consultees		Notification was sent out through MySouthwark which all statutory consultees are signed up to.
Displaying consultation documents at our offices.	All		As council offices are closed, we would have printed one copy per person and sent it out to individuals if requested All documents were made available online and everyone was encouraged to use this facility first.
Upload the documents onto the council website for the public to view	All		All documents relating to this consultation are available here: https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/development-plan/supplementary-planning-documents-spd/spd-by-planning-topic?chapter=2
Advertise the consultation in the local press	All		This will be Southwark News

Table 2: Additional Consultation

Method of Consultation	Consultee	Date	Comments
Update MySouthwark users regularly of the consultation and where to find consultation documents	All	11.01.2021	An email was sent to the 16,000+ contacts signed up for planning policy email notifications and updates via MySouthwark.
Advertise the consultation through Council social media such as Twitter.	All		Sent out regular updates and reminders through council social media pages.
Display the Heritage SPD and accompanying documents on the Council's Consultation Hub with an online questionnaire available for comments	All	11.01.2021	A link to the Consultation Hub was sent in regular updates to MySouthwark users https://consultations.southwark.gov.uk/corporate-strategy/heritagespd/
Present the document to Southwark's Conservation Area Advisory Group (CAAG) at a monthly meeting.	All	23.01.2021	Southwark's Conservation Area Advisory Group (CAAG) is formed from representatives of local historical, civic and amenity societies. The group provides regular guidance on planning applications that may affect the character or appearance of our conservation areas. The document was presented at the CAAG meeting on Tuesday 23 January 2021 by a Design and Conservation team leader.

Public consultation event with a presentation to be live streamed. Followed by questions and answers session to talk about the Heritage SPD and consultation in planning.	All	16.02.2021	A public consultation event was held on 16 th February 2021 where an overview of the document was given by the previous Cabinet Member for Climate Emergency, Planning and Transport, Councillor Johnson Situ, and was followed by a presentation by the Group Manager of the Design and Conservation team and a Q&A session.
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2.2 How many comments were received on the Heritage SPD?

2.2.1 19 formal representations were received from statutory consultees, various groups and members of the public. Further details on the responses is set out in Section 2.3 - Summary of Consultation responses received on the Heritage SPD

2.2.2 The full representations and the officer comments to these representations are set out in appendix D.

2.3 Summary of Consultation responses received on the Heritage SPD

2.3.1 A summary of the representations received and from whom are set out below.

Local Councillors

Chapter 1 – About this document

2.3.2 No responses were received from local Councillors for the Heritage SPD

Statutory consultees and other public bodies

2.3.3 Representations were received from Historic England, The British Sign and Graphics Association, Natural England, and Spatial Planning on behalf of TfL

Chapter 1 – About this document

2.3.4 n/a

Chapter 2 – Our vision

2.3.5 n/a

Chapter 3 – How can I learn more and get involved?

2.3.6 n/a

Chapter 4 – what is the legal and policy context?

2.3.7 n/a

Chapter 5 – understanding Heritage Terminology

2.3.8 n/a

Chapter 6 – The Historic Environment in a Changing Climate

2.3.9 n/a

Chapter 7 – Introduction to ‘Built heritage Assets’

2.3.10 n/a

Chapter 8 – Archaeology in Southwark

2.3.11 (HE) The document contains useful content and advice on the local historic environment. Reference to the policies of the New Southwark Plan should be referenced in the document. For example policy P18 Listed Buildings should be referenced in The Principles of Development in the Context of Listed Buildings (page 28).

Chapter 9 – Nature

2.3.12 n/a

Chapter 10 – Heritage Crime

2.3.13 n/a

Chapter 11 – Glossary of terms

2.3.14 n/a

Chapter 12 – List of Abbreviations

2.3.15 n/a

Chapter 13 – Useful Contacts

2.3.16 n/a

Local residents, individuals and groups

2.3.17 14 residents, individuals, some of whom are represent local groups submitted comments via the Consultation Hub.

Chapter 1 – About this document

2.3.18 n/a

Chapter 2 – Our vision

2.3.19 n/a

Chapter 3 – How can I get involved?

2.3.20 The list of contacts should be updated to reflect local groups within the borough

Chapter 4 – What is the legal and policy context?

2.3.21 The policies of the New London Plan should be listed. And the hierarchy of the policies from the London Plan, National Planning Policy Framework (NPPF) and the New Southwark Plan.

2.3.22 Historic England is not referenced in this section, which is believed to be odd as its referenced in Chapter 5.

Chapter 5 – Understanding Heritage Terminology

2.3.23 More detailed explanations should be provided here for the different types of values mentioned in the chapter.

2.3.24 Highlighted an error of repetition of the phrase ‘it is important’ paragraph 5.5.

Chapter 6 – The Historic Environment in a Changing Climate

2.3.25 Question on how Southwark will discourage the use of the car use and installing electrical car charging points is not positive addition as introduces a different form of car and takes away from pedestrian paths and cycle routes.

2.3.26 More information on retrofitting, installing renewable energy resources and how to make building to achieve net zero whilst being able to preserve the historic environment.

2.3.27 To provide more information on the harm to the historic environment as a result of demolition.

2.3.28 The chapter needs to be updated with the Mayor’s goals

2.3.29 The guidance from Historic England on ‘Energy Efficiency’ should be made clearer, it seems to be lost in the text. The information from Historic England is very useful.

2.3.30 More emphasis should be placed on the skill and craft that people should/may have on repairing historic buildings, rather than talking about prefabricated cladding systems.

2.3.31 The explanation between heritage and climate change is welcomed, in particular the link between re-use and embodied carbon, however, a clear statement on the interconnected issues around repair, conservation, avoidance of demolition, should be included.

Chapter 7 – Introduction to ‘Built Heritage Assets’

2.3.32 More detail should be provided on this section. Definitions/explanation should be used when talking about shopfront, so it is clear for readers. Illuminated signs are

commonly used and modern technology have made them slimmer so why can't they be used in Conservation Areas and on Listed Buildings? Further explanation should be added in this section differentiating between modern and traditional shopfronts.

- 2.3.33 Further detailed and clarity on Permitted Development Rights for owners of Listed Buildings and buildings within a Conservation Area. This information should also be updated to reflect the changes from the Government
- 2.3.34 Building heights should be considered and not introduce skyscrapers. Rents are too high for old stall holders.
- 2.3.35 The proposed new Conservation Areas in the Old Kent Road needs to be included.
- 2.3.36 Examples of locally listed buildings should be included and to allow the community to help gather information on the buildings that are currently on the local list.
- 2.3.37 More information should be included on what happens after a building is nominated for the local list.
- 2.3.38 More guidance on the contents of Heritage Statements and what information should be included in this document.
- 2.3.39 The guidance included in Conservation Area Appraisals, particularly on the Walworth Road and development.
- 2.3.40 Strong support for the shopfront policy of the SPD, however, there are not a lot of applications submitted to the Council that conform with this policy.
- 2.3.41 Locally listed building should be moved and be put after designed heritage assets.
- 2.3.42 Historic England's 55 page guidance should be summarised and put in the Heritage SPD.
- 2.3.43 An updated map highlighting the Conservation Areas in the borough as it not clear currently, suggested to add numbers, and make it a whole A4 page.
- 2.3.44 The illustration on shopfronts is good. The guidance is slim and should be more detailed, similar to Westminster's .
- 2.3.45 There should be information about contested heritage assets, as there are applications for statues to be removed.
- 2.3.46 The shopfront guidance is good, should a shopfront design guidance be created.
- 2.3.47 Listed building principles of development should be updated to reflect the information of the National Planning Policy Framework.
- 2.3.48 Conservation Area principles of development section 1(c) cultural' in the Conservation Areas guide strikes me as ultra vires. There is no statutory

requirement to research famous occupants of a house before submitting an application.

Chapter 8 – Archaeology in Southwark

2.3.49 The dates of the Mesolithic period should be corrected to 10,000 BC - 4,000 BC.

2.3.50 Should have a reference to burial licenses issued under the 1981 Act.

2.3.51 Should include how long a scheduled area is scheduled for.

2.3.52 The Heritage SPD seems to provide warnings and problems rather than providing guidance and solutions for works that may be carried out.

Chapter 9 - Nature

2.3.53 There is not enough information on Tree Preservation Orders (TPOs), the age requirements for a tree

2.3.54 Building heights of new developments have not been included in the heritage SPD, nor has an example of scale in relation to the building and the tree.

2.3.55 A clearer explanation about the protected view terminology and clarified which buildings might infringe on this legislation

2.3.56 Noticed a numbering issue.

2.3.57 At present, section 9.1.1. does not accurately reflect that much of the endangered biodiversity of Southwark.

2.3.58 A list of useful contacts within the borough of groups/organisations who deal with amenity.

2.3.59 More detail on borough views and how they are mapped. The information should also align with the NPPF.

2.3.60 The following questions have arisen:

- How much weight does heritage assets have in registered parks and gardens?
- How set out borough view?

Chapter 10 – Heritage Crime

2.3.61 Examples of when Southwark has enforced penalties should be included here.

Chapter 11 – Glossary of terms

2.3.62 n/a

Chapter 12 – List of Abbreviations

2.3.63 n/a

Chapter 13 – Useful Contacts

2.3.64 n/a

Table List

2.3.65 n/a

Figure List

2.3.66 n/a

2.3 Developers, planning agents and interested parties

2.3.1 No representations were submitted by developers, planning agents or other interested parties.

2.4 Summary of changes made to the draft Heritage SPD

2.4.1 The key themes to come out of the consultation were;

- 2.4.1.1 Need to expand upon guidance in chapter six, 'Historic Environment in a Changing Climate'
- 2.4.1.2 Additional clarifications to be provided in chapter seven, 'Introduction to Built Heritage Assets' in order to make guidance clearer and consistent
- 2.4.1.3 Summaries requested of external guidance documents such as those from Historic England

2.4.2 Chapter six, 'Historic Environment in a Changing Climate' has been added to, with updated information and further diagrams provided. Additional clarifications have been provided within chapter seven, 'Introductions to Built Heritage Assets' and guidance updated with any national or regional policy changes to ensure consistency. The SPD was not considered the place to provide extensive summaries of external guidance as the document would become overly lengthy, however, any relevant external guidance has been linked to and signposted.

2.4.3 Full consultation responses and how they have been dealt with can be found in the Appendix D.

3. Monitoring our Consultation

3.1. Why we monitor our consultation

3.1.1. Our statement of community involvement indicates that the success of consultation can in part be measured by the number and diversity of consultees and responders. This is particularly important for Southwark which is very diverse and includes many traditionally hard to reach groups. We want to ensure the final SPD meets the needs of those living, working and visiting the area.

3.1.2. We monitor our consultation at every stage of policy preparation so that we can see where we need to engage more with certain groups.

3.2. How we monitor our consultation

3.2.1. After every stage of consultation, we look at the people and groups that have commented on the planning document and look back over the events and consultation activities we carried out to see whether we should have targeted more or different groups. We feed this into our planning for future consultation on our planning policy documents.

Appendix A – Consultation notification email/mailout

Appendix B – Zoom question and answer session invitation

Appendix C – Press notice

Appendix D – Table of detailed summary of representations and council response

Appendix A – Consultation Notification email / mailout

GOV Delivery email notification sent: 12th January 2021

Heritage Supplementary Planning Document

Southwark Council is consulting on the draft Heritage Supplementary Planning Document from 11th January until 5th April 2021.

The Heritage SPD provided detailed guidance on how to apply the relevant policies of the Southwark Plan and the emerging New Southwark Plan concerning our historic environment.

The Heritage SPD also sets out further advice on how we expect development to be consistent with wider national and local legislation and policy, within which the council must operate.

It has been written to provide better understanding of heritage matters and provides clear advice on the conservation, preservation and enhancement of our historic environment. It is designed for a wide readership, including applicants, building owners, residents, planners, community groups and developers.

Consultation will take place from 11 January 2021 to 5 April 2021.

How to comment on the Heritage Supplementary Planning Document

The plan can be viewed [here](#).

Comments can be made via the Consultation hub [here](#).

If you have any questions or issues, please contact planningpolicy@southwark.gov.uk

Southwark Council

Appendix B – Zoom question and answer session invitation

Invitation to question and answer session on 16th February at 6pm

Appendix C – Press notice

Appendix D - Table of detailed summary of representations and council response

Chapter	Reference	Name	Comment	Response
Chapter 6 - The Historic Environment in a Changing Climate		Caroline Kinight	I would like to know how Southwark plans to discourage car use. Installing on-street electric charging points only encourages a different type of car use and takes up space that could be used for public, pedestrian or cycling movement.	This is not considered to be within the scope of the Heritage SPD
Chapter 6 - The Historic Environment in a Changing Climate		Anonymous	I would like the document to further prioritise measures that reduce energy usage by allowing for energy efficient retrofitting and installation of renewable energy sources in/on buildings in conservation areas and listed buildings under permitted development rights. I would hope that making additional allowances for this in combination with educating residents and installers on historic character/sensitivities will speed the transition towards achieving net zero while maintaining the historic environment of Southwark.	This is not considered to be within the scope of the Heritage SPD as we cannot amend policies, but additional guidance could be included for assistance
Chapter 6 - The Historic Environment in a Changing Climate		Mark Morris	Expand upon harm caused by demolition	Chapter 6 of the SPD explains the harm caused by demolition in environmental terms. Harm is caused to a heritage asset through the removal of its fabric or loss of its features. In the case of a demolition the harm to the heritage is due to the total loss of a feature or a building of architectural or historic significance and should be avoided. The principle here is that the demolition of a historic building will not only lead to the loss of its architectural, or cultural significance, but should also be considered in environmental terms because there is a vast amount of embodied energy in existing buildings that is wasted if the building is demolished to make way for a new one.
Chapter 6 - The Historic Environment in a Changing Climate		Hannah Platt	Chapter 6 needs to be updated with the Mayor's Plan goals and document should be read by planning committee	The energy hierarchy will be updated to reflect the London Plan 2021
Chapter 6 - The Historic Environment in a Changing Climate		Jeremy Leech	This section mentions the voluminous technical guidance produced by Historic England on 'Energy Efficiency'. This priceless resource, however, seems to be lost in the text within this chapter. Highlighting this resource better would be very useful to applicants and their builders. Producing a precis on best practice from HE's guidance would be ideal but likely well beyond the scope of this document.	Providing a summary of the Historic England guidance is not considered to be within the scope of the Heritage SPD however there will be improved signposting to references and links included on the website.
Chapter 6 - The Historic Environment in a Changing Climate		Claire Hegarty	Paragraph on human skill and craft leading to careful repair. Touch on the materials of historic buildings: brick, stone, timber, and how they lend themselves to human skills, rather than say prefabricated cladding systems, which are industrialised. As much holistic linking of sustainability and repair knowledge and skill as possible! There is a story about revaluing forgotten skills, apprenticeships, valuing practical ingenuity, which builds an argument for sustainability on many levels across society.	This chapter will be expanded upon
Chapter 7 - Introduction to 'Built Heritage Assets'	7.4.7 Shop Fronts in Conservation Areas	Chris Thomas, British Sign and Graphics Association (BSGA)	We think that the whole section should be re-considered to offer sensible advice where it will be needed (or delete it entirely). At present, it is useless. For example, what is a "projecting" box fascia? If you mean "bulky" (in depth) box fascia, say so. But it will be important to emphasise that "box" fascias in general must be considered on merit. Modern internally illuminated "box" fascia signs (often in modern materials) are commonplace, particularly on modern shopfronts in all types of local and central shopping areas. Modern technology allows them to be of slim construction (LED illumination does not need as much space for heat dissipation as older form of lighting). They are commonly fret-cut so that light shows only through lettering/logos; or individual letters may be face or halo illuminated. We see no reason why these commonly-seen forms of signage should not be acceptable in conservation areas and on listed buildings where they are otherwise acceptable within their specific context. In particular, many conservation areas are thriving commercial centres, where all types of commercial activity and signage is expected. Similarly, many listed buildings in commercial areas have modern shopfronts where modern signage is equally appropriate. The generalisation that "box" signs (including those which have internal illumination) are "to be avoided" in conservation areas is totally inappropriate. It is also contrary to the requirements of the Regulations which require every advertisement proposal to be considered on its own merit in the interest of amenity and public safety, without any preconceptions of what is "normally" acceptable or otherwise. We therefore suggest that section 7.4.7 be wholly re-written. This could take the form of information on the common elements of "traditional" and "modern" shopfronts. It might then offer advice appropriate to each style (based on the simple and sensible advice in P38 and P42 of the draft Local Plan). The advice could be simple, eg advertisements which may be wholly appropriate on modern shopfronts (such as "box" fascia and projecting signs) may be out of place on "traditional" shopfronts where panel and hanging signs would be more likely to complement the age and appearance of the shopfront.	Clearer images will be given on what is defined as 'projecting'

Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.6.4 Historic, evidential, communal and social values	Derek Kinrade	Historical associations with famous people commonly merit blue plaques across the nation. You instance this in citing Southwark's blue plaque scheme. This , to my mind, is too prescriptive. There are a number of worthy candidates not , or not yet, so awarded who arguably deserve such recognition. Examples are William Griggs and William Harnett Blanch, whose homes survive. Both have been awarded plaques by the Peckham Society. It should be made clear that such associations can be grounds for nomination.	Paragraph 7.2.6.4 will have a new opening line to describe the assets of historic, evidential, communal and social value.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.3, p.28 (flowchart)	Derek Kinrade	"in the context of" in the heading is obscure. The section appears to apply only to the development OF listed buildings. Likewise on page 38 in relation to developments IN conservation areas.	This is consistent throughout the flowchart sections of the document, however the headings could be made clearer.
Chapter 7 - Introduction to 'Built Heritage Assets'	p.28	Laura Schaaf, Southwark and Lambeth Archaeological Excavation Committee	Expand - developments adjacent to listed buildings can have a harmful effect on their setting even to nullifying the reason for listing p28, para 2 - 'less than substantial harm' (included in the NPPF glossary) could constitute a 'major' harm (not included in the NPPF glossary)	This is not considered to be within the scope of the Heritage SPD
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.6	Hannah Dixon	1. Height of new buildings - important for feel of areas and background views of bermondsey street or Tower Bridge not to have Elephant and Castle or Battersea style sky scrapers in the background 2. Community importance over time (e.g. Essex Market in New York - been demolished when had huge role to play locally (new building rents too high for old stall holders and competing with modern stores) as well as huge historic role in the street traders/immigration story of the lower east side. Important local businesses can afford to stay in areas.	Southwark is an inner city borough where there are on-going commercial societal implications to development which are considered to be outside the scope of the Heritage SPD.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.3.7 Certificate of Lawfulness for Listed Building Consent	Mark Morris	This section is not explained in any way that will make sense to people who don't already know about the subject.	This section will be expanded to explain the Certificate of Lawfulness Listed Building Consent process in a clearer format
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.2 Does Southwark have a Local List	Mark Morris	Section 7.2.2 tells us that 14% of the original locally listed buildings have since been demolished. I think, based on that, that I would want some greater assurance that there was a point to what I was doing if I were to embark on nominating a building for locally listing.	The purpose of this document is to recognise this and set the groundwork for a Local List, to agree the criteria, explain how we will go about it and identify locally listable buildings, and establish our approach to developments affecting locally listed buildings.
Chapter 7 - Introduction to 'Built Heritage Assets'	Conservation areas	Hannah Platt	Needs to be updated with 5 areas in OKR AAP	The five proposed Old Kent Road conservation areas have not been designated yet, with a decision expected in September.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.6 Grant Programmes	Hannah Platt	Expand upon how grants can be applied for	Every grant programme has its own criteria and funding requirements so we are unable to expand upon each process.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.2 Does Southwark have a Local List	Hannah Platt	Provide examples of Locally Listed Buildings	Example photographs will be added to illustrate each criterion
Chapter 7 - Introduction to 'Built Heritage Assets'	Conservation areas	John Bussy	The integrity of Pages Walk Conservation Area is being serious attacked by developments on the edge of the Old Kent Road Area Action Plan (OKR AAP). Developers and case officers take no notice of the fact that there is a Conservation Area or the damage they are doing to it. As yet none of the recent applications have planning permission, and they are contrary to the requirements of the OKR AAP, but they keep on coming and they are included in documents setting out to New Southwark Plan Inspectors how the Council is meeting its housing and jobs targets.	This is not considered to be within the scope of the Heritage SPD as the document does not comment on particular examples
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.6 Local Listing	Eileen Conn	Historic, evidential, communal and social values: These criteria should be widened to include the uses of the building for the community as an important part of assessing its value. This is especially so for example with old sturdy buildings with features like high ceilings, now more rare in modern buildings.	Historic, evidential, communal and social values are specific criteria defined by Historic England which the Council needs to follow. We cannot expand upon the definition in any way

Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.2 Local Listing	Eileen Conn	7.2.2 the Local List – This comment follows up the zoom meeting PHRP held with Michael Tsoukaris on the Heritage SPD, and the suggestion made to arrange a volunteer process to help the Council gather information on the up to date state of the c400 buildings still on the draft list. This could build on the good experience we had with the Council in getting the info needed on the c300 commercial buildings in Peckham Town Centre for the THI application in 2011. Peckham Vision would be glad to help work with PHRP and the Council on developing a simple scheme to do this across the borough. We could trial it in Peckham and then roll it out across the borough with other community groups taking it on with the simple training we could refine in the Peckham trial. It could also dovetail into information and education workshops and sessions in different neighbourhoods about their local heritage.	This is useful to note for when the Council proceeds with public process of selection and inviting people to recognise and appreciate their built heritage, however is outside the scope of the Heritage SPD.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.3 How can I nominate a building?	Eileen Conn	I suggest that a new subsection ending paragraph is added here to cover what happens after a nomination is made so that the process is transparent and gives the nominator the chance to clarify anything not adequately explained in the reasons for nomination. This might be something like eg: "There will be a guidance note sent to each person making a Local List nomination explaining the procedure for taking the decisions and how the nominee can be involved in producing further information if necessary, and before a decision to turn down a nomination, how to respond to the reasons for that being the likely decision."	Further clarification will be sought on duty to inform nominator of any decision. The document already states that nominators have the right to appeal to the Director to revisit the decision. This implies that the council will explain its decision in these cases.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.7 Heritage Statements	Eileen Conn	I agree with the points made during the EIP hearings that explicit written guidance needs to be in the SPD about the contents for the Heritage Statement to make it standard coverage, and guidance produced which explains this more as necessary.	The flow charts provide guidance about what should be in the Heritage Statement which is set out in each chapter and does not need further explanation.
Chapter 7 - Introduction to 'Built Heritage Assets'	Conservation areas	Jeremy Leech	The Walworth Society would make most of its comments around the issue of Conservation Area and their quality. The Walworth Society's most significant concerns relate to the quality of preservation of the character of Conservation Areas. In the case of Walworth the one that is most contested is the Walworth Road Conservation Area. While we were delighted to see the adoption of the Walworth Road Conservation Area in 2015 and the development of a high-quality Conservation Area Appraisal (CAA), we are disappointed at the clarity of the guidance especially in relation to the development that is continually occurring to buildings throughout the length of the Walworth Road and the northern end of the Camberwell Road. On the positive side, the Walworth Road Conservation Area has been of tremendous benefit in preserving buildings such as the former Church Army Commissioner properties on Horsley Street which might otherwise have been considered for redevelopment rather than refurbishment. On the Walworth Road itself, however, there is a lack of clear guidance as to expectations as to what developers are or not permitted to do. For example, the shop front policy in the W Rd CA is little adhered to with little conformity to the aspirations of the adopted CAA. We have in recent months seen new open fronted butchers shops created on the Walworth Road in spite of specific guidance (5.3.11) in favour of a more traditional shop frontages. Most important is the issue of the increasing height of buildings. The core character of the Walworth Road is of three storey terraced buildings but there is currently a clear expectation amongst freeholders that it is not only acceptable to introduce a mansard roof on to the original terraces but also we are starting to see (eg with 220-222 Walworth Road) a desire to see two extra storeys being added. We are fearful that without far clearer guidance to developers, we will lose the original character of the Walworth Road and the street itself will become far more of a canyon with higher buildings lining it than has historically been the case. We would ask therefore that the SPD endorses the need for clear guidance for development in the Southwark Conservation Areas (we understand that this occurs in other conservation area guidance in other London boroughs) and is clearer about what and is what is not permitted for developers to expect to be able to do and what local people can expect in being able to defend and support the designated conservation areas. We would also like to see planning officers taking far more notice of these guidance requirements and adhering to these requirements with developers who are seeking	This is not considered to be within the scope of the Heritage SPD as the document does not comment on particular examples. The guidance will, however, be better applied in practice when adopted
Chapter 7 - Introduction to 'Built Heritage Assets'	7.4.7 Shop Fronts in Conservation Areas	Jeremy Leech	We strongly support policy 7.4.7 Shop fronts in conservation areas. We are, however, seeing very few applications for shop fronts that are in conformity with this policy which is already encapsulated in the adopted Walworth Conservation Area Appraisal at Shop Front Design 5.3.7 to 5.3.11. A current application (21/AP/0928) has been validated as an application and is clearly entirely out of conformity with this guidance.	The Heritage SPD will help to state what is required when shopfronts are concerned and guidance can be better applied in practice when adopted

Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.6 Local Listing	Jason Leech	<p>Although locally listed buildings are clearly the headline act, it would make more sense to place this section in order of precedence: after the designated heritage assets.</p> <p>The Camberwell Society made representations about these criteria during the EIP of the New Southwark Plan.</p> <p>The six groups of criteria make much more sense in the Heritage SPD than draft Policy P25, but there is still a sense that some of the pairings make odd bedfellows. It would make more sense to me, and aid consistency and comparative assessment, to pair up individual selection criteria with the four heritage values set out by HE (and which overlap neatly with the NPPP's interests). That way these criteria/considerations can guide to the values which will ultimately determinate the nominated asset's heritage significance.</p> <p>The process (method and timeframe) whereby the local list will be compiled is worthy of a separate consultation once more detail is known. It would be worth taking this matter to CAAG.</p>	Order can be amended to reflect order of precedence of designated heritage assets. Heritage Values – we have echoed the Historic England guidance on this including, by definition the 4 heritage values. This is a complex technical comment that would warrant a minor update
Chapter 7 - Introduction to 'Built Heritage Assets'	7.3.6 What is Listed Building Consent required for?	Jason Leech	Should reference HE's consultation draft which covers the subject the bullet points try to illustrate over 55 pages and is the best reference point currently available (to my mind). Perhaps its 'traffic light' system is something to incorporate here.	This is not considered to be within the scope of the Heritage SPD as we do not want to replicate existing Historic England guidance
Chapter 7 - Introduction to 'Built Heritage Assets'	Conservation areas map	Jason Leech	It is really useful to have a map (in Figure 6) of the borough's conservation areas. It is assumed that in the final version, the map would cover a whole A4 page. The illustration would be even more useful if the listed conservation areas could be numbered and these numbers appear on the map, so that each conservation area could be more clearly identified.	Map to be updated and made clearer with numbers
Chapter 7 - Introduction to 'Built Heritage Assets'	7.4.7 Shop Fronts in Conservation Areas	Jason Leech	Beyond the points made above, the discussion of 'shop fronts in in conservation areas' is useful. The annotated illustration is also very useful in helping lay applicants to articulate their proposals. What is sad is that guidance on shop fronts is limited to under two pages; although, considering the intended scope of the SPD, perhaps these 2 pages are an unintended bonus! The City of Westminster has produced three whole SPDs (47 pages in total) covering: - 'Shopfronts, Blinds and Signs – A Guide to their Design' - 'Shopfronts and Security' - 'Advertisement Design Guidelines' This supplementary planning guidance goes further than Southwark's SPD in giving much clearer guidance on the design and construction of signs (especially as regards backlit illumination); how to secure shop fronts without roller shutters; and provides lots of examples of good and unacceptable practice to illustrate the policies. There is also guidance on the application of the TCP (Control of Advertisements) Regulations 2007 which is materially relevant in almost all applications involving development of a shop front. If not in this edition of the Heritage SPD, then in a subsequent edition or altogether separate SPD, a distillation of best practice on shop front and sign design (perhaps based on the work of Purcell on the Walworth Road), would go a huge way to improve all the borough's conservation areas centred on shopping parades (Camberwell Green, Rye Lane Peckham, Walworth Road etc).	This is not considered to be within the scope of the Heritage SPD as it is not intended as a shopfront guide
Chapter 7 - Introduction to 'Built Heritage Assets'	Statues / contested heritage	Jason Leech	There should also be something about contested heritage when there have been applications in the borough to remove statues with substantial aesthetic value when their historic value (equally substantial) is contestable. This is a very current, burning matter, especially for significantly large minority groups in the borough for whom 18th century heritage assets have a far more ambivalent significance; something which may well warrant being remembered but not celebrated in public. (The Georgian Group has published some thought-provoking guidance on this.)	Southwark Stands Together pledged to conduct 'an anti-racist audit of the borough to identify statues that do not reflect our borough's diversity, especially anything with links to slavery or our country's colonial past, and to identify positive opportunities for the celebration of more diverse figures.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.4.7 Shop Fronts in Conservation Areas	Claire Hegarty	The PHRP welcomes this reference to shopfronts, but would also encourage the delivery of a Shopfront Design Guide	This is noted, however it is not considered to be within the scope of the Heritage SPD
Chapter 7 - Introduction to 'Built Heritage Assets'	7.4.11 Article 4 Directions	Claire Hegarty	This section needs an update clarifying recent government changes in permitted development rights in conservation areas.	This will be updated to reflect recent government policy changes.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.6.3 The Peckham THI	Claire Hegarty	Text needs amending, as refers to "you". (Also 6.6.4 numbers out of sync.)	This error will be corrected
can	8.2 Archaeological sites	Laura Schaaf, Southwark and Lambeth Archaeological Excavation Committee	There is no specific mention of the archaeological study of buildings	This will be updated to mention archaeological study of buildings
Chapter 8 - Archaeology in Southwark	8.2.2 Archaeology in Southwark	Laura Schaaf, Southwark and Lambeth Archaeological Excavation Committee	The dates of the Mesolithic period should be corrected to 10,000 BC - 4,000 BC	This error will be corrected
Chapter 8 - Archaeology in Southwark	8.3 The Law and Burial Archaeology	laura Schaaf, Southwark and Lambeth Archaeological Excavation Committee	Should have a reference to burial licenses issued under the 1981 Act	Burial licenses issued under the 1981 Act will be referenced
Chapter 8 - Archaeology in Southwark		Hannah Platt	Should include how long a scheduled area is scheduled for	This information will be updated

Chapter 8 - Archaeology in Southwark		Jeremy Leech	Not being an archaeologist, I've come away thinking that, as the hypothetical owner of a building in north Southwark, before I proceed with my hypothetical basement extension, I need to apply for pre-application advice with the Council's archaeologist and then hire an archaeologist and a planning consultant. I wonder whether that's the reaction of others to the other above-ground planning pages. Perhaps that's the course of action the SPD intends to provoke. Overall though, the tenor of the SPD seems to be not 'problem-solving' but 'problem-posing'; it 'warns' (or 'forewarns') a lot more than it 'explains'.	This section will be updated to focus the Heritage SPD more on 'explaining' rather than 'warning'
Chapter 8 - Archaeology in Southwark	8.2.1 What is archaeology?	Jeremy Leech	Scheduled Ancient Monuments seem to have jumped the gun and pushed in front of '8.2.1 What is archaeology?' which would naturally lead this section.	Scheduled Ancient Monuments to be moved to between 8.2.4 and 8.2.5
Chapter 9 - Nature	TPO's	Caroline Knight	I didn't feel there was enough information about TPOs, nor how you will prevent developers from "accidentally" cutting down trees or accidentally "damaging" trees so that they eventually die. I would like to hear that Southwark Council is including in their contracts that any damage to a protected tree (accidental or otherwise) will incur a fine.	The Heritage SPD clearly states that it is a criminal offence to carry out unauthorised works to a tree under a TPO and therefore no change is required.
Chapter 9 - Nature	Borough views	Caroline Knight	There seem to be a great number of buildings planned that will be over 20 storeys. You have not given the actual estimated height nor have you provided a graphic for scale (ie. placing a picture of a planned building right next to say the Gherkin). I think by doing this, you are hiding just how high these planned buildings will be and I would like to use this opportunity to state my objection to any building higher than either 15 storeys or higher than anything that is currently built in Peckham, whichever is the tallest. Increase clarity on height of buildings proposed.	This is not considered to be within the scope of the Heritage SPD as the Borough Views policies and the site allocation in the NSP are the relevant policy.
Chapter 9 - Nature	Borough views	Caroline Knight	I think you could have been clearer about the protected view terminology and clarified which buildings might infringe on this legislation	This is not considered to be within the scope of the Heritage SPD as it is not intended to offer detailed guidance on views but to explain the process of identifying and scoping townscape and visual impact assessment. Text will however be updated to state that views are considered in accordance with Historic Engalnd guidance on setting in the context of heritage significance (i.e. what is significant about each view) and better understand the impact of a proposal on that significance through a process of qualitative assessment.
Chapter 9 - Nature	9.5.4	Lambeth Archaeological Excavation Committee	This paragraph has been numbered 8.5.4	This error will be corrected
Chapter 9 - Nature	TPO's	Hannah Platt	More information on age requirements	TEMPO is the method used by the Council and not age so no change is required. TEMPO template will be added to the website for guidance.
Chapter 9 - Nature	Registered parks and gardens	Hannah Platt	How much weight does heritage have?	The weight of a heritage asset will depend on its significance.
Chapter 9 - Nature	Borough views	Hannah Platt	How set are they seeing as Southwark has already shifted the actual view requirements to suit planning proposals for the southernwood retail park planning application	This is noted, however it is not considered to be within the scope of the Heritage SPD as the NSP policy has been consistently applied.
Chapter 9 - Nature	9.1.1 Southwark and natural environment	Mike Priaulx	At present, section 9.1.1. does not accurately reflect that much of the endangered biodiversity of Southwark is dependent on buildings for nesting and roosting, e.g. bats, sparrows, swifts, and starlings, for example. This is especially relevant to this document as it relates mostly to older buildings which have the greatest proportion of this biodiversity. 9.1.1. Please add ", in addition to roosting and nesting spaces in older buildings which support bats and nesting birds" or similar to the end of the first sentence. The potential significance for biodiversity of the building should be considered, e.g. for bats or nesting birds.	This is not considered to be necessary to the Heritage SPD however a link to the Council's Biodiversity Action Plan will be included.
Chapter 9 - Nature	Borough views	Jason Leech	Although not necessarily for inclusion in this document, it would be useful if Conservation Area Appraisals dedicated space to discuss locally important views. This is not often done.	All Conservation Area Appraisals have section on important views. 7.4.5 will be updated to also refer to local views.
Chapter 9 - Nature	Useful contacts	Eileen Conn	I suggest this list includes the community organisations working on heritage eg all the amenity societies, and others like Peckham Vision, and history associations etc. As this is a digital document this can be updated from time to time eg annually or every other year.	List of useful contacts will be updated on the website to ensure it is kept up to date.
General	Whole document	TFL	In general terms we welcome the work undertaken and the basis this should provide on conservation and heritage matters as development comes forward as set out in the OKR AAP is implemented. It will be important going forward to ensure careful coordination between the aims and objectives of the SPD which by definition relates to conservation and the development aspirations as set out in the OKR AAP. The two should work together in providing an appropriate framework for delivery of new housing and jobs, the district centres and other regeneration alongside new and improved infrastructure, notably for TFL the Bakerloo Line extension and the Healthy Streets scheme.	This is noted, however it is not considered to be within the scope of the Heritage SPD

General	Whole document	Historic England	We note and welcome the contents of the draft SPD, which contains much helpful content and advice on the local historic environment and the planning system. Our only comment therefore would be to suggest that in finalising the document, cross-references to the appropriate policies in the New Southwark Plan be included at the relevant point. So for example, in the section on page 28 (the principles of development in the context of listed buildings) there should be a signpost to policy P18 (listed buildings) in the NSP. I trust these comments are of use. Please do not hesitate to contact me should you require any further information.	Referencing to NSP will be updated as adopted.
General	Whole document	Caroline Knight	Maps could be improved. The detail and longer explanations are very helpful but the different types of maps used with the lack of key street names on all of them makes it difficult to visualise	Conservation Area Map to be updated to be clearer.
Chapter 4 - Legal and Policy context	4.2	Derek Kinrade	In section 4.2, page 5 of a heritage document it would be helpful if something could be said about the set of policies for the historic environment in the new London Plan. These are of crucial importance.	References to London Plan 2021 will be updated.
General	Whole document	Derek Kinrade	The document is very welcome, but difficult to navigate.	Contents page can be made clearer, and sub-headings on footer to aid navigation.
General	Whole document	Laura Schaaf, Southwark and Lambeth Archaeological Excavation Committee	It would be useful to have links to referenced documents. How will updates to the policy be managed in future - perhaps by reference to a Southwark Council or other website	Links to documents will be inserted where necessary
General	Whole document	Hannah Dixon	A vision at the beginning of how you expect southwark to look, e.g. some mock ups of how old architecture will be sensitively treated alongside newer developments	Updated images are to be added to reflect this.
General	Whole document	Mark Morris	The layout looks dated, cluttered and crowded. I think the content is probably fine, but the layout is cluttered and off-putting.	Layout will be revised where possible.
Chapter 9 - Nature	Borough Views	Hannah Platt	More detail on borough views, what they are and how they are mapped	This is not considered to be within the scope of the Heritage SPD as it is not intended to offer detailed guidance on views but to explain the process of identifying and scoping townscape and visual impact assessment. Text will however be updated to state that views are considered in accordance with Historic England guidance on setting in the context of heritage significance (i.e. what is significant about each view) and better understand the impact of a proposal on that significance through a process of qualitative assessment.
Chapter 10 - Heritage Crime		Hannah Platt	Want examples of when Southwark has actually enforced penalties for heritage crime (if they can actually find any)	Example to be provided of 549 Lordship Lane with photograph
General	Whole document	John Bussy	It is produced with double pages which means you need a big screen to be able to read the digital version, you cannot print a single page and a printed double page is too small to read.	The Heritage SPD is set out as single page, but presented in a double page view. This will be amended to single pages.
Chapter 9 - Nature	TPO's	Hannah Platt	More information on how to get a TPO (minimum or maximum age for trees)	TEMPO is the method used by the Council and not age so no change is required. TEMPO template will be added to the website for guidance.
General	Whole document	Jeremy Leech	I should flag accessibility. Although the language used in the draft SPD is sometimes beautifully lyrical, I did also find the text sometimes quite dense. Whereas the professional has no problem understanding the document, a lay person may find it hard-going or daunting.	Heritage SPD will be reviewed to assess where plain English alternatives are required

General	Whole document	Jeremy Leech	<p>As regards the content: the draft SPD is very good at highlighting the considerations any applicant must factor in; however, it is much less good at indicating how to actually develop acceptable proposals. It highlights questions much more than it answers any. That may be said to be an intentional limitation because it is just one step toward a complete heritage strategy. It follows that there will be 'gaps' in the SPD as regards different standard/regular types of development of heritage assets, and that these gaps will be filled in the coming years by supplementary heritage guidance which will form a larger suite of documents. If that's the approach to be adopted though, then the reference to more detailed guidance by other heritage bodies (eg. Historic England) must be much better integrated and feature much more prominently. If the Heritage SPD is not to be the vehicle for conveying that information, then it must be the perfect route to that information.</p> <p>For example, in some other boroughs, the SPG ends with a 'Reading List' or 'Further Reading'. Here, details could be given of Historic England's voluminous guidance (available to download from its website), especially its Conservation Principles, Policies and Guidance (2008). Depending on the progress of the consultation draft of HE's 'Listed Building Consent Advice' nearer the time of the draft Heritage SPD's adoption, reference to this could also be made. This Advice will likely become the go-to document for all owners/custodians of listed buildings and their consultants. Equally, it might be useful to mention the Georgian Group and the Victorian Society as statutory consultees for their respective periods. Both these amenity societies, as well as the Twentieth Century Society, produce scholarly writing and can provide expert advice on proposals to develop listed buildings.</p> <p>It would also be helpful to applicants if it were made clear that the Planning Practice Guidance on the Historic Environment is available online, continually updated, and is a remarkably user-friendly guide on (all) planning matters.</p>	The Heritage SPD is not intended to be the only guidance for heritage assets or as the place for replicated guidance, however it will be updated to better signpost other guidance available.
Chapter 4 - Legal and policy context		Jeremy Leech	Makes no reference to Historic England. This absence seems odd, especially when there's reference to HE's 'heritage values' in Chapter 5.	This was not raised as a concern from Historic England so no change is seen to be necessary
Chapter 3 - How can I learn more and get involved?		Jeremy Leech	This section has good purpose but is a bit flimsy. Despite seeking to guide the reader to getting involved, there are no contact details for the Conservation Area Advisory Group, or other local amenity groups. eg. The Camberwell Society has a long established Planning Sub-Committee (just as old as CAAG) which reviews all applications submitted within the Camberwell area; gives advice to current and prospective householders and developers; campaigns on strategic matters; and drafts sound planning policy. Would it not be useful to list active groups who can assist and educate, and to provide contact details for them?	List of useful contacts will be updated on the website to ensure it is kept up to date.
General	Whole document	Jeremy Leech	It might make the document clearer and easier to use if 'the development of heritage assets' formed a chapter in itself which, ultimately, paid very close reference to the final draft(s) of the New Southwark Plan's heritage policies. This section could guide householders and commercial developers on how to submit valid and acceptable applications. The 'Principles of Development in the Context of Heritage Assets' (p.6) could preface this section, followed by the 'step-by-step' guides for development within the curtilage of listed buildings and conservation areas.	No change is necessary as guidance on development is offered in each chapter within the flow chart sections.
Chapter 9 - Nature	9.6 Views, vistas and panoramas	Jeremy Leech	It needs to be clearer that not all the information requirements listed are required in all cases. As it reads, it appears that 3D visualisations, AVRs, UXB surveys (1) are par the course. Para. 189 of the NPPF is clear that 'the level of detail [in an application] should be proportionate to the assets' importance'. It would help if the purpose/value of each of these information requirement was made clear, which would also clarify the kinds of applications to which they would be relevant.	Text to be updated to clarify that accurate views and CGI's are only necessary for Major and Strategic Major applications.
Chapter 7 - Introduction to 'Built Heritage Assets'	Listed building principles of development	Jeremy Leech	'Section 1(c) Its value' in the Listed Building guide strikes me as problematic. Heritage 'values' (or 'interests') in the NPPF are very precisely defined concepts. The step-by-step guide trips up the applicant by encouraging them to freestyle this section rather than, methodically, pick out and explain the evidential, historical, aesthetic or communal values encapsulated in their asset.	Minor amendment will be made to ensure consistency
Chapter 7 - Introduction to 'Built Heritage Assets'	Conservation Area principles of development	Jeremy Leech	'Section 1(c) cultural' in the Conservation Areas guide strikes me as ultra vires. There is no statutory requirement to research famous occupants of a house before submitting an application for a roof extension. Perhaps this section could be re-framed to explaining the two-step process in assessing (1) whether proposals harm, preserve or enhance the character and appearance of the building itself and, (2) its altered/proposed contribution to the conservation area.	Cultural' value to be removed.
Chapter 5 - Understanding Heritage Terminology	5.2	Jeremy Leech	Section 5.2 (which discusses heritage 'values' or 'interests') needs to go much further in its explanation of what is meant by evidential/historical/aesthetic/communal value, since these are fundamental concepts which underpin the management of change and decision-taking. The Glossary has a longer but still too brief explanation. A precis of paras. 30-60 of HE's Conservation Principles, with some illustrative examples of buildings encapsulating each of these values (eg. photos / case studies) would be ideal if this is to be a genuinely accessible document.	It is not considered to be within the scope of the Heritage SPD to provide a precis of another document however a link will be provided on the website to keep it up to date.

General	Whole document	Jeremy Leech	The definition of 'development' in the Glossary with reference to s55 of the TCPA 1990 may help to make its explanation more precise and declutter the 'step-by-step' guides. For example, the reference to 'change of use' is correct but not necessarily intelligible to the lay person unfamiliar with the Use Classes Order 1987 (as recently substantially amended).	Definition will be updated to provide greater clarity.
General	Whole document	Jeremy Leech	A further improvement would be a solid explanation of heritage 'harm', and how this is weighed against 'public benefit' in the planning balance. 'Harm' is mentioned in Chapter 4 and in the following chapters, and in the glossary, where it is defined but not really explained.	This is not considered to be within the scope of the Heritage SPD as the term 'harm' is defined by case law and legal precedent, and not even defined in the NPPF
Chapter 3 - How can I learn more and get involved?		Claire Hegarty	We suggest that here it would be helpful to list the "local groups, historical societies, organizations, etc" , as well as the council staff, contacts and resources. This could be an expansion of Section 13 Useful Contacts.	List of useful contacts will be updated on the website to ensure it is kept up to date.
Chapter 4 - Legal and policy context		Claire Hegarty	The NPPF, London Plan and New Southwark Plan all sit in relationship to one another. Michael Tsoukaris (in his talk to us) showed a diagram which illustrates the interrelationship of these different planning frameworks. Perhaps that should be included? The document needs to take account of both the new London Plan and the NSP when approved. Any relevant heritage issues need to be explained, as it is surely unrealistic for citizens to have to go through the documents? Give full reference for Historic England 'Conservation Principles' guidance.	Diagram explaining document hierarchy to be added.
Chapter 7 - Introduction to 'Built Heritage Assets'	Principles of development in context of Heritage Assets	Claire Hegarty	From an organizational point of view, the whole discussion of the Heritage Statement would benefit from having its own section, setting out what is expected in a Heritage Statement with clear reference to listed buildings, locally listed buildings, conservation areas. The Heritage Statement is an important step in establishing the value of a building or space, and as high a standard as possible should be encouraged. We've set out below (with reference to locally listed buildings), that support and guidance for owners on the public is needed.	The Heritage Statement is explained through the flowchart sections and no change is seen to be necessary.
Chapter 5 - Understanding Heritage Terminology	5.5	Claire Hegarty	Typo: page 9 item 5.5 para 2 text repeats " It is important... etc.)	Error to be corrected.
Chapter 6 - The Historic environment in a changing climate		Claire Hegarty	The explicit relationship between heritage and climate breakdown is welcome, in particular the link between re-use and embodied carbon, and the inherent sustainability of historic buildings. A clear statement on the interconnected issues around repair, conservation, avoidance of demolition, should be inserted at this point.	Text to be updated to reinforce this interconnected issues.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2 Locally listed buildings	Claire Hegarty	<p>The PHRP supports the adoption of a local list for Southwark which identifies, celebrates and protects heritage value across the breadth of the historic environment. The PHRP proposes that the compilation of a Southwark Local List will include an inclusive process of community engagement to encourage wide participation, and to ensure that a broad range of histories, voices and experiences is reflected in both the nomination and adoption processes. Our concern is that there is a lack of active proposals for encouraging and supporting community participation in nominating and agreeing a local list. Draft Heritage SPD item 3 'How Can I learn more and get Involved' - acknowledges the importance of community knowledge and experience and suggests ways in which people can connect and make contact with various heritage groups and organizations, and the Council's planning decision making process. However, in our opinion, this does not go far enough. It relies on people being able to take the initiative, and does not address the problem that while people are deeply interested in their built heritage and environment, they often feel detached and excluded from discussions and decision making, and the planning process feels mechanistic, technical and alienating. Surely this process of adopting a Southwark Local List (almost from scratch) is an opportunity to reconnect buildings to the space of culture and peoples' lived experience?</p> <p>We note that the criteria in the Draft Southwark Heritage SPD are based on Historic England's Advice Note "Local Heritage Listing: Identifying and Conserving Local Heritage" (December 2020). However, the Historic England document also emphasises the importance of:</p> <ul style="list-style-type: none"> • Local consultation (item 17), • Community experience and knowledge (item 20), • Communications (item 31), • Inclusivity (items 32, 34, 37) <p>The PHRP believes that the process of nominating and adopting a local list offers great scope for involving volunteers in assisting the council to do the necessary assessment of all the buildings on their existing draft lists - i.e. to check they still exist and if they do to complete templates on the key facts that the Council needs to know. This would echo the successful approach in recording the needed info on all the commercial buildings in Peckham Town Centre for the application to the HLF for the THI. The PHRP would be pleased to work with the council, Peckham Vision and other</p>	The Heritage SPD will be updated to ensure that consultation between communities and affected building owners is explicitly referenced.

			<p>Section 7. The principles in relation to applications concerning listed buildings and in conservation areas are written as applying to developments of such buildings. There is nothing there about developments which are external to the heritage assets but may cause harm to them (such as the Aylesham Centre proposals). For that circumstance guidance is located on page 6, but even there it is not clear who is being addressed.</p> <p>'Harm'. It is explained on page 27 that the NPPF requires the LPA to assess the degree of proposed harm and to decide if it is substantial or less than substantial. This is a very crude measure if interpreted literally. The degree of harm must surely be judged on the facts of each case. There is a very real danger that if the harm is judged to be a simple 'less than substantial' it may be disregarded.</p>	
Chapter 7 - Introduction to 'Built Heritage Assets'		Claire Hegarty		This is not considered to be within the scope of the Heritage SPD as 'less than substantial harm' is defined by the NPPF. The process of selection for the Local List is also intended to accommodate community engagement.
Chapter 7 - Introduction to 'Built Heritage Assets'	7.2.64 Criteria for local listing	Claire Hegarty	Criteria for local listing. We suggest an opening 'Association with a celebrated person having lived in a building may be a factor in selection. For example.....'	No change is necessary as this is already a category for local listing 'evidential, communal and social values'.
General	Whole document	Claire Hegarty	Offer building owners information which allows them to make an informed choice about who they employ to work on their historic buildings, e.g. architects, builders, tradespeople who have experience and expertise in working with historic buildings.	This is not considered to be within the scope of the Heritage SPD as it would be inappropriate for the Council to promote organisations. Chartered bodies which can help with this matter such as RIBA, RICS, etc have been referenced
General	Whole document	Claire Hegarty	Perhaps a model document should be published to show the quality of information expected in a Heritage Statement?	This is not considered to be within the scope of the Heritage SPD as guidance has been provided.