

Appendix 11: Table of representations received at Draft revised AAP stage

List of objectors and objector numbers

Organisation	Surname	First Name	Objector No.
	Aitcheson	Dr & Mrs	1093
	Adamson	Joanne	1116
	Adenwalla	Pauline	178
	Anderson	Rory	1075
	Anonymous	1	1095
	Anonymous	2	1127
	Anonymous	3	1128
	Anonymous	4	1185
	Anonymous	John	1187
	Anonymous	Asha	1079
	Arayo	Mary	1113
	Boulton	Alma	1106
	Cavouras	Anastasia	1114
	Chung	Nicola	1100
	Darcy	Alan	1094
	Debbage	Simon	1104
	Droghier	Fabio	1125
	Egbe	Joseph	1101
	Green	George	1103
	Hartt	Peter	1097
	Hewitt	Jerry	191
	Hodge	Brian	1107
	Holder	Tom	1126
	Holmes	S	1184
	Howe	Jennifer	1111
	Kelly	Adrian	1082
	Kingwell	Patrick	1112
	Kukoyi	Taiwo	1186
	Lai	Hon-Wai	1096
	Langton	Dave	1091
	Martin-Taylor	Robert	1083
	McCarthy	Kate	1092
	Mcllwraith	Nicholas	1122
	Meredith	Russell	1102
	Miah	Jorina	1183
	Momodo	Nathan	1090
	Ogunbiyi	Toks	1077
	Oh	Anthony	1110
	Pooi Yee	Yong	1076
	Roberton	Morag	1080
	Sessa	John-Paul	1115
	Shcherbakov	Andrey	1120
	Sproston	Alison	1099
	Stecklow	Steve	1084
	Stenson	Jon	1105
	Taylor	John	845
	Vaghela	Dipa	1078
	Veneziano	Sara	1109
	Vesey	Christine	1085

	Vintner	Phil	1081
	Walker	Fay	1182
	Warren	John	1098
	Weber	Manuela	1123
	Wood	Richard	1089
	Woolhouse	Angela	1124
Alfred Salter Primary School			1117
Avia Life & Pensions Ltd			1108
British Land			1118
English Heritage			961
Environment Agency			643
Fairview New Homes			1121
Greater London Authority			196
Highways Agency			162
King's College London			248
Port of London Authority			119
Surrey Docks ward councillors			1074
Canada Water (Developments) Ltd in partnership with Sellar Design and Development			159
Sport England			795
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Transport for London			214

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Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
119	374	Policy 6	<p>Thank you for consulting the PLA about the draft revised Canada Water Area Action Plan (AAP). I have chosen to respond by email rather than filling in the questionnaire and I hope that is acceptable. As the areas of interest to the PLA have not changed substantially since I last reviewed the AAP many of the comments have been raised previously.</p> <p>Reference continues to be made to a proposed Thames crossing. Any crossing will need early discussions with the PLA to ensure that it does not have a detrimental impact on navigation, river regime or environment</p>	<p>The reference to the Thames Crossing was adopted in the AAP in 2012. The council is not proposing to amend the reference in the draft revised plan. The need for discussions with the PLA, if the crossing were to be progressed, is noted.</p>
119	375	Policy 7	<p>Whilst the reference to river transport in policy 7 is welcomed, it is slightly confusing. Does this mean that the Council considers river transport to be public transport? There is no target or indicator in the document for monitoring river transport usage and the document needs to be updated to reflect the target in the River Action Plan to increase passenger journeys on the River Thames to 12 million a year by 2020 and maximise its potential for river travel. There is also no reference in the document to the role that the river could play within the AAP area in transporting materials to and waste materials from development sites</p>	<p>The reference to river transport is part of the adopted AAP and the council is not proposing to change it in the draft revised AAP. Any target should measure the impact of the AAP. From that perspective referring to the target of 12 million passenger journeys per year does not help.</p> <p>The council's Sustainable Transport SPD, which applies across the borough, promotes the use of river in transporting materials and waste.</p>
119	376	CWAAP 23	<p>Given that South Dock Marina is London's largest marina and the document identifies that boatyards are protected in the London Plan it is surprising that the Council is considering alternative development on the car park site. It is also surprising given the desire to see an increase in passenger and freight transported on the River Thames. It is questioned how the existing boatyard would be able to expand to meet any increased demand for their facilities if the car park site is developed in accordance with the AAP as currently drafted.</p>	<p>This site designation is part of the AAP which was adopted in 2012. The council is not proposing to change the designation in the draft revised AAP. The existing site allocation explicitly protects the boatyard.</p>
127	529	General	<p>Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water.</p> <p>Thames Water are the statutory sewerage and water undertaker for Borough and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012.</p> <p>Comments Thames Water have previously raised some concerns over water and wastewater network capacity in the area during earlier consultations on the Canada Water Area Action Plan.</p> <p>The existing text included in the Area Action Plan in sections 6.4.12 and 6.4.13 is supported. To assist with ensuring that any necessary water or wastewater upgrade requirements are identified at an early stage developers are encouraged to contact Thames Water to discuss water and wastewater infrastructure requirements and identify how these will be delivered.</p> <p>I trust that the above comments are of use. However, should you wish to discuss the comments please do not hesitate to contact me</p>	<p>The support is noted.</p>

Obj-jector no.	Rep no. Policy	Details of Representation	Officer Response to Representation
159	512 CWAAP 24	<p>Our client agrees that proposals should maximise the amount of non-residential use that can be provided on Harmsworth Quays and adjacent sites, as these uses will assist in transforming Canada Water into a town centre destination. However, housing should also be a key priority for Site E, as the site can also provide a significant proportion of the 2,500 new homes required by the AAP, including a sizeable proportion of the 875 affordable homes.</p> <p>The current application proposals for Sites C and E include the delivery of non-residential floorspace at Site E, providing up to 2,460sqm of office floorspace for workshops and business hubs for the local community, as well as new retail and health uses. These uses will help to animate this part of Canada Water, providing a working population on the site during the day and drawing further customers for retailers.</p> <p>In order to deliver both the above benefits as well as those associated with the redevelopment of site C, a viable and deliverable scheme is required, which includes a quantum residential units on Site E.</p> <p>We would therefore respectfully request that the above be recognised within the proposal for site CWAAP 24 and that residential use (with capacity of up to 236 units) be included as a requirement for Site E.</p>	<p>Support welcomed. The Council considers that the policy provides a balanced set of guidelines for the redevelopment of the sites within the CWAAP 24 allocation which emphasises the importance of non-residential uses. The AAP recognises that the majority of new homes will be delivered on the proposals sites in policy 21.</p>
159	517 Policy 17	<p>Our client strongly supports the Council's recognition of the appropriateness of tall buildings in important locations in the town centre, as this is key to the delivery of sites C and E.</p> <p>The current application proposals for the redevelopment of Sites C and E have been developed in the context of the changed position on Harmsworth Quays (allowing the town centre to expand eastwards). The tall buildings proposed on Site C as part of the application will:</p> <ul style="list-style-type: none"> • Allow for the creation of access to the basin, as well as significant new public open spaces and streets at the heart of the town centre; • Reinforce and enhance already established desire lines and open up the site and allow for new connections and links, improving the permeability and connectivity of the town centre and beyond; • Provide active double height ground floor frontages for town centre uses, reinforcing the function of the town centre and helping to animate the spaces around the buildings; • Have negligible impacts on LVMF views and heritage assets and reinforce the identity of Canada Water on the wider skyline as a Major Town Centre and focus of intensification for growth; • Provide an exemplary development in terms of urban design, composition and detailed design of the built form and landscape; • Provide high quality residential accommodation, significantly exceeding minimum space standards, providing a mix of unit types and communal facilities for residents of the development; 	Support noted

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- Allow adequate sunlight and daylight into streets, public spaces and courtyards;
- Avoid harmful microclimate and showing effects or adverse effects on local amenity;
- Include a publically accessible roof garden on the upper floor of building C4.

The application proposals for Site C therefore demonstrate the suitability of tall buildings within Canada Water, as now proposed within the revised CWAAP

159	521	Policy 16	<p>The amendments to Policy 16 are welcomed and we believe that the application proposals for the redevelopment of Sites C and E will assist the Council in achieving the aims of the revised policy by establishing the Canada Water basin as the new town centre within the wider area. The application proposals provide a number of new and connected key public spaces including a new public square, within which will be situated three central buildings and a large centre lawn, with connections to the water provided by the introduction of new steps along the edge of the basin. The proposals also allow sites to the east of Surrey Quays Road to integrate into the wider town centre by providing space for the safeguarding of roads between Site E, Mulberry Business Park and Harmsworth Quays and providing new public space on Surrey Quays Road, which is responsive to both the existing context and the Council's longer term plans to close the southern end of Surrey Quays Road to through traffic.</p>	Noted
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159	522	Policy 22	<p>Policy 22 Affordable Homes confirms that "Development in the AAP area will provide a minimum of 875 new affordable homes between 2011-2026" and that "in schemes of 10 or more homes, at least 35% of homes must be affordable". The policy also confirms that of the affordable homes, "70% should be social rented and 30% should be intermediate".</p> <p>Our client recognises the need to provide a range of different types of housing types to meet the needs of the community and they are supportive of the Council's requirement for new affordable housing to be provided on the CWAAP proposals sites. However, in considering the level of affordable housing to be provided on individual sites, the wording of the policy does not take into account the need to ensure the viability and deliverability of development.</p> <p>The NPPF advises that sustainable development requires careful attention to viability and costs in plan-making and decision-taking and that the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.</p> <p>The need to ensure viability and deliverability is also reflected within London Plan Policy 3.12, which confirms that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to a number of factors, including the site specific circumstances of the site. Part B of the Policy confirms, "negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including provisions for re-appraising the viability of schemes prior to implementation and other scheme requirements".</p> <p>Our client submitted proposals in December 2012 for the redevelopment of Sites C and E to</p>	<p>We will take viability into account. It is our intention that policy 22 of the AAP will be used alongside other policies in the development plan including Core Strategy policy 6 and the relevant London Plan policies. Core Strategy policy 6 states that we require the maximum amount of affordable housing as is financially viable. The Affordable Housing SPD sets out that where the policy requirement of affordable housing cannot be met, we require applicants to prepare and submit a financial appraisal to justify the amount and or type.</p> <p>The policies in the London Plan and Core Strategy will be applied and do not need to be repeated in the AAP.</p>
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			<p>provide a development of very high design quality, containing a mix of new retail, leisure, employment and residential uses surrounding a new public square.</p> <p>In considering the level of affordable housing to be provided as part of the development, a financial viability assessment was submitted to the Council. The viability assessment draws attention to the sizeable costs and phasing requirements associated with Decathlon's involvement, who have a lease for the existing premises which runs until 2028 and will be re-provided with a new and significantly larger store within Phase 1 as part of the contractual arrangements agree in order to release the site for redevelopment. Consequently a lower level of affordable housing than 35% is currently being negotiated with the Council so that a viable and deliverable scheme providing tangible regenerative benefits on two key town centre sites can be delivered within the lifetime of the CWAAP.</p> <p>In order to be consistent with NPPF and the London Plan, we would request that Policy 22 be reworded as follows:</p> <p>"In schemes of 10 or more homes, the Council will endeavour to secure at least 35% of homes as affordable, subject to individual site circumstances, including development viability.</p> <p>Of the affordable homes, 70% should be social rented and 30% should be intermediate."</p>	
159	523	CWAAP 7	<p>With regard to updated proposal site CWAAP7, we welcome the Council's recognition that the Decathlon site can accommodate a higher density of residential development than previously estimated. In line with the revised proposal site designation, the submitted application proposals demonstrate that the site has capacity for 800 units, whilst at the same time achieving a policy compliant mix of units and exemplary residential standards. In accordance with the revised site designation, Sellar's proposals also provide public open space, quality restaurants and cafes that maximise the waterside location, a new cinema and flagship Decathlon store with town centre basement car parking, alongside high quality retail stores, including a new food and convenience store.</p>	Support for the policy is noted.
162	361	Policy 8	<p>The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport.</p> <p>The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.</p> <p>We have reviewed the information and have no objection</p>	Noted.
178	653	Vision	<p>The AAP needs to be far more robust and visionary for the area. The fact that the comments by Southwark's Design Review Panel regarding the lacklustre application to extend Surrey Quays Shopping Centre showed that assurances given in CWAAP about design quality were weak and unenforceable.</p> <p>The AAP needs to be updated to clearly, robustly and explicitly ensure that only developments of excellent design and quality are constructed. The AAP needs to be far more robust to deliver</p>	The vision has been examined and was found to be sound by an independent inspector. During the EIP the council maintained that any changes to the plan associated with Harmsworth Quays could be formed within the scope of the vision and therefore no substantive changes were required to the vision. However, some amendments are proposed to bring more prominence to the council's aspiration to diversify the economic base of the town centre.

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			the stated themes. To date, the aspirations of the community have not been met and outcomes are very disappointing.	
178	654	Policy 1	<p>POLICY 1 SHOPPING IN TOWN CENTRE</p> <p>Should read The large retail developments MUST provide a range of shop unit sizes. The planning conditions to ensure that the units are suitable and viable for independent operators must be based enforceable and proven evidence, demonstrable need and appropriate leases.</p> <p>The area falls far short of being a major town centre (4.2.3)</p>	<p>We consider that the current wording of the policy is sufficient to meet our objectives. It explicitly states that we will use conditions or obligations to ensure that units are made available as independent units. This policy has been examined in 2011 and the plan was found to be sound. We do not consider that the policy needs to be changed.</p>
178	655	Policy 2	<p>POLICY 2 CAFES AND RESTAURANTS IN THE TOWN CENTRE</p> <p>Should readWe will ENSURE provision cafes Site A, Site B and Site C Experience to date of Site B is that the units are in the wrong place and too small and have therefore remained empty for 2 plus years rendering the Canada Water Plaza a bleak and forlorn place as opposed to the promised vibrant town centre. The Plaza design appears to have had more to do with providing a water view for Ontario Point flats than a community amenity</p>	<p>We agree that improvements should be made to the plaza and are looking at potential opportunities. It should be recognised however that it may take time for the plaza to become better used, given that footfall is still quite low. It will become better used, once developments on the Decathlon site and Harmsworth Quays get underway and the number of residents and businesses in the vicinity of the plaza increase.</p> <p>We do not consider that the proposed text is necessary. Policy 2 already adequately captures Southwark's desire to bring cafes and restaurants to the area.</p>
178	656	Policy 3	<p>POLICY 3 IMPORTANT SHOPPING PARADES</p> <p>Should include wording to restrict the number of betting shops to one and ban pay day loan shops.</p> <p>Should include wording that encourages LBS to offer units empty for more than 6 (?) months to pop up initiatives or entrepreneurs to stimulate the economy of the streets and create opportunities for employment.</p> <p>Policy 3, 4 and 5 will only be successful if there are logical and meaningful pedestrian and cycle routes (policy 6) across the area – particularly linking Albion street to Canada Water tube / bus station and Canada Water library . Figure 7 does not indicate such a route.</p> <p>Policy 3, 4 and 5 will only be successful if there is substantive employment and family housing in the area. Currently no day time footfall nor incentive to return to the area after work for leisure activities</p> <p>Pedestrian access to the shops within the Surrey Quays Shopping Centre is poor for residents living in the north of the area.</p>	<p>Betting shops and payday loan shops fall within the A2 use class. Developers and occupiers do not require planning permission to change between uses in the A2 class (eg between banks, travel agents, building societies, betting shops, post offices etc) or to change from an A3 use (café restaurant), A4 use (pub/drinking establishment) or A5 use (hot food takeaway).</p> <p>However, borough-wide, the council is introducing an Article 4 direction to ensure that these change of use do require planning permission. This will come into immediate effect in October 2013.</p> <p>The planning system and use classes order provides flexibility that allow pop-up shops to open. The government are promoting further deregulation to allow changes of use from retail (Class A1) to café/restaurant (Class A3) without needing planning permission and will consult on allowing a change of use to residential without the need for planning permission.</p> <p>We are aware that growth in the area over the life of the plan will require improvements to pedestrian and cycle connectivity. Policy 6 recognises and supports this.</p>
178	657	Policy 8	POLICY 8 VEHICULAR TRAFFIC	<p>Our proposals aim to simplify the gyratory system making it less complicated for all users. Our testing shows that reintroducing two-way</p>

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		<p>Not convinced returning Lower Road to 2 way will have a significant impact on the severe congestion and pollution in the area.</p> <p>A radical re think of the areas road network is required.</p> <p>There is little sign that TFL are coming forward with serious well funded solutions and the focus has been on Elephant and Castle, not Canada Water. The Rotherhithe Tunnel, gyratory and local roads continue to be heavily used with congestion affecting economic growth. The Congestion charge has not delivered substantial reductions in traffic because drivers use our roads to avoid charges. There needs to be coherence and coordination all along the A200 and between planning authorities including Lewisham.</p> <p>More use of river bus and more river bus stops needed.</p>	<p>traffic on Lower Road substantially reduces traffic flows on Rotherhithe Old Road which has the potential to significantly improve the environment for residents. While the proposed changes do not significantly increase the capacity of the network, revised signalling of key junctions enables traffic to move through the area more smoothly. It will also enable us to improve pedestrian crossings on Lower Road, reducing the barrier effect it currently creates between the shopping centre and Surrey Quays station, the Hawkstone Estate and Southwark Park.</p> <p>Policy 7 supports improvements to public transport, including river transport.</p>
178	658 Policy 10	<p>POLICY 10 PARKING FOR RESIDENTIAL DEVELOPMENTS</p> <p>A total ban on converting garages into living accommodation should be introduced. Policy 10 must be considered in the light of the cost of public transport, lack of employment in the area and the cost of public transport to say take the children swimming at E & C / Lewisham. Families need cars and car clubs are not the solution for low income families / people with anti social hours jobs.</p>	<p>Policy 10 strikes a balance between providing some on-site parking, particularly for those who need it such as disabled people and potentially families, while also contributing to our objective of reducing car trips and promoting sustainable modes of travel. This will also help address issues associated with levels of congestion in the area.</p> <p>We do not think it that a policy to "ban" conversion of parking into living accommodation is needed. Policies in the saved Southwark Plan ensure that we are able to consider impacts of such proposals on over-spill parking as well as impacts on the appearance and character of the area.</p>
178	659 Policy 12	<p>POLICY 12 SPORT</p> <p>A new start of the art full size swimming pool must be provided as promised within the CW area . A refurbished Seven Islands cannot accommodate the current needs of the community nor the requirements of the primary school NC.</p> <p>A further 5 or 10 years delay is not acceptable and not compatible with the need to provide more sustainable homes as soon as possible.</p> <p>As an alternative consideration should be given to a land swap with developers. This could provide a new leisure and fitness centre in exchange for developing the Seven Islands site for housing.</p>	<p>The council has committed to refurbish 7 Islands to extend its life by up to 10 years. The council is exploring whether a new leisure centre can be provided in the town centre in the longer term. King's College have proposed a new centre as part of a campus development and the council is keen to explore this option with King's College and British Land.</p>
178	660 Policy 13	<p>POLICY 13 CULTURE</p> <p>4.4.9. Pumphouse Museum closed 2011 (?)</p> <p>4.4.14 Swedish Seaman's Church deconsecrated December 2012 – building sold to Danish hostel (?)</p> <p>The strategic cultural area should be extended to include St Olav's listed Norwegian Church and</p>	<p>Reference to the Pumphouse will be deleted.</p> <p>Reference to the Swedish Seaman's mission will be deleted.</p> <p>The current boundary was designated during the preparation of the Southwark Plan following a recommendation by the Southwark Plan (2007) Inspector. The SCA includes the concentration of cultural and tourism uses around St Mary's Church.</p>

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			the listed Finnish Church. Both these churches are the UK cultural centres for their respective communities and hold numerous public concerts and events in their buildings.	The London Plan defines strategic cultural areas as "areas with internationally important cultural institutions which are also major tourist attractions". While the two churches have an international dimension they are not major tourist attractions. When the fact that they are relatively isolated from the SCA and separated from it by a large amount of residential development is also taken into account, it is not considered that there is justification to extend the boundary.
178	661	Policy 14	POLICY 14 STREETS Reinstate bullet 5 in policy 16 ?? Enforce the importance of the continuous Deal Porters Walk / Path between the two red bridges.	We disagree. Policy 14 clearly outlines the strengthening of pedestrian and cycle links from the town centre to open spaces including Deal Porter's Walk. Both Policy 14 and 16 must be read in combination.
178	662	Policy 16	POLICY 16 See Policy 2 CW plaza 4.5.7 LBS granted the very boring SQSC planning permission, ignoring the Building Design Panel's comments because of lack of enforceable policies in AAP	The council disagrees. Policy 16 is based on robust evidence and was found to be sound following an examination-in-public.
178	663	Policy 18	POLICY 18 Include square with no name – between St Olav's Business Centre and Blick House as well as Neptune Park. Neptune Park is on corner of Neptune Street - Figure 10 wrong Housing estate open spaces must be protected in Open spaces strategy	Space with no name: The council considers it too late in the process of revising the AAP to protect this space, especially as the proposal has not been subject to any consultation. The issue can be reviewed through the preparation of the local plan. Neptune Street Park: Noted. Figure 10 will be corrected. Housing amenity land: Our approach is consistent with our Open Space Strategy adopted in January 2013. Both the Open Space Strategy and the Canada Water Area Action Plan recognise that amenity spaces are highly valued by the local community. The Open Space Strategy emphasises the importance of amenity spaces in enabling informal recreation close to residential areas and their potential as a biodiversity and community gardening resource. In preparing the Open Space Strategy we audited a number of amenity spaces and found that generally their quality was below that of the borough's parks. This was also reflected in the perceptions of residents contacted in the Residents' Survey carried out to inform the strategy. In

				<p>the light of this, the strategy states that we will work with registered providers and other partners to identify opportunities to improve the role and quality of amenity spaces. CGS is a good example of a programme which has helped secure small scale improvements which encourage a range of activities including food growing, nature conservation and recreation.</p> <p>Of course it is also important that provision is made for good quality amenity space in new developments. Our policies in the Southwark Plan, Core Strategy and Residential Design Standards SPD, which require provision of private amenity space for family homes, communal amenity space and children's play facilities in all residential developments, aim to achieve this. The Core Strategy requires developers to improve the overall greenness of development sites and our urban design policies to help preserve amenity spaces which are an integral part of good quality townscapes.</p> <p>We consider that these policies will be more effective in securing good quality amenity space than simply protecting all existing amenity space or applying a per capita standard across the borough. This is consistent with national guidance in the PPG 17 Companion Guide which suggests that in the case of amenity greenspace "higher quality local environments will result from the use of an urban design-led approach than from a simple quantitative provision standard." The value of this approach at a neighbourhood level has been reflected in the Aylesbury AAP and Elephant and Castle SPD . Both of these documents aim to ensure that good mix of private and public amenity space is made, while also facilitating the regeneration of the Aylesbury and Heygate estates.</p>
178	664	Policy 19	<p>POLICY 19</p> <p>Need more young people play areas. Currently all seem to be for young children. Clarification needed re. Youth space on corner of Quebec Way and Roberts Close (primary school nursery and playground)</p>	<p>Policy 19 indicates that the council will seek to ensure that new development provides 10sqm per child, as per the Mayor's Children's Play supplementary planning guidance. Doorstep and local playable space would usually be provided on site. The council will look to improve youth and neighbourhood space using s106 and in the future CIL.</p> <p>The space referred to on Quebec Way is the MUGA on Alfred Salter primary school. Our strategy is to locate local facilities together so that the services required by the community including services for young people, community space and schools are provided in accessible locations in a way in which different facilities can complement and support each other. We are promoting better use of schools for provision of play facilities and new school facilities should be available for the community outside school hours.</p>
178	665	Policy 21	<p>POLICY 21 NEW HOMES</p>	<p>Unfortunately this is beyond the realms of the scope of the AAP. We</p>

			<p>The AAP need to set out conditions that can be incorporated into planning consents that ensures properties are occupied and bans the bulk sale of dwellings for investment letting.</p>	<p>cannot set policy which dictates who buys or occupies private flat/houses.</p>
178	666	Policy 22	<p>POLICY 22 AFFORDABLE HOMES</p> <p>The AAP needs to ensure that the 35% of new homes designated as affordable within new developments in the CW area :</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Are delivered • <input type="checkbox"/> are available to Southwark residents at a rent that people earning the London Living Wage (or national minimum wage) can afford. A Southwark resident should be defined as someone born in the borough or who has lived / worked in the borough for past two years. • <input type="checkbox"/> Are mixed size – ranging from 1 bed to 4 bed family units <p>The AAP needs to ensure that family units are occupied by families and not allowed to be converted into multiple occupancy bed sits</p>	<p>In line with the NPPF and the London Plan, the delivery of affordable housing has to be subject to a number of requirements including financial viability. Our policy is to require a minimum of 35% affordable housing, however there may be some instances where this is not achievable.</p> <p>Affordability levels are set out in our affordable housing SPD. Social rent levels are set nationally however, we can set our own levels for intermediate housing. Updated annually, our current figures are: one, two, three and four bedroom units must be affordable to households with total incomes of £31,881, £37,670, £43,729 and £49,592 respectively assuming that no more than 40% of their net income is spent on mortgage, rent and service charges. Net income is defined as 70% of gross income.</p> <p>The allocations policy for affordable homes is set by Southwark's housing department and is beyond the realms of the AAP.</p> <p>The AAP sets a policy on the required mix of units which is that: developments must provide the following in schemes of 10 or more homes:</p> <ul style="list-style-type: none"> • a minimum of 60% of units with two or more bedrooms • a maximum of 5% of units as studio flats (private only) • a minimum of 20% of units with 3, 4 or 5 bedrooms with directly accessible amenity space in the core area • a minimum of 30% of units with 3, 4 or 5 bedrooms with directly accessible amenity space in the suburban density zone.
178	667	Policy 25	<p>POLICY 25 JOBS and BUSINESS SPACE</p> <p>The focus placed on retail jobs needs to be re-assessed given the changing nature of the retail market and the move to internet shopping.</p> <p>Evidence from studies show that there is a need for small to medium business spaces for people wishing to start a business or move to the next stage of an emerging business. Evidence shows that innovation/incubation units with on—site business support have a success rate higher than those facilities without on-site support.</p> <p>Canada Water / Surrey Quays Shopping Centre will struggle to be a viable town centre in the face of the competition from West End, Canary Wharf, Stratford, London Bridge and Croydon. The area needs a great deal more investment and the Shopping Centre a radical and extensive rethink.</p>	<p>We agree. Policy 25 emphasises the importance of non-retail jobs and promotes the need for office space and space for small and medium sized businesses.</p> <p>Our policies on shopping are grounded on good evidence set out in our retail capacity study. While Canada Water is unlikely to ever compete with the West End and Stratford etc it can still become a fantastic destination in its own right. We recognise that the regeneration of Canada Water should not depend solely on retail growth. Our policies seeks to expand a range of facilities in the area, including leisure and business to help make the centre more attractive and improve its viability. The process has started with the building of the library but there is lots more potential. A new university campus in particular could help to diversify and strengthen the centre.</p>

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			The idea for a university campus is well supported. However, unclear if so much of the core area is handed over to education use will less CIL or S106 be generated as a consequence ? If so, how will all the facilities, infrastructures and everything the area needs and desires be paid for?	
178	668	Policy 27	POLICY 27 24 – 28 Quebec Way – clarify	Policy 27 highlights the potential to provide community facilities on 24-28 Quebec Way. This is consistent with the site allocation CWAAP 10.
178	669	Policy 29	POLICY 29 Additional Health provision required.	Noted. AAP policy 29 states that we are working with NHS Southwark to meet the needs generated by an increased population. It recognises that a new health facility will be required at Canada Water, which will need to be highly accessible and close to public transport routes. We will continue to make sure that HNS Southwark are aware of development opportunities. A new facility of 1,500sqm will also be built on the Downtown site.
178	670	Policy 30	POLICY 30 Albion Street Include restrictions on number of betting shops and a total ban on pay day loans. Include necessity for LBS to be pro active should a property be empty for 6 months. 5.2.7 Not correct LBS not in the process of selling. LBS stated it plans to redevelop itself after abortive attempt to sell to CQ Ltd.	Betting shops and payday loan shops fall within the A2 use class. Developers and occupiers do not require planning permission to change between uses in the A2 class (eg between banks, travel agents, building societies, betting shops, post offices etc) or to change from an A3 use (café restaurant), A4 use (pub/drinking establishment) or A5 use (hot food takeaway). However, borough-wide, the council is introducing an Article 4 direction to ensure that these change of use do require planning permission. We will amend the text relating to the library to make sure that it is up to date.
191	545	Vision	You have stated your ambition however it is essential that the ambition and aspirations of the local AAP (and proximal) community are incorporated into the AAP and the Review is a great opportunity to improve the plan overall. It is impossible to "review" the AAP for such a large area of land and not reconsider the plan overall and in the round and come up with something much better. Something better that will benefit all stakeholders much greater. Something more aspirational and more smart.	The vision has been examined and was found to be sound by an independent inspector. During the EIP the council maintained that any changes to the plan associated with Harmsworth Quays could be formed within the scope of the vision and therefore no substantive changes were required to the vision. However, some amendments are proposed to bring more prominence to the council's aspiration to diversify the economic base of the town centre.
191	546	General	I am not going to suggest specific policy wording changes in this document because if you wished me to do that you would have asked me, and other previous EIP attendees, more specifically other than a general consultation call.	The council considered that consulting widely is consistent with our Statement of Community Involvement. It is also a requirement of the Regulations.
191	547	Policy 22	Affordable homes: the AAP needs to be updated to ensure at least 35% of new homes are available to Southwark residents at a rent that people earning the London Living Wage (or national minimum wage) can afford. Something like £20,000 to £22,000 is average salary. Developments are coming in at 10 or 12% etc., or much lower than 35%, and this casts doubt	In line with the NPPF and the London Plan, the delivery of affordable housing has to be subject to a number of requirements including financial viability. Our policy is to require a minimum of 35% affordable housing, however there may be some instances where this is not

on the Council's past evidence into CWAAP EIP. Much was said at the time about viability by the Council and assurances were given in this regard to the Inspector, and the outcome is something else despite improvements in the property market since 2008 and booming developer profits and rising share prices. Overall around 35% was expected and it's nothing like that.

The AAP also needs policy to guide when the 35% target is not appropriate for a particular development. Residents and politicians can be subject to various snide attacks and comments if they support anything other than the target. The situation is made worse when there is no clarity about how providing less affordable housing will enable other priorities to be delivered. How can we support, at planning application stage, a 10 or 15% level without knowing what will be provided otherwise? The constant fear is that Southwark and the community will be ripped off again.

If the policy is "something is better than nothing" then that needs to be re-examined because there was confidence from Officers in the 35%. It was not a fantasy target and the argument was that it was evidence based. I queried that evidence and ran into a brick wall.

achievable. We have evidence to show that the 35% target is achievable and this was used to underpin our approach at the EIP into the Core Strategy and the AAP (Affordable Housing Viability Study 2010).

Affordability levels are set out in our affordable housing SPD. Social rent levels are set nationally however, we can set our own levels for intermediate housing. Updated annually, our current figures are: one, two, three and four bedroom units must be affordable to households with total incomes of £31,881, £37,670, £43,729 and £49,592 respectively assuming that no more than 40% of their net income is spent on mortgage, rent and service charges. Net income is defined as 70% of gross income.

191 548 General

The Council, and it's consultants, "informed" the CW AAP EIP with similar evidence such as 'feasibility studies' and other studies and what we know now, by outcome, is that assurances based on these kinds of paid-for studies for specific desired results (that desired by the Council and those who lobby) turn out to be not little of no value. Outcomes do not follow, this is explicitly clear in the issue of viability which is shaping up to be an unmitigated disaster in relation to affordable housing on land in the Canada Water area that is not owned by the Council. The Inspector, and others, should therefore look back to the poor record of so called "evidence" and place little weight on constructed evidence provided by paid for consultants. Consultants who are clearly not independent since they are dependent on money from commissions.

Greater weight and regard should be given to residents and others who live and work in the area and have consistently and correctly pointed to weaknesses and provided alternative evidence. Southwark tends to disregard residents and regard it's consultants and it is only fair that we take the opportunity to point out when consultants have been hopelessly wrong – and Canada Water is becoming an exemplary in unexpected outcomes. The Council has been over confident and unwise.

The AAP has been informed by a range of studies and information, which include evidence base studies as well as the views of residents. The adopted AAP was subject to several rounds of consultation at issues and options, preferred options, publication and further changes stages. Since then we have also held a planning for real event to gain people's views on the redevelopment of Harmsworth Quays. In accordance with our Statement of Community Involvement, the views of residents have helped influence the plan.

191 549 General

Residents object to any creepy social engineering that forces them, or their families, to move – to be resettled - to a designated 'central residential area' elsewhere in the borough, and we value our community. In being responsible, positive and supportive about good appropriate development residents do expect the CWAAP Area, people and wildlife, and wider area of "the peninsula" to benefit in a way that meets the aspirations of the proximal community (e.g. those living within and adjacent to the AAP Area). The CIL rate paid by social housing providers etc. within the CWAAP Area and surrounds needs to be the same as the proposed central residential area, or possibly much less given the lower percentages of affordable housing coming forward in CWAAP schemes. The idea that CWAAP Area can subsidise a central residential zone elsewhere in the borough seems to be entirely bogus given the low percentages of affordable housing in the CWAAP Area coming through recently.

We have highlighted in the plan where improvements need to be made to infrastructure which supports growth, including transport improvements, health facilities, schools and play facilities. S106 and in the future CIL will be used to help secure these improvements. The CIL Regulations require at least 15% or 25% of CIL revenues to be retained and spent locally. We anticipate that at least 25% will be retained locally. We have consulted on potential projects through the Community Infrastructure Project Lists and these will be reviewed and updated regularly.

Obj-jector no.	Rep Policy no.	Details of Representation	Officer Response to Representation
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There issues are directly linked to density and 'The height of new buildings and potential for public realm improvements'. Harmsworth and Surrey Quays Shopping Centre car park etc. have the potential to provide a great many homes for residents. But if we are to build taller then you must deliver on the improvements, facilities and other community resources that residents and others have outlined.

S106 and money from developments: the whole S106 etc. allocation, decision making and distribution process needs to be made open and transparent. For example, we have youth clubs and facilities in the area that require funding and it is essential that S106 flows to such facilities e.g. Surrey Docks adventure playground, Trident Street SE16 and Docklands Settlement. If there are highly restrictive criteria for the award of S106 and other monies then these need to be made explicit so the impact on sustainability can be determined etc

191 550 Policy 25

Jobs: There has been a greater focus on calls for job creation in the CWAAP Area recently. However, what we see (and is reported widely now) is the creation of jobs that are filled by people from outside the area and the borough. We also see the loss of highly paid quality jobs and the growth of lower paid jobs. Some areas try to ensure that a proportion of jobs go to people living in the area / borough and to help reduce road travel and impact on public transport (by employing people who live nearby) and we need policies to ensure that as many residents unemployed living around, proximal to, the developments benefit and fill the jobs created.

Canada Water / Surrey Quays is sinking as the competition from West End, Canary Wharf, Stratford, Clapham and Croydon improve their offerings. The area needs a great deal more investment and the Shopping Centre needs a radical and extensive rethink. If British Land cannot come up with a better plan then the Council should compulsorily purchase the site.

The AAP aims to increase the number of jobs in the area. In addition, the S106 SPD and the draft CIL charging schedule aim to secure a number of jobs in new employment generating development for local residents.

Our policies on shopping are grounded on good evidence set out in our retail capacity study. While Canada Water is unlikely to ever compete with the West End and Stratford etc it can still become a fantastic destination in its own right. We recognise that the regeneration of Canada Water should not depend solely on retail growth. Our policies seek to expand a range of facilities in the area, including leisure and business to help make the centre more attractive and improve its viability. The process has started with the building of the library but there is lots more potential. A new university campus in particular could help to diversify and strengthen the centre.

191 551 General

Images, figures & artists impressions: within the documentation similar problems have been created that were condemned at CWAAP EIP. The Council needs to ensure it's approach to illustrations and figures is clear, not misleading, open, honest and transparent. And comes with some integrity. Diagrams and figures needs to be clear, of a size that can be read, and with clear keys etc.

We consider the diagrams and plans to be clear. They have been tested through an examination in public and found to be sound. We will consider amendments where specific improvements are suggested.

191 552 Policy 29a

Affordable homes charities / education: the AAP needs to deal with the issue created by substantial large major developments by charities and others who do not allocate at least 35% of homes on the development as affordable (and to be occupied by residents who have no association with the charity / educational institution as opposed to their own key workers etc). Recently, it is reported in the press that charitable and educational organisations are also acting in a more commercial mode and perhaps they should be treated in a similar way to other businesses if they do not offer something different (and substantial) to the community. Students are now big business, with accommodation rates of several hundred pounds a week. In the summer student hall now become hotels charging c.£80 to £90 a night. In this mode these developments need to be considered as hotels etc.

The AAP requires all development to contribute to affordable housing in policy 22. In addition, Core Strategy policy 8 requires student development to contribute to affordable housing. An exceptional case would need to be made to demonstrate why a particular charity or educational institution could not provide affordable housing.

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191	554	Policy 15	Design: The disregarding of the comments by Southwark's Design Review Panel in 2012 showed that assurances given in CWAAP EIP about design quality were false. The AAP needs to be updated to clearly, robustly and explicitly ensure that only developments of excellent design are constructed. The aspirations of the community have not been met and outcomes disappointing. Any day now we might even have a pile of sea containers. A clear policy needs to be inserted into the AAP to ensure design and materials are exemplary.	The AAP's design policies are explicit and robust in their requirement for high quality design with the area, The detailed design of proposals would be assessed at the planning application stage.
191	557	Policy 12	Seven Islands: Little or no improvement has been delivered at Seven Islands since (and years before) CWAAP EIP. Money is pencilled in but not actually spent. The area needs a completely refurbished leisure centre without further delay or the speedy delivery of a new leisure centre. A further 5 or 10 years delay is not acceptable and not coherent with the need to provide more sustainable homes as soon as possible. We cannot keep building homes (most for profit) while delaying providing other important community resources.	Funding for improvements to the Seven Islands Leisure Centre is committed in the council's capital programme for the years 2014/2015 and 2015/2016. Policy 12 has been amended to state that this funding will be used to extend the life of the centre by up to 10 years. King's College have proposed a new leisure centre as part of their proposals for a new campus and the council is keen to explore this further with King's College and British Land.
191	560	Policy 18	Green / Open Spaces: The assurances given at CWAAP EIP were false. The community have repeatedly brought forward suggestions for places to be designated as open space etc. and have been blocked. The AAP has failed to meet the aspirations for the community to protect places we value. The Council has repeatedly refused, dogmatically and blanketly, to consider places on our council owned estates for recommendation and subsequent protection. This discrimination against residents who live on Council estates is abhorrent. Council owned and managed housing estates occupy a considerable land area and particularly in the ward of Rotherhithe. This obnoxious weasily prejudicial policy leaves large areas of ours two wards unable to benefit from open space designation and protection. In addition, places have been identified that are not on Council Housing Estates and these have not been adequately considered either. In being supportive of development and growth, we also need to have places that we value and cherish protected and maintained.	The open space strategy emphasises the importance of amenity spaces in enabling informal recreation close to residential areas and their potential as a biodiversity and community gardening resource. The audit of amenity spaces we carried out found that generally their quality was below that of the borough's parks. This was also reflected in the perceptions of residents contacted in the residents' survey carried out to inform the strategy. In the light of this, the strategy states that we will work with registered providers and other partners to identify opportunities to improve the role and quality of amenity spaces. CGS is a good example of a programme which has helped secure small scale improvements which encourage a range of activities including food growing, nature conservation and recreation. Our approach in the open space strategy is consistent with the approach taken in the Southwark Plan which is explicit in not protecting amenity spaces. The reasons are: The most effective way of providing good quality amenity space is through policies in the Southwark Plan, Core Strategy and Residential Design Standards SPD which require provision of private amenity space for family homes, communal amenity space and children's play facilities in all residential developments. These include requirements to provide at least: 50sqm of communal amenity space per residential block, 10sqm of private amenity space for homes with 3 or more bedrooms and 10sqm of playspace per child. This is reinforced by the Core Strategy which requires developers to improve the overall greenness of development sites. Our urban design policies provide an effective means of assessing the contribution which amenity spaces make to the character of the built environment and the borough's heritage.

Our approach is consistent with national guidance. The PPG 17 Companion Guide which suggests that in the case of amenity greenspace "higher quality local environments will result from the use of an urban design-led approach than from a simple quantitative provision standard."

The value of this approach at a neighbourhood level has been reflected in the Aylesbury AAP and Elephant and Castle SPD . Both of these documents aim to ensure that good mix of private and public amenity space is made, while also facilitating the regeneration of the Aylesbury and Heygate estates.

191 562 Policy 18

High Rise / tall buildings / density: The Sustainability Appraisal is flawed as usual. There needs to be actual delivery on the issues of congestion, traffic and pollution etc. The queues and hold-ups along the A200 and associated roads that are so damaging for economic growth. The robust data, e.g. from the Department of Transport, showing high future levels of traffic growth and car ownership need to be factored in. The story and narrative of squeezing vehicles out of the area is a good fantasy tale however robust data points entirely in the other direction. Meanwhile nationwide vehicle users are free to drive where they want including along the A200. There is little sign that TfL are coming forward with serious well funded solutions and the focus has been on Elephant and Castle, not Canada Water. The Rotherhithe Tunnel, gyratory and local roads continue to be heavily used with congestion affecting economic growth. The Congestion charge has not delivered substantial reductions in traffic because drivers use our roads to avoid the C-charge. There needs to be coherence and coordination all along the A200 and between planning authorities including Lewisham.

Lots of ideas and solutions have been proposed by the community to help improve the traffic and mitigate affects. The failure to directly address a whole range of matters and issues, or even have robust data about them (e.g. environment), directly impacts on the development that is tall, dense and highly lucrative. It becomes much harder to be supportive of development when reasonable sustainability enhancing aspirations and requirements of the community are disregarded.

The AAP sets out a strategy for improving the highway network, ensuring that it is capable of accommodating growth. With regard to timing, 2016-2020 is the timescale set out in the adopted AAP and was based broadly on when we expect development to occur and trigger the need to carry out improvements and when sufficient s106 funding may be available. The feasibility work we are doing with TfL will provide a better idea of when it can happen and CIL also provides more flexibility. Mouchel are working to an assumption that the project should be delivered in 2015 in order to meet TfL's deadline for the implementation of the cycle superhighway on Lower Road. Depending on the options developed, it may be necessary to implement a minimal scheme to deliver the cycle superhighway in 2015 and follow on in 2016-2020 with the remainder of the scheme - we will not know that until TfL have considered the outcome of the study.

191 570 Vision

Vision etc: It was made clear a CWAAP EIP that residents would need to engage with each planning application as it came along. In so doing it has become clear how weak the AAP is. The vision and policies need to be rewritten to ensure that the aspirations of the community are taken fully into account and flow through to decision making. Residents have repeatedly stressed how important various forms of green infrastructure are including wildlife, trees and hedgerows. Looking at the applications approved since CWAAP EIP we can see how defective the plan is, and what it has failed to regulate following the NPPF and subsequent Coalition changes to planning policy nationally.

The vision has been examined and was found to be sound by an independent inspector. During the EIP the council maintained that any changes to the plan associated with Harmsworth Quays could be formed within the scope of the vision and therefore no substantive changes were required to the vision. We do not consider that substantive changes need to be made.

191 573 Policy 27

In regards to the idea for a university campus which is well supported I am concerned about how this will help local Southwark and Rotherhithe people. We need the facilities required to support our area delivered. A new swimming pool at Elephant is no good when public transport costs 2.80 return, or >10.00 for a family of four before entry charges. If so much of the core area is handed over to education use, and less CIL or s106 is generated as a consequence, how will all

In revising the AAP we have reassessed infrastructure requirements needed to support growth of the life of the plan. The plan highlights the need for a range of facilities including new school places, pre-school facilities, health facilities and transport infrastructure. The council will use s106 and in the future CIL to help secure infrastructure

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		the facilities, infrastructures and everything we need and desire be paid for? We need doctors, dentists, youth facilities etc and so on. Everything that a town of 10,000 new homes over a couple of decades requires to support it	improvements.
191	574 Policy 17	I have no objection in principal to taller buildings and higher density provided that all the other matters and issues that the community raises and aspires to are dealt with etc. We have been tricked, bamboozled and lied to in the past - the usual clever wording deployed - and there needs to be greater balance so that development potential is sustainably optimised and not simply maximised for profit (and benefit others via expenses such as dinners, trips or Olympic host events and so on).	Absence of objection to taller buildings and higher densities is noted.
191	575 Consultation	Consultation: the consultation for the CWAAP Review included an event, November 2012 consultation workshop, that claimed to test scenarios etc. There has been no explanation about how the 'scenarios' were conjured up. Or how the board game was produced or the assumptions designed into it. E.g. the number of green squares available. The strange way this workshop was carried is not a problem provided that the "evidence" used by the Council from it coheres with the aspirations of the AAP and AAP wider area community. And the event not misused in a way that shows no local authority integrity whatsoever.	A report on the event held in Nov 2012 has been published. Comments made during the event have influenced the AAP. Examples include support for non-residential space and university facilities which can create jobs and boost the daytime economy, support for a green link through Harmsworth Quays, support for provision of new open space for play facilities, food growing etc and support for the idea of straightening Surrey Quays to provide better access to the leisure facilities and Greenland Dock. The event also highlighted general consensus around having taller development in the centre of the core area, with heights diminishing towards the periphery of the core area, particularly where it adjoins the suburban surrounds. There was a mix of views on tall buildings: some people were supportive, while others felt they would be out of place. Most people seemed to agree that if tall buildings were built, we should be very careful about microclimate impacts and make sure they have excellent design.
191	577 Policy 16	<p>Town Centre / Area name: The issue of the town centre was fudged in the EIP and really overall still does not make sense.</p> <p>"Our ambition to promote activities and uses on Harmsworth Quays and the adjacent sites which will boost the daytime economy and create a vibrant town centre."</p> <p>You were going to do that at Canada Water Plaza and failed. The focus of the "town centre" is moving around the place depending on applications for planning approval. The confusion over names such as Rotherhithe, Canada Water, Surrey Quays and Surrey Docks needs to be sorted out. The relation of Lower Road (shops) needs to be resolved properly and the "desired" walking route diagonally from Surrey Quays overground to the SQSC.</p> <p>Recently I went to Dorchester, and they have regenerated part of the town centre with a great fountain that children play in (like the one at More London only much better) and a large screen and landscaped places to sit. Why cannot we not have something like this south of the SQSC car park to really weld and integrate Lower Road and surrounds into the overall scheme and ensure continued high footfall between Lower Road shops, SQSC and Canada Water.</p> <p>Dorchester has smart clever people in charge of design whereas in Canada Water, by outcome, we do not. Dorchester thought about children and thought about families. The focal point is successful because they got the basics right, which is, time and time again, something that Southwark struggles to do. Residents constantly make extremely good suggestions that are disregarded by co-called experts and we end up with highly suboptimal outcomes which do not</p>	The town centre boundary has been revised in response to the Harmsowth Quays site coming forward. The boundary now includes the western side of the Harmsworth Quays site that is closest to the the Canada Water basin. The AAP sets out a clear rationale for focusing the town centre around the basin, as this will act as a focal point and has the greatest potential for open spaces. The AAP proposes a number of policies that will promote activity and new spaces within core area and town centre that will creat vibrant place for existng and new communities. These include Policies 5, 6, 14, 18 and 19.

even maximise long term financially return.
The failure of outcome and delivery has impacted on sustainability and equality. At CWAAP Review the Council needs to make sure it conducts it's sustainability appraisals and do proper equalities assessments. For example, if the Plaza at Canada Water was a sustainability factor - a positive one that balanced against negative impacts of development, then the malaise and non-performance of the Plaza needs to be considered so we can begin to see whole the whole intended plan across all the sites is going to overall improve the area. We cannot have piecemeal failures one after the other, stack up.

Development is widening gaps within the AAP which might be less of an issue is the matters being repeatedly raised by residents and the local community are addressed speedily and with less prevarication and dithering.

Dorchester's Brewery adds to community gathering, sustainability and helps equality in a way that the Canada Water plaza does not. It is getting to a time when policy must be founded on reality and the facts as they are, and not on marketing puff, educated guesswork or the waffle of those paid to say whatever is required.

CW AAP Review is also a time to reflect back where things have not turned out as expected and not been particularly successful so we can plan some solutions and also improve policy.

The NPPF changed so much, and the fear is now that our area will be exploited by numerous parties to gain as much as they can out of it. In response we need an Area Plan that ensures our area, and the community around here, positively benefits from development as we suffer the disbenefits.

191 582 General

Southwark Council has failed to adequately deal with the scandal of air pollution, diesel particulates, emissions from SELCHP and so on. It is time that it did. And a recent FOI response from the Council shows that that the evidence based for CWAAP Review is incomplete. The Council must understand that if it's departments cannot respond with data to FOI requests then it partially pulls the rug from under its planning policy team who are trying to make out that they have a decent evidence base. I focus on environmental data because that is particularly weak

Rotherhithe, along with much of the rest of the borough, has been designated an air quality management area (AQMA) (see page 104 of the core strategy). We have an air quality management plan that contains policies and measures to improve air quality in Southwark, including measures that address emissions from industry, construction, domestic properties and traffic.

Core Strategy policy 13 states that we will set high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work. Policy 3.6 in the Southwark Plan states that development should not reduce air quality.

Through an air quality impact assessment, we would expect development to mitigate impacts, including impacts caused by traffic, construction, and heating systems.

Our Sustainable Design and Construction SPD provides additional guidance on air quality. It sets out the following requirements:

- Development in the Air Quality Management Area will need to provide

Objector no.	Rep no. Policy	Details of Representation	Officer Response to Representation
			<p>a formal air quality impact assessment (as set out in appendix 6).</p> <ul style="list-style-type: none"> - Applications for district CHP and CCHP schemes will need to be accompanied by a formal air quality impact assessment (refer to appendix 6). This includes explaining the type of fuels to be used and how these have been sourced as close to the site as possible. Where biomass boilers are proposed, further information will be required to be submitted (refer to appendix 6). - Where the use of zero emission fuels are demonstrated to not be feasible, systems should be designed to allow easy conversion to these fuels in the future. - All new gas boilers should produce low levels of NOx. <p>Appendix 6 of the SPD sets out detailed guidance on the preparation of an air quality impact assessment.</p>
191	583 Policy 29a	<p>Hopefully, an organisation such as King's College London can help us to plan and design development so that we can robustly tackle environmental (and health) issues coherently and properly so that CWAAP AAP can become an exemplary of urban development.</p>	Comments noted.
191	696 Policy 22	<p>I wish to submit as evidence into the CWAAP Review the ITN News broadcast below. It also features a statement made by Cllr Fiona Colley which refers to genuinely affordable homes. Assurances, commitments and understandings made during the original CWAAP on this matter have now been trashed. For example, the approx. 11% affordable housing proposed for Sellars development on Decathlon sites C & E is rising to c.21% however at what level of market rent?</p> <p>ITV News at Ten & Weather 10:10pm - 10:45pm http://www.itv.com/news/london/story/2013-09-09/councils-fight-boris-rent-plan/</p> <p>"London councils challenge rent plans Four councils are taking legal advice to challenge the Mayor over his decision to make renting more affordable. Boris Johnson wants to set rents at 80 percent of market prices for people who qualify for so-called affordable housing. But Southwark, Islington, Tower Hamlets and Camden councils all say at that rate many of their residents will be priced out of their boroughs. Luke Hanrahan reports."</p> <p>Further evidence of fact:</p> <p>National Minimum Wage: https://www.gov.uk/national-minimum-wage/what-is-the-minimum-wage £2.68 (19 years old apprentice who also have to live somewhere) to £6.31.</p> <p>London Living Wage = £8.55 (2012) (http://www.london.gov.uk/sites/default/files/living-wage-2012.pdf)</p> <p>Southwark's "something is better than nothing" approach has undermined Area Action Plan and the aspirations of the local community. While it is appreciated that 35% was a target, something</p>	<p>The council's policy on affordable housing is set out in the Core Strategy, which requires 35%. However, while this is a requirement, in accordance with the NPPF, the council does need to take viability into account in determining applications.</p>

to spotlight, we really do need to see housing provided that Rotherhithe, Bermondsey and Southwark residents earning the minimum wage and London Living Wage , or less, can afford.

Many jobs being created locally do not pay enough to cover cost of living.

I also wish to submit as evidence Dave Hills blog (Guardian, Wednesday 13 February 2013) including comments by Peter Thatchell
<http://www.theguardian.com/politics/davehillblog/2013/feb/13/elephant-and-castle-southwark-council-regeneration-rights-and-wrongs> - Council's do not get the best deal from developers by missing the chance to buy back the lease on freehold land they own e.g. Harmsworth Quays.

191 697 Consultation

Months are ticking by for me to make a formal complaint about the consultation event on 17th November 2012.

You would not recall that my role was a "housebuilder" in the "game", and I attach as evidence for CWAAP Review the Housebuilder instructions given out on the evening. I do this because things have moved on and now the Council's propaganda machine is threatening Judicial Review (to Mayor of London) because they are rightly unhappy about the 80% figure. But look at my card (attached) - and I thought that were considering 35% x 2000, or c. 700 new "affordable homes". And not at up to 80% market rent either! (I forget what it was at the time, say 40 or 50%). Not c.20% x 2000, at what could now be 70% to rent at upto 80% market and 30% to part buy at prices people around here cannot afford. So I just want to send this to you as just one example of how this whole constructed bogus, rigged, and pre-structured "game" is undone by events over time. And it's assumptions are pretty much out of date. I am sure CWAAP Review will provide an opportunity to look at any serious issues if necessary and I will not bother Southwark's complaints Team who probably would not know what to do with it. I think, as I have said, Planning Policy should have involved residents and others in authoring Planning Policy's scenarios in the first place and also in the design of the game etc. I wrote to you at the time.

And I also believe there should be a live ongoing process and not any rabbits out of the hat from Ivory Towers at Tooley Street or more likely the con-sultants.

The council's planning policy for affordable housing is that 35% of new homes should be affordable and this should be split 70/30 between social rented homes and intermediate homes. The council would only agree to vary this, where it is demonstrated by a developer that the requirement is not viable, in which case a developer would need to provide the maximum proportion.

In 2011 the government introduced a new type of affordable housing: affordable rent. Southwark's position on affordable rented homes is set out here:
http://www.southwark.gov.uk/downloads/download/2963/Affordable_rent_planning_committee_report
 The latter indicates that our evidence base shows that it will be very difficult for people in housing need to afford the affordable rent model, particularly family homes. Therefore we would only accept affordable rent where a financial appraisal justifies to the satisfaction of the council, that the policy requirement of amount or mix of affordable housing cannot be delivered.

191 698 General

I would like to submit the attached report into CWAAP Review (Management of the London Basin Chalk Aquifer Status Report 2012). I link this to SUDS issue and the wording of "should" in the AAP which I think needs to be much more directive and aspirational.

PS There has been zero feedback from Southwark Transport regarding updated figures for traffic and I hope data won't be sat on, and shared with other participants.

PPS Did cross rail dewatering steal out aquifer water and crash the levels in the Rotherhithe bore holes?

The report will be added to the relevant documents listed in the sustainability appraisal.

Para 6.4.13 in the AAP refers to SUDs (copied and pasted below). It refers back to our policy in the Core Strategy and the detailed guidance we have on SUDs in the Sustainable Design and Construction SPD.

Para 6.4.13
 "In 2005, Thames Water recommended that surface water discharge should be restricted to greenfield rates. Southwark has carried out a strategic flood risk assessment of the borough. Much of the AAP area lies in flood zone 3a (high probability of flooding in the event of a breach of flood defences), although the large mixed use development sites in the core area lie predominantly in zones 1 (low probability) and 2 (medium probability). Core strategy policy 13 states that Southwark will

Obj-jector no.	Rep no. Policy	Details of Representation	Officer Response to Representation
			allow development to occur in zones 2 and 3a, providing it is designed to be safe and resilient to flooding. It also requires development to reduce the risk of flooding by reducing surface water run-off and using sustainable urban drainage systems. Further guidance is set out in our Sustainable Design and Construction and Sustainability Assessments SPDs."
196	530 General	<p>Thank you for consulting the Mayor on the above document. The Mayor has delegated authority to me to respond. On 1 June 2011 the Mayor issued a report on further changes to the submission version of the Canada Water Area Action Plan (reference PDU/LDF28/LDD04/DW04); the AAP was adopted 28 March 2012. This letter and attached appendix constitute the Mayor's representations to the preferred option consultation of the revised Canada Water AAP.</p> <p>As you will be aware, by virtue of section 24(1)(b) of the Planning and Compulsory Purchase Act 2004, all development plan documents must be in general conformity with the London Plan. Please note that this includes a representation relating to general conformity with the London Plan as well as other representations to clarify or improve policy:</p>	Noted.
196	531 Policy 22	<p>•<input type="checkbox"/> Affordable housing:</p> <p>The review of the Canada Water Area Action Plan should provide a new opportunity for the Council to take account of the NPPF and the requirement to meet the full range of housing needs. In line with the NPPF and the 2011 London Plan the Council should seek to maximise affordable housing provision; take account of the viability of future development taking into account future resources as far as possible, including the availability of public subsidy; take account of the fact that as a matter of national policy Affordable Rent is intended to address the housing needs of those eligible for Social Rent. This issue should not be confined to the "fact box" as currently proposed; Policy 22 'Affordable homes' and its proposed changes should be amended to include Affordable Rent as well as Social Rent and make sure that all delivery options are considered to ensure that affordable housing provision is maximised. The Council's changes to Policy 22 have been considered against the London Plan and the Revised Minor Alterations to the London Plan, which are currently with the Secretary of State, and would not be in general conformity with these, as proposed.</p>	<p>It is the council's view that affordable rent does not meet our housing needs. This is illustrated by the following evidence base studies: Strategic Housing Market Assessment, Housing Requirements Study, Affordable Rent Viability Study and our Affordable Rent Study.</p> <p>The AAP acknowledges the change to the definition of affordable housing in the fact box which accompanies policy 22 . The NPPF requires councils to use their evidence to ensure that their Local Plan meets the full, objectively assessed need for market and affordable housing. It is acknowledged that the NPPF defines affordable rent as being let by local authorities or registered providers at up to 80% of the local market rent. However it does not explicitly state that every local authority must provide affordable rented housing or that it must be provided consistently at levels close to 80% of market rent. The council is therefore consistent with the NPPF as our policy is based on our evidence base looking at housing need, as required by the NPPF.</p> <p>We are proposing to amend our approach to affordable housing though the forthcoming Local Plan review rather than solely through the Affordable Housing SPD. This will allow us to fully investigate the impact of affordable rent and determine our approach at a borough wide level, rather than just in Canada Water.</p> <p>We are proposing to remove the reference to the tenure split between the different tenure types that will be required in the area. We will instead, reply on the saved Southwark Plan policy 4.4 until a new Southwark Plan is adopted</p>

Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
196	532	Policy 26	<p>•☐Schools:</p> <p>The amended Policy 26 on 'Schools' is supported as well as the identification of a new primary school site (para 4.7.7a) in accordance with London Plan Policy 3.18 on Education facilities. The Council should continue to keep this under review to meet Southwark's identified and future needs for school places in the area.</p>	The support is noted.
196	533	Policy 1	<p>•☐Town Centre:</p> <p>London Plan Table 2.2 recognises Canada Water District Centre as having the potential to become a Major Centre. The proposed amendment to the town centre boundary to include Harmsworth Quays and Site E (Policy 1) and to enable the town centre to expand to the east is welcomed. The Mayor would anticipate that as a Major Centre it would develop in line with paragraph A2.3 of the London Plan. It is for the Council to determine the boundary to ensure the centre complements other centres within and outside the borough boundary.</p>	Noted.
196	534	Policy 17	<p>•☐Tall buildings:</p> <p>The Mayor welcomes the Council's new tall building strategy (Figure 9) and its approach to building heights in the core area (Policy 17) that are in accordance with London Plan Policies 7.7 and 7.12.</p>	Support noted.
196	535	Policy 8	<p>•☐Transport:</p> <p>Transport for London (TfL) considers that the document is in general conformity with the transport policies of the London Plan. The Council should address the detailed transport comments in Appendix One that identify matters for clarification in the document rather than matters of general conformity.</p>	Noted.
196	536	General	<p>The Mayor will issue his formal opinion on general conformity when requested at the publication stage. However, I hope that the policy concerns I have raised at the current stage can be resolved before then, through further informal discussions with Council officers. If you would like to discuss the representation in more detail, please contact Hermine Sanson (020 7983 4290).</p>	Noted.
214	537	General	<p>The following response contains comments from TfL to the GLA regarding the London Borough of Southwark's, Canada Water Area Action Plan (AAP), with detailed matters outlined below.</p> <p>The core AAP area is centred around Canada Water station, which provides London Underground services on the Jubilee line, and London Overground services on the former East London line. A number of bus routes operate within the AAP area, providing links to the west, east and the south. The Public Transport Accessibility (PTAL) of the area is highest around the station, with a very good PTAL rating of 6a, although this drops to a value of 2 in those parts of the AAP area furthest from the station.</p>	Noted.
214	538	Policy 6	<p>Transport Policy 6: Walking and Cycling</p>	Noted.

TfL supports the position of LB Southwark with regards to the need for development proposals within the AAP area to provide safe, direct and convenient routes for pedestrians and cyclists. TfL considers such a position to be in accordance with London Plan Policy 6.9 Cycling and London Plan Policy 6.10 Walking.

TfL notes comments within Paragraph 4.3.6, which cite an aspiration to create a new bridge to connect Rotherhithe and Canary Wharf. Though opportunities to increase pedestrians and cyclists ability to cross the river Thames are promoted within the Mayors Transport Strategy (MTS), no specific schemes are proposed within it, the London Plan or the Central Sub Regional Transport Plan to enhance links at this location.

214 539 Policy 7

Policy 7: Public Transport

The support is noted.

In principle TfL welcomes the position of LB Southwark in promoting the continuous improvement of public transport within the area boundary. TfL periodically reviews both bus and rail based public transport to ensure that it is still meeting demand as effectively as possible. The AAP's stated commitment to continue to secure s106 planning contributions towards public transport improvements in order to mitigate site specific impacts following introduction of the borough CIL is welcomed, and TfL considers this in accordance with London Plan Policy 8.2 Planning Obligations.

TfL notes the proposals outlined within Policy 1: Shopping in the Town Centre to deliver 35,000sqm of new retail space within the area boundary. TfL considers that this proposal may place further pressure upon Canada Water station, which currently experiences congestion for passengers interchanging between London Underground and London Overground services. However, it is likely that this impact will be offset by the proposed improved linkages between Surrey Quays station and Canada Water AAP area, alongside an improved retail offering. Nonetheless, TfL expects that as development proposals come forward, the impacts of development upon station capacity alongside any required mitigations, are considered within a Transport Assessment in line with London Plan Policy 6.3 Assessing the effects of development on transport capacity.

TfL welcomes the requirement for any future development of the Canada Water Shopping Centre and associated car park to re-provide bus stop/standing space and taxi drop off areas. Such a position recognises the strategic importance of such facilities, and is considered to be in accordance with London Plan Policy 6.2 Providing Public Transport Capacity and Safeguarding Land for Transport.

214 540 Policy 8

Policy 8: Vehicular Traffic

The council does not consider that the proposed change around Jamaica Road needs to be made. TfL were satisfied with this wording when it was originally proposed in preparing the AAP and the AAP has subsequently been found sound and been adopted.

TfL notes the aspiration to simplify and improve the safety of the existing local road network, and this is broadly supported by TfL provided it at least maintains, if not improves, provision for bus operations, cyclists and pedestrians. The intention to secure s106 and CIL planning contributions towards the delivery of these schemes, and the intention to submit an Area Based Scheme (ABS) bid to TfL to deliver a portion of the works is noted.

Obj-jector no.	Rep no. Policy	Details of Representation	Officer Response to Representation
		<p>In respect of the proposed improvements to the Jamaica Road Rotherhithe Tunnel junction, TfL seek the amendment of this section. Although the improvement of the junction is in principle supported by TfL, designs are at an early stage, and TfL consider it too early to conclude that signalisation of the junction is the most appropriate solution at this location. TfL request that both Policy 8 and Para 4.3.19 are revised to reflect the above</p>	
214	541 Policy 9	<p>Policy 9: Parking for Retail and Leisure</p> <p>As a result of the existing high level of car parking, accompanied by relatively low usage within the area boundary and the high PTAL rating, TfL strongly supports the position of LB Southwark to class car parking for the identified retail and leisure developments as "town centre" car parking which would both reduce the level of provision but also promote shared use. Furthermore, TfL encourages LB Southwark to explore and implement policies which demonstrate a restrained approach to car parking at these developments within the area boundary, which would have the dual benefits of minimising increases in traffic congestion and providing more land for development in this high PTAL intensification area</p>	The support is noted.
214	542 Policy 10	<p>Policy 10: Parking for Residential Developments in the Core Area</p> <p>TfL welcomes the approach to residential car parking within the Core Area set out within Policy 10, and consider the promotion of parking restraint, alongside the aspirations to extend the current Controlled Parking Zone (CPZ) in accordance with London Plan Policy 6.13 Parking.</p>	The support is noted.
214	543 Policy 14	<p>Policy 14: Streets and Public Spaces</p> <p>TfL welcomes the aspirations set out within Policy 14 to enhance streets and spaces. A number of references are made to the improvement of cycling links within the area boundary, this is also supported as a policy by TfL, in accordance with London Plan policy 6.9 Cycling. It is requested that all cycling improvements proposed are in line with Mayor's Cycling Vision published in March 2013.</p>	Noted. Policy 6 'Walking and cycling' focuses on walking and cycling improvements within the AAP area, while the broad focus of Policy 14 is urban design considerations.
214	544 Policy 33	<p>Policy 33: s106 Planning Obligations and Community Infrastructure Levy TfL requests that commitment set out within Policy 7 to secure s106 contributions towards public transport improvements to mitigate site specific impacts is reiterated within this section/policy. Such a revision would confirm and clarify the Council's position in seeking s106 Planning Obligations to mitigate the site specific impacts of development, including bus service enhancements, and would be in accordance with London Plan policy 8.2.</p>	The council does not consider that the proposed change is needed. The wording of policies 7 and 33 were agreed by the GLA/TfL and the council in the statement of common ground prepared prior to the 2011 examination of the AAP. The plan, including the wording agreed by TfL and the council was subsequently found to be sound by the inspector.
248	641 General	<p>On behalf of our client, King's College London (King's), we are pleased to submit representations on the Revised Canada Water Area Action Plan (CWAAP). King's is a key stakeholder in Canada Water, with an option to purchase the former Mulberry Business Park site (the Mulberry site) and an interest in delivering campus-led regeneration of a wider area including part of the Harmsworth Quays site with the encouragement of Southwark Council.</p> <p>In November last year, a high level masterplan exercise was carried out to illustrate the extent and nature of a new university-led development that could be provided at Canada Water and the regeneration impacts that this would have. The masterplan was prepared as an illustrative tool</p>	Noted.

to inform discussions with LBS and other stakeholders and, in particular, to inform the Council's development of new policies for the area in its current review of the Canada Water Area Action Plan (CWAAP).

King's undertook consultation on the masterplan and it was met with broad support from all sectors of the community. In May this year the College submitted a planning application on the Mulberry Site for a mixed-use development comprising student residential, affordable housing, office and retail uses and public realm. This is a stand alone development, which will help meet King's urgent operational need for student accommodation, but would also function as the first phase of a wider university led regeneration scheme if King's is able to pursue this. The development proposed in the current planning application for the Mulberry site would be undertaken by King's whether or not the wider masterplan is taken forward, as the student accommodation proposed is a critical element of the College's Estates Strategy.

Canada Water, as an acknowledged regeneration priority area and Intensification Area in the London Plan, is deemed suitable for a new university environment and could provide King's with:

new space to meet its teaching and full student accommodation needs specifically the objective to grow student and academic staff numbers by c. 2,000 and 150 respectively in coming years;

the potential to create a vibrant university environment with new infrastructure and facilities;

a convenient location that is only ten minutes by tube to Central London and to other King's campuses;

an opportunity to further embrace world leading collaborations such as the Francis Crick Institute and London Life Sciences, all of which will require additional spatial capacity near Central London; and

an opportunity to extend public-private partnerships such as Imanova, a new state-of-the-art imaging centre formed collaboratively by King's, University College London, Imperial College London and the Medical Research Council and CUSP in association with Warwick University, New York University and private sector partners.

In order to achieve this, King's has been actively engaged with Southwark Council as the majority freeholder of Harmsworth Quays and British Land as the leaseholder.

Given this position, the revisions to the CWAAP are of great interest to King's. It is important that the new or revised policies provide a supportive context for King's to bring forward its proposals for the Mulberry site, and the wider area if this proves possible, otherwise the very significant regeneration benefits that the university uses will bring will not be delivered.

The remainder of this letter comments on the Revised CWAAP policies in detail.

transforming Canada Water in to a town centre and creating a new destination around the Canada Water Basin as a new heart for Rotherhithe. However, we would request that explicit acknowledgement of the contribution of Higher Education uses is made.

248 643 Policy 1

Policy 1 and Figure 5: Town Centre Boundary

This policy sets out that Canada Water will become a major town centre and areas for new retail development are identified including part of Harmsworth Quays. Figure 5 identifies an indicative change to the town centre boundary . This takes in Site E, part of Harmsworth Quays and the southern fringe of the Mulberry site. The text at 4.2.7a explains that the exact location of the boundary extension will depend on the amount and distribution of town centre uses.

This is an unusual approach to take at what point will the actual town centre boundary be defined? If it is to be defined after planning consents have been granted for town centre uses, the policy will provide a very ambiguous context for the determination of those applications.

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

Core Strategy Strategic Policy 8 Student Homes states that appropriate locations for student homes are within town centres and other places with good access to public transport. As such, the entire Mulberry Site should be included in the town centre.

Establishing this wider town centre boundary will also be consistent with new Policy CWAAP 24 which covers Site E, Mulberry, Harmsworth Quays and the Surrey Quays Leisure Park. This policy states that proposals in this area should:

maximise the amount of employment which can be generated and the contribution to the regeneration of the town centre resulting from:

The economic benefit of proposals, including their potential to increase the turnover of the town centre and attract inward investment into other businesses;

Diversifying the range of employment generating and town centre uses;

Increasing the number of visitors that would be attracted to the town centre at different times of the day and its potential to appeal to a wide range of age and social groups;

The creation of a town centre and urban environment providing a network of streets and open spaces .. (our emphasis)

The wording of this policy suggests that all the sites concerned are suitable for town centre uses and will contribute in various ways to the function of the town centre. As such, it would be logical

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

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

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

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

We recognise that the indicative boundary shown in the draft revised

Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
			for the sites to form part of the town centre and we request that the boundary is adjusted in Figure 5 accordingly.	AAP is confusingly precise and have proposed to make it more indicative.
248	644	Policy 12	<p data-bbox="421 300 678 323">Policy 12: Sports Facilities</p> <p data-bbox="421 352 1294 475">The consideration of long term options for the provision of sports facilities alongside the redevelopment of Seven Islands is welcomed by King's, as both of these strategies will complement the King's planning application and masterplan. We consider that the new town centre is the better location for the provision of modern sports facilities such that the Seven Islands site could be redeveloped to provide say affordable housing.</p> <p data-bbox="421 499 1312 600">As a point of information, the masterplan includes sports facilities and King's would intend to deliver these in association with a wider campus development. It is envisaged that these facilities would also be available for public use and therefore this aspect should be considered as part of the Council s long term options and strategy for the area.</p>	The support for a new centre is noted.
248	645	Policy 16	<p data-bbox="421 627 779 651">Policy 16: Town Centre Development</p> <p data-bbox="421 675 1267 751">This policy sets out objectives that development in the Canada Water town centre should deliver. These include:</p> <p data-bbox="421 775 1339 898">Enable the integration of sites to the east of Surrey Quays Road (Site E, Harmsworth Quays and the Surrey Quays Leisure Park) into the town centre by providing strong visual and physical connections which link them to the basin, shopping centre and tube station, introducing a new public space on Surrey Quays Road and in the longer term closing the southern end of Surrey Quays Road to through traffic.</p> <p data-bbox="421 922 1323 999">As discussed above, at present the at present the indicative extension to the town centre boundary includes part of Harmsworth Quays, part of the Surrey Quays leisure park and part of the Mulberry site.</p> <p data-bbox="421 999 1305 1051">The above policy wording is not consistent with this as it refers to the Harmsworth Quays and Surrey Quays Leisure park sites as a whole and completely excludes the Mulberry site.</p> <p data-bbox="421 1075 1330 1176">We object to this approach which lacks clarity and does not sit logically with new policy CWAAP 24. As set out above we consider that the town centre boundary should include all of the Harmsworth Quays, Surrey Quays Leisure Park and Mulberry sites. We request that the text above is modified to read (additional text is underlined):</p> <p data-bbox="421 1200 1339 1321">Enable the integration of sites to the east of Surrey Quays Road (Site E, Harmsworth Quays, the former Mulberry Business park site and the Surrey Quays Leisure Park) into the town centre by providing strong visual and physical connections which link them to the basin, shopping centre and tube station, introducing a new public space on Surrey Quays Road and in the longer term closing the southern end of Surrey Quays Road to through traffic.</p>	We have updated Policy 16 for consistency.
248	646	Policy 17	Policy 17 and Figure 9: Building Heights in the Core Area	The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water

This policy sets out an approach to height which gives guidance for prevailing building heights across the whole of the core area (4-8 storeys), for tall buildings (above 30m in height broadly 10 storeys) and then refers to a specific area shown in Figure 9 where tall buildings of 20 25 storeys will be appropriate.

Figure 9 then shows a zone where tall buildings will be appropriate . The policy text and supporting text makes it clear that this zone is the area where it is considered that 20 25 storey buildings may be appropriate (rather than being the only place where buildings of above 30m will be appropriate the core strategy definition of a tall building). Therefore, to add clarity we consider that the annotation to Figure 9 should be amended to read indicative area where tall buildings of 20 storeys or above will be appropriate.

In terms of the general prevailing heights, we consider that these should be amended to read between 4 and 9 storeys as this seems more appropriate in the context of existing height benchmarks in the core area such as the Water Gardens and the print works. The view modelling and townscape analysis work undertaken by King's consultants in relation to the Mulberry planning application demonstrates that building heights of up to 9 commercial floors are appropriate in the existing context. We are also aware that the local context will change significantly if and when schemes for very tall buildings of 20 storeys and above (or significantly above in the case of the current application for Site C) are permitted in the defined zone.

It is also considered that the indicative zone for tall buildings of 20 storeys or more should be extended to include the southern part of the Harmsworth Quays site (that part currently shown as being in the indicative town centre boundary) as it is considered this area would

basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the core of the new town centre. We have amended the Figure 9 legend to clarify that the area illustrated is the area within the town centre that is considered appropriate for tall buildings around 20-25 storeys. The provision of taller buildings over the existing and consented heights of around 20 - 25 storeys within this area is seen as an exception. The extension of this zone of heights around 20-25 to the south of the area illustrated in Figure 9, is not considered appropriate, as the focal point of the new town centre is around the basin and not the Harmsworth Quays site. Additionally, part of the Harmsworth Quay site falls outside the proposed town centre boundary resulting in heights that would be lower than the town centre where it would modulate the building heights from the tallest elements around the basin to the lower heights around the periphery of the AAP core area. The 4-8 storeys is a benchmark considered acceptable by the Inspector who examined the previous AAP and is consistent with our evidence base. Any proposed development exceeding this would be assessed at the planning application stage.

248 647 Policy 25

Policy 25: Jobs and Business Space

Comments noted.

The promotion of a business cluster in the core area on the sites identified is supported. The supporting text at paragraph 4.7.3 notes that demand could also be boosted by the requirements of end users such as King's and this acknowledgement is welcomed. The current planning application for the Mulberry site includes an office building that would bring some 300 jobs to the area.

248 648 Policy 29a

Policy 29a: Higher Education and Student Housing

King's welcomes the inclusion of Policy 29a and its support for the provision of higher education uses at Canada Water. However, we have a number of serious concerns about the detailed policy wording.

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

Is part of a campus development which also provides a significant amount of teaching and/or research facilities and supporting infrastructure?

Is part of a mixed and inclusive community?

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

However, we acknowledge that all sizes of student accommodation can have an impact on amenity and change the character of the area. We therefore propose to amend the wording of the policy and supporting

Includes a range of student housing types such as a cluster flats, studio flats and accommodation for couples and families as well as homes for staff.

Our first point is that 300 bed spaces seems to be a somewhat arbitrary figure at which to make a policy distinction on acceptability. From our discussions with you we understand that this approach has been used to seek to address concerns about the impact of large scale student schemes on the amenity of surrounding land uses. It seems to us that amenity issues could occur at any scale of student development if the schemes are not carefully managed. For example, a poorly managed 150 bed scheme could cause significant problems, while a well managed 600 bed scheme would not. Therefore we consider that a more appropriate approach would require major student schemes to have an approved management scheme in place.

Our second point is that we do not see the need for major student developments necessarily to be part of a campus development. The reason that King's acquired an option on the Mulberry site is that this location is very well linked by public transport (Jubilee Line and buses) to all of the College's other campus locations. Therefore, there will be easy access for students to all of King's teaching and other facilities. As you know, King's intends to bring forward its mixed use development on the Mulberry site whether or not its aspirations for a wider teaching campus in the area can be delivered. This would involve some 770 student bed spaces on the Mulberry site which may never form part of a teaching campus - although King's hopes that it will.

Our third point is that we believe the reference to homes for staff in the third bullet has been included to support King's original ideas for Mulberry. It is no longer the intention to house staff on site and therefore this wording is not needed.

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

Is part of a campus development which also provides a significant amount of teaching and/or research facilities and supporting infrastructure, or is linked to a campus by good public transport services.

Is subject to a residential management plan that has been approved by the Council.

Is part of a mixed and inclusive community.

Includes a range of student housing types such as a cluster flats, studio flats and accommodation for couples and families.

We consider that the third sentence onwards in paragraph 4.7.23, referring to the 300 bedroom definition, should be deleted.

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

text to ensure that all student schemes are part of a mixed use developments and that they are accompanied by an approved management plan. This will ensure that any issues of amenity and impacts on neighbouring uses can be carefully managed.

It is important to support the provision of higher education uses in the action area, however we also want to ensure that there is a mix of uses as well as new residential development. It is therefore necessary to require other uses and facilities alongside large student housing proposals. Student accommodation alone does not support the improvements we want to make to the town centre or help to meet the vision for the wider area.

The Council proposes to amend the wording of policy 29a to make it more flexible on the provision of accommodation for staff.

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

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

248 649 CWAAP 24

Proposal Sites: CWAAP 24 and Figure 29: Site E, Mulberry Business Park, Harmsworth Quays and Surrey Quays Leisure Park

Comments noted and support welcomed. We have amended the text to CWAAP 24 to include reference to higher education.

CWAAP 24 represents a new single allocation for Site E, Mulberry, Harmsworth Quays and Surrey Quays Leisure Park to ensure a joined up strategy for bringing forward development on these sites. King's welcomes this new policy but has some detailed comments on it, Figure 29 and the supporting text.

Within the first paragraph of the policy we request that the wording higher education is used rather than, or in addition to, education .

King's acknowledges and supports the policy recognition in paragraph 7.8.53 that once Harmsworth Quays is vacated by the Daily Mail Group, a non-residential noise buffer will no longer be needed on the Mulberry Site. King's supports the aspiration stated in paragraph 7.8.54 to create an environment which feels like a town centre . This supports our request that the whole area covered by policy CWAAP 29a is included within the town centre definition.

King's supports the recognition of the role that higher educational uses could play in strengthening the economy and delivering jobs (second bullet point of 7.8.55).

In terms of student housing, paragraph 7.8.56 states:

Student homes can contribute to widening the mix and choice of homes in the area and would also be an acceptable use. However, the appropriate level of student housing will depend on the accompanying mix of uses. The number of student homes should not unbalance the mix of homes in the area. If a significant number of student homes are proposed, this should be justified by other benefits associated with university campus development.

For the same reasons as set out in response to policy CWAAP 29a above, we consider that the final sentence of this paragraph should be deleted as large scale student accommodation may be acceptable where it is well linked to an existing campus by public transport and is well managed in terms of impacts on residential amenity. Therefore, we consider that this paragraph should refer back to Policy 29a and the revised wording we have suggested for this policy, as follows:

Student homes can contribute to widening the mix and choice of homes in the area and would also be an acceptable use. However, the appropriate level of student housing will depend on the accompanying mix of uses. The number of student homes should not unbalance the mix of homes in the area. If a significant number of student homes are proposed, this should comply with the criteria in Policy CWAAP 29a for large student housing developments.

At paragraph 7.8.58 guidance is given on the location of residential uses. It is stated that non

residential uses should be located on the western side of the site, closest to the town centre and tube station, while the eastern side of the site would be more appropriate for any residential housing provided. We strongly object to this paragraph and suggest that it is deleted. This approach is overly prescriptive and removes the ability for a thorough masterplanning exercise to come up with an appropriate distribution of uses across all or part of the site. In order to create a genuine mixed use community it will be important that there is a mix of uses, including residential uses, across the site. For example, King's is proposing affordable and student housing uses on the western side of the site and this is entirely appropriate given the adjoining residential uses on Canada Street.

643 499 General

Thank you for consulting the Environment Agency on the above which we received on 19 June 2013. We have been involved in the previous Canada Water Area Action Plan consultations between 2007 and 2011 during which many of our environmental issues were addressed. We also responded to the Canada Water Area Action Plan Review- Sustainability Appraisal Scoping Report in our letter of 28 November 2012 reference SL/2009/104986/SE-03/SP1.

The documents referred to are noted. We will ensure we refer to these in the SA.

We support the revised Canada Water Area Action Plan incorporating the Harmsworth Quays site which will play a key part in the delivery of the plan. We would wish to see the revised plan aligning with the Environment Agency Thames Estuary 2100 (TE2100) Plan which was approved by DEFRA in November 2012. We are keen to ensure that TE2100 Plan informs the development and revision of the borough Strategic Flood Risk Assessment (SFRA) and other flood plans. We hope the London Borough of Southwark will support the flood risk management measures identified by the TE2100 Plan. We have no specific comments to make in regard to the consultation questionnaire.

However we have attached below further comments and information on the following:

- Flood Risk
- Thames Estuary 2100 (TE2100) Plan
- Surface Water Management

Please do not hesitate to contact me should you wish to discuss this further.

643 500 General

Flood Risk
As pointed out on paragraph 6.4.13 the London Borough of Southwark's SFRA indicates that much of the AAP area lies in flood zone 3a (high probability of flooding in the event of a breach of flood defences). The SFRA sets out recommended development control policies within section 6.4.4, stating that for less vulnerable development, flood resilient design measures and a site specific flood evacuation plan should be implemented to ensure that in the event of a breach the risk to life and property are minimised.

As the EA note, detailed guidance on flood risk is set out in our Sustainable Design and Construction SPD.

The recommended development control policies are embodied within the London Borough of Southwark's Sustainability Assessments Supplementary Planning Document (SPD) that sets out in more detail the requirements for site specific flood risk assessments. The London Borough of Southwark's Sustainable Design and Construction Supplementary Planning Document section 9.2 states 'sleeping areas should not be located below the predicted 1 in 200 year flood level'. The table within Appendix 5 of the SPD states that 'No residential development is permitted at ground floor level' and 'No basements permitted within this area' for the less than 6 hours rate of

inundation zone.

Where a Flood Risk Assessment is required, all sources of flooding including groundwater, surface water and sewer flooding, and historic flood mapping are required to be considered within the FRA to determine the risk of flooding from sources other than fluvial and/or tidal, and for appropriate mitigation measures to be proposed as necessary.

The Flood Risk Assessment will be required to consider how the development will remain safe during a flood and how development would recover from a flood. Developers should be required to make occupants aware of the possible impact of flooding on the property, how to receive flood warnings and what action should be taken should a warning be received or a flood occur.

Thames Estuary 2100 (TE2100) Plan

Although the AAP core area does not front the River Thames, the wider AAP area fronts the river. The Council will require developments to reduce flood risk now and in the future and act on the recommendations of TE2100 Policy Unit – Wandsworth to Deptford. Each policy unit has been assigned a policy which determines how flood risk will be managed in the future. The selected policy for Wandsworth to Deptford is policy P5-‘take further action to reduce flood risk beyond that required to keep pace with climate Change.’ See the table below for more detail. Developers should demonstrate how the tidal flood defences protecting their site can be raised to the required TE2100 levels in the future.

Policy unit Flood risk policy What this means...

Wandsworth to Deptford

P5

To keep up with climate change and reduce flood risk further, we and others will need to do more to manage and reduce both the likelihood and consequence of flooding, providing a level of flood risk management which is higher still than the standard currently provided.

There are 10 underground stations and three major railway terminals in the tidal flood risk area. There are also 32 care homes, 93 schools, three hospitals and over 200 electricity substations potentially at risk. This makes the Wandsworth to Deptford policy unit one of the most vulnerable in the TE2100 area to flood risk in the event of a failure or overtopping of the defences. There is need to agree a programme of floodplain management including local flood protection, resilience and emergency plans for vulnerable key sites in the area. The actions include:

- Safeguarding land beside flood defences where it is expected that defence raising and improvements will be required in the future;
- Maintaining, enhancing or replacing flood defences so they provide adequate protection for the lifetime of development;
- Where opportunities exist re-aligning or setting back flood defence walls and improving the river frontage to provide amenity space, access and environmental enhancement;
- Maintaining and improving flood storage areas whilst offering benefits for wildlife and people;
- Ensuring the NPPF principles are applied to development to ensure vulnerable developments are appropriately located;
- Flood resilience and resistance is built in where developments are at risk from flooding.

Land requirements for each Policy Unit

The Thames Estuary 2100 Plan requires a wide range of works to be implemented on the estuary including: maintenance and repair of defences, raising of defences, new 'fixed' defences and intertidal habitat creation. One of the actions identified in the plan is to develop a Land Strategy for the Thames Estuary to identify and safeguard the land that will be or may be needed for future flood risk management, so that it is available when required. All Policy Units will require land for the following purposes:

- Along the existing defence lines for inspection, maintenance and repair.
- Additional land along the existing defence line where defences are to be raised. This includes all the existing tidal flood defences that are to be raised except where defences are realigned.

Additional requirements for Wandsworth to Deptford Policy Unit are listed below.

- The local choices include some local defence realignment. If defences are to be realigned, space will be needed along the new alignment for the defence and an access route.
- Land for secondary defences at vulnerable locations including tube station entrances and critical infrastructure, for example pumping stations.
- Potential future high level access routes into and out of the main flood risk areas.

The River Thames

We support Theme 4, P4 to make the River Thames and its river front more accessible. The borough should recognise the River Thames as a local and regional asset. We note how the space alongside the River Thames is now more frequently used to celebrate public events that use the River Thames as a London focus. This heightened interest reminds us of the need to consider the highest of standards of riverside design for the public realm. We believe the London Borough of Southwark may wish to consider how it may respond to the need for open water space in relation to facilities that may be required for river related activity and if the plan will play a constructive role for the betterment of such interests. We support River transport as long as its implementation will maintain the integrity of the flood defences.

It is equally important to prevent development into the River Thames that would damage the openness of the riverscape which is the most valuable landscape feature in London. Realignment of the flood defences, habitat creation and removal of obsolete structures are measures which are identified in the 'Thames River Basin Management Plan'. The Environment Agency can provide case study material and further information if needed. For more detail see Estuary edges guidance at: <http://www.environment-agency.gov.uk/cy/busnes/sectorau/100745.aspx>

Surface Water Management

We responded to the London Borough of Southwark's Draft Local Flood Risk Management Strategy 2013 consultation in our letter of June 17, 2013 reference SL/2009/104986/SE-06/DS1 and would wish to see the recommendations of this strategy reflected in CWAAP. London Borough of Southwark is the Lead Local Flood Authority (LLFA) with the full responsibility for managing flood risk from surface water, groundwater and ordinary watercourses. Developments in CWAAP area should have regard to the following criteria:

- Determination of potential overland flow paths and proposals for appropriate solutions to minimise the impact of development on surface water flooding. Road and building configuration should be considered to preserve existing flow paths and improve flood routing, whilst ensuring that flows are not diverted towards other properties elsewhere;

- In the areas outlined in the Surface Water Management Plan as areas with increased risk of surface water flooding, a FRA should mitigate off site surface water flooding by aiming to achieve greenfield run off rates or better. SUDS techniques should be applied with regard to the London Plan Sustainable Drainage Hierarchy.

- Incorporation of soft landscaping and permeable surfaces into all new residential and non-residential developments. Retention of soft landscaping and permeable surfaces in front gardens and other means of reducing, or at least not increasing, the amount of hard standing associated with existing homes is encouraged. New driveways or parking areas associated with non-residential developments and those located in front gardens should be made of permeable material.

- Application of a site wide sequential approach to development by locating buildings within the areas of lowest flood risk on a site in accordance with the areas set out within the Surface Water Management Plan as areas with increased risk of surface water flooding.

Pre- Application Consultation

The new legal requirements on pre-application consultation are set out in Section 122 of the Localism Act. This places a new legal duty on developers to consult local communities on certain planning applications above a certain size. The duty does not apply to all planning applications. It is presently proposed that the threshold level will be:

- 200 residential units (4 hectares) or more; or

- Developments of 10,000 square metres, or more, of new floor space (2 hectares).

The Environment Agency is proposing a voluntary chargeable agreement for planning pre-applications for complex developments. Complex development may include one or more of the following:

- Large scale development proposal (e.g. greater than 10 hectares) with an impact on strategic areas of environmental sensitivity, or sites where there are many constraints to be resolved.

- Proposal involving significant off-site improvements, related to our remit.

- Proposal requiring an Environment Impact Assessment (EIA) under Schedule 1 of the Town and Country Planning (EIA) Regulations 2011.

We will continue to encourage early pre application discussions and request developers and consultants to complete our pre application consultation form. The developers will continue to use our free service for all developments, irrespective of scale and complexity funded through our Grant-in-Aid from Defra. For the Pre-Planning Enquiry Pro-Forma link visit:

http://www.environment-agency.gov.uk/aboutus/512398/908812/1351053/1351105/?version=1&lang=_e

Developers Frequently Asked Questions link: http://www.environment-agency.gov.uk/commodata/acrobat/faqfinaljune06_1410784.pdf.

Our national planning WebPages link: www.environment-agency.gov.uk/planning

795 586 CWAAP 2

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

The sports pitch itself is metropolitan open land. The provision of ancillary facilities are required by CWAAP 2. The policy has been examined through the 2011 EIP and the council are not proposing to make any substantive changes to the policy.

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

7.8 Appendix 5: Schedule of proposals sites – CW AAP 2: Land adjacent to Surrey Docks Stadium

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

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

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

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

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

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

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

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

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

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

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

We hope these comments can be given full consideration. Please do not hesitate to contact me if you have any queries or would like to discuss the response.

845 501 Vision

2.2.1."Canada Water has the potential to be a fantastic destination", we read, - however the range of shops is very limited. The text needs to spell out from how far afield it aspires to attract shoppers because, obviously, it is never going to compete with Oxford Street or Bluewater, or Westfields. It should replace the ad-word "fantastic" with something more grounded, recognizing that the shopping is rarely going to attract beyond buyers from beyond an area bounded by say Greenwich, north Lewisham and the Old Kent Road.

People, it seems to me, don't necessary want to shop locally for other than household things; they prefer to "go shopping", ie. make a day's expedition of it.

The first objective, therefore, should be to improve the retail offer for local people living in Bermondsey, Rotherhithe and Deptford. Visitors, tourists, I suggest, are more likely to be brought in by the wider environmental attractions of the peninsula.

Our policies on shopping are grounded on good evidence set out in our retail capacity study. While Canada Water is unlikely to ever compete with Bluewater and Stratford etc it can still become a fantastic destination in its own right. We recognise however that the regeneration of Canada Water should not depend solely on retail growth. Our policies seeks to expand a range of facilities in the area, including leisure and business to help make the centre more attractive and improve its viability. The process has started with the building of the library but there is lots more potential. A new university campus in particular could help to diversify and strengthen the centre.

845 502 Policy 6

4.3 Policy 6: Walking and Cycling
The present cycle route signage consists of crude daubs on the tarmac, already wearing away after a couple of years. The council should investigate the effective but unobtrusive signage used on cycle routes in the Low Countries.
So I suggest adding to line 1 of the policy, "including improvements in signage."

AAP policy 6 states that we will improve the network of pedestrian and cycle routes in the area. There are many ways in which routes could be improved, which include improved signage. However, it would not be appropriate to single out signage alone. Policy 1.10 of our Transport Plan is to "Improve the cycling environment and ensure that people have the information and confidence to use it." The actions to help deliver the policy include installing legible London signage at key destinations and implementing improvements to network permeability.

Objector no.	Rep Policy no.	Details of Representation	Officer Response to Representation
845	503 Policy 12	<p>4.4 Policy 12: Sports facilities</p> <p>Bullet point 2: "improve sports facilities in Southwark Park" is like saying "give Lazarus a pick-me-up." Even refurbish (4.4.7) is a euphemism. There are no sports facilities apart from bowls, tennis and the exercise machines.</p> <p>The policy should read "Rebuild and upgrade the running track and associated sports facilities " – without however encroaching further into the park.</p>	<p>We have identified the need to improve facilities in Southwark Park. Given however that improvements are not currently funded, it would be overly prescriptive to state that it will be rebuilt at this stage.</p>
845	504 Policy 16	<p>4.5. Policy 16: Town centre development</p> <p>Bullet point 6. The use of "east" and "south" in relation to Surrey Quays Road is confusing because the road curves in a loop north from Canada Water station, then east and south east. "Southern end" presumably means south-eastern end. As a frequent traveler to and from Canada Water station on the 381 and C10 bus I don't see how closing this end could work with the present road layout.</p>	<p>The idea of realigning Surrey Quays Road to the east of the Leisure boxes which would then enable the southern part of Surrey Quays Road to be converted into service access only into the shopping centre service yard and rear of the leisure boxes. We have set out the benefits on p. 155 of the AAP. These include providing better connectivity between the shopping centre and leisure uses, safer and more attractive routes and better links to Greenland Dock. It was shown as a possible option in the evidence work we published in support of the adopted AAP. Now that Harmsworth is available, it becomes less complicated to implement, although if it did not happen, it would not undermine the AAP ie. things could carry on as they do at present. The idea was generally supported during the consultation event we held in November 2012.</p>
845	505 Policy 16	<p>4.5.7a. This location of this potential public space needs spelling out more precisely. I presume it means on the corner of the dock where there is presently a gap between Decathlon and BHS. It is not possible on the other corner because of the permission given to extend the shopping centre.</p>	<p>A degree of flexibility is required within the AAP for changing circumstances. As such a balance between prescriptiveness and flexibility is required for the plan to be effective and to provide the required degree of certainty for development to come forward. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design, and where relevant, new public spaces.</p>
845	506 Policy 17	<p>Policy 17: Building heights in the core area.</p> <p>This reverses the previous policy which limited heights around the basin to 5-8 storeys. Now tall buildings of over 30m or 25-30 storeys will be allowed within the curve of Surrey Quays Road "where they reinforce the character and function of the centre," or in plainspeak, mark it out. Even higher buildings will be allowed if they "contribute positively to London's skyline and make exceptional contributions to the regeneration of the area," and meet other conditions.</p> <p>We already have one tall building next to Canada Water station. An even taller one of 41 storeys close to the south east corner of the dock (between the present Decathlon and BHS) forms part of the Decathlon application currently being considered. No doubt it will be opposed. A "local landmark tower" of up to 15 storeys on the south-western corner of the shopping centre site (I understood it was at the Surrey Quays or south-eastern end) has been deleted (p.46).</p> <p>The new policy opens the door to any number of tall buildings with the core area. I strongly oppose this and so I suggest will most people. There are conditions set out, but who wants Canada Water to become a miniature Canary Wharf? No-one. Another warning from across the</p>	<p>Firstly, a degree of flexibility is required in the plan for changing circumstances. A balance between prescriptiveness and flexibility within the policies is required for an effective development framework and to provide the required degree of certainty within the development process. In light of this, the plan cannot be over-prescriptive in relation to tall buildings, but set out the rationale and an appropriate strategy. The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and new surrounding public spaces as the focal point of the new town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights</p>

river. When the "gherkin" was built its simple organic shape was a delight to everyone passing along the south bank. Now it is invisible, hedged in and blocked out by ugly, ostentatious slabs of architectural trash.

The AAP needs therefore, I suggest, to be specific about the number of tall buildings it will permit and their location. I would argue for three: the two locations already mentioned and a third lower one marking the Surrey Quays entrance to the site.

around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the core of the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception.

845 507 Policy 18

4.5.28b. I propose an additional sentence here, reading "We will resist any attempt to infill these amenity spaces with additional housing."

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

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

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

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

We consider that these policies will be more effective in securing good quality amenity space than simply protecting all existing amenity space or applying a per capita standard across the borough. This is consistent with national guidance in the PPG 17 Companion Guide which suggests that in the case of amenity greenspace "higher quality local environments will result from the use of an urban design-led approach than from a simple quantitative provision standard." The value of this approach at a neighbourhood level has been reflected in the Aylesbury

Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
				AAP and Elephant and Castle SPD . Both of these documents aim to ensure that good mix of private and public amenity space is made, while also facilitating the regeneration of the Aylesbury and Heygate estates.
845	508	Policy 21	4.6 Policy 21: New homes I would like to add a sentence, reading, "We shall seek to make it a planning condition that new residential accommodation, here and elsewhere in Southwark, will be sold only to buyers domiciled in the UK who buy it for their own use.	Unfortunately this is beyond the realms of the scope of the AAP. We cannot set policy which dictates who buys or occupies private flat/houses.
845	509	Policy 22	Policy 22: Affordable homes Add phrase to first paragraph ("Most of these new homes will be on the proposal site") - "the others closely adjacent."	It is not considered that the proposed change would add any further clarity. It is simply meant as a statement of fact: most of the homes to be provided will be on sites allocated in the AAP.
845	510	Policy 30	5.2 Policy 30: Albion Street 5.2.8 The school needs to expand; but it is not obvious that building over the front garden area and felling the trees to create a frontage of school-rooms and shops will do anything to improve the ambiance of the street.	We consider that providing a stronger frontage onto Albion Street would be beneficial for the street. Any application for development would need to accord with all planning policies and the council would need to assess impacts on trees etc. In July 2013, Southwark's cabinet agreed in the primary investment strategy to expand Albion primary school to 2 forms of entry.
845	511	General	A final thought: The AAP is a conscientious and (on the whole) sensitive piece of work. It has been extensively consulted on. But it is worth all that time, effort and paper only if it is adhered to when individual planning applications come along. In the recent past planning control has nodded things through that either conflicted with the planning guidelines or undershot them. My last suggestion for improving the AAP is therefore that the planning policy team should make representations to have the current planning control manager replaced by someone more rigorous.	Support for the AAP is noted.
961	485	General	Thank you for your consultation of 11 June 2013 providing the opportunity to comment on the Draft Revised Canada Water Area Action Plan (AAP) and its Sustainability Appraisal. As the Government's adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages in the development of the Local Development Framework including its Area Action Plans. English Heritage provided comments in respect of the previous "adopted" version of the CWAAP. We welcome the Draft Revised CWAAP and the opportunity to develop the framework to integrate the Harmsworth Quays site. We previously raised a number of issues affecting the historic environment in response to the consultation on the CWAAP, agreed in March 2012. We are pleased to note that these comments have been incorporated into the Draft AAP and as such we do not wish to comment in detail. However, having now reviewed the Draft we do consider that a number of issues would benefit from further clarification or revision. With this in mind we can offer the following comments.	Noted.

Obj-jector no.	Rep no. Policy	Details of Representation	Officer Response to Representation
961	486 Policy 17	<p>In respect of Policy 17 : Building heights in the core area, page 43 the reference to Other special buildings, in our view, needs clarification in terms of what is meant by a "special building". We would, at present, consider this term too vague to secure the assumed intended outcome of high quality and innovative buildings marking key gateways into the town centre.</p> <p>We note the deletion of Policy 17 : Building heights in the core area, page 46, Development around Canada Water basin and the edge of Russia Dock Woodland should generally be around the lower end of the ranges. The revised Paragraph 4.5.12d now states, The basin and public spaces around it have the potential to be the focal point of the town centre and should be the focal point for the tallest elements of development. The availability of Harmsworth Quays for development has created the opportunity for tall buildings to the east of Canada Water basin. This suggests a change of emphasis in respect of location of tall buildings and their potential heights around the basin, which could have implications for the setting of heritage assets. It is unclear whether tall buildings are acceptable only to the east of the basin or, as implied, on a wider basis around the basin. We would suggest that Policy 17 should offer greater clarity in respect of the basin and public spaces around it. In addition it would be useful to see the underlying evidence that supports this suggested change in focus for tall buildings in this location.</p>	<p>We have added a fact box to the supporting text that clarifies the 'special building' term. We have assessed the potential impact on townscape and the significance of heritage assets and their settings in the previously published urban design study. The methodology used also underpins our new study which will be published with the new AAP. The area considered appropriate for tall buildings is limited to the new town centre, with heights up to 20-25 storeys geographically limited to the area that we identify to the east of the Canada Water basin, which is illustrated in Figure 9. Within this area, tall buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the town centre. We consider that any tall buildings located on the southern western corner of the basin would be visible in the protected viewing corridor of LVMF 5A.2 and would therefore be inappropriate. The LVMF view is highlighted in the policy criteria. Building heights at the periphery of the AAP core area will step down in response to the lower contextual heights present outside the AAP core area.</p>
961	487 Policy 17	<p>The Interim Sustainability Appraisal for CWAAP Policy 17 states that, The Policy aims to set clear guidelines about the height of buildings in the core area and states there is potential for tall buildings (of 30m and above –roughly 10 storeys) in the town centre. In our previous response to the Sustainability Appraisal Scoping Consultation we urged the Council to demonstrate through thorough analysis and modelling, the impact and relationship of tall buildings with their surroundings and other existing groups/clusters of tall buildings. As such, we would reiterate the benefits of this in order to assess the impacts of the proposals in impact and townscape terms and to provide greater clarity for Policy 17. As part of the Interim Sustainable Appraisal you may find it useful to review this in line with English Heritage's published guidance; The Setting of Heritage Assets (2011), which may help to address these concerns.</p>	<p>The tall building study that assesses the potential impact on townscape and the significance of heritage assets is set out in the CWAAP urban design study. This study is underpinned by a robust methodology that has been previously been agreed by English Heritage. The study will be published with the new AAP.</p>
961	488 General	<p>Finally, we would like to stress that the above comments are based on the information provided and does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may arise and where we consider that these would have an adverse effect upon the historic environment. In the meantime we welcome the opportunity to work with your Planning policy Team on the development of this important planning document, and we would welcome a meeting to discuss the issues raised in order to resolve them prior to EIP.</p>	Noted.
1074	353 Policy 16	<p>On page 39 there is a reference to closing the southern end of Surrey Quays Road at its junction with Redriff Road - this seems very odd. What is the reasoning behind this?</p>	<p>This is in connection with the idea of realigning Surrey Quays Road to the east of the Leisure boxes which would then enable the southern part of Surrey Quays Road to be converted into service access only into the shopping centre service yard and rear of the leisure boxes. We have set out the benefits on p. 155 of the AAP. These include providing better connectivity between the shopping centre and leisure uses, safer and more attractive routes and better links to Greenland Dock. It was shown as a possible option in the evidence work we published in support of the adopted AAP. Now that Harmsworth is available, it becomes less complicated to implement, although if it did not happen, it</p>

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1074	354 Policy 17	In relation to building heights, the current AAP suggested two landmark tall buildings - one above the bus station, now complete, and one at the Tesco end of the shopping centre. It was, however, never envisaged that the second building would be twice the height of the first, which was designed to harmonise with the neighbouring Canada Estate. The suggestion in the revision seems to be that more would be good - on what basis?	would not undermine the AAP ie. things could carry on as they do at present. The idea was supported during the consultation event we held back in November.
1074	354 Policy 17	In relation to building heights, the current AAP suggested two landmark tall buildings - one above the bus station, now complete, and one at the Tesco end of the shopping centre. It was, however, never envisaged that the second building would be twice the height of the first, which was designed to harmonise with the neighbouring Canada Estate. The suggestion in the revision seems to be that more would be good - on what basis?	<p>The availability of Harmsworth Quays for development and the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, provide an opportunity to rethink the approach to town centre development. Following the EIP, the planning inspector recommended that the council review opportunities for tall buildings in the light of the availability of Harmsworth Quays.</p> <p>The adopted vision in the AAP emphasises the desirability of creating a network of streets and spaces that have a town centre and urban feel and which are not dominated by cars. Provision of some tall buildings, provided that they are of the highest design quality and avoid harmful microclimate impacts can help deliver the AAP vision in three important areas:</p> <ol style="list-style-type: none"> 1) Contribution of tall buildings to public realm: Currently the footprint of the existing large sheds in the centre make it difficult to move around the area. With the exception of the plaza outside the library the public realm is uninspiring and offers little to residents, visitors or shoppers. A key advantage of tall buildings is that they can utilise much smaller footprints, enabling the creation of more public realm and making it easier for pedestrians to move around. The design policies in the AAP have been revised to make provision of new public realm a crucial element of new development. 2) Tall buildings and provision of town centre uses: The key to a vibrant and successful town centre is a range of shops, leisure opportunities and businesses which create a destination. Tall buildings can provide a range of uses to help animate the base of the building and contribute to the vibrancy of the centre. They are an important source of capacity and will help deliver the range of non-residential uses which are sought by the AAP vision. 3) Tall buildings and creating a focal point in the town centre: Policy 17 in the revised AAP states that buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular, they will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the town centre.
1074	355 Policy 18	In para. 4.5.28 the reference to considering more detailed proposals for St Paul's Field has gone. Whilst there is no suggestion in the document that it would remain anything other than open land, a more detailed proposal could have been included to aid future implementation.	Text has been added to para 7.8.1 (the site allocation policy) to say that we will explore options to bring back St Paul's into active use. The required use is open space. A community use would also be acceptable. This provides a hook to look at options and ensures that

Obj-jector no.	Rep Policy no.	Details of Representation	Officer Response to Representation
			whatever happens, open space should be retained. If we went beyond that in the AAP it would be overly prescriptive.
1074	356 Policy 26	Paras. 4.7.7a and b suggest that the Compass school will solve all the present and future local secondary school provision shortfall. This would appear very complacent, and references to possibly expanding other secondary school places doesn't provide a solution, as the Globe and Walworth Academies are a long way for 11 year olds to travel and the proposals to expand the City of London Academy have already run into difficulties.	We understand that there may be a need to create further new secondary places in the future. At the moment, based on the Compass School and other new schools (new School Aylesbury and Ark All Saints Academy) there are sufficient places for the next few years. It is important that we are not complacent and we are actively engaging with existing secondary schools to explore potential for future expansions. Our initial feasibility work suggests that there may be potential for Bacon's, St Michael's and COLA to provide additional places. While the AAP is generating a significant number of new homes, the majority of these are likely to be flats and the extent to which these will drive need for secondary places is still unclear. Any growth in the need for secondary places and the potential to expand existing schools will need to be kept under review.
1074	357 Policy 29	Para 4.7.21 is very woolly on providing increased NHS facilities and when they would be provided. The proposal seems predicated on getting more housing into the area first, which doesn't make sense.	Para 4.7.21 states that new health facilities should be provided in the core area and that we are continuing to work with NHS Southwark. There is no intention that housing should necessarily be provided before health facilities. The thrust of the policy has not been changed from that which was in the adopted AAP. We have worked with NHS Southwark in preparing the AAP and proposed changes. NHS Southwark is of the view that new facilities will be required but cannot say at that moment when or how much. Those decisions will depend on the rate of development, availability of sites, availability of NHS funding etc. The AAP can highlight the need, but cannot really be more prescriptive at this stage.
1074	358 Policy 8	Policy 8 on vehicular traffic, along with the timeline at the end, is very concerning. The Council is still using a figure of £9m for the Lower Road traffic scheme, whereas we've been told a lower figure at Community Council meetings. We also believe that keeping the suggested right-turn into Surrey Quays Road from Lower Road within that project is a mistake, as we believe that this could be a stand-alone, affordable quick solution to easing the pressure on the Rotherhithe tunnel roundabout. Even more concerning is that the project as a whole is earmarked for 2016-2020. With the continuing developments at Canada Water, as well as those across the borough boundary to the east of Plough Way, this is an unacceptably long way off. It's interesting to note that in 6.7.7 there is reference to the redevelopment of the shopping centre and overflow car park being slowed by a lack of up-front investment in road capacity!	<p>£9m is the figure in the adopted AAP. It would be premature to reduce the figure now and may serve to reduce our options. Together with TfL we have commissioned Mouchel to carry out a feasibility study and we should have a revised cost for the preferred option by the autumn.</p> <p>With regard to timing, 2016-2020 is the timescale set out in the adopted AAP and was based broadly on when we expect development to occur and trigger the need to carry out improvements and when sufficient s106 funding may be available. The feasibility work we are doing with TfL will provide a better idea of when it can happen and CIL also provides more flexibility. Mouchel are working to an assumption that the project should be delivered in 2015 in order to meet TfL's deadline for the implementation of the cycle superhighway on Lower Road. Depending on the options developed, it may be necessary to implement a minimal scheme to deliver the cycle superhighway in 2015 and follow on in 2016-2020 with the remainder of the scheme.</p>
			Implementing the SQR right turn in isolation from the wider scheme and

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			<p>introducing it in advance will be considered as part of Mouchel's work. It should be noted that the Rotherhithe Tunnel roundabout is also on TfL's programme of junction reviews as well as being considered as part of their work on the Cycle Superhighway.</p> <p>The comment about things slowing up refers to the risk section in the adopted AAP. We have not changed it through our current proposals. It simply means to say that if development is delayed, then transport investment may also slow down partly because the improvements are not required and partly because s106 funding will not be forthcoming.</p>
1074	359	Policy 12	<p>In the document the refurbishment of Seven Islands is confirmed for 2014-16, but that will only extend its life to 2026 and it is said that there are still opportunities within the town centre for a new one. Unless King's College are going to provide one at reasonable prices, we believe that the refurbishment should be dropped and a proper job done on Seven Islands, as there quite simply isn't going to be a site which just appears for a leisure centre in the town centre.</p> <p>The council has committed to refurbish 7 Islands to extend its life by up to 10 years. The council is exploring whether a new leisure centre can be provided in the town centre in the longer term. King's College have proposed a new centre as part of a campus development and the council is keen to explore this option with King's College and British Land.</p>
1075	362	Policy 26	<p>p15. Please keep the need for secondary school places under review. I'm slightly disappointed that plans for a new secondary school in Rotherhithe didn't come to fruition.</p> <p>We have updated our policies to recognise circumstances which have changed. A new school which would provide 4FE has been approved to open in September 2013 in Bermondsey.</p> <p>We understand that there may be a need to create further new secondary places in the future. At the moment, based on the Compass School and other new schools (new School Aylesbury and Ark All Saints Academy) there are sufficient places for the next few years. It is important that we are not complacent and we are actively engaging with existing secondary schools to explore potential for future expansions. Our initial feasibility work suggests that there may be potential for Bacon's, St Michael's and COLA to provide additional places. While the AAP is generating a significant number of new homes, the majority of these are likely to be flats and the extent to which these will drive need for secondary places is still unclear. Any growth in the need for secondary places and the potential to expand existing schools will need to be kept under review.</p>
1075	363	Policy 12	<p>p40. Item 4.5.7. Is it worth considering whether Canada Water could be used for boating? Or would that have too detrimental an impact on wildlife?</p> <p>It is an idea that could be considered, although the council would need to assess impacts on wildlife and angling and consult groups connected with an interest in these issues.</p>
1075	364	Policy 17	<p>Policy 17: Building heights in the core area. I strongly disagree with the change of stance compared to the current AAP.</p> <p>(a) Building heights should be limited to 25 stories (and there should be VERY few that high).</p> <p>(b) To quote deleted 4.5.15, "Building heights should not be overbearing on the docks". Building heights in the immediate vicinity of Canada Water could help to create an amphitheatre feel,</p> <p>The availability of Harmsworth Quays for development creates the scope to expand the new town centre eastwards and bring in new land uses, such as business and higher education, provide an opportunity to rethink the approach to town centre development. Following the EIP, the planning inspector recommended that the council review opportunities for tall buildings in the light of the availability of Harmsworth Quays.</p>

being kept to about 4 or 5 stories near to the basin and rising (possibly on a terraced basis) up to 8-10 stories a block or so away.

The adopted vision in the AAP emphasises the desirability of creating a network of streets and spaces that have a town centre and urban feel and which are not dominated by cars. Provision of some tall buildings, provided that they are of the highest design quality and avoid harmful microclimate impacts can help deliver the AAP vision in three important areas:

1) Contribution of tall buildings to public realm: Currently the footprint of the existing large sheds in the centre make it difficult to move around the area. With the exception of the plaza outside the library the public realm is uninspiring and offers little to residents, visitors or shoppers. A key advantage of tall buildings is that they can utilise much smaller footprints, enabling the creation of more public realm and making it easier for pedestrians to move around. The design policies in the AAP have been revised to make provision of new public realm a crucial element of new development.

2) Tall buildings and provision of town centre uses: The key to a vibrant and successful town centre is a range of shops, leisure opportunities and businesses which create a destination. Tall buildings can provide a range of uses to help animate the base of the building and contribute to the vibrancy of the centre. They are an important source of capacity and will help deliver the range of non-residential uses which are sought by the AAP vision.

3) Tall buildings and creating a focal point in the town centre: Policy 17 in the revised AAP states that buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular, they will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the town centre.

1075 365 Policy 18

p50. Item 4.5.24b

- (a) The new pocket park on Site A has already been provided I think.
- (b) It would be wonderful if Russia Dock Woodland could be expanded a little to the west at its southern end.

A new pocket park will be provided on Site A.

It may not be possible to extend Russia Dock Woodland. However, through the AAP we are making a number of improvements to the open spaces network, including:

Requiring provision of new open space on Harmsworth Quays when it is redeveloped; designating new sites of importance for nature conservation; allocating the former nursery and St Pauls Sports Ground as an open spaces and bringing them it back into active use; and expecting new development to provide opportunities for food growing.

1075 366 Policy 24

p62. Item 4.6.19 The revised percentages don't seem to add up to 100%.

Thank you. This will be corrected.

Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
1075	367	Policy 15	<p>Although the general style of the buildings in the Canada Water area will understandably tend to be modern, would it be possible to encourage some more traditional building styles to complement them and to bring out some of the area's heritage? Some of the riverside developments in Surrey Docks ward have a Georgian feel for example. Maybe King's College could consider something more traditional for their student accommodation?</p>	<p>The AAP cannot be prescriptive with regards to building styles, as this is outside the scope of the AAP. However, the requirement for high quality design is robustly explicit.</p>
1075	368	Policy 27	<p>Please make sure that there is sufficient community space for peripatetic churches to rent (or encourage the building of a purpose-built church building in the town centre).</p>	<p>Our strategy is to locate local facilities together so that the services required by the community including, housing services, services for young people, health centres, community space and facilities for the police are provided in accessible locations in a way in which different facilities can complement and support each other.</p> <p>An example of this approach is the new library at Canada Water which provides exhibition and performance space and focuses strongly on facilities for and participation by young people and families, providing a base for Southwark Young People's Forum. It is also hired out to faith groups.</p>
1076	370	Policy 17	<p>I am writing in reference to the Canada Water area action plan - Draft Revised Area Action Plan. Being a resident of Rotherhithe, I am really concerned with the current development and the negative consequences it will bring to the environment.</p> <p>Tall buildings and New Homes:</p> <p>- we do not need tall buildings to make Canada Water distinctive. A neighbourhood which is quiet, clean and safety with green areas will make the place distinctive.</p>	<p>The availability of Harmsworth Quays for development creates the scope to expand the new town centre eastwards and bring in new land uses, such as business and higher education, provide an opportunity to rethink the approach to town centre development. Following the EIP, the planning inspector recommended that the council review opportunities for tall buildings in the light of the availability of Harmsworth Quays.</p> <p>The adopted vision in the AAP emphasises the desirability of creating a network of streets and spaces that have a town centre and urban feel and which are not dominated by cars. Provision of some tall buildings, provided that they are of the highest design quality and avoid harmful microclimate impacts can help deliver the AAP vision in three important areas:</p> <p>1) Contribution of tall buildings to public realm: Currently the footprint of the existing large sheds in the centre make it difficult to move around the area. With the exception of the plaza outside the library the public realm is uninspiring and offers little to residents, visitors or shoppers. A key advantage of tall buildings is that they can utilise much smaller footprints, enabling the creation of more public realm and making it easier for pedestrians to move around. The design policies in the AAP have been revised to make provision of new public realm a crucial element of new development.</p> <p>2) Tall buildings and provision of town centre uses: The key to a vibrant and successful town centre is a range of shops, leisure opportunities and businesses which create a destination. Tall buildings can provide a range of uses to help animate the base of the building and contribute to</p>

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			<p>the vibrancy of the centre. They are an important source of capacity and will help deliver the range of non-residential uses which are sought by the AAP vision.</p> <p>3) Tall buildings and creating a focal point in the town centre: Policy 17 in the revised AAP states that buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular, they will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the town centre.</p>
1076	371	<p>Policy 21</p> <p>The entire area – Canada Water, Rotherhithe, Surrey Dock is already at high densities. Do bear in mind that Ontario Point is yet to be occupied. Once it achieves full occupancy, there will be massive congestion at Jubilee Line</p> <ul style="list-style-type: none"> - Since the neighbouring boroughs are expecting to provide additional homes, why can't Canada Water AAP reduce the number of homes? Therefore, we can maintain buildings at low height. - The additional homes will result to air and noise pollution. - 3000 new homes expected to be delivered in the next 15 years?? What are the plans in improving infrastructure without causing pollution? For example, the nearest telephone exchange is located in Bermondsey, certain parts of Rotherhithe is already receiving extremely poor broadband signal. 	<p>There is significant demand for new homes in London and some of these need to be built in Southwark. The London Plan identifies Canada Water as a potential growth location and in terms of providing new homes, it is considered to be an excellent location as it has good transport links and a significant amount of development sites. The Mayor of London and Transport for London are working together to ensure that the tube capacity is increased across all the network, including the Jubilee line. The plan to deliver 3000 new homes in Canada Water has been subject to a sustainability appraisal which identifies any negatives impacts and ways of mitigating against them. Infrastructure is clearly an issue that needs to be considered and there is an infrastructure plan that will accompany the updated AAP.</p>
1076	372	<p>Policy 7</p> <p>Public Transport:</p> <ul style="list-style-type: none"> - The high volume of developments in the area is going to result to higher frequency of bus trips, which affecting air and noise pollution 	<p>AAP policy 7 states that we will work with TfL to improve the frequency, reliability and quality of public transport at Canada Water. Our modelling has shown that development is likely to increase demand for buses, particularly on Saturdays.</p> <p>TfL are increasingly looking at greener forms of fuel, such as hydrogen and green diesel-electric hybrid technology which service to reduce pollution and noise impacts.</p>
1076	373	<p>Policy 29a</p> <p>Schools:</p> <ul style="list-style-type: none"> - schools for higher education and to provide student accomodation? Again, we do not want this place to be over-crowded. How many jobs can be generated with such proposals? The students are likely to fill up the vacancy, and therefore do not see how it benefits the existing residents. In contrast, some high street retails shops, ie café and restaurants and grocery are more likely to create jobs and make the area distinctive. 	<p>The approach to schools is set out in policy 26. Kings College estimate that a new campus at Canada Water could generate around 700 new jobs. These will be across a range of professions and it is unlikely that student will fill all of them The Council can use S106 agreements to secure local training and employment benefits. The AAP also encourages the provision of more shops, cafes and restaurants in the town centre to enliven and expand the current offer.</p>
1077	420	<p>Policy 27</p> <p>Large community use space such as multi function hall for celebrations, conferences, church services etc is desperately needed</p>	<p>Our strategy is to locate local facilities together so that the services required by the community including, housing services, services for young people, health centres, community space and facilities for the police are provided in accessible locations in a way in which different facilities can complement and support each other.</p>

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				An example of this approach is the new library at Canada Water which provides exhibition and performance space and focuses strongly on facilities for and participation by young people and families, providing a base for Southwark Young People's Forum. It is also hired out to faith groups.
1077	421	Policy 7	No need having good access with pedestrianisation if no near by BUSES to use. 381 is using old rickety buses?	AAP policy 7 states that we will work with TfL to improve the frequency, reliability and quality of public transport at Canada Water. Our modelling has shown that development is likely to increase demand for buses, particularly on Saturdays.
1077	422	Policy 27	Any developments must be within the context of a balanced community so that schools, shops are balanced alongside	We agree. It is essential the growth in homes is supported by schools, shops, health facilities and business space. In reviewing the AAP we have reassessed impacts on social and physical infrastructure and updated policies on schools and leisure facilities.
1077	423	Policy 29	GP practices and other things that make a functional community!	Noted. AAP policy 29 states that we are working with NHS Southwark to meet the needs generated by an increased population. It recognises that a new health facility will be required at Canada Water, which will need to be highly accessible and close to public transport routes. We will continue to make sure that HNS Southwark are aware of development opportunities. A new facility of 1,500sqm will also be built on the Downtown site.
1078	411	CWAAP 24	More shopping and leisure facilities for all. More of a high street feel with cafes and places to eat	We agree. Policy CWAAP 24 concentrates on the provision of town centre and other non residential uses. It also emphasises the importance of creating a genuine town centre.
1078	412	Policy 6	More pedestrian and cycle only routes. Preserve the quiet environment keep traffic to a minimum	Noted. AAP policy 6 promotes increase the number of trips made on foot and by bike.
1078	413	Policy 12	A more modern leisure facility with modern leisure equipment and studios for people to access including a pool	Noted. The council has committed to refurbish 7 Islands to extend its life by up to 10 years. The council is exploring whether a new leisure centre can be provided in the town centre in the longer term.
1078	414	Policy 17	Tall buildings are sanitized and clinical and do not create a community. People live on top of each other in small spaces. Why not build houses for families?	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that tall buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular, they will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the

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				<p>Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception. The AAP sets out a requirement for a mixture of housing types. This is set out in policy 23 Family housing, and also within saved Southwark Plan and core strategy policies.</p>
1078	415	Policy 18	More people are moving in to the area so we need more open spaces.	<p>Through the AAP we are making a number of improvements to the open spaces network, including:</p> <p>Requiring provision of new open space on Harmsworth Quays when it is redeveloped; designating new sites of importance for nature conservation; allocating the former nursery and St Pauls Sports Ground as an open spaces and bringing them it back into active use; and expecting new development to provide opportunities for food growing.</p>
1079	424	Policy 27	There are no community related activites - Green gym, community centre etc please.	<p>Our strategy is to locate local facilities together so that the services required by the community including, housing services, services for young people, health centres, community space and facilities for the police are provided in accessible locations in a way in which different facilities can complement and support each other.</p> <p>An example of this approach is the new library at Canada Water which provides exhibition and performance space and focuses strongly on facilities for and participation by young people and families, providing a base for Southwark Young People's Forum. It is also hired out to faith groups.</p>
1079	425	Policy 6	No traffic for cyclist to merge with	The AAP seeks to ensure that roads are safe for cyclists and are easy to understand and use.
1079	426	Policy 26	Keep to the original plans	<p>We have updated our policies to recognise circumstances which have changed. A new school which would provide 4FE has been approved to open in September 2013 in Bermondsey.</p> <p>We understand that there may be a need to create further new secondary places in the future. At the moment, based on the Compass School and other new schools (new School Aylesbury and Ark All Saints Academy) there are sufficient places for the next few years. It is important that we are not complacent and we are actively engaging with existing secondary schools to explore potential for future expansions. Our initial feasibility work suggests that there may be potential for Bacon's, St Michael's and COLA to provide additional places. While the</p>

Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
				AAP is generating a significant number of new homes, the majority of these are likely to be flats and the extent to which these will drive need for secondary places is still unclear. Any growth in the need for secondary places and the potential to expand existing schools will need to be kept under review.
1079	427	Policy 17	We don't need another Canary Wharf	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that tall buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular, they will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin appropriate for heights around 20-25 storeys. Within the area identified for 20-25 storeys, as illustrated in Figure 9, tall buildings will help to define the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception.
1080	416	CWAAP 24	Too many high rise blocks is detrimental to the area. Higher Education faculty would bring more students into the area - spending money locally	We agree that a higher education facility would bring more young people to the area and add to the vitality of the town centre.
1080	417	Policy 6	Although I find this difficult to judge until it actually happens	Noted. The AAP vision supports sustainable types of transport.
1080	418	Policy 12	Yes to Seven Islands	Noted. The council has committed to refurbish 7 Islands to extend its life by up to 10 years. The council is exploring whether a new leisure centre can be provided in the town centre in the longer term.
1080	419	Policy 26	I am against free schools - so if there was a way preventing that	Free schools are an initiative of central government. The AAP has no influence over whether schools are free schools or otherwise.
1082	409	CWAAP 24	As long as this use is not the construction of more large warehouse type retail/business space	The AAP aims to guide development in the area and support a vibrant new town centre. Our vision for the CWAAP 24 site is to prioritise non-residential uses such as higher education and other employment generating uses. We have put in place guidance around the character of new development to try to ensure that new space is compatible with a town centre environment.
1082	410	Policy 6	But please maintain or increase dropping off points for cars	Noted. Our strategy through AAP policy 6 is to promote a network of cycle routes which is easy to understand and use. AAP Policy 7 requires developers to re-provide bus and taxi facilities and use

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				opportunities to improve them. We have highlighted the potential for a taxi-drop off area near the tube station, which has been a request of TfL.
1084	408	General	look at improving broadband access for the area. Particularly for homes connected direct to the Bermondsey exchange. Right now it is incredibly slow	We are aware of the lack of coverage in the Canada Water area. While it is an issue that the AAP cannot directly influence, the council is work exploring what can be done to improve broadband services.
1085	404	CWAAP 24	The area needs something with a strong identity - a destination for a new client group. ie - University, college, theatre,? It would be good to encourage the evening economy It would be good to have a significant piece of architecture - landmark building	The AAP aims to guide development in the area and support a vibrant new town centre. Our vision for the CWAAP 24 site is to prioritise non-residential uses such as higher education and other employment generating uses. All new development should be well designed and the AAP identifies sites which could be suitable for a tall or landmark building.
1085	405	Policy 6	If the are has too many pedestrian routes/cycle ways it all becomes too confusing. There do need to be carefully planned routes for buses and taxis and some can to access successful commercial units - well planned pedestrianised roads are better than just pathways	Noted. Our strategy through AAP policy 6 is to promote a network of cycle routes which is easy to understand and use. AAP Policy 7 requires developers to re-provide bus and taxi facilities and use opportunities to improve them. We have highlighted the potential for a taxi-drop off area near the tube station, which has been a request of TfL.
1085	406	Policy 17	See previous comments - preferably not residential	The AAP requires a mix of uses within the new town centre as well as active ground floors. This requirement relates to tall buildings.
1085	407	Policy 18	Having lived away for 10-years we think that some really good improvements have been made to open spaces and walkways around the area. They show a real care for our way of life - this should be built on further through this plan	Through the AAP we are making a number of improvements to the open spaces network, including: Requiring provision of new open space on Harmsworth Quays when it is redeveloped; designating new sites of importance for nature conservation; allocating the former nursery and St Pauls Sports Ground as an open spaces and bringing them it back into active use; and expecting new development to provide opportunities for food growing.
1089	401	CWAAP 24	I think this would change the character of the area too much. Theres no need for industry or further leisure facilities. There's no draw for offices or higher education	The redevelopment of Harmsworth Quays and the surrounding sites is inevitable, therefore the council is trying to guide development and shape the area in line with the AAP vision. The area is predominantly residential and so the revised AAP aims to encourage a range of non-residential uses in the town centre. This will help to enliven the area and provide a greater range of services and facilities for local residents.
1089	402	Policy 17	The new building near Canada Water bus station is intrusive and totally out of scale. It is not even a good building - No more high rise.	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that tall buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular, they will help to define the importance of the Canada Water

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				basin and surrounding public spaces as the focal point within the town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define core of the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception. The AAP sets out a requirement for a mixture of housing types.
1089	403	Policy 18	Need more open spaces particularly around houses	Through the AAP we are making a number of improvements to the open spaces network, including: Requiring provision of new open space on Harmsworth Quays when it is redeveloped; designating new sites of importance for nature conservation; allocating the former nursery and St Pauls Sports Ground as an open spaces and bringing them it back into active use; and expecting new development to provide opportunities for food growing.
1090	396	CWAAP 24	But it might increase congestion in the area	The AAP aims to manage traffic and public transport issues along with the Mayor of London and Transport for London. Policy 8 sets out a strategy which aims to manage traffic flows more effectively, through simplifying the Lower Road traffic gyratory.
1090	397	Policy 6	So long as cycle lanes don't take up much space on pedestrian walks	Roads should be safe for pedestrians and cyclists to use.
1090	398	Policy 12	I don't know. Seven Islands need to increase facilities then its for the better	Noted. The council has committed to refurbish 7 Islands to extend its life by up to 10 years. The council is exploring whether a new leisure centre can be provided in the town centre in the longer term.
1090	399	Policy 17	Make them good looking. Ontario Point is a good shape. Still need limits on tall buildings on one site development. They should never be built to over shadow the streets below. Natural light needs to shine in easily. Not to close together unless low rises.	Any new tall buildings would have to comply with the criteria set out in the policy which includes high quality design and the avoidance of harmful microclimate impacts. Detailed assessment of the impact on amenity would be assessed at the planning application stage. The provision of taller buildings over the existing and consented heights of around 20-25 storeys within the area identified in Figure 9 is seen as an exception. Most development within the AAP core area would be significantly lower in height.
1090	400	Policy 15	Conserve as many historic buildings as possible demolishing is too expensive	It is important to conserve and enhance the significance and setting of heritage assets. Policy 15 explicitly recognises this requirement, which will be underpinned by the adopted heritage policies of the saved Southwark Plan and the Core Strategy

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1091	393	CWAAP 24	If Kings College moves in to the area, how much student accommodation will be required? I'd welcome an influx of students; I'm just curious about numbers	Support welcomed. Kings College don't have an exact requirement for the number of student homes. We need to make sure that the number of student homes is balanced by the amount of other non-residential/student residential space which is provided to avoid creating a dormitory style development.
1091	394	Policy 8	I'm AGAINST making Lower Road a two-way street. It's dangerous enough as it is for pedestrians	<p>We agree that Lower Road is a barrier to pedestrian movement. One of objectives of the plan to reintroduce 2-way traffic is to create a safer and more attractive environment for pedestrians and cyclists.</p> <p>Our testing of AAP proposals demonstrates that we need to make improvements to transport infrastructure. If we do nothing, modelling shows that traffic queues and delays around the gyratory and on Lower Road would be expected to worsen.</p> <p>Our proposals aim to simplify the gyratory system making it less complicated for all users. Our testing shows that reintroducing two-way traffic on Lower Road substantially reduces traffic flows on Rotherhithe Old Road which has the potential to significantly improve the environment for residents. While the proposed changes do not significantly increase the capacity of the network, revised signalling of key junctions enables traffic to move through the area more smoothly. It will also enable us to improve pedestrian crossings on Lower Road, reducing the barrier effect it currently creates between the shopping centre and Surrey Quays station, the Hawkstone Estate and Southwark Park.</p>
1091	395	Policy 17	Tall buildings are fine but PLEASE make sure that the ground-level areas are well designed, and not like centre point in town.	The requirement for ground and lower floor active frontages and a mix of town centre uses is important for a vibrant, new town centre. Both policy 15: Building blocks and policy 16 Town centre development set out requirements for active lower floors, while bullet 3 of Policy 17 sets out the requirement for development to animate spaces around buildings.
1092	390	Policy 6	It would be good to have Boris Bikes extended to the area	We agree. Our revised policy 6 states that we will work with the Mayor to extend the Barclay's Cycle Hire scheme to Canada Water.
1092	391	Policy 17	I think tall buildings are fine as long as not only providing new housing without any amenities. The area is lacking much in the way of restaurants, shops etc to keep people who live here in the area	he requirement for ground and lower floor active frontages and a mix of town centre uses is important for a vibrant, new town centre. Both policy 15: Building blocks and policy 16 Town centre development set out requirements for active lower floors, while bullet 3 of Policy 17 sets out the requirement for development to animate spaces around buildings.
1092	392	Policy 25	Supportive. Would like to see some local business opening as well - not only chains as part of the regeneration	Support welcomed. Policy 1 requires large developments to make a proportion of shops units available to independent occupiers.

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1094	382	CWAAP 24	<p>Transport infrastructure and high-speed broadband are key - both are poor/very poor in the Rotherhithe peninsula.</p> <p>No highrise (fewer than 5 stories)</p> <p>Too much residential already.</p> <p>Insufficient, independent - retail and catering /café restaurant - we need more</p>	<p>As a growth area, Canada Water will experience growth and change. The revised AAP focuses on the provision of non-residential uses on the CWAAP 24 sites in order to attract more daytime activity and footfall. The AAP also aims to create a new town centre, with a wider range of café, shops and restaurants. The revised approach to tall buildings is set out in policy 17.</p>
1094	383	Policy 7	Canada Water tube station is already over crowded at peak times as are the buses	AAP policy 7 states that we will work with TfL to improve the frequency, reliability and quality of public transport at Canada Water. Our modelling has shown that development is likely to increase demand for buses, particularly on Saturdays.
1094	384	Policy 8	Surrey Quays roads is already too busy	<p>Our testing of AAP proposals demonstrates that we need to make improvements to transport infrastructure. If we do nothing, modelling shows that traffic queues and delays around the gyratory and on Lower Road would be expected to worsen.</p> <p>Our proposals aim to simplify the gyratory system making it less complicated for all users. Our testing shows that reintroducing two-way traffic on Lower Road substantially reduces traffic flows on Rotherhithe Old Road which has the potential to significantly improve the environment for residents. While the proposed changes do not significantly increase the capacity of the network, revised signalling of key junctions enables traffic to move through the area more smoothly. It will also enable us to improve pedestrian crossings on Lower Road, reducing the barrier effect it currently creates between the shopping centre and Surrey Quays station, the Hawkstone Estate and Southwark Park.</p>
1094	385	Policy 18	Interest in expanding and protecting the ecological park and essential resource for wildlife and people	We recognise the importance of wildlife and through the AAP we have designated new sites of importance for nature conservation on King's Stairs Gardens, Deal Porters' Walk and Durands Wharf.
1094	386	Policy 12	A public climbing wall is needed and a skate park, more cycle routes and more cycle stands	Noted. These ideas have been passed on to the council's leisure team.
1094	387	Policy 17	Maximum of 5 stories any taller is ugly and out of keeping and out of character with the rest of the Rotherhithe peninsula. I DO NOT AGREE that 4-8 stories is acceptable	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point of the new town centre. The area considered appropriate for tall

Objector no.	Rep Policy no.	Details of Representation	Officer Response to Representation
			buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the importance of the Canada Water basin the focal point of the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception.
1094	388 Policy 18	Open spaces are an essential part of the character of the Rotherhithe peninsula providing much needed respite for humans and wildlife. The water features including Albion Channel, Surrey water and Canada Water need more investment to develop their character role as leisure feature and wildlife habitat.	We recognise the importance of wildlife and through the AAP we have designated new sites of importance for nature conservation on King's Stairs Gardens, Deal Porters' Walk and Durands Wharf. We will also use s106 planning contributions and in the future the community infrastructure levy to improve open spaces
1094	389 CWAAP 24	I support the idea of a Kings College campus in the area	Support welcomed
1095	428 CWAAP 24	More space for smaller shops, cafes and bars would make a huge difference to the area and how local residents use the area. Currently I feel the need to spend much of my leisure time elsewhere due to lack of facilities. It would build more of a community feel and ability to socialise locally	We agree. The aim of the AAP is to change the look and feel of the town centre and policy CWAAP 24 aims to guide development to create a genuine town centre.
1095	429 Policy 6	How could you disagree with this? Move cycle lanes (off roads where possible) and paths to cut through are always welcome. Cycle hire in Canada Water would be good. Though more tackling of the bike theft would be needed as it is a problem here	Noted. All developments should provide appropriate bike parking space either within development (for residents etc) or in a secure place in the public realm (for shoppers etc).
1095	430 Policy 12	I think it is wrong to class these two very different topics together. Yes - refurbishing the leisure centre	Support for refurbishing the leisure centre is noted.
1095	431 Policy 26	No - regrading free schools to replace a secondary school. Free schools can ONLY be a second option and should in no way be replacing the more secure state funded and run schools. I cannot agree more strongly with this	Free schools are an initiative of central government. The AAP has no influence over whether schools are free schools or otherwise.
1095	432 Policy 17	I think there are enough tall buildings and 8-storeys will also be quite tall. Too many taller buildings creates a feeling of being hemmed in. One of the best features of the area is its open feeling. Making the area into another generic high rise area would be a disservice to the heritage of the site and I feel it would make a less pleasant environment and also be counter intuitive in terms of building communities as tall flats give a sense of an individual compartment, NOT part of a whole community	We have assessed the potential impact on townscape and the significance of heritage assets and their settings in the previously published urban design study. The methodology used also underpins our new study which will be published with the new AAP. The area considered appropriate for tall buildings is limited to the new town centre, with heights up to 20-25 storeys geographically limited to the area that we identify to the east of the Canada Water basin, which is illustrated in Figure 9. Within this area, tall buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the town centre. Any new development within this area identified would have to comply with the criteria set out

Obj-jector no.	Rep no. Policy	Details of Representation	Officer Response to Representation
			in the policy which includes high quality design and mitigating any adverse microclimate impacts. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception. Building heights at the periphery of the AAP core area will step down in response to the lower contextual heights present outside the AAP core area.
1095	433 Policy 18	The more open space the better	Through the AAP we are making a number of improvements to the open spaces network, including: Requiring provision of new open space on Harmsworth Quays when it is redeveloped; designating new sites of importance for nature conservation; allocating the former nursery and St Pauls Sports Ground as an open spaces and bringing them it back into active use; and expecting new development to provide opportunities for food growing.
1095	434 Policy 22	More social housing within the area - lots of expensive new apartments change the demographic of the area and limit the influx of those who wish to continue living close to families	The AAP requires a minimum of 35% affordable housing in the area.
1095	435 Policy 18	An emphasis on open space, free from overly tall buildings	Through the AAP we are making a number of improvements to the open spaces network, including: Requiring provision of new open space on Harmsworth Quays when it is redeveloped; designating new sites of importance for nature conservation; allocating the former nursery and St Pauls Sports Ground as an open spaces and bringing them it back into active use; and expecting new development to provide opportunities for food growing.
1095	436 CWAAP 24	An emphasis on more non-residential building, or additions to residential buildings of cafes/restaurants	We agree. Policy CWAAP 24 concentrates on the provision of town centre and other non residential uses
1095	437 Policy 27	Facilities for teens and young people	AAP policy 19 states that new development should provide sufficient space for children and young people. For young children, doorstep and local playable space should be included in residential developments. We will generate funding to support off-site play facilities for older children using s106 planning obligations and the community infrastructure levy. Our strategy is to locate local facilities together so that the services required by the community including services for young people, community space and schools are provided in accessible locations in a way in which different facilities can complement and support each other. We are promoting better use of schools for provision of play facilities and new school facilities should be available for the community outside school hours. A further example of this approach is the new library at Canada Water which provides exhibition and performance space and focuses strongly on facilities for and participation by young people and families, providing a base for

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				Southwark Young People's Forum.
1095	477	Policy 6	Please consider to establish cycle routes that are separated from motorised road traffic.	Our priority is to create conditions on the road which are safe for cyclists and pedestrians. However, there may be some cases where segregation is appropriate and these will be assessed on their merits.
1095	478	Policy 17	I think that 8-storeys are quite high, considering the otherwise residential feel of the area. Taller building will create too much shadow and "intimidate" an area	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that tall buildings will be appropriate in the town centre, where they reinforce the character and function of the centre. In particular, they will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the town centre. The area we consider appropriate for tall buildings around 20-25 storeys is geographically limited to the area that we identify to the east of the Canada Water basin, which is illustrated in figure 9. Building heights will step down from this area to the existing lower building heights at the edge of the AAP core area. Any new tall buildings would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20-25 storeys is seen as an exception.
1096	445	CWAAP 24	The building of new shops is long overdue. Since the start of the development several years ago, there have been only a few new shops. Retail facilities and places to eat have not improved despite the surge in new residences.	We agree. The AAP, and specifically the approach set out for the CWAAP 24 sites, aims to ensure that a genuine town centre is created in the area. This will include the provision of more shops, cafes and restaurants as well as new public space.
1096	446	Policy 17	The number of residential tower blocks (like Ontario Point) should be minimised. There are enough tower blocks around Canada Water, adding more risks ruining the low density feel of the area and obscure the skyline. If improved amenities need to be financed by tower blocks. These towers should be mixed use with shops and office on the lower floors, or the teaching by King's College. Purely residential towers whether student hall or private flats - must be avoided. Southwark Council should bargain hard with developers to maximise their contributions to public amenities in return for permitting new tower blocks.	The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the core of the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception. The AAP requires a mix of uses within the new town centre and active ground floors to encourage activity within the new town centre.
1096	447	Policy 15	Do not build multi-storey car parks unless they are underground or obscured from view. Otherwise they will be an eyesore	The policy requires the visual impact of car-parking to be minimised.
1096	448	CWAAP 24	The stacking of Decathlon in to a multi-storey building is a good idea. I am in favour of the new	Support welcomed. The policies for CWAAP 7 and 24 emphasise the

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			Decathlon building of comparable height to the multi-storey residences near by, provided all the storeys house shops, restaurants and other leisure facilities - no more residences. The What! Discount store provides great-value DIY and furniture goods. It should stay in the area, at the same or adjacent location	importance of non residential uses to ensure that a genuine town centre is created, however there will be additional housing development.
1096	449	Policy 29a	Southwark should encourage and facilitate Kings College to build a major campus, not just halls of residences. Students attending lectures and classes will provide day-time demand for shops on campus. The Kings College campus need to open to the public	Comments noted. We agree and are promoting the provision of a campus and other facilities alongside any halls of residence in policy 29a. This will ensure that the university uses can contribute to the wider vision and the infrastructure in the area.
1097	459	CWAAP 24	I completely agree that non-residential developments would help boost the local area and attract more people. As it is mainly residential at the moment, it is very quiet at certain times of the day	Support welcomed. The site allocation policy for CWAAP 24 aims to create a genuine town centre and support the provision of non-residential uses.
1097	460	Policy 6	It would create a hot spot for cyclists, especially with the nearby Decathlon	Roads should be safe for pedestrians and cyclists to use. The needs of all road users will need to be taken into account to ensure that roads and public spaces are safe.
1097	461	Policy 5	There is currently a small market on Canada Water Plaza and in order for it to match the appearance and functionality of the proposed new developments, it would be good to install small permanent hub similar to those at Canary Wharf. It would make the square look a lot smarter	We agree that improvements should be made to the plaza and are looking at potential opportunities. It should be recognised however that it may take time for the plaza to become better used, given that footfall is still quite low. It will become better used, once developments on the Decathlon site and Harmsworth Quays get underway and the number of residents and businesses in the vicinity of the plaza increase.
1098	462	CWAAP 24	Strongly support the use of the site by Kings College. This would be a great addition to the area. It is likely that this would not put too much strain on the existing infrastructure or transport, but would stop all centres being empty during the day.	Support welcomed. The site allocation policy for CWAAP 24 aims to create a genuine town centre and support the provision of non-residential uses, including higher education.
1098	463	Policy 6	Transport should be based on pedestrians, cyclist and the Overground. The overground makes Surrey Quays - Canada Water - Rotherhithe very accessible to areas such as Wapping which has very little retail. By having better retail ? we would attract shoppers from south and north London who live near the Overground. Too much land is given to car parking space	We agree. Our strategy through AAP policy 6 is to promote a network of cycle routes which is easy to understand and use. AAP policy 9 states that new car parking in the town centre must be made available to the general public as town centre car parking and maximise opportunities to ensure that parking spaces are used more efficiently at different times of day. Policy 15 states that developments should minimise the impact of parking by locating it within buildings, basements or where appropriate above development. The London Plan and saved policies in the Southwark Plan provide standards which limit the amount of parking which can be provided.
1098	464	Policy 17	Tall buildings could be bunched together around the Tesco's site. There is not shortage of land for development that is currently used for vast car parks - unnecessary as we have some of the best public transport in the world.	The Tesco carpark is considered unsuitable for tall buildings due to its location within the protected viewing corridor of LVMF 5A.2.

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			We should avoid all costs a ghetto of high rised owned by overseas investors. Most flats in Ontario Point are owned by Chinese investors.	
1098	465	CWAAP 7	Could put current extensive car parks to better use	We agree. AAP policy 9 states that new car parking in the town centre must be made available to the general public as town centre car parking and maximise opportunities to ensure that parking spaces are used more efficiently at different times of day. Policy 15 states that developments should minimise the impact of parking by locating it within buildings, basements or where appropriate above development. The London Plan and saved policies in the Southwark Plan provide standards which limit the amount of parking which can be provided.
1098	466	Policy 1	<p>The Rotherhithe peninsula has several aspects that are creating a community atmosphere based around Canada Water.</p> <p>This would benefit from a better focal point. A high street is not possible in the conventional sense, but the Overground stations of Rotherhithe - Canada Water and Surrey Quays could perform a high street function. More shopping along the this axis would attract shoppers who live along the Overground route. The front and back of the Tesco's site are eyesores - no need for so much car parking when public transport is now excellent. The axis to include Albion Street, could be base on pedestrians, cyclist and the Overground</p>	We agree. Policy 1 and CWAAP 7 seek to make better use of the car parks and provide a new high street between Canada Water tube station and Surrey Docks station. It is more difficult to connect to Albion Street, but in the longer term it is a link we would like to promote.
1099	455	Policy 1	A small supermarket is needed very badly near Canada Water tube station - ideally Marks and Spencer or a mini Waitrose	Noted. AAP policy seeks to expand and improve the amount of retail space at Canada Water. The council will work with landowners and the local community to help deliver this aspiration. The shopping centre now has permission to expand its floorspace by around 10,000 square metres.
1099	456	Policy 6	We regularly walk or cycle to Canada Water from home and the top of the peninsula, through the woodland, but have to make a big detour because we can't get through this area	AAP policy 6 promotes improvements to routes through Russia Dock Woodland, by providing better lights, visibility, signage and more direct routes.
1099	457	Policy 17	Important to try to limit the wind	Noted. The design of tall buildings would have to mitigate any impacts on amenity including wind shear. Policy 17 sets out requirements for the design of tall buildings to avoid harmful microclimate affects including wind shear.
1099	458	CWAAP 24	<p>Very keen on proposed development around Canada Water, especially King's College plans.</p> <p>Need café and shops (especially a small supermarket) and updating and improvement of SQSC</p>	Support welcomed.
1100	451	Policy 5	<p>The market on the plaza need more development - more permanent structure</p> <p>Currently it lacks the support to opening only ad hoc not very well established market ? more assistance</p>	We agree that improvements should be made to the plaza and are looking at potential opportunities. It should be recognised however that it may take time for the plaza to become better used, given that footfall is still quite low. It will become better used, once developments on the Decathlon site and Harmsworth Quays get underway and the number of

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				residents and businesses in the vicinity of the plaza increase.
1100	452	Policy 8	Important not to create congestion for residents	<p>Our testing of AAP proposals demonstrates that we need to make improvements to transport infrastructure. If we do nothing, modelling shows that traffic queues and delays around the gyratory and on Lower Road would be expected to worsen.</p> <p>Our proposals aim to simplify the gyratory system making it less complicated for all users. Our testing shows that reintroducing two-way traffic on Lower Road substantially reduces traffic flows on Rotherhithe Old Road which has the potential to significantly improve the environment for residents. While the proposed changes do not significantly increase the capacity of the network, revised signalling of key junctions enables traffic to move through the area more smoothly. It will also enable us to improve pedestrian crossings on Lower Road, reducing the barrier effect it currently creates between the shopping centre and Surrey Quays station, the Hawkstone Estate and Southwark Park.</p>
1100	453	Policy 26	A closer secondary school would have been adventurous	We have updated our policies to recognise circumstances which have changed. A new school which would provide 4FE has been approved to open in September 2013 in Bermondsey. While a closer secondary school would have advantages, there is no government funding available for it.
1100	454	Policy 17	Too many tall buildings will blight the skyline	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point of the new town centre. The area we consider appropriate for tall buildings is limited to the town centre and the area that we identify as appropriate for heights around 20-25 storeys to the east of the Canada Water basin, as illustrated in figure 9. Building heights will step down from this area to the existing lower building heights at the edge of the area. Any new tall buildings would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20-25 storeys is seen as an exception.
1101	444	Policy 26	Please keep to your original proposed plan	We have updated our policies to recognise circumstances which have changed. A new school which would provide 4FE has been approved to open in September 2013 in Bermondsey.

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1102	438	Policy 22	A balance must be achieved not just locally, but throughout the city to address the lack of housing for people on real incomes . Lack of social housing and high private rents sucks money out of the economy and inflate an already high benefits bill	The approach to affordable housing in the AAP area and the rest of the borough is set at a minimum of 35%. We aim to maximise the amount of affordable housing that is provided in new developments, whilst taking the viability of the scheme into account. This approach is echoed by the Mayor of London who sets similar policy in the London Plan.
1102	439	Policy 6	Absolutely - Promotion of green transport must be a priority in these times	Noted. The AAP vision supports sustainable types of transport.
1102	440	Policy 12	The building of a new leisure centre is most welcome	Support for a new leisure centre is noted. The AAP promotes provision of a new leisure centre in the medium to long term.
1102	441	Policy 26	Free schools are a dangerous inefficient way to educate children. No to companies making profit from the state subsidies. It has failed in Sweden and will fail here too	Free schools are an initiative of central government. The AAP has no influence over whether schools are free schools or otherwise.
1102	442	Policy 17	I agree on the fundamental principal that the buildings are of a high standard and thought given to the planning and layouts of the buildings	Support noted
1102	443	Policy 22	Build more SOCIAL HOUSING! It's a total NO-Brainer. More money in peoples pockets, less personal debt, a drastically reduced benefits bill, secure housing for the tenant. It would the economy and social Mobility and cohesion	The AAP requires a minimum of 35% affordable housing in the area.
1103	467	Policy 17	Having attended one of the drop-in sessions, I wanted to feedback my views, specifically on high buildings and the amount of public realm available. First off I want to debunk the false choice between amount of public realm at ground level and building height. Two ideas seem inherent in the current AAP: 1. to have public realm at ground level we must allow tall buildings or; 2. tall buildings in of themselves afford greater public realm. Both erroneously suppose that adequate public realm and low rise development are mutually exclusive. Self-evidently false assumptions, so it beggars belief that these have become core tenets of planning policy in the area. I've heard that the developers claim that they need to build high to ensure return on investment. The council's duty of care is not to developers, it is to the people of the borough. Further, what grounds to the developers have to assume they can realise a floor area requiring a high building? That's their planning risk, and it should not be the role of council to offset that risk. The planning office grants planning permission, and it should do so in the service of public interest.	It is the council's view that tall buildings within the town centre and especially the area identified as appropriate for heights around 20-25 storeys would enable a greater quantum of public space to be created within the new town centre, and also stimulate regeneration within the area. Currently the footprint of the existing large sheds in the centre make it difficult to move around the area. With the exception of the plaza outside the library, the public realm is uninspiring and offers little to residents, visitors or shoppers. A key advantage of tall buildings is that they can utilise much smaller footprints, enabling the creation of more public realm and making it easier for pedestrians to move around. The design policies in the AAP have been revised to make provision of new public realm a crucial element of new development. Additionally, the safeguarding of views or the setting of heritage assets would be assessed at the planning application stage where proposed development would be assessed against the urban design policies within the AAP, alongside the existing heritage policies in the saved southwark plan and adopted core strategy and The London Plan and its SPGs. Any new development within the area identified for tall buildings would have to comply with the criteria set out in the policy which includes high quality design, consideration within local and wider views, and consideration of the impact and relationship on skyline and cumulative impact of tall buildings

Secondly and even more importantly, let us be clear that the sky is part of the public realm. A tall building in Canada Water would dominate the skyline from everywhere in the area, and be visible from miles around.

This bears repeating: An unobscured view of the horizon is part of the public realm, and needs to be protected.

The usual reason to build upwards is due to a shortage of space. Given the vast amount of land available at Harmsworth Quays, Surrey Quays shopping centre, and Surrey Quays Leisure Park, there is no credible case of the need to build upwards.

For this reason, with the exception of Canary Wharf, there are, very few tall buildings outside of Zone 1.

To sum up:

1. The choice between height and adequate ground level public realm is false. Other parts of London have both.

2. Views of the the sky are part of the public realm and need to safeguarded.

3. Southwark's primary planning responsibility should be a duty of care to the public, not commercial interests.

Please acknowledge receipt of this email. Thank you.

1104	468	CWAAP 24	The area badly lacks leisure facilities such as cafes and restaurants, and high-quality shops. There is little at the moment to attract people in the daytime, and nearly nothing at night, meaning people have to travel to central London or Westfield for shopping and leisure.	We agree. The AAP, and specifically the approach set out for the CWAAP 24 sites, aims to ensure that a genuine town centre is created in the area. This will include the provision of more shops, cafes and facilities as well as new public space.
1104	469	Policy 6	At the moment its really difficult to move around Rotherhithe. There need to be more direct routes to and from the tube stations. When people arrive at Canada Water station there is no obvious destination for them to head to. There needs to be a much more joined-up approach to the shopping centre, the leisure park, Lower Road and the river/dock areas.	We agree. Our strategy through AAP policy 6 is to promote a network of routes which is easy to understand and use. In particular we have highlighted the need for better routes from the tube station to the leisure park, better routes from the shopping centre and tube centre to Greenland Dock and better routes from Lower Road through to the shopping centre, Greenland Dock and Russia Dock Woodland.
1104	470	Policy 12	It would be good to have a wider selection of sports available, eg squash.	Support for a new leisure centre is noted. The AAP promotes provision of a new leisure centre in the medium to long term.
1104	471	Policy 17	Tall buildings can be a big positive. They help to put the area on the map and mean there is much more space for public areas such as cafes with outdoor areas and cycling paths. The tall	Support noted. It is our view that tall buildings would enable the creation and use of a great quantum of public space around the basin

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			buildings do need to be high-quality though, preferably with some public access to facilities, such as roof-top gardens / bars.	as a focal point for the town centre. High quality design and publically accessible areas on the upper floors of tall buildings where appropriate, are set out within the policy.
1105	472	CWAAP 24	This area is in desperate need for more restaurants, cafes, coffee shops, bars and quality shops (e.g., Waitrose).	We agree. The AAP, and specifically the approach set out for the CWAAP 24 sites, aims to ensure that a genuine town centre is created in the area. This will include the provision of more shops, cafes and facilities as well as new public space.
1105	473	Policy 6	It is essential for the peninsular to be more connected, and for there to be routes to the shopping centre area from all around the peninsular (e.g., Rotherhithe Street)	We agree. Our strategy through AAP policy 6 is to promote a network of routes which is easy to understand and use. In particular we have highlighted the need for better routes from the tube station to the leisure park, more direct links from the tube station to Albion Street and Rotherhithe New Road, better routes from the shopping centre and tube centre to Greenland Dock and better routes from Lower Road through to the shopping centre, Greenland Dock and Russia Dock Woodland.
1105	474	Policy 8	The traffic problems around the horrible one way system around Lower Road need to be urgently addressed.	We agree. Our testing of AAP proposals demonstrates that we need to make improvements to transport infrastructure. If we do nothing, modelling shows that traffic queues and delays around the gyratory and on Lower Road would be expected to worsen.
1105	475	Policy 12	A new leisure centre, with squash court facilities, should be built around the existing leisure park area, along with the cinema, bowling etc.	Support for a new leisure centre is noted. The AAP promotes provision of a new leisure centre in the medium to long term.
1105	476	Policy 17	I think taller buildings, if designed nicely, can add to the character of an area. As long as attention is given to public space on the ground, and maximising this for cafes, restaurants, bars and coffee shops.	Support noted. The requirement for ground and lower floor active frontages and a mix of town centre uses is important for a vibrant, new town centre. Both policy 15: Building blocks and policy 16 Town centre development set out requirements for active lower floors, while bullet 3 of Policy 17 sets out the requirement for development to animate spaces around buildings.
1105	525	Policy 6	It is essential for the peninsular to be more connected, and for there to be routes to the shopping centre area from all around the peninsular (e.g., Rotherhithe Street).	We agree. Our policies aim to improve the network of routes which are direct and safe for cyclists and pedestrians.
1105	526	Policy 8	The traffic problems around the horrible one way system around Lower Road need to be urgently addressed.	Our testing of AAP proposals demonstrates that we need to make improvements to transport infrastructure. If we do nothing, modelling shows that traffic queues and delays around the gyratory and on Lower Road would be expected to worsen. We agree. Our proposals aim to simplify the gyratory system making it less complicated for all users. Our testing shows that reintroducing two-way traffic on Lower Road substantially reduces traffic flows on Rotherhithe Old Road which has the potential to significantly improve the environment for residents. While the proposed changes do not significantly increase the capacity of the network, revised signalling of

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			key junctions enables traffic to move through the area more smoothly. It will also enable us to improve pedestrian crossings on Lower Road, reducing the barrier effect it currently creates between the shopping centre and Surrey Quays station, the Hawkstone Estate and Southwark Park.
1105	527 Policy 12	A new leisure centre, with squash court facilities, should be built around the existing leisure park area, along with the cinema, bowling etc.	Noted. The council has committed to refurbish 7 Islands to extend its life by up to 10 years. The council is exploring whether a new leisure centre can be provided in the town centre in the longer term.
1105	528 Policy 17	I think taller buildings, if designed nicely, can add to the character of an area. As long as attention is given to public space on the ground, and maximising this for cafes, restaurants, bars and coffee shops.	Support noted. The requirement for ground and lower floor active frontages and a mix of town centre uses is important for a vibrant, new town centre. Both policy 15: Building blocks and policy 16 Town centre development set out requirements for active lower floors, while bullet 3 of Policy 17 sets out the requirement for development to animate spaces around buildings.
1106	479 CWAAP 24	Not prioritise - make use of mixed area which actually work! Planning should usually and practically "walk through" i.e. somewhere to live, learn, exercise, eat, meet and socialise with adequate medical facilities equidistant. all facilities are concentrated . What about where elderly live?	Comments noted. The site allocation policy for CWAAP 24 aims to ensure that the sites will come forward with mixed use development that contributes to the town centre and to meets the vision of the AAP.
1106	480 Policy 7	Urgent areas for pick-up drop-off for people with suitcases heading to and from the airports. How stupid that there is no safe place!! Who was so remiss considering that a number of elderly people need help loading and off loading luggage - The area doesn't work making the roads dangerous. One has to walk miles to get to the underground and buses - makes stations drive through	Our proposals for a development on the site of the shopping centre overflow car park indicate that a taxi pick-up/drop-off area should be provided which is close to the tube station.
1106	481 Policy 26	We need the schools if there is more housing. We need more places around the middle of Rotherhithe ie. Russia Dock Road for exercise and entertainment. There are lost of retired folks, some teens and no places to go!!	Schools: We understand that there may be a need to create further new secondary places in the future. At the moment, based on the Compass School and other new schools (new School Aylesbury and Ark All Saints Academy) there are sufficient places for the next few years. It is important that we are not complacent and we are actively engaging with existing secondary schools to explore potential for future expansions. Our initial feasibility work suggests that there may be potential for Bacon's, St Michael's and COLA to provide additional places. While the AAP is generating a significant number of new homes, the majority of these are likely to be flats and the extent to which these will drive need for secondary places is still unclear. Any growth in the need for secondary places and the potential to expand existing schools will need to be kept under review.

Facilities for young people:

AAP policy 19 states that new development should provide sufficient space for children and young people. For young children, doorstep and local playable space should be included in residential developments. We will generate funding to support off-site play facilities for older children using s106 planning obligations and the community infrastructure levy. Our strategy is to locate local facilities together so that the services required by the community including services for young people, community space and schools are provided in accessible locations in a way in which different facilities can complement and support each other. We are promoting better use of schools for provision of play facilities and new school facilities should be available for the community outside school hours. Other examples of this include:

The new library at Canada Water which provides exhibition and performance space and focuses strongly on facilities for and participation by young people and families, providing a base for Southwark Young People's Forum.

Dockland Settlement is currently being redeveloped to provide a new community centre which provides a range of community and sports facilities including a multi purpose sports hall, a gym, clubroom for shared use with Southwark Youth Services and general purpose space.

1106 482 Policy 17 Buildings should be less than 4-storeys! Lets have some areas of London that are not concrete jungles. You are just planning a more modern Heygate

The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. Following the EIP, the planning inspector recommended that the council review opportunities for tall buildings in the light of the availability of Harmsworth Quays.

The adopted vision in the AAP emphasises the desirability of creating a network of streets and spaces that have a town centre and urban feel and which are not dominated by cars. Provision of some tall buildings, provided that they are of the highest design quality and avoid harmful microclimate impacts can help deliver the AAP vision in three important areas:

1) Contribution of tall buildings to public realm: Currently the footprint of the existing large sheds in the centre make it difficult to move around the area. With the exception of the plaza outside the library the public realm is uninspiring and offers little to residents, visitors or shoppers. A key advantage of tall buildings is that they can utilise much smaller

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				<p>footprints, enabling the creation of more public realm and making it easier for pedestrians to move around. The design policies in the AAP have been revised to make provision of new public realm a crucial element of new development.</p> <p>2) Tall buildings and provision of town centre uses: The key to a vibrant and successful town centre is a range of shops, leisure opportunities and businesses which create a destination. Tall buildings can provide a range of uses to help animate the base of the building and contribute to the vibrancy of the centre. They are an important source of capacity and will help deliver the range of non-residential uses which are sought by the AAP vision.</p> <p>3) Tall buildings and creating a focal point in the town centre: Policy 17 in the revised AAP states that buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular, they will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the town centre.</p>
1106	483	Policy 18	<p>What does protection mean?</p> <p>What does it entail?</p>	<p>The open spaces will be protected by policies in the Core Strategy and saved Southwark Plan. Development in spaces protected by Southwark Plan policy 3.27 (other open space) will only be allowed where the development is ancillary to the enjoyment of the open space and is small in scale and does not detract from the openness of the space or where land of an equivalent or better size is secured in the local catchment area.</p>
1106	484	Policy 27	<p>What about making more places and facilities available in this area so that we don't have such an arid desert-like existence. We need facilities that can be club houses for youths/elderly mixed usage at different times. ie.. used for the elderly in the mornings, some planned for teens in the afternoons and evenings to keep them off the streets and mischief. We need netball hoops and cricket nets and informal football areas that not miles away and only reachable by bus and cars and then nowhere to park</p>	<p>AAP policy 19 states that new development should provide sufficient space for children and young people. For young children, doorstep and local playable space should be included in residential developments. We will generate funding to support off-site play facilities for older children using s106 planning obligations and the community infrastructure levy. Our strategy is to locate local facilities together so that the services required by the community including services for young people, community space and schools are provided in accessible locations in a way in which different facilities can complement and support each other. We are promoting better use of schools for provision of play facilities and new school facilities should be available for the community outside school hours. A further example of this approach is the new library at Canada Water which provides exhibition and performance space and focuses strongly on facilities for and participation by young people and families, providing a base for Southwark Young People's Forum.</p>
1107	490	Policy 22	<p>Affordable homes: the AAP needs to be updated to ensure at least 35% of new homes are available to Southwark residents at a rent that people earning the London Living Wage (or</p>	<p>Affordability levels are set out in our affordable housing SPD. Social rent levels are set nationally however, we can set our own levels for</p>

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		national minimum wage) can afford., alternatively conditions need to be placed on planning consents that properties should only be available for occupation by the owner thereby banning the sale for investment letting.	intermediate housing. Updated annually, our current figures are: one, two, three and four bedroom units must be affordable to households with total incomes of £31,881, £37,670, £43,729 and £49,592 respectively assuming that no more than 40% of their net income is spent on mortgage, rent and service charges. Net income is defined as 70% of gross income. We cannot set policy which dictates who buys or occupies private flat/houses.	
1107	491	Policy 25	<p>Jobs: There has been a greater focus on calls for job creation in the CWAAP Area recently. However the focus placed on retail jobs needs to be re-assessed given the changing nature of the retail market. Evidence from studies show that there is a need for small business space provided for people wishing to start a business or move to the next stage of an emerging business.</p> <p>Evidence shows that innovation/incubation units with on—site business support have a success rate higher than those facilities without on-site support. Canada Water / Surrey Quays are sinking as the competition from West End, Canary Wharf, Stratford, Clapham and Croydon improve their offerings. The area needs a great deal more investment and the Shopping Centre a radical and extensive rethink.</p>	<p>We agree. Policy 25 emphasises the importance of non-retail jobs and promotes the need for office space and space for small and medium sized businesses.</p> <p>Our policies on shopping are grounded on good evidence set out in our retail capacity study. While Canada Water is unlikely to ever compete with the West End and Stratford etc it can still become a fantastic destination in its own right. We recognise that the regeneration of Canada Water should not depend solely on retail growth. Our policies seek to expand a range of facilities in the area, including leisure and business to help make the centre more attractive and improve its viability.</p>
1107	492	Policy 15	<p>Design: The disregarding of the comments by Southwark’s Design Review Panel in 2012 showed that assurances given in CWAAP EIP about design quality were false. The AAP needs to be updated to clearly, robustly and explicitly ensure that only developments of excellent design are constructed. The aspirations of the community have not been met and outcomes disappointing. Any day now we might even have a pile of sea containers.</p>	<p>The AAP’s design policies are explicit and robust in their requirement for high quality design with the area. The detailed design of proposals would be assessed at the planning application stage.</p>
1107	493	Policy 12	<p>Seven Islands: Little or no improvement has been delivered at Seven Islands since (and years before) CWAAP EIP. Money is pencilled in but not actually spent. The area needs a completely refurbished leisure centre without further delay or the speedy delivery of a new leisure centre. A further 5 or 10 years delay is not acceptable and not coherent with the need to provide more sustainable homes as soon as possible. We cannot keep building homes (most for profit) while delaying providing other important community resources.</p> <p>As an alternative consideration should be given to a land swap with developers providing a new leisure and fitness centre in exchange for developing the Seven Islands site for housing.</p>	<p>Funding for improvements to the Seven Islands Leisure Centre is committed in the council's capital programme for the years 2014/2015 and 2015/2016. Policy 12 has been amended to state that this funding will be used to extend the life of the centre by up to 10 years. King’s College have proposed a new leisure centre as part of their proposals for a new campus and the council is keen to explore this further with King’s College and British Land.</p>
1107	494	Policy 18	<p>Green / Open Spaces: The assurances given at CWAAP EIP were false. The community have repeatedly brought forward suggestions for places to be designated as open space etc. and have been blocked. The AAP has failed to meet the aspirations for the community to protect places we value. The Council has repeatedly refused, dogmatically, to consider land on our council owned estates for recommendation and subsequent protection. This discrimination against residents who live on Council estates is abhorrent. Council owned and managed housing estates occupy a considerable land area and particularly in the ward of Rotherhithe. This policy leaves large areas of ours two wards unable to benefit from open space designation and protection.</p>	<p>Our approach is consistent with our Open Space Strategy adopted in January 2013.</p> <p>Both the Open Space Strategy and the Canada Water Area Action Plan recognise that amenity spaces are highly valued by the local community. The Open Space Strategy emphasises the importance of amenity spaces in enabling informal recreation close to residential areas and their potential as a biodiversity and community gardening resource.</p>

In being supportive of development and growth, we also need to have places that we value and cherish protected and maintained.

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

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

We consider that these policies will be more effective in securing good quality amenity space than simply protecting all existing amenity space or applying a per capita standard across the borough. This is consistent with national guidance in the PPG 17 Companion Guide which suggests that in the case of amenity greenspace "higher quality local environments will result from the use of an urban design-led approach than from a simple quantitative provision standard." The value of this approach at a neighbourhood level has been reflected in the Aylesbury AAP and Elephant and Castle SPD . Both of these documents aim to ensure that good mix of private and public amenity space is made, while also facilitating the regeneration of the Aylesbury and Heygate estates.

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

Obj-jector no.	Rep no. Policy	Details of Representation	Officer Response to Representation
			area which has significantly less park provision per capita than other parts of the borough.
1107	495 Policy 17	<p>High Rise / tall buildings / density: The Sustainability Appraisal is flawed as usual. There needs to be actual delivery on the issues of congestion, traffic and pollution etc. The robust data, e.g. from the Department of Transport, showing high future levels of traffic growth and car ownership need to be factored in. The story and narrative of squeezing vehicles out of the area is a good one however it is a story. Meanwhile UK wide vehicle users are free to drive where they want including along the A200. There is little sign that TFL are coming forward with serious well funded solutions and the focus has been on Elephant and Castle, not Canada Water. The Rotherhithe Tunnel, gyratory and local roads continue to be heavily used with congestion affecting economic growth. The Congestion charge has not delivered substantial reductions in traffic because drivers use our roads to avoid charges. There needs to be coherence and coordination all along the A200 and between planning authorities including Lewisham.</p> <p>The suggestion that tall buildings should be permitted around Canada Water itself should be rejected as tall buildings will have a detrimental impact on local wildlife.</p>	Any development including tall buildings would have to assess its impact on the local environment and biodiversity, and propose mitigation measures for any negative impacts. This would be undertaken and assessed at the planning application stage.
1107	496 Vision	<p>Vision etc: It was made clear a CWAAP EIP that residents would need to engage with each planning application as it came along. In so doing it has become clear how weak the AAP is. The vision and policies need to be rewritten to ensure that the aspirations of the community are taken fully into account and flow through to decision making. Residents have repeatedly stressed how important various forms of green infrastructure are including wildlife, trees and hedgerows. Looking at the applications approved since CWAAP EIP we can see how defective the plan is, and what it has failed to regulate following the NPPF and subsequent Coalition changes to planning policy nationally.</p>	The vision has been examined and was found to be sound by an independent inspector. During the EIP the council maintained that any changes to the plan associated with Harmsworth Quays could be formed within the scope of the vision and therefore no substantive changes were required to the vision.
1107	497 Policy 12	<p>In regards to the idea for a university campus which is well supported there is concern how this will help local Southwark and Rotherhithe people. We need the facilities required to support our area delivered. A new swimming pool at Elephant is no good when public transport costs 2.80 return, or >10.00 for a family of four before entry charges. If so much of the core area is handed over to education use, and less CIL or s106 is generated as a consequence, how will all the facilities, infrastructure and everything we need and desire be paid for?</p> <p>The area needs doctors, dentists, youth facilities etc and so on. not just the health centres currently included in various planning applications.</p>	<p>The council has committed to refurbish 7 Islands to extend its life by up to 10 years. The council is exploring whether a new leisure centre can be provided in the town centre in the longer term. King's College have proposed a new centre as part of a campus development and the council is keen to explore this option with King's College and British Land.</p> <p>AAP policy 29 flags the likely need for health facilities and states that the council will work with NHS Southwark to identify an appropriate location.</p>
1107	498 Policy 1	<p>Town Centre / Area name: The issue of the town centre was fudged in the EIP and really overall still does not make sense. The "town centre" is moving around the place depending on applications for planning approval and disappointment – bangles – with the Plaza. In reality the Surrey Quays area is not a town centre and the continued use of the term should be dropped particularly as various developers are using the term for different sites.</p> <p>The community fear that our area will be exploited by numerous parties to gain as much as they can out of it. In response we need an Area Plan that ensures our area, and the community around here, benefits from development.</p>	The designation of Canada water as a town centre is consistent with the London Plan and the Core Strategy. The boundaries of the town centre are shown on the adopted policies map. The council's aspiration is to transform what has historically been an out-of-centre destination into an environment which feels like a town centre.

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1108	589	General	<p>I write in response to the consultation for the Revised Draft Canada Water AAP May 2013.</p> <p>Frogmore Property Company acts as Development Manager for Aviva Life and Pensions Ltd who are the owners of the Surrey Quays Leisure Site. The site has an outline planning permission for a mixed use development containing circa 50,000sq.m of residential development as well as leisure, retail, student housing and office space. Discussions are currently ongoing with the existing occupiers for the process of releasing the site for development.</p>	Noted.
1108	600	Vision	<p>Frogmore and Avia support the AAP's vision for a more cohesive and vibrant town centre; however, wish to raise the following points in relation to the Surrey Quays Leisure site;</p>	The support is noted.
1108	601	CWAAP 24	<p>1.Focus on commercial uses</p> <p>Whilst it is clearly accepted that commercial uses play an important role in the success and sustainability of the Town Centre it is of paramount importance to recognize that their delivery will be market lead. The draft AAP should avoid being too prescriptive in terms of the type and quantum location of employment uses in order not to constrain or delay regeneration.</p>	Noted. The Council considers that the wording of the policy/allocation is flexible and will work with the other policies in the AAP to allow for a range of employment uses.
1108	602	CWAAP 24	<p>2.The acoustic buffer zone</p> <p>We welcome the statement in paragraph 7.853 that the non-residential buffer incorporated in the existing permission will no longer be required when the prints works moves. We believe that there is an opportunity to better integrate the two sites and to improve upon layout and development capacity</p>	We agree. Our strategy is to set a framework for redevelopment of both the print works and the leisure park sites.
1108	603	Policy 17	<p>3.□Urban design and building heights</p> <p>We also welcome the proposed opportunity to provide special buildings on the south west corner of the Surrey Quays Leisure Park in policy 17. However, we feel very strongly that this location, given its gateway position outside of viewing corridors and away from sensitive existing development, would be appropriate for a well-designed tall building. We therefore request that the western part of the site is included within the indicative area where tall buildings are appropriate</p>	Although the south west corner of the Surrey Quays Leisure Park is considered appropriate for a 'special building' to highlight the southern gateway in the new town centre, this location is considered inappropriate for inclusion within the area identified for heights around 20-25 storeys due to its location towards the edge of the town centre and away from the basin which is identified as the focal point for the new town centre. In addition to this, is the proximity of the lower building heights to the south of Redriff Road. Proposed development at this location would be assessed at the planning application stage.
1108	604	General	<p>We sincerely hope that the Council will consider the above points in the process of finalising the Canada Water Area Action Plan and we look forward to working in partnership with the Council and other parties in order to achieve vision set out in the document</p>	Noted.
1109	605	CWAAP 24	<p>I agree with the idea of having a couple of shops and coffee shops but not more than this. The residents have chosen to live here because it's a quiet area and we would like it to remain so.</p>	In line with the vision, the AAP aims to improve the town centre and expand the range of shops and services that are available to local residents. There will be more shops and cafes as a result but the main focus of the town centre will still be around the water basin and the shopping centre.

Obj-jector no.	Rep Policy no.	Details of Representation	Officer Response to Representation
1109	606 Policy 8	No – I don't think the current layout needs changing	<p>Our testing of AAP proposals demonstrates that we need to make improvements to transport infrastructure. If we do nothing, modelling shows that traffic queues and delays around the gyratory and on Lower Road would be expected to worsen.</p> <p>Our proposals aim to simplify the gyratory system making it less complicated for all users. Our testing shows that reintroducing two-way traffic on Lower Road substantially reduces traffic flows on Rotherhithe Old Road which has the potential to significantly improve the environment for residents. While the proposed changes do not significantly increase the capacity of the network, revised signalling of key junctions enables traffic to move through the area more smoothly. It will also enable us to improve pedestrian crossings on Lower Road, reducing the barrier effect it currently creates between the shopping centre and Surrey Quays station, the Hawkstone Estate and Southwark Park.</p>
1109	607 Policy 17	<p>I don't agree with more than 4 stories buildings especially around the waterways including Albion Canal and CW Basin. The other buildings, except for Ontario House, are no more than 8 stories and tall buildings would not fit at all. Not to mention that they would ruin the view the residents currently enjoy. It's a quiet residential area, not the City!</p> <p>Also, there should not be any encroachment to the existing boundary line that leaseholders and tenants presently enjoy.</p> <p>And the old moorings should be protected for future generations.</p>	<p>The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point of the new town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception. Any issues regarding encroachment would be assessed at planning application stage. Conserving and enhancing the significance of the area's heritage assets is covered by the borough's adopted heritage policies in the saved Southwark Plan and Core Strategy.</p>
1109	608 CWAAP 24	<p>As I mentioned above, I do agree with the idea of having a couple of shops and coffee shops but I do not agree with the plan of building any residential buildings and especially not tall ones. The area is already busy as it is and this plan would completely change it and I would like to remind you that the residents have bought properties here because of its intimate and quiet atmosphere. More people and more commercial facilities would also probably devalue our properties.</p>	<p>The AAP, which was adopted in 2012, already set out a vision for how the area would change over the next 15-20 years. This included new homes and an improved town centre. The proposals for Harmsworth Quays build on this.</p>

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1110	609	CWAAP 24	The area has always been a residential haven unfortunately stained by the Harmsworth Quays and other light industrial in the area. We now have the opportunity to remove these and replace them with lower density housing to bring more families into the area	Comments noted. The redevelopment of Harmsworth Quays and the surrounding sites presents a significant opportunity for the Canada Water area. The AAP aims to guide development in order to create an improved town centre and also to integrate with the existing community. There is significant demand for new homes across London and in Southwark so it is unlikely that all the housing will be low density, however it will be a mix of sizes and types and include family housing.
1110	610	Policy 26	Bermondsey is still too far for local residents. Education options in the direct area are in short supply and I would support a secondary school	We have updated our policies to recognise circumstances which have changed. A new school which would provide 4FE has been approved to open in September 2013 in Bermondsey. While a closer secondary school would have advantages, there is no government funding available for it.
1110	611	Policy 17	I strongly disagree. Towers greater than 8 stories are an eye sore and do not fit in with the local area. We should limit buildings to 8 stories maximum, my preferred is actually below 8 stories and we should DEFINITELY NOT permit exceptions for "some towers" above this	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and new surrounding public spaces as the focal point of the new town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception.
1111	612	CWAAP 24	We need more quality shops – They are all closing down in Surrey Quays shopping centre. We need to bring in more specialist businesses we desperately need good quality bistro style restaurants /bars – there is NOWHERE nice to eat in this area. I never use this area to socialise in as others have much more to offer.	We agree. The council's aspiration is to transform what has historically been an out-of-centre destination into an environment which feels like a town centre. AAP policies 1 and 2 support the provision of new shops, cafes and restaurants in the town centre and on the CWAAP 24 site.
1111	613	Policy 6	Cycle routes essential as I use them locally all the time.	Noted.
1111	614	Policy 12	I have never used Seven Islands as it looks so unappealing. We need new sports centre but centrally located.	Support for a new centre is noted. The council has committed to refurbish 7 Islands to extend its life by up to 10 years. The council is exploring whether a new leisure centre can be provided in the town centre in the longer term.

Obj-jector no.	Rep no. Policy	Details of Representation	Officer Response to Representation
1111	615 Policy 26	I don't have children so unable to make any comments on schooling.	Noted.
1111	616 Policy 17	Absolutely NO tall buildings. 5-storeys maximum otherwise it creates tall dark corridors between buildings. We need lots of light and open space with on water features and not bland open spaces like the area to the side of the library.	The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canda Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the core of the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception.
1111	617 CWAAP 7	<p>I have a proposal I mentioned to a council member.</p> <p>Have you considered developing the area around Canada Water lake? I have in mind small bistros/restaurants built surrounding the pond but with glass enclose jetties projecting in to the pond. These jetties can then have eating areas inside and would be a lovely to have a meal in an enclosed glass jetty and able to look on the water to see the ducks and maybe have some lovely lighting and possibly a fountain and make this a focal feature.</p> <p>The area has become very run-down and lacks a focus/heart to the place. You need to incorporate shops/bistros surrounding the lake and maybe some walkways in to the lake.</p> <p>The projecting buildings can have glass sides/which then can be opened in summer.</p> <p>It needs pretty- fying! It needs to ensure that locals stay in the area to socialise. At present there is nothing nice to draw you in to stat and eat. I go out of the area to eat.</p> <p>There could be some lovely sculptures in the lake and local colleges could be involved in creating them. We need small bars/tapas bars/ specialist cheese and bread shop – where shops make things on the premises</p>	Our site policy for the Decathlon site, shopping centre and car parks states that the Canada Water basin and surrounding public spaces should be the focal point of the town centre and that development around the basin should provide a range of town centre uses, including shops, cafes, restaurants and cultural or leisure uses. Development should have "active frontages" rather than blank facades and should have generous floor to ceiling heights to reinforce the feeling of a town centre.
1112	618 Policy 18	Fully support the proposal to designate the Old Nursery Southwark Parks MOL	The support is noted.
1112	619 Policy 18	We would like to see a commitment - the plan to replace the existing café and toilets in Southwark Park with a much better facility	The council agrees that facilities in Southwark Park can be improved over the life of the plan. We have stated that we will use s106 and in the future the community infrastructure levy to help improve parks and open spaces. At this stage however it would be overly prescriptive to make the change which is proposed.
1113	620 Policy 17	Very tall buildings will deny the fauna and flora the sunlight they need to flourish especially by the Albion canal and Canada Water Basin and on a personal note, tall buildings around the Albion canal will also deny me the much needed sunshine and light that I currently enjoy in my apartment in Montreal House	The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings

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			will help to define the town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 stores within this area is seen as an exception.
1113	621 Policy 19	This development was marketed as family friendly area. I have noticed that there are many children under the age of 13 in this area and there is not enough areas for them to play in except a measly play areas suitable for only under fives. I wonder if anyone in the planning department has ever been here in the morning around 11am (now during school holidays) or even in the evenings at about 5 pm to see these poor children kicking a ball in the only place available by the Albion canal.	We agree that more children's play facilities should be provided as the population increases. Policy 19 indicates that the council will seek to ensure that new development provides 10sqm of space per child. This is consistent with guidance produced by the Mayor. It is important that a variety of spaces and facilities are provided, including space for toddlers and the under 5s, spaces for children under 11, as well as space for older children. Doorstep and local playable space for young children would usually be provided on site. The council will look to improve youth and neighbourhood space using s106 and in the future CIL.
1114	623 CWAAP 24	<p>In principal, I agree with the proposed changes to the Harmsworth Quay site and yet, I think that the language and any changes to the existing CWAAP needs to be more prescriptive and highlight the specific changes for this specific area only. In my view, it should clearly denote the types of buildings that would justify high rise and/or changes to the existing CWAAP for this particular area.</p> <p>In my opinion, it would be unfair to compromise on the existing CWAAP. In particular, I seek clarification how this change will affect the existing CWAAP and in particular, if at all will affect Site C (Decathlon site) in any way.</p> <p>To be clear, I do not object to the right building being erected in the right area. But I do object to excessive massing in the local area and lots of tall buildings in one particular area.</p>	<p>Comments noted. However the changes to the AAP are intended to guide development and provide a flexible framework to enable development to come forward. Change will happen over a number of years and development will be implemented by a number of developers. Therefore it is important that the plan strikes a balance between providing sufficiently strong guidance to ensure that the AAP vision is delivered, while providing enough flexibility to adapt to changing circumstances. We consider that this balance has been struck.</p> <p>The revisions to the AAP include an amended site allocation policy which covers the Decathlon site. Policy 17 deals specifically with building heights and our approach to them in the action area and on site CWAAP 24.</p>
1114	624 Policy 6	In principal, I do not have an issue with this. As long as it does not impact on the environment and cause delays to the existing traffic situation.	Support noted.
1114	625 Policy 7	In my view, I would like to see a reduction of buses along Surrey Quays Road and/ for the 'traffic wardens' to be patrolling this area vigilantly as sometimes I have witnessed people parking along Surrey Quays Road even though there are double yellow lines. This has on occasion affected our enjoyment. We have seen cars and buses swerving and there have been a few accidents as a result. In my view, this presents a serious issue which requires urgent attention given that many local residents walk along Surrey Quays Road to get to the tube station.	Policy 7 states that we will work with TfL to improve the reliability and frequency of public transport services. The comment about Surrey Quays Road will be passed on to our network management team.
1114	626 Policy 12	I would need additional information to understand the impact to the local community. Are there any statistics that you can provide? Further, I am unclear what the original proposal included and would therefore seek additional information.	The council has committed to refurbish 7 Islands to extend its life by up to 10 years. The council is exploring whether a new leisure centre can be provided in the town centre in the longer term. Further consultation will take place on the kinds of facilities that would be provided in a new

			I do support the refurbishment to the existing swimming pool as it is unsatisfactory in its present condition and in my view, not fit for purpose.	centre.
1114	627	Policy 17	<p>I note that the Council and the policy team would like the CWAAP's focus to be buildings between 4 and 8 storeys. Therefore, if any tall buildings need to be adopted then, they should not only be in the right place and of exemplary design quality but the language needs to be prescriptive in order to justify these large structures. To be clear, I do not oppose tall buildings. I do however object to excessive massing and buildings encroaching on existing boundary lines and affecting the enjoyment and experience of local residents eg. Overshadowing, environmental issues, wind tunnelling.</p> <p>You need to consider the issue of massing. How many tall buildings on any site can be justified? Where will these be located?</p> <p>Gardens should be incorporated at the ground level for all to enjoy not within the buildings otherwise in my view we are not creating a community.</p> <p>You should consider that low rise of no more than 3 or 4 storeys in height along the Albion Canal and/ directly facing the CW Basin. That the buildings along the Albion Canal should not encroach on the existing boundary lines. Alternatively, for the council to be prescriptive and ensure that a Children's playground and/ open space be requested as a key requirement alongside the Albion Canal to allow children and local residents to enjoy this local area. It may also provide an inviting town centre for those coming out of the Tube station that are faced with an open concrete Plaza which unfortunately at various times looks dirty and unkempt.</p> <p>Finally, that any building i.e. low rise or high rise should not affect the existing enjoyment of leaseholders and tenants in the areas. That the buildings themselves should not impact by way of overshadowing, or affect adversely such as wind tunnelling. Further that they be sympathetically designed and not impact local resources.</p>	<p>Firstly, a degree of flexibility is required in the plan for changing circumstances. A balance between prescriptiveness and flexibility within the policies is required for an effective development framework and to provide the required degree of certainty within the development process. In light of this, the plan cannot be over-prescriptive in relation to tall buildings, but set out the rationale and an appropriate strategy. The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and new surrounding public spaces as the focal point of the new town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the core of the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception. The provision of new public spaces that act as a focus for activity and draw people through the area is set on Policy 14,</p>
1114	628	Policy 18	<p>Have you considered protecting the old moorings located along the Albion Canal? That the CW Basin and the Albion Canal need to be protected.</p>	<p>The Albion Channel and Canada Water basin are both protected open spaces. In addition, both are identified sites of importance for nature conservation. The moorings on the channel are not protected, but there are no plans to remove them. Southwark Plan policy requires development to take into account local context and character. Development proposals which involved removing the moorings would need to assess the impact of this on the character of the area.</p>
1114	629	Policy 17	<p>In principal, I am concerned that at a recent meeting the words not prescriptive were used when the new CWAAP was presented. In my opinion, I would only seek to support changes to the existing CWAAP as long as they are prescriptive and that specific guidelines are adopted to protect the existing leaseholders and local generations for the generations to come.</p> <p>To ensure that massing is not excessive and that the existing enjoyment is not impacted in any way i.e. energy costs, natural wildlife etc That all environmental impacts are addressed in full and in writing prior to any planning application being granted approval.</p>	<p>A degree of flexibility is required within the AAP for changing circumstances. As such a balance between prescriptiveness and flexibility is required for the plan to be effective and to provide the required degree of certainty for development to come forward. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design, as well as the range of design polices that form part of the saved Southwark Plan, Core Strategy and the London Plan. The impacts, including</p>

Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
			I did not say yes or no to many of the questions as I wanted to outline my reasons. To be clear, I do not oppose regeneration but I would like to make sure that any planning application does not present excessive residential massing which may impact on local infrastructure and enjoyment i.e. transport, etc	environmental, of all proposed development would be assessed at the planning application stage. Additionally, it is important to note that the Canada Water has been designated an Area of Intensification in the London Plan which sets out an indicative minimum new homes target of 2,500 units.
1115	632	CWAAP 24	Agree in principle. However support is tempered by the development being directly sponsored by the actual end user of the site (eg, the owner of the education facility), rather than some sort of short term developer who is developing the land with the view of "hoping" to attract an end user. Preference should be given to parties wishing to develop the site and to remain a part of the community in the long term – ie, for time horizon in excess of 25 years and closer to 125 years so we end up with a high quality development.	Comments noted. The council is promoting the provision of a new university campus in the area, however the AAP cannot dictate a specific end user as this is outside the realms of planning and the AAP would not be found 'sound'.
1115	633	Policy 7	Local traffic is one issue. However, what about consideration of traffic links into the area? My main concern is the incremental impact on public transport during periods such as peak hour where both bus and tube connections are already uncomfortable full.	AAP policy 7 states that we will work with TfL to improve the frequency, reliability and quality of public transport at Canada Water. Our modelling has shown that development is likely to increase demand for buses, particularly on Saturdays.
1115	634	Policy 29a	I am not directly impacted via these issues so cannot comment. I would however point out that if the site is developed by a university, that it should develop programmes with the secondary school, to encourage students to aspire to higher education through (say) student tutoring programmes, etc	Comments noted. We would use legal agreements to ensure that new training and employment opportunities generated by a new university are targeted towards local people.
1115	635	Policy 17	There are enough "failed housing towers" in Southwark where tall buildings do not help create communities but rather isolate people from each other. I might be prepared to be slightly more flexible if slightly higher buildings would be used for office space to create open areas. However, there should be no clustering of tall buildings. Working a Canary Wharf I can personally attest to the wind tunnelling effect that is created by a massing of taller buildings (and many of the buildings are not that high rise)	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and new surrounding public spaces as the focal point of the new town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception
1115	636	Policy 18	Further action should be taken to protect open spaces. I am particular concerned by protective measures being put in place around unique features of the area such as the Canada Water Basin and Albion channel where the council should take active steps to guarantee that areas adjacent to these waterways will remain free and open to the public and not diminished in area or importance by future development	The Albion Channel and Canada Water basin are both protected open spaces. In addition, both are identified sites of importance for nature conservation.

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1115	637 Policy 7	It is not entirely clear that these amendments to the CWAAP will only impact upon Site E and Harmworth Quay and that the CWAAP will remain unchanged for areas such as Site C. You can appreciate the scope for confusion given that the current CWAAP lays out some clear principles for the development of Site C and yet there are planning submissions before Council that differ sharply from the CWAAP. Clearly we would be concerned if such planning applications would prejudice any changes to the CWAAP for Site C.	The AAP is being revised mainly to put in place a planning framework to guide a redevelopment of Harmsworth Quays and ensure that impacts of this can be addressed. Development of Harmsworth Quays will create opportunities not previously considered. These include the opportunity to expand the town centre to the east and also the opportunity to provide some tall buildings. Both of these have implications for Site C. In the revised plan we have identified the potential for tall buildings on Site C and as a result, the number of homes expected to come forward on the site has been increased. We have taken increased population into account in reassessing need for infrastructure including schools, pre-school facilities and transport.
1116	638 Policy 17	Any development, residential or non residential, should be low rise. Not higher than four storeys. We already have enough high rises after the Barratt developments.	As a growth area, Canada Water will experience growth and change. The revised approach to tall buildings is set out in policy 17.
1116	639 Policy 17	No. We don't want to look like the Shard. Views over to Kent countryside should be maintained. Impact on light in residential areas is v important. Stick to 4-8 storeys. I can't think of a single case – apart from Manhattan - where a tall building has enhanced the feeling down on the ground for the community.	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and new surrounding public spaces as the focal point of the new town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the core of the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception. The requirement for ground and lower floor active frontages and a mix of town centre uses is important for a vibrant, new town centre. Both policy 15: Building blocks and policy 16 Town centre development set out requirements for active lower floors, while bullet 3 of Policy 17 sets out the requirement for development to animate spaces around buildings. It is not possible to protect views from private buildings, although existing residential amenity is protected. Policy 17 does require publically accessible viewing areas, where appropriate, in tall buildings that are significantly higher than 25 storeys.
1116	640 Policy 17	Please be really careful to keep the Canada Water basin clear of high buildings. The feel right now is good. The new library was a great example of sympathetic design which enhances the community. Don't overdo it.	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to

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			<p>rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and new surrounding public spaces as the focal point of the new town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception. Additionally, it is important to note that the Canada Water has been designated an Area of Intensification in the London Plan which sets out an indicative minimum new homes target of 2,500 units.</p>
1117	622 Policy 19	<p>On page 54 you have identified the ball games caged area of the playground as a "Youth Space". This area is in fact an integral part of the playground and there is no access to this area by the general public. Please revise your plan accordingly</p>	<p>The space referred to on Quebec Way is the MUGA on Alfred Salter primary school. Our strategy is to locate local facilities together so that the services required by the community including services for young people, community space and schools are provided in accessible locations in a way in which different facilities can complement and support each other. We are promoting better use of schools for provision of play facilities and new school facilities should be available for the community outside school hours.</p>
1118	513 General	<p>We write in response to the Draft Revised Canada Water Area Action Plan (the "draft AAP"). These representations are submitted to Southwark Council (the "Council") on behalf of British Land.</p> <p>As you know, British Land holds significant land interests in Canada Water, including the Surrey Quays Shopping Centre and the recently acquired Harmsworth Quays site. The draft AAP is therefore of significant interest to our client.</p> <p>The Canada Water AAP was adopted by the Council in March 2012 with the intention that it would provide a plan to regenerate the area around Canada Water and set out a vision for how the area will change over the period leading up to 2026. Once adopted, the AAP will be an important policy tool with which the Council can coordinate growth and shape development over the plan period and we support the role that it will play in revitalising Canada Water.</p> <p>The sole reason for the revision to the recently adopted Canada Water AAP is the Harmsworth Quays site being released by the Daily Mail General Trust and ceasing to operate as a print works. As you know, British Land agreed to acquire the leasehold interest to Harmsworth Quays in June 2012. As such British Land is one of the principal stakeholders for the purposes of this review. We therefore look forward to working with the Council in preparing the revised Canada Water AAP to ensure that it represents a successful and deliverable plan for regeneration.</p>	<p>Noted.</p>

We have reviewed the draft AAP against the requirements of the National Planning Policy Framework (NPPF), specifically paragraph 14 which requires local plans to meet objectively assessed needs, with sufficient flexibility to adapt to rapid change and paragraphs 150-182 which seek to ensure that plans are positively prepared, justified, effective and consistent with national policy. References to the NPPF are made throughout our representations where necessary.

Structure of the Representations

These representations are comprised of two parts. The first part sets out the main areas of comment. The second part comprises a table to address detailed points of drafting with associated justification for the proposed amendments.

1118	514 CWAAP 24	<p>CW AAP 24 Site Designation</p> <p>We support the principle of combining Site E, Mulberry Business Park, Harmsworth Quays and Surrey Quays Leisure Park into one site allocation (CW AAP 24), although the draft AAP should acknowledge that this will be delivered in phases, and these phases are likely to be governed by land ownership.</p> <p>It is absolutely right that neighbouring sites should have regard to the emerging context and be mindful of adjacent development opportunities. British Land made representations to this effect in respect of the proposals being put forward by Sellar Property Group Ltd at Sites C and E.</p>	<p>We welcome the support for the new combined site allocation CWAAP 24. We have added a reference to the need for the site to be phased into the text.</p>
1118	515 CWAAP 24	<p>Town Centre uses and the role of residential in delivering development</p> <p>British Land supports the ambition to deliver a range of town centre uses on site CW AAP 24 and acknowledges the long longstanding ambition of the Council to transform Canada Water and make best use of the development opportunities to create a new destination comprising shopping, civic and leisure, business and residential uses to create a new heart for Rotherhithe.</p> <p>The Core Strategy seeks to provide at least 2,500 high quality new homes, to be accommodated in generally mixed use development with office floorspace to provide space for local occupiers and retail development which combined will generate around 2,000 new jobs.</p> <p>This is consistent with London Plan Policy 4.3 which seeks to secure mixed use development comprising both housing and office/employment on strategically significant sites. Supporting paragraph 4.15 encourages mixed use development which utilises different approaches for places where high office values will generally support other uses, and those where values for other uses (such as residential) may be higher and support some office space renewal.</p> <p>The focus of the revised site allocation for CW AAP 24 is towards non-residential uses, principally employment generating uses including business and retail; and community uses including education and health and hotel use. These are identified as being "required" uses for the site. Residential is listed as being one of two "other acceptable uses" alongside student housing.</p>	<p>We welcome the support for the approach to transforming Canada Water and the town centre. With regard to the request to reference housing in the CWAAP 24 site allocation, in the council's view the policy reflects the council's ambition to maximise the amount of non-residential use which can be provided. It sets out clear criteria to ensure that where land is not required for non-residential use, it could be used for residential use. The criteria which are set out reflect the guidance in paragraph 22 of the NPPF which states that where there is no reasonable prospect of a site being used for employment use, alternatives can be considered on their merits and having regard to market signals.</p>

The term "required use" is defined in the Southwark UDP as being a use which must be included within any development on sites designated on the proposals map. The definition goes on to state that planning permission may be granted for "other acceptable uses" provided that development for the required uses is, has been, or is thereby secured. Policy needs to be sufficiently flexible to accommodate rapid change (NPPF paragraph 14). The exclusion of residential and the inclusion of the other listed uses is contrary to national policy. We address this in more detail below.

As a minimum residential uses should be seen as being equally important in both place making terms and in ensuring that the AAP vision is deliverable. Policy needs to recognise residential and should be positive about it forming a key part of the mix of uses for the site.

The importance of residential uses is identified in the Harmsworth Quays non-residential land uses study (October 2012) which acknowledges that the demand for employment space in the short-term is likely to be lower with demand picking up in the medium to long term period once Canada Water becomes more intensely developed for retail and residential uses.

Given the low demand and the low value non-residential uses in this area, we believe residential, delivered as part of a broad mix of uses, will be a key driver to enable the site to come forward for redevelopment. This is acknowledged in both the Canada Water Viability Analysis (February 2013) and the Hawkins Brown Study (April 2013). The site allocation should reflect this.

Housing is a key objective at all levels of policy and it should be afforded great weight on a site of such strategic importance, to not do so would result in the draft AAP being inconsistent with adopted policy and contrary to the provisions set out in the NPPF (paragraph 182). Residential use is absolutely a required use for site CW AAP 24 and the draft AAP should be amended to reflect this, to not do so would be contrary to the aspirations and objectives of national, regional and adopted local planning policy and would result in a missed opportunity to deliver housing, including social housing, of a substantial scale and density

1118 516 CWAAP 24 Education Use

As you know, British Land has been involved in prolonged discussions with Southwark Council (Property) and Kings College London with regards to their proposals for the Mulberry Business Park and aspirations for a larger presence at Canada Water which could include the Harmsworth Quays site.

The Non-residential uses study (2012) identifies Kings College London as the sole education provider with an interest in Canada Water and the draft AAP only identifies possible future demand for increased primary education spaces stating that such demand will be kept under review. The draft AAP identifies site CW AAP 24 as being a possible location for such provision.

Given there is limited identified demand, it is unjustified to include education as a required land use. As stated above, a required use is defined in the Southwark Plan as a use that must be delivered in advance of other acceptable uses being proposed. Should Kings' interest subside and no demand for primary education uses arise there would be no requirement for education

We have clarified CWAAP 24 to make it clearer that higher education use is not a required use.

floorspace on the site. The evidence base provides no justification for such an allocation. This is contrary to NPPF paragraph 182.

Education use should be listed as an acceptable alternative land use for the site.

1118 518 CWAAP 24

Employment Use

British Land acknowledges and supports the role of employment generating uses in creating a successful town centre and is in discussions with retail and office operators regarding space at Canada Water. British Land supports the intention to provide a range of employment generating uses on site CW AAP 24 which could include office, hotel, retail and leisure uses although the policy should not read as an employment designation.

The Non-residential uses study (2012) notes that Canada Water is not a prime office location and is not perceived as one by the market, rather it is characterised by small scale, secondary units. The study does not identify any demand for Grade A office floorspace in the area and states that there is no certainty that an office market can be established in Canada Water. The draft AAP needs to acknowledge that the employment contribution of Harmsworth Quays has dwindled over many years, as such new employment floorspace should come forward as part of a broader mix of uses and due to the change in existing provision, at a level that is reduced from the earlier AAP aspirations.

The Non-residential uses study (2012) identifies potential future demand for upwards of 5,000 sqm of office floorspace and acknowledges the role that residential uses will play in identifying this demand and potentially increasing demand as the success and profile of the centre increases. This should be reflected in the draft AAP in accordance with London Plan paragraph 4.15.

References to the testing of future demand should be removed. It is vitally important that developers have sufficient certainty before proceeding with a scheme and a requirement to test future phases of a permission is unworkable and unreasonable. Proposals should seek to provide the appropriate amount of employment floorspace taking account of the scale of development proposed but having regard to the market at the point at which an application is made. A requirement to test for an unknown and unquantifiable future demand is unreasonable and unworkable in practice.

Comments noted. The Council thinks that the CWAAP 24 allocation does acknowledge that a range of employment generating uses will be appropriate. However, due to the scale and nature of the changes that are going to take place in the area, we want the policy to be flexible. It therefore allows for a varied amount of business floorspace to be provided, depending on the types of end users who may eventually be attracted to the area. As BL note in their response, the site will be developed over a number of years and during that time the demand for business floorspace in the area may increase significantly.

1118 519 CWAAP 24

Quantum of Development

An updated evidence base has been prepared by URS and Hawkins Brown to support the draft AAP. The Harmsworth Quays non-residential uses study (October 2012) assesses the potential for non-residential uses that could be accommodated on Harmsworth Quays and the adjacent sites (broadly reflecting CW AAP 24) whilst Hawkins Brown have undertaken a masterplanning analysis of various development and massing options for the site.

The CW AAP 24 site allocation refers to 'around 240,000 sqm' of new floorspace. This does not represent an appropriate quantum of development for the site, nor does it acknowledge the scale of development that is permitted (Leisure Surrey Quays Leisure Park) or proposed (Site E

Comments noted. The reference to the quantum of floorspace has been removed from the AAP.

Obj-jector no.	Rep no. Policy	Details of Representation	Officer Response to Representation
		and Mulberry Business Park). It is unhelpful to refer to a specific quantum as proposals should be assessed on a case by case basis. This should be reflected in the draft AAP and references to specific quantum or caps should be removed from the policies and supporting text.	
1118	520 General	<p>CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH</p> <p>Detailed Commentary</p> <p>The table below sets out our detailed representations in relation to the text of the draft AAP and our review against the NPPF. Extracts from the draft AAP are included where necessary, with changes to show the alterations being proposed. Where relevant, the text to be deleted has been struck through and the new text underlined. This is explained by the key below:</p> <p>Representation Key</p> <p>Text in Italics only □ Direct quotes from draft SPD / OAPF Struck out text □ Text to be removed from the draft SPD / OAPF Text underlined □ British Land suggested text for inclusion in the draft SPD / OAPF</p>	Noted.
1118	553 Policy 1	<p>CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH</p> <p>We support the inclusion of retail uses on the Harmsworth Quays site, however reference should be made to all elements of CW AAP 24:</p> <p>“We will work with landowners to improve and expand shopping floorspace by around 35,000sqm (net) through the promotion of new retail space on the following sites:</p> <ul style="list-style-type: none"> • □ Surrey Quays shopping centre and overflow car park • □ Site A • □ Site B • □ The Decathlon site • □ Surrey Quays Leisure Park • □ Site E • □ Harmsworth Quays • □ Site E, Mulberry Business Park, Harmsworth Quays and Surrey Quays Leisure Park <p>Reason In order to be consistent with the new site allocation.</p>	We agree. The list will be expanded to refer to CW AAP 24.
1118	555 Policy 1	<p>CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH</p> <p>“...We are proposing to bring Site E and a parts of Harmsworth Quays and the Surrey Quays Leisure Park Site into the centre. The exact location of the boundary extension will depend on the amount and distribution of town centre uses brought forward by the development proposals for site allocation CW AAP 24.</p> <p>Reason</p>	Policy 1 will be amended by adding CWAAP 24 to the list and include reference to Surrey Quays Leisure Park.

Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
			To allow sufficient flexibility in the plan and to acknowledge the extant permission for leisure uses on the Surrey Quays Leisure Park Site.	
1118	556	CWAAP 24	CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH We support the inclusion of café and restaurant uses on the Harmsworth Quays site, however reference should be made to all elements of CW AAP 24: “We will support provision of new cafes and restaurants through the redevelopment of the following sites: • <input type="checkbox"/> Site A • <input type="checkbox"/> Site B • <input type="checkbox"/> The shopping centre and overflow car park • <input type="checkbox"/> The Decathlon site • <input type="checkbox"/> Surrey Quays Leisure Park • <input type="checkbox"/> Site E • <input type="checkbox"/> Harmsworth Quays • <input type="checkbox"/> Site E, Mulberry Business Park, Harmsworth Quays and Surrey Quays Leisure Park Reason In order to be consistent with the new site allocation.	We have amended to the text to reflect the new site allocation.
1118	558	Policy 16	We support the objective to maximise physical and visual connections to the town centre. Policy should recognise existing constraints and extant planning permissions (see comments on CW AAP 7 below). We are not aware of any justification for the closing of the southern end of Surrey Quays Road to through traffic, and whilst we may support the objective (subject to testing), it should not be included in policy, rather it should be a stated objective.	With regard to Surrey Quays Road, it is unclear what difference including it as an objective rather than a policy would make. The benefits of the proposed realignment of Surrey Quays Road have been tested through the masterplanning feasibility work carried out by Benoy (in preparing the adopted plan) and also by Hawkins Brown. The proposal was also tested through informal consultation carried out in preparing the revised draft AAP and met with a positive response. The council considers that a requirement to carry out this work is in the interest of the proper planning of the area. The council included the cost of realigning the road as a development cost in the financial appraisal carried out in support of the Hawkins Brown study and the council is confident therefore that it is capable of delivery.
1118	559	Policy 17	We support the review of the tall buildings strategy which should provide sufficient flexibility to enable a range of building heights across the core area. This should be provided as part of the evidence base.	Noted
1118	561	Policy 17	CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH “Prevailing building heights in the core area should be between 4 and 8 storeys. Heights will generally be at the lower end of the range on sites on the periphery of the area. Developments should contain variations in height to add interest and variety to the development. Taller buildings should be used to help signify places which are more important and help relate more effectively to surrounding development. Reason	We disagree. The proposed change does not help clarify the policy, which is structured in such a way that tall buildings are the subject of the following section. To add references to tall buildings in the first section could create confusion.

Obj-jector no.	Rep no. Policy	Details of Representation	Officer Response to Representation
		To acknowledge the role and importance of taller buildings to placemaking.	
1118	563 Policy 17	<p>CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH</p> <p>“Within the area indicated on Figure 9, and in other suitable locations where tall buildings signify a gateway to the town centre or act as a local landmark signifying an important place or junction, tall buildings which have around 20-25 storeys will be appropriate. Tall buildings in excess of these heights will be considered against adopted policy on an individual basis.”</p> <p>Reason See comments on Figure 9 and deletion of paragraph 4.5.19 below. “...Include a publically accessible area on upper floors where feasible and viable.</p> <p>Reason Policy should acknowledge the inherent costs with providing such a space, which could impact on scheme viability.</p>	<p>We disagree. This change is not considered appropriate, as it is not supported by our evidence base. The area considered appropriate for building heights around 20-25 storeys is around the basin, as this the focal point for the town centre and has the best opportunity for public space and the highest PTAL rating. It is noted that the costs involved in implementing public viewing spaces can impact the viability of a development, which is a material consideration at the planning application stage.</p>
1118	564 Policy 17	<p>This should be referred to as the 'Indicative Tall Buildings Strategy' to allow suitable flexibility within the plan and to acknowledge that tall buildings may be acceptable in locations outside the indicative area subject to detailed analysis and justification on a case by case basis.</p> <p>The indicative area where tall buildings will be appropriate should be extended to include the southern end of the Harmsworth Quays site where a tall building is appropriate to signify the gateway to the town centre from the north and east.</p>	<p>We disagree. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the core of the new town centre.</p> <p>The zone shown on figure 9 is marked as indicative. Stating that in addition the strategy is indicative does not provide additional clarity or improve the plan.</p>
1118	565 Policy 17	<p>There is no justification for the removal of paragraphs 4.5.19 and 7.8.16 and the inclusion of a marker for the site on Figure 9.</p> <p>The release of the Harmsworth Quays site does not in any way effect the suitability of the south west corner of the shopping centre to accommodate a tall building. A tall building in this location would create a landmark at Surrey Quays station and create a gateway to the town centre, its location was supported at EiP and formed part of the adopted CW AAP.</p> <p>Paragraph 4.5.19 and the marker on Figure 9 should be included in the draft AAP.</p>	<p>In the council's view this is an important gateway location which merits provision of a special design. Policy 17 provides criteria which would allow an appropriate building height to be assessed. A tall building on the site is not ruled out but is considered sensitive and any proposal would be assessed at the planning application stage.</p>
1118	566 Policy 17	<p>CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH</p> <p>“While most buildings will be in the range described above, there is also the potential for tall buildings (of 30m and above – roughly 10 storeys and above) in the town centre and other important locations to signify important landmarks and/or gateways.</p> <p>Reason For the avoidance of doubt and to acknowledge the important role taller buildings will play throughout the core area in defining spaces and signifying important gateways.</p>	<p>We disagree. Our assessment base does not support this. Our view is that taller heights would be appropriate in the town centre, with heights up to 20-25 storeys in the area around the basin as illustrated in Figure 9, where there is the opportunity for new public spaces and town centre uses with the highest PTAL ratings. The council's view is the tall buildings should be located in the town centre to help define the importance of the centre, contribute to its legibility, reflect generally better public transport accessibility in the centre and because they are capable of accommodating land uses which reinforce the vitality and</p>

Obj- jector no.	Rep no. Policy	Details of Representation	Officer Response to Representation
			viability of the town centre.
1118	567 Policy 17	The supporting text acknowledges that tall buildings are suitable in locations to the east of Canada Water. Whilst we acknowledge that the area where tall buildings will be appropriate is marked indicative, we are concerned that the area does not extend sufficiently into the Harmsworth Quays site, parts of which will be important gateways to the north and suitable for tall buildings. Figure 9 should reflect this.	<p>The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the core of the new town centre.</p> <p>We have amended the Figure 9 legend to clarify that the area illustrated is the area within the town centre that is considered appropriate for tall buildings around 20-25 storeys. The extension of this zone of heights around 20-25 to the south of the area illustrated in Figure 9, is not considered appropriate, as the focal point of the new town centre is around the basin. However, as BL note, Figure 9 is indicative and the manner in which proposals meet criteria set out in the policy can be assessed at planning application stage.</p> <p>The policy states that tall buildings are appropriate in important locations in the town centre. Such locations may include gateways. This would be assessed at planning application stage using the criteria set out.</p>
1118	568 Policy 17	<p>CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH</p> <p>“...Buildings which are very tall (in excess of 25m) will have spectacular views and should provide a facility for the general public which takes advantage of views where it can be demonstrated to be feasible and viable.”</p> <p>Reason Only the tallest buildings should be required to provide a viewing platform for the general public. Policy should acknowledge the inherent costs with providing such a space, which could impact on scheme viability.</p>	Noted. The costs involved in implementing public viewing spaces can impact the viability of a development, which is a material consideration at the planning application stage.
1118	569 Policy 18	This should reflect the latest CIL programme which we understand targets the adoption of the CIL charging schedule for early 2014.	We agree and propose to make this change.
1118	571 Policy 18	Greater clarity is required. The provision of food growing facilities within developments should only be required where it can be demonstrated to be feasible and viable and consistent with the land uses in the area.	Policy 18 - The Policy is not prescriptive and has sufficient flexibility for these requirements to be met in different ways. Proposals would be addressed at the planning application stage. The policy responds to previous Inspector's report.
1118	572 Policy 19	This should be updated to reflect the new site allocation boundaries, specifically CW AAP 7 and CW AAP 24.	Agreed. The plan will be amended.

Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
1118	576	Policy 25	<p>CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH</p> <p>“Where appropriate Nnew business space must be designed flexibly to accommodate a range of unit sizes to help meet the needs of the local office market and SME businesses...”</p> <p>Reason Where a specified end user is identified there will be specific design requirements for the space which may conflict with the requirement for flexible working. “In large developments, consideration should be given to phasing the delivery of business space to allow for future growth and demand.”</p> <p>Reason We have addressed future demand in our main text above. Proposals should seek to provide the appropriate amount of employment floorspace taking account of the scale of development proposed but having regard to the market at the point at which an application is made. A requirement to test for an unknown and unquantifiable future demand is unreasonable and unworkable in practice.</p>	<p>We do not agree with the proposed wording. As noted in a previous comment on the matter of phasing, it is likely that the demand for business space will change as the area is transformed. We want to make sure that the changing nature of the area is a consideration in agreeing new development. No changes proposed.</p>
1118	578	Policy 25	<p>CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH</p> <p>“We have reviewed the type quantum and distribution of new business floorspace which is appropriate for Canada Water... However, as is noted above, we anticipate that the impact of regeneration and the potential to provide complimentary uses, such as residential, retail, hotels and higher education will substantially increase the attractiveness of business space in the area.”</p> <p>Reason The Non-Residential Uses Study 2012 specifically identifies that residential will be a key driver in demand. This should be recognised here. London Plan policy 4.3 and supporting paragprah 4.15 seeks residential and employment generating uses to come forward as mixed use development. The supporting text should be consistent with the Development Plan.</p>	<p>We do not agree with the proposed wording. As already noted in an earlier comment on this issue, residential will be a key use in the action area. However, policy 25 concentrates on jobs, business space and employment generating uses. A reference to residential is therefore not appropriate and no changes are proposed.</p>
1118	579	Policy 25	<p>CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH</p> <p>“The 2012 study recommends that business space should be flexibly designed, ideally be provided in stand alone buildings and should be clustered to create a business community which can connect and share services. The minimum size of a cluster of employment spaces accommodating a range of start-up and small enterprises and providing a degree of flexibility for on-site growth, would be approximately 2,000 sq m although the scale varies across sectors. Typically such clusters provide fairly high density development.</p> <p>Reason To acknowledge that employment clusters vary in size dependant of the sector and smaller clusters may be appropriate.</p>	<p>The wording recognises that there may be a varying scale of cluster, however the Council feels that it is appropriate to set a minimum. No change proposed.</p>
1118	580	Policy 29a	<p>Clarification should be given on the scale of student housing proposals that will be supported. An acceptable range of bed numbers should be provided and this should be backed up by</p>	<p>The scale of student housing will be dependant on the range and mix of other uses that come forward in the area. There is no specific target for</p>

Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
			evidence of demand. The term 'large student housing developments' is overly vague and in order to be consistent with the requirement of the NPPF greater clarity if required based on appropriate evidence..	the number of student homes that need to be delivered in Southwark and the proportion that may be built in Canada Water is dependant on a number of factors. We want the policy and the AAP to be sufficiently flexible to deal with a range of circumstances and developments. Our evidence shows that it is difficult to pinpoint the exact demand for student homes at a borough level because the higher education institutions in London attract students from across the capital as well as the country and also worldwide. In London there may be demand for between 17,000-24,000 student rooms between 2011-2021.
1118	581	Implementati	CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH "In July 2011, Daily Mail and General Trust which operates from Harmsworth Quays announced its intention to relocate its present printing operation to a new site. We have therefore reviewed the AAP take account of opportunities generated by the availability of that site and to provide a framework to guide its redevelopment. We have engaged the key landowners, including Sellar Property Group, Frogmore/Aviva, King's College, Surrey Quays Ltd and DMGT/British Land in considering future options on Harmsworth Quays and the adjacent sites. Reason To acknowledge British Land as one of the principal stakeholders in delivering CW AAP 24.	Noted. This change will be proposed
1118	584	Implementati	This should be updated to reflect the current timetable for the adoption of CIL which we understand now targets early 2014.	Noted. This will be updated.
1118	585	Implementati	The title should refer to the NPPF and table A3.1 should refer to paragraph 14 of the NPPF which requires plans to be sufficiently flexible to respond to rapid change.	Noted. These updates will be made.
1118	587	Implementati	CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH "New health facilities at Canada Water: ... Implementation of development of shopping centre site or alternative sites in the core area." Reason To be consistent with Policy 29	Noted. We will propose making this change.
1118	588	CWAAP 7	Figure 24 should be updated to reflect planning permission reference: 11/AP/4206 which was approved in March 2012 and represents a different arrangement to that shown. Extensive pre-application discussions were held to establish the most efficient and deliverable plot layout which culminated in a revised masterplan which was submitted to illustrate how development could come forward in future phases.	The council does not consider it necessary to update Figure 24. Paragraphs 4.5.11 and 5.3.4 state that the Figures are indicative and that the precise location of buildings and routes will be determined by planning applications. The principles shown indicatively on Figure 24 (and on other sites which have permission such as the Quebec Industrial Estate) are still applicable.
1118	590	CWAAP 24	CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH	Disagree. The text is sufficiently flexible as drafted. However, we have added a reference to lesiure uses as requested.

□□A mix of employment generating uses such as business use (Class B1), retail use (Class A), community use and leisure (Class D), including education and health uses and hotel use (Class C1), and residential use (Class C3). Within a balanced mix of uses pProposals should maximise the amount of employment which can be generated and the contribution to the regeneration of the town centre resulting from:

- The economic benefit of the proposals, including their potential to increase the turnover of the town centre and attract inward investment into other businesses...

- Creating a mixed and balanced community so that people can have access to local housing and jobs by locating residential uses within the town centre and adjacent land.

In assessing the maximum amount of employment which can be generated and contribution to regeneration, we will take into account:

- Demand for floorspace at the time of an application being submitted.

- Phasing: the ability of the market to absorb new floorspace and also the potential for demand to change over time.

- Financial vitality."

Reason

For the avoidance of doubt and to ensure that whilst employment uses are required, the designation is not prescriptive on the type of employment uses being proposed and that no one specific use is required. As currently drafted the site allocation is contrary to paragraphs 14 and 150-182 of the NPPF which require a flexible approach based on evidence. We address this point in more detail in our main text above.

To acknowledge that leisure is one of the employment generating uses and to be consisted with paragraph 7.8.55.

To acknowledge that there is currently no demand for primary or secondary education and that Kings is the sole higher education establishment to show interest in the site (as set out in our main text above).

To acknowledge the role and importance of residential in providing a mixed and balanced community with access to housing and jobs and to acknowledge the role that residential will play in delivering other town centre uses, in order to be consistent with the Development Plan.

To be clear that in assessing demand for employment uses that future demand cannot be relied upon. See comments re: Policy 25 above.

1118 591 CWAAP 24

CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH

Residential use (Class C3); Education (Class D1; Student housing (sui generis use).

Reason

To acknowledge existing education demand and to accord with the NPPF which requires development plans to be prepared having due regard to evidence. British Land considers education to be an acceptable alternative use not a required land use.

Disagree. As noted in previous comments, the priority for this site is to get a rich mix of non-residential uses in order to meet the vision and objectives.

In the council's view the policy reflects the council's ambition to maximise the amount of non-residential use which can be provided. It sets out clear criteria to ensure that where land is not required for non-residential use, it could be used for residential. The criteria which are set out reflect the guidance in paragraph 22 of the NPPF which states that where there is no reasonable prospect of a site being used for employment use, alternatives can be considered on their merits and having regard to market signals.

No change proposed.

Obj-jector no.	Rep no. Policy	Details of Representation	Officer Response to Representation
1118	592 CWAAP 24	CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH "Around 240,000 sqm of floorspace. Proposals will be assessed on a case by case basis. The number of new homes would be dependant on the amount of non-residential floorspace which is provided."	Agree. We have removed the reference to a quantum of floorspace from the text.
1118	593 CWAAP 24	CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH "We anticipate the site being delivered in phases and these phases are likely to be driven by the separate land interests." Reason To recognise that phased delivery is highly likely given the range of landowners across the site.	We agree that text around phasing should be clarified. We have added the following text on phasing: "Development will be phased with the timing for implementation of individual phases likely to be driven by a number of factors including the need to secure vacant possession, the ability to relocate of existing occupiers, the potential to tie into development on adjacent sites, delivery of infrastructure and the ability of the market to absorb new space."
1118	594 CWAAP 24	CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH In August 2011 the Daily Mail announced it would be vacating Harmsworth Quays. British Land subsequently secured the leasehold interest for the site and will be a key stakeholder in delivering the CW AAP vision and objectives. There are consented developments on Mulberry Business Park and Surrey Quays Leisure Park... Reason To acknowledge the role that British Land and the Council will play in delivering the AAP vision.	We disagree. We have updated the implementation section to refer to BL. This paragraph in CWAAP 24 however does not mention landowners. Adding a reference to BL would simply repeat text added elsewhere and is not considered to improve the policy.
1118	595 CWAAP 24	CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH Potential employment generating uses include: •□Business:... However, we anticipate that the impact of regeneration and the potential to provide complimentary uses, such as residential, retail, hotels and higher education will significantly increase the attractiveness of business space in the area, with the potential to create provided scope for significantly more space... Reason To acknowledge the role and importance of residential uses in enabling development and aiding regeneration. This is consistent with the conclusions of the Non-residential Uses Study (2012) and the London Plan. •□Schools: We are likely to need to expand primary school provision over the life of the plan. A new primary school could form part of the site proposal, although this would depend on the level of demand generated by new housing and viability. We are considering other locations for the provision of new school places and will keep the need for a new primary school on the site under review. Proposals that come forward on the site in advance of an identified demand for primary school places will be assessed on a case by case basis. Reason To acknowledge that there is no current demand for primary school places and other sites are capable of accommodating a new primary school.	We do not consider that residential is an employment generating use and therefore do not think it is appropriate to list it in this case. All planning applications are considered on a case by case basis and if there is no need for a school when an application is submitted then it will not be necessary to provide one. It is a phasing issue and a possible infrastructure requirement that we think is important to highlight.

Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
1118	596	CWAAP 24	<p>CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH</p> <p>New residential homes will be required on the site in order to deliver a mixed and balanced community and help deliver the wider regeneration benefits and enable alternative town centre uses to come forward as part of a mixed use development. also be an acceptable use. Proposals for new homes and student housing will need to demonstrate that the maximum potential for employment generating uses and contribution to the regeneration of Canada Water has been properly tested through market evidence and financial viability.</p> <p>Reason To acknowledge the role and importance of residential uses in delivering wider regeneration benefits and enabling alternative town centre uses to come forward.</p>	<p>The AAP acknowledges throughout that a significant amount of residential uses will be provided in the core area and on the proposals sites. Policy 21 specifically refers to the number of homes we want to see developed over the life of the plan. The aim of the CWAAP 24 site allocation is to guide and shape development in a way that best meets the vision and the objectives. Therefore greater emphasis is placed on the non-residential uses in the policy as these require more intervention and policy to ensure that they are delivered.</p>
1118	597	CWAAP 24	<p>CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH</p> <p>Distribution of uses across the site requires careful consideration. Non-residential uses should principally be located on the western side of the site, closest to the town centre and train/tube stations with the potential for complimentary residential units to provide a mix of uses in the area. Whereas the eastern side of the site, close to existing and proposed residential uses along Redriff Road and Quebec Way would be more appropriate for any residential housing provided.</p> <p>Reason To acknowledge residential as a suitable use for the eastern portion of the site closer to Canada Water and consistent to the proposals being put forward on Sites C and E.</p>	<p>We have proposed an amendment to the text to clarify its meaning.</p>
1118	598	CWAAP 24	<p>CHECK THE ORIGINAL COPY OF THE REPRESENTATION TO SEE TEXT WHICH IS UNDERLINED AND STRUCKTHROUGH</p> <p>“Redevelopment also provides the opportunity to address the lack of connectivity between the shopping centre and leisure use on the Leisure Park. Our preferred option is to realign the southern part of Surrey Quays Road to the east of the existing alignment...</p> <p>... The Council acknowledges that this represents a significant cost and could therefore form part of the infrastructure projects delivered by the Council’s Community Infrastructure Levy (CIL) once adopted.</p> <p>Reason It is unreasonable to consider the realignment of Surrey Quays Road as a site specific development cost. The realignment is not required to make the development acceptable (as acknowledged through the grant of planning permission for the Leisure Park site) and unless the Council assists developers in funding this work, it is unlikely to be delivered.</p>	<p>The benefits of the proposed realignment of Surrey Quays Road have been tested through the masterplanning feasibility work carried out by Benoy (in preparing the adopted plan) and also by Hawkins Brown. The proposal was also tested through informal consultation carried out in preparing the revised draft AAP and met with a positive response. The council considers that a requirement to carry out this work is in the interest of the proper planning of the area. The council included the cost of realigning the road as a development cost in the financial appraisal carried out in support of the Hawkins Brown study and the council is confident therefore that it is capable of delivery.</p>
1118	599	General	<p>We request that we are kept informed with the progress of the draft APP and reserve our right to prepare additional representations as they may be required and to appear at the Examination in Public in due course.</p>	<p>Noted.</p>

Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
1120	630	Policy 12	I don't believe renovation will be sufficient; a brand new leisure centre is required.	Noted. The council has committed to refurbish 7 Islands to extend its life by up to 10 years. The council is exploring whether a new leisure centre can be provided in the town centre in the longer term.
1120	631	Policy 17	No tall buildings should be built if they are in direct proximity to existing residential buildings or waterways, such as the Albion Canal and Canada Water Basin	There is an existing context of development at the Canada Water basin which will be the focal point of the new town centre. The key to a vibrant and successful town centre is a range of shops, leisure opportunities and businesses which create a destination. Tall buildings can provide a range of uses to help animate the base of the building and contribute to the vibrancy of the centre. They are an important source of capacity and will help deliver the range of non-residential uses which are sought by the AAP vision.
1121	651	CWAAP 2	<p>I write on behalf of my client Fairview New Homes (Fairview) in response to the above revised policy document. Fairview is a stakeholder in Canada Water as it is currently completing the purchase of the former Fisher Athletic Site on Salter Road and will be bringing this site forward for redevelopment in the near future.</p> <p>The site is the subject of Allocation CWAAP 2 in the draft document. In the adopted AAP the site is allocated for sports facilities and car parking ancillary to the use of the adjacent playing field. Other acceptable land uses are listed as residential and retail with an estimated capacity of 100 homes and 500 sq m of retail.</p> <p>We note that in the draft revised AAP although the allocation remains the same the estimated residential capacity is reduced to 80.</p> <p>We consider that this allocation should be updated to reflect the current situation which has resulted from Fairview's discussions with the Council and Fisher FC. An agreement has been reached with the Council's Estates Department and the Club that new sports facilities will now be provided at the nearby St Pauls Sports Ground and the MOL land on Salter Road will become a park. Fairview will help fund the new sports facility and park and will progress a residential scheme on the CWAAP2 site.</p> <p>As such, we consider that the wording of CWAAP2 should be amended so that the required land use is residential. Other acceptable land uses should be retail and the site specific guidance section and paragraph 7.8.1 should be amended to explain that the sports facilities will be relocated to St Paul's.</p> <p>Para 7.8.2 should also be amended by deletion of the second sentence as this point is no longer relevant.</p> <p>Finally, we consider that the estimated housing capacity should be retained at 100. We understand that the reduction to 80 was made because the consented scheme would no longer meet Council policy. However, we consider that without the need to include sports facilities on the site there is room to accommodate 100 dwellings while complying with Council policies for this suburban zone area. It is prudent to make best use of housing land and therefore no reason to lower the density of the site to only 80 units.</p>	<p>The capacity of 80 homes reflects the site's location within the suburban density zone. It is simply however an estimate of capacity. Paragraph 5.3.3. makes clear that the estimates should not be interpreted as targets to be achieved and during the EIP 2011, the inspector was clear that the capacities are neither a target nor a cap. They are helpful for us however in understanding impacts on infrastructure. These impacts are kept under review when circumstances change.</p> <p>We do not consider that the requirement for sports facilities should be removed. In principle, sports facilities should continue to be provided in the area. If a proposal comes forward to relocate facilities onto another local site such as St Paul sports ground, this can be negotiated through a planning application and secured through a s106 agreement.</p>

I would be grateful for the Council's consideration of Fairview's representations above. If you require any further information please do not hesitate to contact me.

1122	671	Policy 17	I am very concerned at the height of some of the proposed buildings. In particular those buildings which are adjacent to waterways such as the Albion Canal should not be more than 3-4 stories. I am also concerned at the proximity to existing buildings and the encroachment to existing set backs	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point of the new town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define he new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design and mitigating any adverse microclimate impacts. The provision of taller buildings over the existing and consented heights of around 20 - 25 storeys within this area is seen as an exception.
1122	672	Policy 15	I believe that permitting hawkers to set up trailers on the piazza between Montreal House and Library is contrary to upgrading of the area. It is repugnant to those who live close by and who are subjected to cooking smells and to trucks setting up and removing these trailers. I am afraid that once established these vendors are going to be difficult to remove	This response relates to an issue that is outside the scope of Policy 15. However, the provision of a street market is considered important to bring activity to the area. Issues relating to loss of amenity due to cooking smells can be investigated by council's Environmental Health team.
1122	673	Policy 17	Yes, but with the comments made previously about those adjacent to waterways etc (on page 2). I am very concerned at the height of some of the proposed buildings. In particular those buildings which are adjacent to waterways such as the Albion Canal should not be more than 3-4 stories. I am also concerned at the proximity to existing buildings and the encroachment to existing set backs.	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point of the new town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define he new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design and mitigating any adverse microclimate impacts. The provision of taller buildings over the existing and consented heights of around 20 - 25 storeys within this area is seen as an exception.

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1123	674	CWAAP 24	Yes since the area is already purely residential with no independent shops or cafes therefore there's no community feel. Also, the tube station (Canada Water) is already overcrowded every morning despite the adjacent tower not being fully inhabited. I would prefer independent shops and cafes (partly community-run) to give the area more character and give back money to the local economy (not chains)	Comments noted. AAP policies 1 and 2 support the provision of new shops, cafes and restaurants in the town centre. AAP policy 7 states that we will work with TFL to improve the frequency, reliability and quality of public transport at Canada Water. Policy 1 also requires large developments to make a proportion of shops units available to independent occupiers.
1123	675	Policy 6	Pedestrians and cyclists should have highest priority in transport planning. Public transport should be further encouraged and use of privately –owed cars discouraged	Noted. Policy 6 in the AAP seeks to improve a network of cycle and pedestrian routes.
1123	676	Policy 12	I agree that the leisure centre should be refurbished and made more attractive to visitors.	The council has committed to refurbish 7 Islands to extend its life by up to 10 years. The council is exploring whether a new leisure centre can be provided in the town centre in the longer term.
1123	677	Policy 26	Free school shouldn't replace state-run school as schools should be run centrally by the state. The secondary school on the site of primary school should be build in any case	We have updated our policies to recognise circumstances which have changed. A new school which would provide 4FE has been approved to open in September 2013 in Bermondsey. While a closer secondary school would have advantages, there is no government funding available for it. Free schools are an initiative of central government. The AAP has no influence over whether schools are free schools or otherwise.
1123	678	Policy 17	Most tall buildings, including the ugly new tower Canada Water tube, are unattractive for several reasons. They take away sunlight from the street and create a cold uninspiring living space in and around the building. To suggest that the choice is between and lower buildings and pleasant environment and lower buildings and less vibrant and attractive environment is ridiculous. I prefer low-rise buildings that atomically link with their environment from an architectural and social point of view	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point of the new town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point within the core of the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design and mitigating any adverse microclimate impacts. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception.
1123	679	Policy 2	The area need restaurants, cafes and community space as well as independent shops to provide retail opportunities, community space and community atmosphere, green spaces should be created as well as pedestrian and cycling paths	We agree. Policy 2 seeks provision of more cafes and restaurants in the town centre. Policy 1 states that in large retail developments, a proportion of shop units should be made available to independent

Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
				operators. Policy 27 sets out our strategy for community uses. Generally we have reviewed the plan to assess the infrastructure that is needed to support development.
1123	680	Policy 20	Low carbon building and energy efficient building should be encouraged! The council could demand of developers to build eg. 50% of the new buildings as low carbon builds with double-triple-glazing, wall and roof insulation. New public building in particular, should be powered partly or fully by renewable energy. (I never understood why the new library at Canada Water is not covered by sola panels. The design of the library seems perfect for the installation of such panels) I'm sure the council does officially claim to support climate change mitigation. I don't see this happening anywhere in the borough at the moment	Our planning policies in the Core Strategy require new homes to cut CO2 emissions by 40% over the Building Regulations and by 2016 all homes will need to be carbon zero. Our policies also require developments to reduce CO2 by 20% using renewable energy technologies. Solar water heating and a ground source heat pump were installed in Canada Water library. These provide hot water and heating and aim to reduce CO2 emissions by 10% (which was the target in place at the time the buildings was approved). These were assessed as the most cost effective means of reducing CO2 using renewable technologies.
1124	681	CWAAP 24	As long as the area does not become just another `cloned' high street, with canyons between high-rise buildings	Comment noted. AAP policies 1 and 2 support the provision of new shops, cafes and restaurants in the town centre. Policy 1 also requires large developments to make a proportion of shops units available to independent occupiers.
1124	682	Policy 6	As a local cyclist myself, I am all in favour of local designated cycle routes	Our priority is to create conditions on the road which are safe for cyclists and pedestrians. However, there may be some cases where segregation is appropriate and these will be assessed on their merits.
1124	683	Policy 26	I am opposed to the priciple of free schools	Free schools are an initiative of central government. The AAP has no influence over whether schools are free schools or otherwise.
1124	684	Policy 17	Already new tall buildings, such as the Ontario tower, dominate what was designed to be a low-rise, human-size living environment. Such plans as the proposed high-rise (40-storeys?) development on the decathlon site, are totally out of proportion to the area	The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and surrounding public spaces as the focal point of the new town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an

1125	685 General	<p>First of all, my main impression about Canada Water AAP is that reflects an old view way of making business: building houses and retail shops, importing people from abroad, to create (unsustainable) growth !</p> <p>With regards to AAP, in my opinion, there is a fake assumption about Southwark Park: it is not part of Rotherhithe but it belongs to Bermondsey (East and South) which deserves it as it is the last left !</p> <p>Then it would be more correct changing the wider AAP area borders: Rotherhithe ends at Lower Road.</p> <p>It seems clear to me the intent to show off an area with a lot of green spaces to justify an aggressive speculation property policy which will change dramatically the landscape and lifestyle in Rotherhithe.</p> <p>And we have already a taste of it around Canada Water and other locations in Rotherhithe.</p> <p>And the sentence. repeated more time in different forms, in the document: “ There is significant need for more affordable housing in the area, with average property prices in 2008, being around 8 times the average earnings of someone working full-time in the Southwark.” is just to enforce that (fake) certainty !</p> <p>And, still in my opinion, it is a no sense sentence like</p> <p>“• There is a need for more family sized homes to help ensure that the area is attractive for families. This was strongly supported by the local community during consultation” when the vast majority of property built and planned are one or two bedroom flats!</p> <p>And reading “• There are several pockets in the AAP area, particularly in Rotherhithe ward in which health education and multiple deprivation levels are higher than the Southwark and UK average.”</p> <p>I didn't know to live in a such poor area. Are you sure about that or do you copy and paste something regarding Peckham or Lewisham or Catford ? Or maybe it is just a lapse revealing what will be Rotherhithe in the future, destroying what is now one of the best places in the Southwark where to live.</p>	<p>exception.</p> <p>The AAP contains a strong vision to guide growth in the area. The council recognises that more affordable housing is needed and the plan puts in place a policy that requires 35% of homes to be provided as affordable housing. The majority of that housing would be made available to people who cannot afford to buy on the open market. Likewise, the plan also recognises that more family housing is required and put in place a policy to boost the proportion of family housing in new development to 20% or 30%. This was introduced in 2011 and applies to developments approved after that date. The reference to pockets of deprivation reflects factual data gathered through the census and through other channels, such as the national indices of deprivation.</p>
1125	686 Policy 1	<p>However, reading “ our retail study shows that most people in Southwark go outside the borough to shop for things like clothes, shoes, music, books and electronic equipment” you simply show no consideration has been made about the (growing for real) online shopping. We are in the internet era and you simply ignore it.</p> <p>And then why the only (without competitors) electronic equipment Currys shop in the Surrey Quay Shopping Center shut down recently ?</p>	<p>The council recognises that the way in which people shop is changing. However, there is still a significant amount of expenditure generated in Southwark which is spent in shops and Southwark's aspiration is to capture more of this in the borough which will boost choice for local residents and reduce the need to travel elsewhere. Of course, it is also recognised that Southwark will not compete with the west end or Stratford, but there is nevertheless scope to expand retail space in the borough and the quality of the retail offer.</p>

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			<p>Even foods are bought more and more online thanks also to the home delivery. Maybe the only shop missing is to buy shoes and clothes just because it is no possible, generally, buy them online !</p>	
1125	687	Vision	<p>With those preliminary remarks some sentences contained in PART 3 OUR STRATEGY FOR CANADA WATER are, for me, no sense and contradictory.</p> <p>“Development will meet the highest possible environmental standards to help tackle climate change, improve air quality”</p> <p>“Rotherhithe should be a desirable place to live, particularly for families, and promote healthy lifestyles.”</p> <p>I didn't know crossing out the green space and incrementing the traffic by at least the double you can achieve the “improvement of the air quality”, and “promoting the lifestyle quality” packing people in small flats with no green space for the children ! And is that, by chance, also very good to fight against the growing children and adult obesity ?</p> <p>What I like in your planning is at least your efforts to improve the use of the bikes and the make more enjoyable the path along the Thames river. And it has been very good also put in place outside gym equipment, at South Park and along the Thames River, for example.</p>	<p>Support for promoting cycling and the Thames path is noted. Our policies on housing seek to ensure that at least 20% or 30% of homes have three or more bedrooms and that the majority have two or more bedrooms. This together with other measures including provision of new school places will help the area become more desirable for families. Canada Water is located in an air quality management area and all planning proposals have to demonstrate that they will not result more air pollution and they should preferably improve it.</p>
1125	688	Policy 26	<p>And eventually I have found a sentence I really like: “..., we will consider building a new secondary school provision to meet the forecast need for places”</p> <p>and fortunately “4.7.9 Our preferred site for the new secondary school is the Rotherhithe Primary School site. It is a site which meets minimum size requirements, has good transport links, has good access to other amenities such as open space and leisure facilities and is in council ownership. If the new school is built on our preferred site, it will also allow us to rebuild Rotherhithe primary school.</p> <p>We will also explore ways of linking together the schools of Rotherhithe in a form of federation should the governors of the school wish it.</p> <p>“</p> <p>has been already crossed out because, despite the name Rotherhithe Primary, is not located in Rotherhithe and south Bermondsey has got already two secondary schools: Compass and City of London Academy.</p> <p>A new secondary school, for many reason, has to be built in Rotherhithe from scratch: there is only one secondary school (Bacon's) with its specific policy allowing only few local pupils to get in there.</p> <p>And maybe even the 5 primary schools could be not enough for the future, as the growing population in the area.</p>	<p>We have updated our policies to recognise circumstances which have changed. A new school which would provide 4FE has been approved to open in September 2013 in Bermondsey. While a closer secondary school would have advantages, there is no government funding available for it.</p>

However even if Bacon's would change dramatically its policy collecting only local pupils, that would not be enough, considering how many people have already moved in Rotherhithe and many others will arrive when others new buildings will be completed.

1125 689 Policy 12

With regards to
Policy 12: Sports facilities
We will support improvements to sports facilities. As part of this, we will
"• Refurbish the Seven Islands leisure centre and consider long term options for the provision of sports and leisure facilities.
"

I would say that Seven Islands leisure centre has sited in a wrong location with a lot of traffic and pollution.

Well, before say my ideas, I am asking you:
Which is one of the main "oil" source for UK economy ? I believe the most of the foreigners come here to learn English.

My idea is building before anything else in Rotherhithe a new secondary with an excellent sport centre and two hotels (one economic, affordable, for the youth), creating a fantastic place for summer international campus to learn English and practise sports for young people coming from all over the world and, first of all, Europe.

"Learning English doing sports in a fantastic central location in London" could be the motto ! And also Decathlon will thank you for this.

For two months during the summer and, maybe, other 15 days during the Easter period, this would create much more money and jobs for the local community than your planning.
I have heard a student just to study two weeks in central London spends more than two thousand pounds.

Imagine thousands of young students, some with their parents what could be for the local pubs, the leisure park centre (bowling, cinemas, restaurants, etc) already available in the area !

Think about how many things Rotherhithe has already got and totally unknown even to Londoners: a fantastic walk along the Thames River, an Ecological Park (which should be extended and not assaulted as you have allowed with the Redwood park project), the already mentioned Leisure Park Centre, and with good transport link to the rest of London already available.

And for the rest of the year, those facilities would be available for the local young people, who, at the point, could excel in the school results as well as in the sports !
While the hotels could be used by businessmen as reaching the City or Canary Wharf is very easy even by the Thames Clipper ferries.

Creating then a new Seven Island Leisure centre with a new swimming pool in the heart of Rotherhithe, without wasting money to refurbish it, because it is a wrong location along the very busy Lower Road, you free up a place for a fantastic place to retail shops to sell for example,

Noted. The council has committed to refurbish 7 Islands to extend its life by up to 10 years. The council is exploring whether a new leisure centre can be provided in the town centre in the longer term. The plan would support new teaching and education facilities. The council is promoting the provision of a new university campus in the area.

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			shoes and clothes (like a Mark & Spencer): a shopper can simply stop, buy and go quickly and without importing useless traffic in Rotherhithe.	
1125	690	CWAAP 24	<p>The heart of "my" project would be centred around key site of Harmsworth Quays Printworks for the secondary school and the new Seven Island Sport Centre. From there, building the hotels would be the second part of the project.</p> <p>Ask above English and local people if they prefer to work for few pounds a hour in a shop or well paid for teaching English or organize sport events for young foreigners. Ask local pubs and leisure centre owners and Decathlon what they prefer between my idea and your planning.</p> <p>Ask the local community, especially the families with children.</p> <p>It is likely that such a kind of business requires private funding and management, possibly keeping the secondary school public, otherwise let other private entrepreneurs can create an independent school.</p> <p>Only after that all this is in place, you can evaluate to build tall buildings and new shops carefully, because when the green spaces are gone, are gone forever, destroying the quality of the air, the lifestyle of the local people.</p> <p>When I say to Londoners we live in Rotherhithe, they ask me: Rotherhithe ? Where is it ? You have a fantastic opportunity to get know Rotherhithe as an excellence in the sports, schools and English learning centre in central London, leaving to others old and ridiculous ideas to create jobs and affordable houses when their purpose is simply allowing builders making money in short terms and leaving the troubles for the locals.</p> <p>Another serious way to create jobs is to develop high tech companies but this is another story.</p> <p>I hope will not waste a fantastic opportunity for Rotherhithe area and for the Southwark in general and you will you evaluate my proposals with attention.</p>	<p>The Council has considered a range of options for how Harmsworth Quays might be redeveloped and the revised AAP sets a broad framework which will enable development to come forward. There have been a range of consultation events and activities with local residents. We attended the local consultative forum, Bermondsey Carnival and had drop in sessions at the library and the shopping centre. There will be more consultation as the AAP progresses and also on each individual planning application as sites come forward.</p>
1126	691	General	The first thing to say is that I am looking forward to the redevelopment of Canada Water - I think there is huge potential. A few points below:	Support is noted.
1126	692	Policy 26	<p>Education</p> <p>I would note that contrary to the report, Bacon's College has lower rate of GCSE 5A*-C than the national average (though it does better when taking account of English and Maths). An investment in the education system of the area is important for both children's wellbeing and making the area attractive to families. I could not see a clear plan for the set up and creation of a new school in the Canada Water AAP. Could this be made more clear?</p>	<p>We have updated our policies to recognise circumstances which have changed. A new school which would provide 4FE has been approved to open in September 2013 in Bermondsey. While a closer secondary school would have advantages, there is no government funding available for it.</p>
1126	693	Policy 1	Shopping	<p>We agree. AAP policy 2 supports provision of new cafes and restaurants in the town centre. Policy 1 supports an expansion of retail spaces and requires large developments to make a proportion of shops</p>

I fully appreciate the need for big shops to attract a larger foot fall to the new town centre, however there needs to be a clear plan for attracting a number of independent outfits (shops, cafes and restaurants). There is not the space for Canada Water to compete effectively with large town centres like Westfield Stratford (6 stops away) so instead it should seek to attract people for the mix of independent and commercial shops not available in the big shopping centres. Independents would also give Canada Water a culture which homogenised high street shops cannot.

With KCL building student housing in the area (and a possible campus) there will be an increase in the number of 18-25s in the area. This means a need for small coffee shops and other "meeting" places. Students are generally willing to travel to meet friends, so the question of why would they meet in Canada Water (as opposed to, say, Brixton, London Bridge or Dalston) needs strong consideration.

I think the idea of a market is fantastic!

units available to independent occupiers.

1126 694 Policy 6

Transport links

There needs to be some thoughts as to how to ensure cars stop at zebra crossings. The Zebra crossings are poorly marked and drivers do not expect them (especially those at the roundabout at the top of lower road; by Rotherhithe tunnel), which poses a risk for both pedestrian and driver.

There is also a sore need for a pedestrian route across the Thames between Tower Bridge and Greenwich foot tunnel.

Policy 6 provides support for a new Thames Crossing to Canary Wharf. This proposal was sponsored by Sustrans. However, it currently has no funding. The location and design of zebra crossings is beyond the scope of the AAP. However, the comment will be passed on to the council's Environment department.

1126 695 Policy 17

Building Heights

To avoid eyesores (like Elephant and Castle) the overall height of the area should not rise any higher than the new Ontario Point tower. Design should also be in keeping with this and therefore I strongly object to the creation of a large tower in the centre of Canada Water.

I hope you will take these points on board.

The availability of Harmsworth Quays for development creates the scope to expand the town centre eastwards and bring in new land uses, such as business and higher education, and provides an opportunity to rethink the approach to town centre development. It is our view that taller buildings will be appropriate in important locations in the town centre, where they reinforce the character and function of the centre. In particular the tallest buildings will help to define the importance of the Canada Water basin and new surrounding public spaces as the focal point of the new town centre. The area considered appropriate for tall buildings is the proposed town centre, with the area that we identify to the east of the Canada Water basin around appropriate for heights around 20-25 storeys. Within this area identified for 20-25 storeys, illustrated in Figure 9, tall buildings will help to define the new town centre. Any new development within this area identified would have to comply with the criteria set out in the policy which includes high quality design. The provision of taller buildings over the existing and consented heights of around 20 -25 storeys within this area is seen as an exception.

1127 379 CWAAP 24

Retail should be added on ground floors

We agree. The AAP supports the provision of new retail in the town centre and proposes to extend this to cover part of CWAAP 24

Obj-jector no.	Rep no.	Policy	Details of Representation	Officer Response to Representation
1127	380	CWAAP 24	We think it is a good idea to add the king's college university to the area.	We agree. The AAP supports bringing a university to the area.
1127	381	Policy 6	They should try to promote cycling in the area	We agree. Policy 6 in the AAP promotes cycling in the area.
1128	377	CWAAP 24	The area is already very densely populated and lacks a high street	Noted. The council's aspiration is to transform what has historically been an out-of-centre destination into an environment which feels like a town centre.
1128	378	Policy 17	Tower blocks do not seem to stand the test of time well and it seems unnecessary to build more.	Any new tall buildings would have to comply with the criteria set out in the policy which includes high quality design and sustainable construction.
1182	700	CWAAP 1	<p>I wanted to write as I have recently had a look at the Canada Water AAP. I read that it was noted that St Paul's Sports Ground is no longer being used. I live very near this sports field. I wanted to point out to you that it seems to me that this site the is being used for sport/leisure/recreation and is appreciated as an accessible and free open space.</p> <p>It's a safe place to jog (as it is not hidden from view by trees or anything else) and I see people playing football in there etc. I also like the peace created by an undeveloped field in that spot.</p> <p>Please bear this in mind when making decisions for this site.</p>	St Paul's sports field is allocated in the plan for open space uses and possibly a community use. Any future use of the space should be compatible with those uses. The council's aspiration is to see it used more effectively than it is currently used.