

Representation	Officer Response
<p data-bbox="181 312 734 347">NSP15 Friars House, 157-168 Blackfriars Road</p> <p data-bbox="181 352 685 421">Organisation: AG EL Blackfriars Road B.V NSPPSV04.1</p> <p data-bbox="181 459 1115 671">We write on behalf of our client, AG EL 160 Blackfriars Road B.V, who are the owners of 160 Blackfriars Road, in response to the Regulation 19 Consultation (Proposed Submission Version) of the draft New Southwark Plan which was published for consultation on 15th January 2018 – 27th February 2018. The Site is referred to within the New Southwark Plan as Site NSP15: 157 – 168 Blackfriars Road.</p> <p data-bbox="181 710 1115 1034">Representations were submitted on behalf of our client to the Preferred Submission version of the Area Vision and Site Allocations document (February 2017). As explained in the previous representations, 160 Blackfriars Road has recently been renovated and is fully let. The area to the rear of the site forms an underutilised car park associated with the office use. The landowner has instructed a full design team to develop a hotel-led development on this underutilised land. Over the course of 2017, we have undertaken several pre-application meetings with the Council to discuss the parameters of a hotel scheme.</p> <p data-bbox="181 1072 365 1107">Site Allocation</p> <p data-bbox="181 1145 1115 1326">The current wording of Site Allocation NSP15 states that any redevelopment of the Site must: “Re-provide at least the amount of employment floorspace (B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater.”</p> <p data-bbox="181 1364 1115 1430">The site allocation then suggests that any redevelopment of the site should provide new homes (Use Class C3).</p>	<p data-bbox="1126 459 2078 890">Noted. The site has been a proposed development site in the emerging New Southwark Plan since the February 2017 Proposed Submission Area Visions and Site Allocations document and has been through two rounds of consultation. The site allocation is written assuming comprehensive redevelopment of the whole site. Therefore it assumes a mix of uses could be provided, requiring the re-provision of employment uses in line with other policies in the CAZ. The site allocation is not too prescriptive, and provides flexibility for development to incorporate a range of employment generating uses, in particular, the provision of active frontages with ground floor town centre uses A1, A2, A3, A4, D1, D2. The requirement for the re-provision/provision of employment floorspace (B class) is in conformity with the NPPF as it seeks to meet the development needs of the area.</p> <p data-bbox="1126 928 2078 1390">The site allocation in the Preferred Option version to the NSP (2015) included reference that the site ‘may’ include new homes or new visitor accommodation. Employment uses and active frontages were listed as required uses. In the NSP Proposed Submission Version (2017) the site continues to list employment uses and active frontages as required uses and the reference that the site ‘should’ provide new homes. However, 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.</p>

The principle of allocating this site for redevelopment is fully supported. However, it is requested that two key changes are incorporated into the final allocation. These are detailed below.

#### Employment Floor Space

As detailed in our previous representations to the Preferred Options version of the document, the current wording regarding the requirement for employment floorspace is too prescriptive. It does not provide suitable flexibility to bring forward proposals for a range of employment generating uses, which both complement existing uses on site and are informed by market conditions.

Paragraph 157 of the NPPF states that Local Plans should allocate sites to promote development and the flexible use of land, bringing forward new land where necessary. The Site Allocations document needs to be in accordance with the NPPF and it is not the purpose of the Site Allocations to create additional prescribed policy tests for new development proposals. Core Strategy Policy 10 already protects existing business floorspace and supports the provision of additional business floorspace. Draft Policy P26 of the draft Local Plan requires development to retain or increase levels of business floorspace. Any redevelopment of the site would need to satisfy these strategic policies.

The Council has prepared a 'Consultation Report on Preferred Option' (November 2017). In response to our previous representations, the Council stated:

"Noted. The Site Allocation has been amended to set out the need for employment floorspace in this location. Redevelopment proposals will be assessed in consideration of the merits of the scheme and any site-specific circumstances."

The Council's statement is unclear and the response in the latest Site Allocation does not reflect the necessary amendment. We reiterate our previous comments regarding the prescriptive nature of the site allocation. It is requested that the allocation is amended as follows:

"Redevelopment of the site existing buildings must:

- Contribute towards the thriving employment cluster in Blackfriars Road by providing at least the amount of employment floorspace currently on the site and satisfy other policies within the New Southwark Plan or at least 50% of the development as employment floorspace, whichever is greater;"

"New development opportunities on the site that do not include the demolition of existing buildings should complement the existing uses on the site and may include new visitor accommodation, new homes, new retail or new employment floorspace."

#### Visitor Accommodation

The previous iteration of Site Allocation NSP15 stated that redevelopment of the Site may "provide new visitor accommodation". Our previous representations strongly supported this designation and proposed use. Our client has instructed a full design team to prepare a hotel-led development and has undertaken several pre-application meetings with the Council on this scheme.

The pre-submission version of the document has omitted reference to visitor accommodation within the site allocation. No reasoning has been provided for the omission of this alternative use in the Council's Consultation Report and no representations submitted resisted a hotel use.

The site is perfectly suited for visitor accommodation. It benefits from excellent public transport accessibility, is located in a central urban location on Blackfriars Road and within close proximity to key tourist attractions. The

site is located within the Central Activities Zone (CAZ) and within an Opportunity Area. The provision of visitor accommodation in this location is supported by the London Plan and adopted Blackfriars Road SPD (2014). A hotel development is an employment generating use that will complement the wider mix of uses on Blackfriars Road.

Therefore, it is requested that reference to the acceptability of visitor accommodation on the site is included within the site allocation.

We trust that our representations for this consultation suitably reflect the aspirations for the Site and likewise the Council's wider vision for Blackfriars Road and the borough. Should you require further information or would like to discuss our representations in more

Organisation: Thames Water Utilities Ltd  
NSPPSV184.31

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

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure 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="188 317 1061 381">NSP16 Land enclosed by Colombo Street, Meymott Street and Blackfriars Road</p> <p data-bbox="188 392 685 456">Organisation: Thames Water Utilities Ltd NSPPSV184.23</p> <p data-bbox="188 501 1032 564">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="188 609 1070 705">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 501 1413 528">Representation noted.</p>
<p data-bbox="188 791 506 855">Organisation: LB Lambeth NSPPSV333.6</p> <p data-bbox="188 900 1099 995">The site is lies adjacent to the borough boundary. It is also in close proximity to the Waterloo OA, and lies to the east of Lambeth Local Plan Site 7 (Waterloo Station/Waterloo Road SE1).</p> <p data-bbox="188 1040 1088 1104">There are potential concerns about allowing visitor accommodation in this location given the significant concentration of hotels that exist in Waterloo.</p>	<p data-bbox="1140 791 2029 855">We have acknowledged the site's proximity to the borough boundary with Lambeth.</p> <p data-bbox="1140 900 2065 1216">The reasons to our hotels policy notes that we have delivered one of the highest numbers of hotel rooms in London. References to new visitor accommodation were removed from 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 including housing and offices 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.</p>

Jupiter Friars Limited are the freehold owners of Friars Bridge Court at 41-45 Blackfriars Road and received planning permission on the site in November 2016 for the demolition of existing office building (Class B1a) and redevelopment to provide a part 13, part 22 storey building plus basement comprising offices (Class B1a) with retail (Classes A1/A3 and A4) together with servicing, car parking and landscaping.

It is within this context that we welcome the opportunity to make representations on the New Southwark Plan Preferred Option Area Visions and Site Allocation.

Allocation NSP16: Land enclosed by Colombo Street, Meymott Street and Blackfriars Road includes the site at 41-45 Blackfriars Road. Whilst we understand why the sites within NSP16 outlined have been identified for development, the document does not reflect or take into account the current planning permissions or development under construction on the sites identified. It will not be possible for these sites to be developed comprehensively and the sites therefore should instead have standalone allocations to reflect their current development status and land ownership position.

As referred to above, Kennedy Wilson currently has planning permission for an office led development on the site, which is likely to be implemented. The consented use is in line with the site vision which states that development should look to “re-provide at least the amount of employment floorspace (B class) currently on site or provide at least 50% of the development as employment floorspace”, however the current consent does not include any residential. The site vision within NSP16 outlines that redevelopment of the site should provide new homes (C3). We agree that the development site has the potential to incorporate some residential use, however we do not consider this should be an absolute requirement and that there should be flexibility in the site allocation in relation to the mix of uses.

Representation noted.

The relevant planning application has been included within the site requirements.

The separate land ownership parcels are acknowledged. It is appropriate to have a larger site allocation to account for collaboration and comprehensive development between landowners where possible and the sites are in close proximity. Therefore it assumes a mix of uses could be provided, requiring the re-provision of employment uses in line with other policies in the CAZ and housing requirements. The site requirements say that residential ‘should’ be provided on site. This is considered to provide enough flexibility in terms of site requirements. The re-provision of employment uses will be prioritised in the CAZ and housing can be accommodated in mixed use schemes where appropriate.

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 site allocation for 41-45 Blackfriars Road should reflect the uses granted under the 2016 consent as well as other uses which would be appropriate within the Central Activities Zone and Opportunity Area, such as employment uses, residential and hotel.

We therefore respectfully request that the site allocation NSP16 is split into separate allocations to reflect the land ownership position and current status of the developments and the wording in relation to Friars Bridge Court for the site allocation is as follows:

Redevelopment of the site must:

- Re-provide at least the amount of employment floorspace (B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater;
- Provide active frontages with ground floor town centre uses (A1, A2, A3, A4) on Blackfriars Road.

Redevelopment of the site could also include a mix of uses, such as:

- Residential (C3)
- Hotel & Leisure (C1)

The site is subject to the following extant permissions: 16/AP/1660

Organisation: Hoxton (Southwark) Ltd  
NSPPSV190.1

Tibbalds has been instructed by Hoxton (Southwark) Ltd to prepare and submit planning representations in response to the Proposed Submission Version of the New Southwark Plan (December 2017), with specific reference to its land interests at Wedge House, 36 Blackfriars Road (a site plan is attached at Appendix 1) which is located within Blackfriars Road Draft Site Allocation NSP16: Land enclosed by Colombo Street, Meymott Street and Blackfriars Road.

Wedge House is currently under construction, Hoxton (Southwark) Ltd having secured planning permission for mixed-use hotel and office development of up to 15 storeys, with ancillary café, bar and restaurant uses including a roof top 'sky bar' in August 2015 (application ref. 15/AP/0237). The application

Representation noted.

Planning application 16/AP/1353 has been included within the site vision.

The site allocation is written assuming comprehensive redevelopment of the whole site to account for collaboration and comprehensive development between landowners where possible. Therefore it assumes a mix of uses could be provided, requiring the re-provision of employment uses in line with other policies in the CAZ and housing requirements.

The site requirements say that residential 'should' be provided on site. This is considered to provide enough flexibility in terms of site requirements. The

was subsequently varied under S73 application in October 2016 (application ref. 16/AP/1253) to allow for minor design changes and it is the S73 scheme that is under construction.

With frontages along both Blackfriars Road and Colombo Street, Hoxton's mixed-use commercial development at Wedge House will considerably assist the Council in achieving its site vision for Site Allocation NSP16. The development will deliver active frontages with ground floor town centre uses on Blackfriars Road, uplift B1 class floorspace on site (compared to the previous office building), enhance walking routes and provide public realm improvements to both Colombo Street and Blackfriars Road.

The Proposed Submission Version of the New Southwark Plan is broadly consistent with national and regional policy, however changes are required in respect of Site Allocation NSP16 to ensure that the document is sound.

Accordingly, these representations propose a number of proposed modifications to Draft Site Allocation NSP16, to ensure that policy is consistent with the rest of the New Southwark Plan policies. These proposed modifications are not of a fundamental nature, nor would they change the overall spatial strategy of the Local Plan.

Commentary on Draft Site Allocation NSP16 Land enclosed by Colombo Street, Meymott Street and Blackfriars Road

#### Land Uses

In addition to the provision of employment and community use and the provision of other town centre uses (A1, A2, A3, A4, D1 and D2), the draft policy also advises that the redevelopment of draft Site Allocation NSP16 should provide new homes (C3). As noted within the policy, the site is already subject to extant permissions for mixed commercial use development at Wedge House and Friars Bridge Court (application ref. 16/AP/1660). Consequently, the future implementation of 16/AP/1660 at Friars Bridge Court would leave the Colombo Sports Centre as the only remaining site with the potential to deliver new houses (C3), in addition to the re-provision of

reprovision of employment uses will be prioritised in the CAZ. Any proposal that comes forward for the remainder of the site will be assessed against the Development Plan and will have to take into consideration the site context, quality of design and impact on amenity of adjoining occupiers.

community uses on site.

Due to the highly constrained nature of the northern end of Draft Site Allocation NSP16, further guidance is required within the policy wording to ensure that any new residential development does not prejudice the operations of existing or future business occupiers of neighbouring developments. Further consideration of this matter is provided below.

#### Design and accessibility guidance

The northern half of Site Allocation NSP16 is triangular in shape and highly constrained. Any new housing development will therefore need to be carefully considered to safeguard the privacy of both future occupiers and neighbours, which will include hotel guests. However, the following important design matters are not currently considered within the design guidance provided by the draft policy.

#### Outlook and privacy

If the Colombo Centre site were to be redeveloped in future to include housing, it is unlikely that the Council's overlooking and loss of privacy distances, which include a minimum distance of 21 metres to the rear of a building, would be met throughout the site. Evidence would therefore be required as part of any future development proposal to demonstrate that appropriate design strategies could be put in place to protect both neighbours and future residential occupants from overlooking and lack of privacy, while also providing an appropriate internal layouts and outdoor external residential amenity space.

#### Amenity/noise

Once in operation, Hoxton's extant hotel and office development will be serviced from Colombo Street between 7am and 10pm. The development will also operate the public areas of the hotel being the restaurant and cafes and sky bar until 2am, with the associated external roof top terrace and first floor balconies overlooking Christ Church Gardens operational until 10pm. These consented operations are compatible with those uses already existing in the locality.

Due to the constrained nature of Site Allocation NSP16, further emphasis is required within the Council's design guidance to ensure that the design of any new housing would not prejudice hotel and office operations from a noise perspective. In accordance with Draft Policy P67, the Council's detailed design guidance should confirm that the consideration of noise management would be integral to the Council's consideration of development proposals for future residential development. Future development should be expected to demonstrate the incorporation of appropriate soundscapes and ensuring good acoustic design principles, so as to ensure that future hotel operations are not prejudiced and can be compatible with any future neighbouring residential development.

Proposed Modifications to Draft Site Allocation NSP16 Land enclosed by Colombo Street, Meymott Street and Blackfriars Road

On the basis of the comments made above, the following modifications (in bold underlined italics) are proposed to ensure that the policy is sound and consistent with national, regional and local planning policy.

***"NSP16 Land enclosed by Colombo Street, Meymott Street and Blackfriars Road***

Site Vision

Redevelopment of the site must:

- Re-provide at least the amount of employment floorspace (B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater;
- Retain or reprovide the existing community centre (D1);
- Provide active frontages with ground floor town centre uses (A1, A2, A3, A4, D1, D2) on Blackfriars Road.

Redevelopment of the site should:

- Provide new homes (C3).

The site is subject to the following extant permissions: 15/AP/0237, 16/AP/1253 and 16/AP/1660

Site area

5,205 m<sup>2</sup>

#### Existing uses

Office (B1) – 9,178 m<sup>2</sup>

Town centre uses (A1, A2, A3, A4) – 1,328 m<sup>2</sup>

#### Design and accessibility guidance

The site is suitable for a mixed-use development that will support the emerging employment cluster on Blackfriars Road by providing at least the same amount of employment floorspace that is currently on the site.

Redevelopment should enhance walking routes and provide public realm improvements to Colombo Street and Blackfriars Road, as well as direct access to the Cycle Super Highway.

Southwark needs to accommodate significant growth for offices and other workspaces which are growing in demand contributing to the central London economy and status as a world city. Sites that are within the Central Activities Zone are in the area most in demand for delivery and will be required to contribute to this growth by providing an increase in the amount of employment floorspace.

Development should be of an appropriate density and design that responds positively to its context. Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.

Future residential development should also be designed so not prejudice the operations of existing or future business occupiers of neighbouring developments.

Development should meet all minimum residential standards as set out within the Council's adopted Residential Design Standards SPG (or future guidance) including the minimum residential overlooking and privacy distances. Where these distances cannot be met, applicants must provide justification through the Design and Access Statement. In accordance with Policy P67, noise management should also be considered at an early stage and will be integral to the Council's consideration of future residential development proposals. Development will be expected to demonstrate that

good acoustic design principles have been incorporated within any proposed development.

The site is not located within a designated Archaeological Priority Area or conservation area. However, it is within the setting of Grade II listed Christchurch to the north, Lambeth conservation areas (especially Roupell Street), as well as the undesignated heritage assets of the Rose and Crown Public House and the Rectory building.

Prehistoric alluvial deposits and an east-west aligned channel have been recorded at Wedge House and archaeological assessment is required for the remainder of this site. Development proposals must recognise the site's close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to any cross-boundary issues and the provisions of policies and site allocations within reasonable proximity of the site as set out in the Lambeth Local Plan."

We trust that this submission provides sufficient information however should you require any further information please do not hesitate to contact me.

We look forward to hearing the Council's responses to these representations.

Yours sincerely

For Tibbalds Planning and Urban Design

Representation	Officer Response
<p>NSP17 Ludgate House and Sampson House, 64 Hopton Street</p>	
<p>Organisation: A&amp;M Leisure Ltd</p>	
<p>We consider that the above referenced Area Vision, Site allocation within the New Southwark Local Plan Proposed Submission version (NSP) are inconsistent with the Mayor of London’s emerging draft Economic Development Strategy (January 2018); adopted Culture and the Night-time Economy SPG (November 2017); policies of the 2016 Consolidated London Plan (including 2.15 and 4.6); and para 70 of the NPPF. We also consider that the NSP 17 site allocation is inconsistent with the proposed NSP development management policies referenced above.</p> <p>We do not agree with the approach in the New Southwark Plan towards leisure and entertainment uses along the Blackfriars Road part of Borough and Bankside District Town centre and London’s Central Activities Zone. Clear and convincing reasons have not been given for the approach proposed in the NSP. The Mayor aims to establish a fairer, more inclusive economy in the capital that creates and supports growth across all London’s sectors. The draft Economic Development Strategy identifies a number of key themes to address in order to achieve continued economic growth across the capital that all Londoners can benefit from, including: • ‘Supporting London’s sectors – including smart services, life sciences, tech and digital, and the cultural, creative and tourism industries.’</p> <p>NPPF Para 70 seeks ‘To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</p> <ul style="list-style-type: none"> <li>● plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;</li> <li>● guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;</li> </ul>	<p>Representation noted.</p> <p>All development on site allocations are subject to the development management policies set out in the NSP, including P43 and P38. The NSP recognises the importance of all leisure and cultural uses in the borough. As per P43, existing leisure, arts and cultural uses are retained or re-provided unless they are surplus to requirements. As well as this, P38 requires existing independent businesses to be relocated where they are displaced by redevelopment.</p> <p>In line with the approach in the London Plan, and the recommendations of the London Plan’s evidence base, the planning policy team intend to map LGBTQ+ venues as part of a review of social infrastructure in Southwark.</p> <p>This review will also help inform the potential designation of existing and future LGBTQ+ night-venues as Assets of Community Value.</p> <p>A proposed amendment to the plan includes updating policy P45 requires an Equalities Impact Assessment will be required for any proposed loss of community facilities in predominant use by protected characteristic communities as defined by the Equality Act 2010.</p>

- ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; ...'

Site allocation NSP17 lies along the Blackfriars Road and within the designations set out below. This part of Blackfriars Road falls within the Central Activities Zone (CAZ) – London’s vibrant core; within the Bankside and Borough District Town centre; and within the Strategic Cultural Area of Bankside & Borough, yet the New Southwark Plan separates Blackfriars Road vision area from that of Bankside and Borough. It notes in description of the Blackfriars Road area (AV.01.1-3; AV.03.1-3) that the Blackfriars Station is a key transport hub. The NPPF includes sui generis uses such as nightclubs within the definition of appropriate town centre uses, where users of larger scale venues can easily access a range of public transport. However, whilst noting that an existing night club exists within site allocation NSP17, it does not mention that this use is part of the existing use of Railway Arches 1-5 as a multi-purpose leisure venue. Furthermore the NSP allocation makes no provision to retain the existing sui generis use. We consider this is contrary to the policies and guidance set out above. We note that this is also in contrast with NSP development management policies within the NSP - P43, P44 and with the tenet of P27.

Significantly the venue is a multi-purpose leisure venue which has hosted Pulse an LGBT+ club since 2011. Para 4.15 of the Mayor of London’s Culture and the Night-time Economy SPG seeks to ensure provision and retention of a wide range of leisure activities, noting London’s diverse population and also notes that premises for LGBT+ have been in particular decline. Whilst the NSP mentions diverse needs it fails to protect diverse need in the wording of its development management policy P43. It is considered that in failing to protect the existing use at the site, the NSP does not comply with the inclusive policies in the London Plan, SPG and NPPF highlighted above.

The Mayor of London has carried out important work set out in the SPG mentioned above, on the significant contribution of the night-time economy to the overall economy of the World City of London.

In order to be considered sound, the NSP should clearly:

- Recognise the huge economic value of the night-time economy and its importance as a source of employment in addition to its social value;
- Recognise the contribution of leisure & entertainment venues within the Borough to the vitality of its town centres, particularly those that provide for the needs of Southwark's diverse population, those of surrounding boroughs and those that are attracted to London's World City offer.
- Include policies which positively seek the retention of venues which have been particularly identified within the Mayor's SPG as in decline - such as those that serve a LGBT+ clientele

This recognition should be translated into site allocation NSP17 and the allocation should seek the retention of the sui generis use in common with site allocations elsewhere in the NSP and with policies P43, 44 and 27. The NSP does not provide convincing reasons for taking a different approach to site allocation NSP17 on Blackfriars Road particularly since para AV.01.1-3; AV.03.1-3 acknowledges that Blackfriars Station is a busy transport hub. Both the Bankside & Borough vision area and the Blackfriars Road vision area show Blackfriars Road station. This hub is ideally located within easy walking distance of site NSP17, making it an ideal location within the CAZ and District Town Centre for leisure & entertainment sui generis use. Whilst the site allocations proposals along Blackfriars Road include an increase in residential uses, the site allocations clearly include other mixed uses in recognition of the existing character of the area and the NSP vision for the area. There is no clear justification for the failure to include the retention of the existing sui generis use. The Planning Inspector's appeal decision dated 2013 clearly showed that the multi-purpose venue, including use as a large nightclub, situated within the Arches was capable of operating within this mixed use context subject to conditions and management plan. The existing planning permission for the NSP17 site was granted without a diversity report being provided, despite being sought by the Mayor's office, despite the club use being authorised at that time.

The NSP area vision and site allocation NSP17 should seek the retention of the existing venue within the redevelopment.

Organisation: Port of London Authority  
MSPPSV143.17

### 3. Blackfriars Road

The PLA consider that the enhancements to the Thames Path, and improving links to the Thames should be featured in the vision for this area, as it has been featured in both the Bankside and the Borough, and Bermondsey vision areas.

Regarding site NSP17 (Ludgate House and Sampson House, 64 Hopton Street), as well as promising access and quality of the Thames Path in this area, consideration must be given to the use of the River Thames as an alternative means of transport in relation to any proposed development at this site.

Representation is noted. The NSP sets out a series of policies which promotes modes of sustainable transport.

Reference has been added to Policy P22 (River Thames) to the use of the River Thames as an alternative means of transport during construction.

The use of the Thames as a means of transport will be decided on a case by case basis when an application comes forward as the site is within the Thames Policy area.

Organisation: Thames Water Utilities  
NSPPSV184.33

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 regarding wastewater infrastructure capability in relation to this site.

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

LONDON BOROUGH OF SOUTHWARK

NEW SOUTHWARK PLAN: PROPOSED SUBMISSION VERSION CONSULTATION

We write on behalf of the site owner, Ludgate House Limited and Sampson House Limited, to submit representations to the publication of the Proposed Submission Version of the New Southwark Plan.

As you are aware, Ludgate House Limited and Sampson House Limited (LHLSHL) hold a substantial land interest in Southwark in the form of Ludgate House and Sampson House. In March 2014, planning permission was secured by CEREP Sampson House Ltd for the redevelopment of the site (reference 12/AP/3940) which LHLSHL acquired in May 2016. Since then, LHLSHL have obtained approvals to allow them to carry out works on site, including the demolition of Ludgate House which is currently underway.

The New Southwark Plan (NSP) identifies Ludgate House and Sampson House under site allocation 'NSP17: Ludgate House and Sampson House, 64 Hopton Street'. The site allocation identifies the site as being suitable for providing new homes; new employment floorspace; providing active frontages with ground floor town centre uses (A1, A2, A3, A4, D1, D2 uses); providing new east-west green links connecting Blackfriars Road to Hopton Street, including a new cycle link; providing community and leisure uses (D1 / D2); and providing new open space, which remains consistent with the extant permission that is currently being implemented by LHLSHL. In commenting on the site allocation, we would recommend that under 'Site Vision', the text should read as follows (proposed changes in bold):

"The site is subject to the following extant permission: 12/AP/3940 which **has now been implemented.**"

The site allocation is also consistent with the 'Blackfriars Road Area Vision' where the NSP states that development should:

- • Increase the number of homes, including affordable homes;
- • Provide new employment floorspace to meet a range of commercial needs including new offices and workspace, hotels and shops;

Representation is noted.

Reference to the planning permission has been added to the site vision.

Support for the site allocation is noted.

- • Provide new workspace, particularly flexible business space, cultural, leisure, arts, entertainment and community facilities;
- • Protect and positively respond to the character and historic value of the surrounding residential areas;
- • Contribute towards the development of the Low Line, a new public realm corridor adjacent to historic arches, with lively accessible spaces for creativity, new jobs and retails;

- • Improve the look and feel of streets and public spaces, creating a strong identity for Blackfriars Road that is welcoming and memorable;
- • Provide more linkages and improvements to the streetscape including lighting, seating and greening; and
- • Improve existing open spaces.

In light of the above, LHLSHL continue to support the inclusion of the site within the Blackfriars Road Area Vision and more specifically under site allocation 'NSP17: Ludgate House and Sampson House, 64 Hopton Street'. We trust that our representations will be fully considered and taken into account as the preparation of the New Local Plan continues.

Representation	Officer Response
<p data-bbox="188 320 719 347">NSP18: Southwark Station and 1 Joan Street</p> <p data-bbox="188 360 566 421">Organisation: TfL City Planning NSPPSV181.13</p> <p data-bbox="188 467 1093 528">This is a part/wholly TfL-owned site, so TfL Commercial Development would be best placed to provide comments.</p>	<p data-bbox="1140 467 1223 491">Noted.</p>
<p data-bbox="188 663 719 724">Organisation: TfL Commercial Development NSPPSV182.2</p> <p data-bbox="188 770 1099 1010">We previously welcomed the inclusion of this site as an allocation with high development potential and are pleased that changes we have suggested are incorporated in the latest draft. However, in the interests of clarity, we would suggest that the reference to Class D1 is deleted from the section underneath “Redevelopment of the site must” as it is already included below under “Redevelopment of the site may”.</p>	<p data-bbox="1140 770 2051 868">Representation is noted. D1 and D2 amongst other town centre uses are included as a ‘must’ as a potential way to promote active frontages. D1 cultural uses is included as a ‘may’ to specify this particular use is welcomed.</p>
<p data-bbox="188 1026 506 1086">Organisation: LB Lambeth NSPPSV333.7</p> <p data-bbox="188 1131 719 1158">NSP18: Southwark Station and 1 Joan Street</p> <p data-bbox="188 1203 1099 1300">The site is lies adjacent to the borough boundary and Waterloo OA. NSP18 is also in close proximity Lower Marsh / The Cut CAZ Boundary, just to the East of Lambeth Local Plan Site 7 (Waterloo Station/Waterloo Road SE1).</p> <p data-bbox="188 1347 1010 1444">We welcome the development of an enhanced station, but wish to understand further what provisions are to be made to for temporary access/egress during redevelopment, and what long term intentions</p>	<p data-bbox="1140 1026 2029 1158">The site allocation requires that redevelopment of the site must maintain and improve access and egress from Southwark Station and Waterloo East station. Temporary access requirements would be part of the detailed site design with TFL.</p> <p data-bbox="1140 1203 2067 1444">The reasons to our hotels policy notes that we have delivered one of the highest numbers of hotel rooms in London. References to new visitor accommodation were removed from 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 including housing and offices and where other uses are proposed this would be assessed against normal development</p>

<p>TfL/Network Rail have to improve access to Waterloo East.</p> <p>We welcome to the commitment to town centre frontages along The Cut, which will contribute to its vitality.</p> <p>There are potential concerns about allowing visitor accommodation in this location given the significant concentration of hotels that exist in Waterloo.</p>	<p>management policies and in the context of meeting the requirements of the site allocation.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.35</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. 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><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p>NSP19 McLaren House, St George's Circus</p>	
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.23</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>Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage..</p>

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

Organisation: TfL City Planning  
NSPPSV181.14

There are errors in the site description –this is not a tube station.

Representation noted and relevant changes have been made to correct this error.

Representation	Officer Response
<p data-bbox="181 312 1081 384">NSP20: Land between Paris Gardens, Colombo Street, Blackfriars Road and Stamford Street</p> <p data-bbox="181 384 689 456">Organisation: Thames Water Utilities Ltd NSPPSV184.36</p> <p data-bbox="181 496 1111 711">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 data-bbox="181 751 1106 1031">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="1128 496 2049 568">Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage.</p>
<p data-bbox="181 1070 510 1142">Organisation: LB Lambeth NSPPSV333.20</p> <p data-bbox="181 1182 875 1214">NSP20 Land between Paris Gardens, Colombo Street, etc.</p> <p data-bbox="181 1254 1050 1358">NSP21 is adjacent to the borough boundary and Waterloo OA. It is in reasonable proximity to Lambeth Local Plan Site 7 (Waterloo Station/Waterloo Road SE1) and Site 9 (ITV Centre and Gabriel's Wharf).</p> <p data-bbox="181 1398 1084 1430">There needs to be recognition in the supporting text of this site's proximity</p>	<p data-bbox="1128 1070 2029 1142">We have acknowledged the site's proximity to the borough boundary with Lambeth.</p> <p data-bbox="1128 1182 2038 1254">We encourage the provision of office and other workspace in the area with the desire of increasing the amount of employment floorspace.</p> <p data-bbox="1128 1294 2029 1430">The reasons to our hotels policy notes that we have delivered one of the highest numbers of hotel rooms in London. References to new visitor accommodation were removed from site allocations in the plan with the exception of key strategic development sites in the Canada Water and Old</p>

<p>on the borough boundary and the implications this has for the setting of heritage assets in Lambeth.</p> <p>There are potential concerns about allowing visitor accommodation in this location given the significant concentration of hotels that exist in Waterloo.</p>	<p>Kent Road opportunity areas. This was due to ensuring the site allocations set out a concise list of required uses including housing and offices 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.</p>
<p><b>Organisation: Black Pearl</b> <b>NSPPSV24.1</b></p> <p><b>Background</b> Our client is the owner of the site known collectively as 18 Blackfriars Road, which comprises the allocated site ref: NSP20 within the Proposed Submission version of the document.</p> <p>The site has recently been cleared following extensive demolition of the existing buildings on the site under planning permission ref. 07/AP/0301. A planning application (ref. 16/AP/5239) for the comprehensive re-development of the site was submitted to the Council in December 2016. The Council's Planning Committee resolved to grant planning permission for the site's redevelopment and the s106 agreement associated with the development is due to be completed imminently.</p> <p><b>Site Allocation NSP20</b> <b>Site Vision</b></p> <p>The reference to planning application ref. 16/AP/5239 within the Site Vision is supported on the basis that this planning permission is due to be issued in the immediate short term.</p> <p>It is however requested that the reference to any new development on the Site needing to re-provide '...at least the same amount of employment</p>	<p>Representation noted. The reference to the planning application is included.</p> <p>As the site is located in CAZ it is considered appropriate to require 50% of floor space to be employment in order to achieve a strong local economy, which is a goal set out in the Council Plan. An evidence base for the provision of employment will be made available online. As outlined in the evidence base, an uplift in employment floorspace is required in the borough and the CAZ is the most appropriate place to achieve which justifies the need for the site to reprovide ' at least the same amount of employment floorspace (B class uses) currently on the site or provide at least 50% of the development as employment floorspace, whichever is the greater'.</p>

floorspace (B class uses) currently on the site or provide at least 50% of the development as employment floorspace, whichever is the greater...' is removed in order to align with draft Policy P26 (Office and Business Development) within the Plan. This policy requires development to retain or increase levels of Class B uses and/or other employment generating floorspace (Sui Generis Use Class) across the borough unless: "in exceptional circumstances, the loss of employment may be accepted in the Central Activities Zone, town centres, opportunity areas and where specified in site allocations, where the retention or uplift in employment floorspace on the site is not feasible."

Whilst it is noted that the Site is located within the Central Activities Zone, which is a suitable location for employment growth, in light of the above policy wording, we consider that the existing reference to the re-provision of employment floorspace detailed in the Site Vision is too prescriptive and would undermine the principal policy intention of P26.

We do not consider this to be a sound approach given that the Plan prescribes a punitive approach for sites allocated within the Plan which is contradictory to the proposed policy intention set out in draft Policy P26. This diversion from policy would establish a separate approach to allocated and windfall sites, whereby the latter would not be subject to prescriptive thresholds for delivery. We therefore urge the Council to remove this wording from the site allocations.

We trust that our representations for Site Allocation NSP20 will be fully considered by LBS as part of this round of consultation on the New Southwark Plan. We look forward to receiving confirmation that the representations have been received.

Representation	Officer Response
<p data-bbox="188 220 719 248">NSP21: 1-5 Paris Garden and 16-19 Hatfields</p> <p data-bbox="188 261 685 325">Organisation: Thames Water Utilities Ltd NSPPSV184.23</p> <p data-bbox="188 370 1108 683">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 regarding wastewater infrastructure capability in relation to this site.</p>	<p data-bbox="1140 370 2047 434">Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage.</p>
<p data-bbox="188 769 506 833">Organisation: LB Lambeth NSPPSV333.9</p> <p data-bbox="188 877 784 906">NSP21 – 1 – 5 Paris Gardens and 16 – 19 Hatfields</p> <p data-bbox="188 951 1108 1088">NSP21 lies immediately adjacent to the borough boundary and Waterloo OA. It is also in close proximity to Lambeth Local plan Site 7 (Waterloo Station/Waterloo Road SE1) and reasonable proximity to Site 9 (ITV Centre and Gabriel's Wharf).</p> <p data-bbox="188 1129 1084 1232">There needs to be recognition in the supporting text of this site's proximity on the borough boundary and the implications this has for the setting of heritage assets in Lambeth.</p> <p data-bbox="188 1273 1070 1337">We welcome the commitment to providing an East-West link through the site. We note the additional pressure the uplift in residential numbers will</p>	<p data-bbox="1140 769 2029 833">We have acknowledged the site's proximity to the borough boundary with Lambeth.</p> <p data-bbox="1140 877 2038 941">We encourage the provision of office and other workspace in the area with the desire of increasing the amount of employment floorspace.</p> <p data-bbox="1140 983 2069 1295">The reasons to our hotels policy notes that we have delivered one of the highest numbers of hotel rooms in London. References to new visitor accommodation were removed from 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 including housing and offices 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.</p>

bring on Hatfields Gardens currently managed by the BOST open space trust.

There are potential concerns about allowing visitor accommodation in this location given the significant concentration of hotels that exist in Waterloo.

Lambeth understand that Southwark have approved an office scheme on the Paris Gardens site so the comments about pressure from increased residential are not so pressing.

Organisation: Historic England  
NSPPSV83.16

We would suggest the second sentence of the design and accessibility guidance is amended to read: Any redevelopment should conserve and enhance the significance of listed buildings ....' Comments made elsewhere about 'taller' buildings in this response also apply here.

Any development on site would need to comply with the design policies of the NSP which would require the development to consider local architectural distinctiveness and respond positively to its context (P11 and P12), this context would include listed buildings.