

Representation	Officer Response
<p data-bbox="188 316 891 343">NSP01 Site Bordering Great Suffolk Street and Ewer Street</p> <p data-bbox="188 355 651 419">Organisation: River Court &amp; Doggett's NSPPSV124.3</p> <p data-bbox="188 467 1361 671">RE: New Southwark Plan: Proposed Submission Version – Consultation These representations have been submitted by HGH Planning on behalf of the freehold owners of River Court and the Doggett's Coat and Badge Public House ("the Client" and "the Site") in response to the consultation on the proposed submission version of the New Southwark Plan ("NSP"). They should be read in conjunction with our previous representations which have already outlined the suitability of the Site as a strategic allocation.</p> <p data-bbox="188 716 291 743">The Site</p> <p data-bbox="188 754 1348 1034">The Site occupies a strategically important gateway site, adjacent to Blackfriars Bridge, fronting the River Thames. Both buildings comprise concrete structures built in the late 1970's as part of the larger King's Reach development designed by R Seifert &amp; Partners. Originally designed as a hotel, the building was later given over to offices but now forms private residential accommodation of up to 12 storeys with some private amenity space and basement parking. The public house comprises a four-storey building adjacent to Blackfriars Bridge with some terracing running along the River Thames walkway. Neither building is of architectural merit, and neither has aged well.</p> <p data-bbox="188 1078 1361 1142">Indeed, it is fair to say that both buildings look rather dated in comparison to the newer structures (built and permitted) nearby.</p> <p data-bbox="188 1187 369 1214">Policy Context</p> <p data-bbox="188 1225 1357 1425">The Site is located within both the Central Activities Zone ("CAZ") and the Bankside, Borough and London Bridge Opportunity Area ("BELBOA") as identified in both the adopted (March 2016) and emerging (December 2017) London Plans. The draft New London Plan in particular talks about the importance of enhancing the strategic functions of the CAZ as an internationally important residential and office location; and the drive to meet or, where appropriate, exceed the indicative guidelines for housing and employment capacity within Opportunity Areas.</p>	<p data-bbox="1391 467 1783 494">Representation has been noted.</p> <p data-bbox="1391 539 2056 743">The proposed site has been examined for its development potential using the criteria set out in the Sites Methodology Report. The site was considered to be small and without a clear opportunity for major intensification. Any redevelopment of this site could be achieved under other NSP policies.</p> <p data-bbox="1391 788 2047 922">Site allocations and area visions have gone through a rigorous process of being decided which is reflected in our sites methodology paper. All evidence base will be available online.</p>

This is therefore a location where massive change is expected and already under way as evidenced by a number of existing consents and construction activity for various major developments.

The Site is located within the Blackfriars Road area of the emerging New Southwark Plan which states:

“Blackfriars Road is part of central London and will provide many new homes, commercial spaces and

other uses on major development sites as well as on smaller sites.”

Further to this, the Site is specifically identified as a “potential development site” within the Council’s Blackfriars Road SPD and there are no obvious planning or other constraints to its redevelopment for different uses. Indeed, it provides opportunities for significant benefits, including but not limited to:

- Ø A high-quality work of architecture;
- Ø Replacement of the existing public house on-site, with a modern, attractive and functional public house designed to reflect the local historic context but with a prominent design;
- Ø Considerable public realm improvements, including:
  - o Enhancement of the Thames Path;
  - o Better vertical connectivity between the Thames Path and Blackfriars Bridge;
  - o Creation of a public outdoor space;
  - o Public performance space, representing a new destination;
  - o Public terraces enabling enjoyment of celebrated views towards the City, St Paul’s and the Temple;
- Ø Either a significant number of residential units (including affordable housing) or the provision of high-quality office floorspace on upper floors; and

The site therefore represents an as-yet, unexploited opportunity to contribute positively to the prominent regeneration process in this part of Southwark for either residential or office uses in line with adopted and emerging policy. It represents a fantastic redevelopment opportunity for a high-quality and sustainable development in a recognised and central gateway location.

With this policy context in mind (and following a significant level of promotion by the landowners to-date) it is curious why the draft New Southwark Plan (“NSP”) does not allocate the Site for development. We set out below our response to the Site’s omission from the NSP and respectfully

request that the Council reconsider its position.

#### New Southwark Plan

Despite previous representations stating the deliverability of the Site, the Council's Site Allocations Methodology

Report has discounted it:

"NSP1 (NSPOV) – River Court and Doggetts Coat and Badge Public House: Small site without the clear opportunity for major intensification where acceptable redevelopment could be achieved under other NSP policies."

This brief assessment of the Site appears to ignore previous representations submitted on behalf of the landowners which clearly indicate the significant development potential of the Site. It is also curious why a site that is explicitly identified as a "potential development site" in the Council's own Blackfriars Road SPD has been so quickly discounted. There are no major constraints to development. Furthermore, there are obvious opportunities for major intensification. The Site's existing use fails to optimise its true development potential which is significant given its highly accessible location and supportive policy basis. This is evidenced by the extent of major redevelopment proposals either consented and underway in the surrounding locality. It is therefore requested that LB Southwark (or the Examining Inspector) re-examine the Site's development potential with a view to including it as a major allocation for either residential-led or office-led development. The brief statement detailing the Site's omission within its methodology report is both insubstantial and incorrect and should be rectified.

Organisation: Thames Water Utilities Ltd  
NSPPSV184.17

On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.

Noted. Notwithstanding the above, applicants will still be notified to consult with Thames Water.



Representation	Officer Response
<p data-bbox="188 316 495 344">NSP02: 62-67 Park Street</p> <p data-bbox="188 357 562 421">Organisation: Historic England NSPPSV83.12</p> <p data-bbox="188 466 1111 600">In line with comments above, we consider the policy text referring to ‘taller’ buildings to be problematic given the sensitive location of the site. Further analysis of likely impacts (including cumulative effects) is required before tall buildings on these sites can be included.</p>	<p data-bbox="1137 466 2067 708">Proposals for tall buildings will be assessed on a case by case basis and will be subject to the criteria set out in P14 which would require a tall building to be considerate to the local distinctiveness of the area and by extension the cumulative impact of tall buildings on the local distinctiveness of the area. The detail of heights however shall not be covered in the NSP as it is a strategic policy document, but where tall buildings are suggested on site allocations the associated area visions AAP or SPD will provide more details.</p>
<p data-bbox="188 721 689 785">Organisation: Thames Water Utilities Ltd NSPPSV184.18</p> <p data-bbox="188 829 1039 893">On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.</p>	<p data-bbox="1137 829 2067 893">Noted. Notwithstanding the above, applicants will still be notified to consult with Thames Water.</p>

Representation	Officer Response
<p data-bbox="188 316 472 343">NSP03: 185 Park Street</p> <p data-bbox="188 357 562 421">Organisation: Historic England NSPPSV83.13</p> <p data-bbox="188 467 1111 600">In line with comments above, we consider the policy text referring to ‘taller’ buildings to be problematic given the sensitive location of the site. Further analysis of likely impacts (including cumulative effects) is required before tall buildings on these sites can be included.</p>	<p data-bbox="1140 467 2063 707">Proposals for tall buildings will be assessed on a case by case basis and will be subject to the criteria set out in P14 which would require a tall building to be considerate to the local distinctiveness of the area and by extension the cumulative impact of tall buildings on the local distinctiveness of the area. The detail of heights however shall not be covered in the NSP as it is a strategic policy document, but where tall buildings are suggested on site allocations the associated area visions AAP or SPD will provide more details.</p>
<p data-bbox="188 719 689 783">Organisation: Thames Water Utilities Ltd NSPPSV184.19</p> <p data-bbox="188 829 1111 1326">The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water at an early stage to review infrastructure requirements taking account of the scale of development and timing of delivery.</p>	<p data-bbox="1140 829 2051 892">Noted. Applicants of major developments will be advised to consult Thames Waters’ free pre-application advice at the earliest stage.</p>

Representation	Officer Response
<p data-bbox="181 248 851 284">NSP04: London Fire and Emergency Planning Authority</p> <p data-bbox="181 288 940 359">Organisation: London Fire and Emergency Planning Authority NSPPSV51.1</p> <p data-bbox="181 395 1108 571">We write in order to make comment on the above named document. Please note that we act on behalf of the London Fire And Emergency Planning Authority (LFEPA) and that this representation is made on their behalf. For your information the following LFEPA sites are within the borough:-</p> <ul data-bbox="181 576 1108 751" style="list-style-type: none"> <li>☒ Dockhead Fire Station – 8 Wolseley Street, SE1 2BP.</li> <li>☒ Old Kent Road Fire Station – 405 Old Kent Road, SE1 5JH.</li> <li>☒ Peckham Fire Station – 78/80 Peckham Road, SE5 8PR.</li> <li>☒ Former Southwark Fire Station and Training Centre – 94 Southwark Bridge Road, SE1 0EG.</li> </ul> <p data-bbox="181 794 1108 1042">Further to our previous representation, dated 13th June 2017 (copy attached for ease of reference), we again note that the former Southwark fire station and training centre has been included as an allocated site (NSP04) within the Bankside and The Borough area. As previously reported, our client is generally supportive of this site being included as a potential development site. However, we note that some factual inaccuracies still remain in the current drafting, as follows:-</p> <p data-bbox="181 1082 1108 1225">1.0 The site boundary is incorrect and should include the former Fire House, situated on the Sawyer Street boundary of the site. Please find attached a further copy of the correct boundary of the site, for inclusion within the document.</p> <p data-bbox="181 1265 1108 1367">2.0 The site area is inconsistently listed. The site totals 0.88 hectares (2.17 acres) or 8,800 square metres, which is the figure that should be included under the 'Site Area' section.</p>	<p data-bbox="1128 395 1982 466">Representation is noted and relevant changes will be made to the site allocation. The site boundary and site area has been amended.</p>

<p>3.0 It is incorrect to list the site's existing use built area as being 8,914 square metres. It is 11,664 square metres.</p>	
<p>Organisation: Education and Skills Funding Agency NSPPSV55.4</p> <p>8. The ESFA supports the continued inclusion of requirements for new or expanded schools in site allocations NSP04, NSP10 and NSP40 and supportive statements on provision of school places in area visions AV.05, AV.06, AV.07, AV.12 and AV.14.</p>	<p>Support noted</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.20</p> <p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage.</p>
<p>Organisation: TfL City Planning NSPPSV181.11</p> <p>Specific mention could be made of the need to protect/enhance CS7</p>	<p>Representation is noted and CS7 has been added to the design guidance of the site.</p>

Representation	Officer Response
<p><a href="#">NSP05: 1 Southwark Bridge and Red Lion Court</a></p>	
<p>Organisation: Historic England NSPPSV83.14</p> <p>Similar considerations to NSP02 &amp; 03 apply here. The design and accessibility text is incomplete as it fails to mention the close proximity of the Thrale Street conservation area at the southern edge of the site, and does not make any meaningful use of the range of heritage assets in setting out parameters to guide likely development. This means the reference to taller buildings is again unspecific and requires further information to be clear about likely impacts of such development.</p>	<p>Proposals for tall buildings will be assessed on a case by case basis and will be subject to the criteria set out in P14 which would require a tall building to be considerate to the local distinctiveness of the area and by extension the cumulative impact of tall buildings on the local distinctiveness of the area. The Thrale Street Conservation area has been added to the site allocation.</p>
<p>Organisation: TfL City Planning NSPPSV181.11</p> <p>Specific mention could be made of the need to protect/enhance CS7, as per NSP04 (fire station site).</p>	<p>Representation is noted and CS7 has been added to the design guidance of the site.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.21</p> <p>On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.</p>	<p>Noted. Notwithstanding the above, applicants will still be notified to consult with Thames Water.</p>

Representation	Officer Response
<p data-bbox="188 316 477 343">NSP06: Landmark Court</p> <p data-bbox="188 355 568 419">Organisation: TfL City Planning NSPPSV181.12</p> <p data-bbox="188 464 1099 528">This is a part/wholly TfL-owned site, so TfL Commercial Development would be best placed to provide comments.</p>	<p data-bbox="1137 464 1227 491">Noted.</p>
<p data-bbox="188 539 725 603">Organisation: TfL Commercial Development NSPPSV182.1</p> <p data-bbox="188 647 1115 1430"> We welcome some of the proposed changes to this draft allocation which were made in response to our previous representations, particularly in relation to the removal of reference to the quantum of floor space and the deletion of indicative through-routes.  However, there appears to be an error within the latest draft wording which includes both of the following headings in relation to land uses:  “Redevelopment of the site must...”; and  “Redevelopment of the site should...”.  In previous versions of the draft Plan, new housing was not a requirement for development of this site. For instance, it was listed under “Other acceptable uses” in the June 2017 consultation version of the draft Plan, which we supported because the policy wording recognised that the site should deliver principally commercial floorspace, but with the potential to also deliver new homes. Such flexibility should be maintained for this CAZ commercial development site. Therefore, in the interests of clarity, consistency and flexibility, the current ambiguous wording (with both headings having a very similar meaning) should be corrected so that the second heading reads:  “Redevelopment of the site should may...”  The draft vision also records that any redevelopment should include active frontages on Southwark Street; as the intention is to encourage greater north-south connectivity, there is scope for the active frontages to penetrate the site in some parts, such that the phrasing should be amended to “include </p>	<p data-bbox="1137 647 1440 675">Representation is noted.</p> <p data-bbox="1137 719 2040 818">It is considered housing should remain as a ‘should’ requirement which is consistent with other sites in the CAZ to reflect any potential for mixed use development. Commercial development is prioritised in the site allocation.</p> <p data-bbox="1137 863 2013 927">Street frontages on Southwark Street are included on the site allocations map.</p> <p data-bbox="1137 971 2063 1035">The Crossbones Graveyard is designated as open space and so is not included in the site allocation as part of the redevelopment of the site.</p>

<p>active frontages mainly on Southwark Street”.</p> <p>We note that a partial change has been made to the red line boundary of the site allocation. However, as previously stated, the boundary should encompass all of TfL’s ownership, including the Crossbones Graveyard. This will form part of our landholding for future comprehensive development and provides the opportunity for provision of improved open-space, accessible to the public as part of the setting for development and contributing towards good placemaking.</p>	
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.22</p> <p>On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.</p>	<p>Noted. Notwithstanding the above, applicants will still be notified to consult with Thames Water.</p>
<p>Organisation: U and I Group PLC NSPPSV197.2</p> <p>Comprising a surface level car park and falling within the Central Activities Zone, Bankside and Borough District Town Centre and the Bankside, Borough and London Bridge Opportunity Area, the Landmark Court site represents a prime opportunity for redevelopment and can make a significant contribution towards regeneration and placemaking.</p> <p>The allocation for the site embraces this, seeking to optimise the provision of new homes and jobs and to ensure that redevelopment integrates the site with the surround area. Required and Preferred Uses</p> <p>U+I notes that the allocation for the site has changed significantly over the course of the last 12 months. The Preferred Options version of the NSP (February 2017) required the provision of homes on the site and noted that new employment space may be provided. This differs from the approach set out now in the Proposed Submission version of the NSP which ‘flips’ the priorities for the site –stating that redevelopment “must provide at least 50% of the development as employment floorspace” and “should provide new homes (C3)”. Additionally, the allocation requires that active frontages</p>	<p>All site allocations currently illustrate the area of the site and the existing use. All development capacities are indicative and this is outlined in the Sites Methodology Report which will be made available online along with the rest of the evidence base.</p> <p>Employment uses refers to B class uses and this has been added to the site allocation for clarification.</p> <p>As Crossbones Graveyard is designated open space it is not considered as part of the site allocation.</p>

are provided on Southwark Street through the introduction of ground floor town centre uses (A1, A2, A3, A4, D1, D2).

For the avoidance of doubt and to ensure that the draft allocation is effective, “employment floorspace” should be defined by NSP06. Recognising the site’s location within the Central Activities Zone and Bankside and Borough District Town Centre (where a broad range of non-residential uses are supported in principle), we suggest that employment uses are defined as uses falling within Use Classes A1, A2, A3, A4, B1, D1 and D2.

#### Quantum of Development

Whilst the Proposed Submission version of the NSP does not specify an indicative development capacity of the site, earlier versions of the allocation had identified capacities for non-residential and residential uses, as noted below:

Table 1.1. NSP – Indicative development capacity of the Landmark Court site

NSP Publication Date	Residential Capacity	Non-Residential Capacity	Other Acceptable Uses
February 2017	227 homes	474sq.m (A1-A4, B1, C1, D1, D2)	A1-A4, B1, C1, D1, D2
June 2017	N/A	12,251sq.m (B1)	2,450sq.m (A1-A4, D1, D2) Housing (C3) Hotel (C1)

These earlier versions of the NSP demonstrate that the site has significant capacity to provide new homes and jobs. Nevertheless, U+I supports the omission of a specified development quantum and considers that the proposed approach will more appropriately allow for the capacity of the site to emerge from a design-led assessment of the site’s context and constraints.

#### Site Boundary

The boundary of the proposed Landmark Court site allocation currently excludes the Crossbones Graveyard.

Adjoining the southern boundary of the site, the Crossbones Graveyard is proposed to be designated as Other Open Space (OS219) in the NSP and is identified as having potential as a park to meet projected quantity deficiencies in the Southwark Open Space Strategy (2013). It was also earmarked for improvement in the Core Strategy (2011).

The draft Landmark Court allocation (NSP06) notes that the Crossbones Graveyard is an undesignated heritage asset and that the Landmark Court site falls within its setting.

As residential and employment development is encouraged on the Landmark Court site, there is an opportunity for the Crossbones Graveyard to be improved and enhanced as part of the development proposals – providing amenity for residents, workers and improved open space for the local community. As the open space also falls within TfL’s ownership, inclusion of it within the allocation for Landmark Court would represent the most appropriate strategy for improving the Crossbones Graveyard, thereby enabling a comprehensive regeneration scheme to come forward.

#### Concluding Remarks

U+I supports the proposed allocation of the Landmark Court site (NSP site allocation ref: NSP06), particularly the requirements for office provision and preference for new homes. Regeneration of the site has potential to make an important contribution to new homes and jobs, improving placemaking and public realm in the process. Active frontages will improve viability along Southwark Street and encourage people to enter the site.

We trust these representations will be fully considered prior to submission of the draft NSP to the Secretary of State.

Representation	Officer Response
<p data-bbox="185 316 936 343">NSP07: Land between Great Suffolk Street and Glasshill Street</p> <p data-bbox="185 355 689 419">Organisation: Thames Water Utilities Ltd NSPPSV184.23</p> <p data-bbox="185 467 1037 531">On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.</p>	<p data-bbox="1137 467 2067 531">Noted. Notwithstanding the above, applicants will still be notified to consult with Thames Water.</p>

Representation	Officer Response
<p data-bbox="188 316 521 344">NSP08: Swan Street Cluster</p> <p data-bbox="188 357 689 421">Organisation: Thames Water Utilities Ltd NSPPSV184.24</p> <p data-bbox="188 466 1115 782">Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the water infrastructure needs relating to the Local Plan.</p> <p data-bbox="188 826 1075 922">On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p data-bbox="1140 466 2042 603">Noted. The Council has met with Thames Water to discuss their representations relating to anticipated growth in terms of wastewater infrastructure. Thames Water will be consulted on formally once a detailed planning application is received to provide further comments on each site.</p>
<p data-bbox="188 973 353 1037">Individual NSPPSV319.6</p> <p data-bbox="188 1078 672 1107">[see all area visions and site allocations]</p>	<p data-bbox="1140 1078 1223 1107">Noted</p>

Representation	Officer Response
<p data-bbox="188 316 595 344">NSP09: 21 and 25-29 Harper Road</p> <p data-bbox="188 357 846 421">Organisation: DP9 on behalf of Southwark Homes Ltd. NSPPSV166.1</p> <p data-bbox="188 466 1111 705">NEW SOUTHWARK PLAN – PROPOSED SUBMISSION VERSION CONSULTATION We are writing on behalf of our client, Southwark Homes Limited, to submit representations to the Proposed Submission Version of the New Southwark Plan. Southwark Homes Limited are the developer representing the landowners of the site at 19, 21 and 23 Harper Road, 325 Borough High Street, 1-5 and 7-11 Newington Causeway, SE1. This site is included within the site allocation NSP09.</p> <p data-bbox="188 718 1079 817">We welcome the further opportunity to make representations on the New Southwark Plan Proposed Submission version. Having had regard to site allocation NSP09, we would like to provide the comments below.</p> <p data-bbox="188 829 1111 922">We support the principle of the allocation of our client’s site. The recognition that the site can include a taller building is supported alongside the overall redevelopment for a mixed-use scheme.</p> <p data-bbox="188 935 1079 1066">The allocation address should be updated to reflect all the addresses included within the site plan as 25-29 Harper Road relates to the previous Core Strategy proposal site 10P which already benefits from planning permission for 63 residential dwellings.</p> <p data-bbox="188 1078 1079 1177">On 23 February 2018, an application was submitted for the comprehensive redevelopment of the site to London Borough of Southwark for the following:</p> <p data-bbox="188 1190 1111 1423">Demolition of existing buildings and redevelopment to provide a hotel-led, mixed-use development comprising erection of ground plus part 4, part 6, part 7 and part 13 storey building with basement providing 434 hotel rooms (Class C1), 6 no. residential dwellings (Class C3), office use (Class B1), retail use (Class A1-A3) and flexible use (Class B1/ D1), 4 no. car parking spaces together with access, cycle parking, hard and soft landscaping and other associated works incidental to the development.</p>	<p data-bbox="1142 466 2024 529">Representation is noted. The site allocation will be updated to include the address.</p> <p data-bbox="1142 571 2024 670">The requirement of 50% employment floorspace necessary to meet the employment needs of the area. An evidence base for this will be provided online.</p> <p data-bbox="1142 711 2065 995">References to new visitor accommodation were removed from all site allocations in the plan with the exception of key strategic development sites in the Canada Water and Old Kent Road opportunity areas. This was due to ensuring the site allocations set out a concise list of required uses and where other uses are proposed this would be assessed against normal development management policies and in the context of meeting the requirements of the site allocation. The reference to the planning application, which is noted includes a hotel, has been added for reference.</p> <p data-bbox="1142 1037 2047 1136">An evidence base will be uploaded online along with the adopted version of the NSP. Consultation with residents and businesses are welcome and have strengthened the plan to form the current submission version</p>

We are keen to ensure maximum flexibility in relation to the mixed-use development for this site. As highlighted above, an application for a hotel-led, mixed-use scheme has recently been submitted to London Borough of Southwark. A previous version of the New Southwark Plan Area Visions and Site Allocation Preferred Options draft document also included a hotel (Class C1) as an acceptable use for the site. In the context of a live application proposing a hotel on the site, it is appropriate that the hotel use is reinstated into the site vision of the New Southwark Plan as shown in previous draft version. This will ensure that the site and wider opportunity area can reach their full potential in meeting and exceeding the targets set by the New Southwark Plan including opportunity for jobs.

In respect of the Site Vision requirement to provide “at least 50% of the development as employment floorspace” is considered too restrictive and should be amended to “provide employment generating floorspace” to allow for future flexibility in the type of uses that could be provided on site. This description should be added to the Site Vision for the NSP09 site allocation.

We support the opportunity for active frontages along Newington Causeway and Harper Road. We suggest that flexibility remains in relation to the variety of land uses in order to improve the vitality and viability of the town centre. The retail sector is currently going through changes and it is unclear how this will stand in the future. Policy should remain as flexible as possible to encourage a wide range of retailing and supporting uses within town centres to ensure the future success and growth of these areas, especially where there are other competing factors and centres close by.

We welcome the engagement that has taken place in relation to the New Southwark Plan to date and encourage the Council to continue to engage with all interested parties and landowners in the borough. We trust that these representations will be fully considered and taken into account as consideration during preparing the final New Southwark Plan.

Yours sincerely  
DP9

Organisation: Thames Water Utilities Ltd  
NSPPSV 184.25

The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered

On the information available to date we do not envisage infrastructure concerns

Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage.

Individual  
NSPPSV319.3

see all area visions and site allocations

Noted