

Representation	Officer Response
<p data-bbox="188 320 752 347">NSP37: Kwik Fit and Gibbs & Dandy, Grove Vale</p> <p data-bbox="188 360 734 419">Organisation: Gulliver Property Management NSPPSV44.1</p> <p data-bbox="188 464 1433 564">The following requirement in site allocation NSP37 (Kwik Fit and Gibbs & Dandy, Grove Vale) is unsound: “Redevelopment of the site must: ... provide a new green link from Grove Vale to Besant Place”. It could be made sound by replacing “must” with “should consider the opportunity to”.</p> <p data-bbox="188 609 1261 710">The arguments below follow the ‘Test of Soundness’ guidelines set out at https://consultations.southwark.gov.uk/planning-and-regeneration/new-southwark-plan-proposedsubmission-version/ and reproduced in Annex A.</p> <p data-bbox="188 754 730 782">The current wording is unsound because it is:</p> <p data-bbox="188 826 1447 997">Not positively prepared – the Council has not “objectively assessed the need for ... infrastructure ...” in relation to this particular green link. The site allocation requires that “redevelopment of the site must: ... provide a new green link from Grove Vale to Besant Place”. However, there is no objective assessment of the need for this link. The Council’s response to a consultation comment (see Annex B) querying the need is that the link is an “aspiration”. By definition, this is not an objective assessment of a need.</p> <p data-bbox="188 1042 1447 1212">Not justified – the requirement for a green link in NSP37 is not “based on a robust and credible evidence base”. The same logic applies as above, and the aspirational nature of the Council’s desire for the link is neither robust nor has a credible evidence base. Indeed, as argued in the previous consultation, there are alternative links in place and the proposed link would not add benefit to any significant degree or numbers of people.</p> <p data-bbox="188 1257 1453 1428">Not effective – the proposed green link in NSP37 is not “achievable” as “the groups who will deliver elements of it haven’t signed up to it”. Were this requirement to remain in the site allocation, then it would create a disincentive to redevelop the site, thereby resulting in the Plan being ineffective and undermining the Council’s aspirations. Furthermore, the relevant group to deliver this green link would be the site owner. The Council is requested to set out the legal basis on which it can require a private land</p>	<p data-bbox="1480 360 2040 461">The representation is acknowledged. We have replaced the current wording in light of this suggestion.</p>

owner to provide a public thoroughfare across his/her land, and what compensation the Council would consider due in such an event. Without this, the Plan is not achievable.

In support of all of the above points, it should be noted that 14 of 85 proposed site allocations include a requirement for green links. In 13 of these 14 cases (all except NSP37 – see Annex C), the “guidance” section of the site allocation provides a clear explanation of the need for the green link, directly related to policies and/or the local area goals set out in the NSP (i.e. with some objectivity and robustness). However, in the case of NSP37, there is no such guidance.

Additionally, in the ‘AV.07 East Dulwich Area Vision’, there are no specific goals that would lead to a requirement for a green link from Grove Vale to Besant Place. And policies P48 Walking, P58 Green Infrastructure and P59 Biodiversity are all applicable any proposed development and do not provide a justification for including a specific requirement for a green link in the site allocation for NSP37.

The following revised wording is suggested for this part of NSP37: “Redevelopment of the site should consider the opportunity to provide a new green link from Grove Vale to Besant Place”.

This would make the Plan sound as it would be positively prepared and justified (“should consider” is appropriate in terms of objectivity, robustness and credibility for an “aspiration”); and effective (the requirement would be “achievable”). The Council would retain influence over the form of any development which would be commensurate with the “aspiration” for additional green links.

It should be noted that the NSP site allocation wording is unusual: “Redevelopment of the site must: ... provide a new green link ...”. Other Councils do not mandate green links in this way e.g. the ‘Camden Site Allocations Plan 2013’ uses language such as “Development will be expected to: ... consider the feasibility of introducing a new pedestrian route through the site”. And even Southwark has been more circumspect to date e.g. the ‘Peckham and Nunhead Area Acton Plan 2014’ uses language such as “Opportunities for increasing north to south, and east to west pedestrian and cycle linkages should be maximised”.

The text for NSP37 is included in Annex D, with the proposed change highlighted.

Organisation: Vital OKR
Individuals
NSPPSV91.24 and NSPPSV128.24

We object to the failure to define requirements for industrial accommodation within mixed-development site allocations for the following Non-Designated industrial Sites. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the allocation policies for each be revised to include requirements for a defined minimum quantum of industrial accommodation.

NPPF para 14 requires Local Plans to meet objectively assessed needs.

London Plan para 6.2.1 emphasises that smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. Hence it is stated that to deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole, and that ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

London Plan para 6.2.4 requires that where there is demand for workspace or viable existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the intensification or reconfiguration of space. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to accommodate replacement workspace and existing businesses on-site through intensification or reconfiguration. What constitutes a reasonable proximity should be determined on the circumstances of each case having regard to the impact on business supply chains and access to labour supply. Relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.

London Plan Policy E2 regarding low-cost business space requires that the provision, and where appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand. Hence development proposals that involve the loss of existing B1 space in areas where there is an identified

This site is a non-designated industrial site.. Policy P26 requires re-provision of employment (B class) uses where sites are located in opportunity areas, town centres or it is specified in a site allocation. The site allocation specifies employment uses should be provided and to make provision for a builders merchants if possible. Policy P26 requires a marketing strategy to be provided for the use and occupation of the employment floorspace to be delivered to demonstrate how it will meet market demand. Therefore planning applications must ensure the delivery of employment space is suitable to the local market and meeting demand. This means we would encourage a range of workspaces to suit demand in different parts of the borough. We are currently working on the types of affordable workspace that are in demand across different parts of Southwark to better inform developers.

<p>shortage of lower-cost space should demonstrate that there is no reasonable prospect of the site being used for business purposes, or ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.</p>	
<p>Organisation: Peckham Society NSPPSV140.10</p> <p>NSP 37 and NSP 39 and see also OKR and Blackpool Road Where will alternative builders merchants be located? This is contrary to the aspiration for a resilient community, and maintenance of employment uses</p>	<p>Site allocation NSP37 dictates employment uses should be provided including provision for a builders merchants. Amended Policy P28 dictates that development must retain small and independent business and that where existing small and independent businesses are at risk of displacement from a development there should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.51</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>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Noted.</p>

Representation	Officer Response
<p data-bbox="188 252 896 284">NSP38: Dulwich Hamlet Champion Stadium, Dog Kennel Hill</p> <p data-bbox="188 293 725 357">Organisation: Greendale Property Company NSPPSV71.1</p> <p data-bbox="188 402 1456 539">We write on behalf of our client, Greendale Property Company Limited (Greendale), owners of Dulwich Hamlet Football Club’s Champion Hill Stadium, in response to the above consultation seeking views on the proposed submission version of the New Southwark Plan (NSP), representations on which are due for submission by 27 February 2018.</p> <p data-bbox="188 580 1438 718">Greendale welcomes the opportunity to comment on the NSP prior to its submission to the Secretary of State and supports the proposed allocation of the Dulwich Hamlet Champion Hill Stadium, both ensuring the preservation of a sports facility onsite and also to promote redevelopment and the introduction of a mix of uses for which an Inner London site such as this should and is able to accommodate.</p> <p data-bbox="188 759 1447 896">However, to fully unlock the redevelopment potential of this important brownfield site as well as safeguard a stadium facility, we believe a number of changes are required to the draft policies to ensure that the plan is reasonable, realistic and most importantly, sound. We set these comments out below and provide suggested tracked changes to the draft policy wording at Appendix 1 of this letter.</p> <p data-bbox="188 938 1438 1075">As required by the National Planning Policy Framework (NPPF), local plans should be aspirational but realistic and should set out clear policies on what will or will not be permitted and where. Only policies that provide “a clear indication of how a decision maker should react to a development proposal” should be included in the plan (NPPF, 154).</p> <p data-bbox="188 1117 1456 1331">Crucially, local plans are required to be deliverable and, in order to boost significantly the supply of housing, should meet the full, objectively assessed needs for housing in full through identifying key sites for the delivery of housing over the plan period (NPPF para 47). The NPPF requires that local plans allocate sites to “promote development and flexible use of land... and provide detail on form, scale, access and quantum of development where appropriate”, meeting the strategic priorities (including delivering homes, jobs and leisure facilities) that an area needs (paras 156 and 157).</p>	<p data-bbox="1487 328 2065 430">Noted. It is also noted that Greendale is in discussion with our officers regarding a planning application at the site.</p> <p data-bbox="1487 472 2065 679">In principle, the council would support the redevelopment of this site, provided it complies with the site allocation and the other relevant policies of the New Southwark Plan. Comments are addressed within the relevant policies.</p> <p data-bbox="1487 721 2051 1005">The artificial pitch which is in the council’s ownership remains as MOL as we seek to protect this land given the importance of the provision of open space in the borough. Open space is important for residents and visitors for sports and other recreation activities. Only in exceptional circumstances will the loss of MOL be permitted.</p> <p data-bbox="1487 1046 2047 1254">We note support for the removal of the indicative development capacity of the site. Comprehensive redevelopment of the site would include the Council’s land which we require to be retained as MOL and therefore is not included within the site allocation.</p> <p data-bbox="1487 1295 2038 1366">We note support for the removal of ‘opportunity for public open space’ within the</p>

Background and Context

Champion Hill Stadium and the Surrounding Area

Constructed in the early 1990s along with the adjacent Sainsbury's superstore (which funded the relocation), the Champion Hill Stadium is home to Dulwich Hamlet Football Club (DHFC).

Prior to construction of the Champion Hill Stadium, Dulwich Hamlet's ground was located on the adjacent plot, now occupied by Sainsbury's, which had been home for the club for some 60 years (between 1931 and 1991). This stadium was demolished as it was in a poor state of repair and did not meet the safety standards of the time.

The current stadium is located to the rear of St. Francis Park and to the south of Sainsbury's supermarket, off of Dog Kennel Hill to the east. The stadium consists of a grassed pitch, main stand (the Tommy Jover stand) and club house, with a 3,000 seat capacity, and a smaller covered stand to the south. The club house includes a gym, boxing gym, squash courts and function rooms, which are available for public use, although these are financially unsustainable in their current form. A small car-park to the east provides around 50 car parking spaces and is partly occupied by a hand car wash.

The current football pitch and stadium are used at limited times for football matches and are not otherwise accessed by the community. The open space itself is therefore of limited value in terms of recreation and amenity; in particular the football pitch is not available for public hire due to the impact this would have on the playing surface.

The surrounding area is mixed in character with: a large Sainsbury's store and surface level car park to the north; St. Francis Park to the east; and Greendale artificial pitch and playing fields to the west. To the south, along Abbotswood Road and Burrow Road, are residential properties. East Dulwich Rail Station is located approximately 300m to the southeast and the site has a good level of accessibility to public transport with a PTAL of 3.

Existing Planning Designations

Along with the London Plan, the Southwark Core Strategy (2011) and Southwark Unitary Development Plan (UDP) (2007, as saved in 2013) form the local development plan documents relevant to the site. Since

site allocation. The council's vision for the site is for the football grounds to be retained or re provided. Any redevelopment of the site should allow the functioning of the football ground. Redevelopment should give the football grounds every opportunity to function successfully by providing the most suitable design, layout and accessibility requirements.

The site allocation has been amended to state 'retain or re provide the football ground and ancillary facilities and sports facilities (D2)'.

Any redevelopment of the site should not compromise the functioning of the football club, including the potential of its progression to the National League as stated within your representation which is why the site allocation states '*proposals must ensure that the football grounds continue to function successfully*'.

In the event the football grounds and associated facilities are no longer required and an application comes forward for an alternative facility or proposal, this would form a material consideration for any application that proposed a scheme that resulted in the loss of the football ground and associated facilities. This application would be assessed against NSP38 and the other relevant policies of the Plan.

The site allocations' visions set out a hierarchy for types of redevelopment to be provided on

its adoption in 2007, over ten years ago, a number of policies within the Southwark UDP plan have been superseded by the Core Strategy.

The football pitch itself is currently designated as 'Other Open Space' (OOS) (note we review and comment on the definition of OOS later in these representations). To the east of the stadium, across Abbotswood Road, St. Francis Park is also designated as OOS and to the west of the stadium the Greendale artificial pitch and playing fields are designated as 'Metropolitan Open Land' (MOL).

The Greendale artificial pitch is a poor quality and unusable area of astro turf within the south east area of the MOL. The pitch is in a state of disrepair and has not been used by DHFC for a number of years. Six floodlights are located around the perimeter of the pitch, whilst an area of hardstanding runs along one corner. The pitch is clearly distinguishable from the remainder of the MOL, forming an area of previously developed land.

The stadium and surrounding land is not currently allocated for redevelopment in the existing Local Plan.

The Need for a New Stadium

Notwithstanding the Club's financial position, the current facilities themselves inhibit the future promotion and expansion of DHFC.

The existing capacity of the Champion Hill stadium is 3,000. In order to meet current Football Association (FA) requirements and enable progression to the National League (also known as the Conference), DHFC must provide a stadium that can accommodate at least 4,000 spectators and specific facilities for officials and the press. Without such provision, the Club is confined to its current position in the 7th tier of the football pyramid.

Whilst improved Club facilities will directly benefit DHFC, a secure future for the Club has far reaching requirements and implications.

The Club is one of the oldest league sides in London and has been part of the Dulwich community for over 100 years, with Champion Hill being DHFC's spiritual home for the majority of that period. The Club's long term survival plus potential for growth and promotion is therefore crucial to the identity and sporting heritage of the local community – as evidenced by the strong local support base.

the sites. The priority for NSP38 is for any redevelopment of the site to re provide the football ground and therefore this requirement is a 'must' within the site vision. Given the need of housing in the borough as recognised in your response, there is also a requirement for housing to be provided within NSP38. Notwithstanding this, the priority for the site is the football ground and accordingly the requirement for redevelopment of the site to provide homes is 'should'.

Indicative capacities are not set out within the site allocations. The NSP Site Allocation Methodology Report to support the NSP sets out indicative capacities. Where an application is submitted that proposes an increase in the site capacity this will be assessed accordingly.

The London Plan housing targets set out are noted. We have prepared an updated 5 and 15 year housing land supply report which demonstrates that we have a 5 and 15 year housing land supply. In addition, to address the previous underdelivery, we will apply a 20% buffer. Given the underdelivery, we have also prepared a Housing Delivery Test Action Plan which sets a number of actions to boost the delivery of new homes.

The reference to extra care homes has been removed within all the site allocations (including NSP38) as the Southwark Housing Strategy to

As the owners of Dulwich Hamlet Football Club's (DHFC) Champion Hill stadium, Greendale seeks to secure the long-term future of the club by improving the stadium and ancillary facilities. The only way to realistically achieve this is to reorganise the site and deliver the required modern facilities to allow club promotion in association with its regeneration for mixed use purposes.

In this regard, Greendale has been engaged with LB Southwark during progression of the NSP and has submitted representations to earlier stages of the consultation (in April and September 2017). These representations sought to promote the allocation of the site in an effort to secure and fund the clubs long-term future at Champion Hill. Greendale has also submitted a planning application for viable proposals to facilitate and improve the Champion Hill Stadium and facilities in an effort to provide a suitable sporting facility that has a long term and secure future.

Of relevance to these representations, the NPPF (at para 70) requires that planning policies should ensure that recreational facilities and services the community needs:
"are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and ensure an integrated approach to considering the location of housing, economic uses and community facilities and services."

In this regard and to ensure the necessary long term and sustainable availability of sports facilities, the comprehensive regeneration of the site is clearly required to deliver the required improvements to the Club's finances and facilities; to do so, it is necessary to realise the site's potential as a suitable site for mixed use development to serve a variety of planning benefits – as the current situation is no longer fit for purpose. Moreover, as a brownfield site in London, it's potential to deliver a sustainably mixed solution delivering high quality sports/leisure facilities and sustainably-located new housing in an effective and efficient manner is not being realised by LB Southwark through the current draft NSP.

The following comments focus on relevant draft policies and designations set out in the emerging NSP and seek to ensure the delivery of a new stadium that meets modern requirements whilst also providing a package of community and local benefits. These include the provision of much-needed new housing (including affordable housing).
Initially we focus comments on

2043 aims to meet the needs of the older people through building lifetime homes, delivering extra care housing, exploring other specialist housing options for older people, and adapting properties to enable older residents and people with disabilities to live independently as long as possible in their communities. As such, the NSP does not include a fixed target for specialist housing but the policy is clear that provision will be accepted where there is a demonstrated need.

Amending the Site Allocation to include adjacent MOL would be contrary to the Council's planning policy regarding development on MOL and therefore it will not be amended.

i the proposed policy designation (NSP38) and vision (AV07)

and then comment on

ii related policies on Other Open Space, Metropolitan Open Lane, community uses and biodiversity (P44, P56, OS130 and P59), which form the wider yet relevant development control policies that will influence the deliverability of proposals at Champion Hill.

For completeness, suggested changes to the wording of the NSP are provided at Appendix 1 of this letter.

Site Allocation (NSP38)

The draft NSP proposes to allocate the Dulwich Hamlet Champion Hill Stadium for redevelopment, along with the adjacent Abbotswood car park to the east.

If the council is genuinely seeking to protect and promote the continued use of the site as a sports and leisure led mixed use facility (noting the other uses suggested in the policy text referred to below), we question why the Greendale artificial pitch, which enables and forms part of the functional character of the site as a whole, has not been included in the allocation.

We note that the artificial pitch forms part of the adjacent MOL designation (which is in any event in an extremely run down condition and not genuinely/freely “open” to the public for use) and that the openness can still be retained and included as a parameter by the council through the designation. The inclusion of the artificial pitch would help further unlock this brownfield site and attract much needed investment for the council-owned facility (which investment is much needed as it is unattractive and barely functioning within the remit of MOL). On these grounds, we would go further to question whether the council should even continue to protect this piece of land as MOL.

The draft allocation for the site suggests that redevelopment:

a must retain the football ground and ancillary facilities

b must ensure that the football grounds continue to function successfully

c should provide new homes and

d may provide new extra care housing

Before considering each of these policy aspirations in turn, we briefly address the evolution of the site allocation. Since the first version of Policy NSP38 was consulted on (in February 2017), the draft allocation has evolved to strengthen the requirements for (a) the football club and ancillary facilities to be retained and (c) the redevelopment to include new homes.

We welcome that the Proposed Submission version of the policy avoids reference to any indicative development capacity, whereas the earlier versions (February and June 2017) had referred to the site having

capacity for 30 units. This allows flexibility for the capacity of the site to be developed with regard to character of the surrounding area and acknowledged opportunities for taller buildings, reasonably maximising housing delivery in line with London Plan requirements.

Nevertheless, we note that redevelopment of the car park site alone has the potential to deliver around 60 new homes. However and with comprehensive redevelopment of the whole site (and potentially adjacent land), there is scope to deliver many more.

Other notable changes to the draft site allocation include the removal of the identified “opportunity for public open space” in place of the football pitch (last featured in the June 2017 Preferred Options version); presumably this omission is due to the growing policy support for re-provision of the football ground (i.e. not public open space).

Whilst Greendale is exploring opportunities to provide and improve public accessibility to the sports facilities at Champion Hill, this omission is welcome as the conversion of the sports pitch to provide public open space would conflict with the central policy objective of providing a football ground for DHFC – a private football pitch which would be accessible to members of the public on match days.

Retaining the Football Club and Ancillary Facilities

Greendale supports in principle the vision of retaining the football ground and leisure facilities (D2).

However, it is noted that the draft site allocation does not define what these ‘ancillary facilities’ are to be. As noted above, the other facilities include a gym, boxing gym, squash courts and function rooms. The only facilities at Champion Hill which are truly ancillary to the football ground are the changing rooms – the other facilities operate independently of the football ground and have low levels of use/membership. In the case of the gym, the Club does not have the right to use the gym facilities free, and they are subsequently not used by the Club. These facilities, like the football stadium itself, are also in a poor state

of repair and vastly in need of improvement. Retention of the “ancillary facilities (D2)” is not justified as it is not the most appropriate strategy for realising the regeneration potential of the site.

To make sound this part of the site vision, the vision should be reworded to state that redevelopment of the site must “Re-provide” (rather than “retain”) “the football ground and leisure facilities” – to allow for the regeneration of the site to develop and modernise in a way that is sustainable, in accordance with the objectives of the NPPF (70). This would allow flexibility for a wider range of leisure facilities to be delivered, thus assisting to ensure that the site allocation is deliverable.

Ensuring the Football Grounds Continue to Function Successfully

Whilst Greendale supports the vision for the site to be retained as a football ground and ideally continue to be the home ground for DHFC, the policy requirement to ensure that the “football grounds continue to function successfully” is unsound.

The success of the grounds is not measurable and falls outside of the planning process. It also overlaps with the requirement to “retain the football ground”– which in itself will assist in promoting the longevity of DHFC. Whilst Greendale’s intention is to ensure that any comprehensive redevelopment of the football grounds will make the football grounds (and Club) successful, the current wording is unduly restrictive. More appropriately, the design and accessibility section of the policy could be updated to clarify that the development of non-leisure uses (i.e. housing) within the site should not prohibit provision of the football ground. To ensure that this element of the policy is effective, we request that the design and accessibility guidance section is updated to omit reference to the proposals being required to “ensure that the football grounds continue to function successfully”.

In any event, the council through this policy is being onerously restrictive as to how this site could be used over the Plan life of 15 years. It may be that DHFC leaves but that a rugby club or other sporting use/leisure facility wishes to use the site. Under the current wording, the council seem to intimate only a football club/use of the pitch for football is the only acceptable use. The council needs to add another layer of wording in the site allocation to allow a more flexible use under the remit of sport and leisure as no one, not even the council, can be certain that the continued used of the site by a football club is viable and the only solution over the Plan period.

Providing New Homes

The inclusion of housing acknowledges the site's suitability for residential development, with it being easily accessible, adjacent to existing residential areas and in close proximity to East Dulwich Town Centre.

Introduced in March 2015, the current annual monitoring target for LB Southwark is 2,736 homes per year (Further Alterations London Plan 2016). Prior to this, the previous version of the London Plan (2011) required LB Southwark to deliver only 2,005 homes per year. This recent increase thus represents an uplift of over 35%.

Whilst only in the initial stage of consultation, the Draft London Plan (Policy H1) seeks to increase annual housing targets from 42,389 to 64,935 houses a year across London; representing an increase of 53% increase overall compared to the current London Plan (Policy 3.3). For LB Southwark, the draft London Plan suggests that the annual target for Southwark is revised downwards from 2,736 to 2,554 homes per year, representing a modest decrease of 7% – whilst still being 27% higher than the minimum target set in the previous London Plan (2011). We note in passing the national consultation on objectively assessed housing need (September 2017) suggests an increased figure for LB Southwark of 3,089 homes per year, confirming the pressure to reasonably maximise housing delivery on all suitable sites.

Relevant to the emerging site allocation, the Draft London Plan also states that boroughs should optimise housing delivery on all suitable and available brownfields sites especially through both :
“b) mixed-se redevelopment of car parks...” and
“c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses” (Policy H1).

The supporting text (para 3.6.1) to Draft London Plan Policy D6 further recognises that every development needs to make the most efficient use of land and that this will mean “developing at densities above those of the surrounding area on most sites”.

Whilst the housing target for LB Southwark is proposed to be reduced slightly (against likely government requirements), the council has struggled to meet its housing needs in recent years. As identified in LB Southwark's Five and Fifteen Year Housing Land Supply: 2016-2031 report (evidence base document ref: EB11), housing delivery fell short of the current LB Southwark annual target for the year 2015/16 by 1,233

residential units – despite the strong push for optimising housing delivery at all levels of planning policy.

Dulwich Hamlet's Champion Hill Stadium represents a site that can also deliver a meaningful contribution towards the borough's housing needs, on a suitable, accessible, brownfield site of a type that is specifically earmarked for optimising housing in the Draft London Plan and aligned with the NPPF's central objective of delivering sustainable development.

Redevelopment of the car park site alone has the potential to deliver around 60 new homes, with comprehensive redevelopment of the whole site (and potentially adjacent land) providing the opportunity to deliver more than 150 homes. To ensure that the policy is justified and provides the most appropriate strategy, we request that the site vision of NSP38 is updated to state that redevelopment of the site "must provide new homes (C3)" on the same basis as for other required land uses.

Recent discussions with the council and evidence provided to officers have shown that the site has the potential to deliver a new stadium facility, MUGA and up to 150 homes. This must be investigated and considered further by the council in order to properly inform the site allocation and its potential as a sustainable brownfield site to deliver much needed housing in the Borough and for London.

For completeness, suggested tracked changes are set out at Appendix 1 of this letter.

Providing Extra Care Housing

The London Plan (2016) identifies an indicative benchmark requirement of 115 specialist housing units per year for older people within LB Southwark between 2015 and 2025. Nevertheless, the draft New London Plan surprisingly suggests a significant (44%) reduction to 65 specialist housing units per year between 2017 and 2029.

Whilst the current Statutory Development Plan does not specifically promote the delivery of extra care housing (Use Class C3), the Saved Southwark Plan Policy 4.7 does encourage non-self-contained housing for identified groups including facilities that provide care or support for occupiers such as the elderly.

Specialist housing for older people is proposed to be specifically promoted through the emerging NSP (Policy P5). The policy criteria state that development for extra care housing should be provided in areas that are suitable for older people and have good access to local goods and services, being located in, or

close to, town centres.

This approach is underpinned by the LB Southwark Older People Housing Report (EB08), which projects a significant (56%) increase in the number of residents aged 65 between 2014 and 2030. This growth does not necessarily translate into additional needs for the provision of additional extra care housing (as residents may stay in their own homes for longer) and the NSP does not identify any target for C2 accommodation.

It is noted that a number of proposed site allocations (including NSP38) are identified as being suitable for the provision of extra care housing, and the proposed potential inclusion of extra care housing (C2) at Dulwich Hamlet Champion Hill Stadium is welcome. This will provide additional flexibility to provide a wide range of housing on the site.

The allocation boundary should be amended to include the Greendale artificial pitch to the west in order to acknowledge the pitch forms part of the function of the overall site as a sports and leisure facility. Doing this will help further unlock the regeneration potential of site.

Update the site vision to read as follows:

“Redevelopment of the site must:

- Re-provide ~~Retain~~ the football ground and ancillary facilities (D2) with capacity for no fewer than 3,000 spectators.
- Provide new homes (C3)

~~Redevelopment of the site should:~~

- ~~• Provide new homes (C3).~~

Redevelopment of the site may:

- Provide new extra care housing (C2).”

Update the Design and accessibility guidance to read:

“The design, layout and accessibility requirements for this site are dependent on the proposed mix and location of land uses and their relationships to each other within the site. ~~Proposals must ensure that the football grounds continue to function successfully.~~

Comprehensive mixed-use redevelopment of the site could include taller buildings subject to

consideration of impacts on existing character, heritage and townscape. Redevelopment should complement the setting of existing open spaces, and enhance walking routes and connectivity to Lordship Lane and East Dulwich.

The site is not within a borough designated Archaeological Priority Area or conservation area. The site is located close to the Camberwell/Constance Road Workhouse build in 1892. An archaeological assessment is required for this site.”

Concluding Remarks

Greendale has invested in Dulwich Hamlet Football Club and is keen to play its part in this important regeneration project.

Redevelopment of the site to provide a new football ground and stadium is necessary in order to support the expansion and promotion of DHFC and seek to secure the Club’s long term future. This can only be achieved through the comprehensive regeneration of the site to deliver the required improvements to Club facilities alongside supporting residential and leisure development. Acknowledging the wider leisure and community benefits of the stadium, regeneration of the site has the potential to deliver significant leisure and community benefits in Southwark, making an important contribution to placemaking in the process.

Located in inner London, adjacent to existing residential areas and open spaces and a short walk from East Dulwich train station and town centre, the site presents a prime and unique opportunity to knit together leisure and residential development and to create a truly sustainable development to the benefit of DHFC and the local community.

As acknowledged in the LB Southwark Open Space Strategy (2013), there is an identified need to improve the quality and value of Greendale Artificial Playing Pitch – an open space that, whilst ancillary to DHFC, is in a poor state of repair and so inaccessible to the general public. The inclusion of this pitch within the site allocation will assist in fulfilling this site’s potential and ensuring that comprehensive redevelopment of the site delivers the fullest benefits.

The Local Plan should positively facilitate the improvements and opportunities available to secure a satisfactory and viable long term home for DHFC (or other sports club), ecological and leisure improvements to the Greendale MOL area and much-needed housing in a sustainable location – rather than,

<p>as now, seek to fossilise a situation likely to lead to decline in access and community involvement.</p>	
<p>Organisation: Sport England NSPPSV170.3</p> <p>Sport England supports the Council’s intention to retain the existing sports facilities on this site. Sport England considers that it would be helpful if the text also included reference to the ancillary facilities that should be retained on the site. It is understood that in addition to the football ground changing facilities, this includes a gym and squash facilities. The plan should include reference to these in the text. Add additional references to the squash and gym facilities to ensure that these are retained within the redevelopment.</p>	<p>The site allocation has been amended to state 'retain or re provide the football ground and ancillary facilities and sports facilities (D2)'.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.52</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 this, applicants will still be notified to consult with Thames Water.</p>
<p>Organisation: Dulwich Hamlet Supporters' Trust NSPPSV293.1</p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant Yes</p> <p>Do you consider that the New Southwark Plan is sound? – Soundness Yes</p>	<p>Positive comment noted.</p>

Representation	Officer Response
<p data-bbox="181 252 595 284">NSP39: Railway Rise, East Dulwich</p> <p data-bbox="181 293 584 395">Organisation: Vital OKR Individuals NSPPSV128.25 and NSPPSV91.25</p> <p data-bbox="181 434 1451 571">We object to the failure to define requirements for industrial accommodation within mixed-development site allocations for the following Non-Designated industrial Sites. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the allocation policies for each be revised to include requirements for a defined minimum quantum of industrial accommodation.</p> <p data-bbox="181 612 1025 644">NPPF para 14 requires Local Plans to meet objectively assessed needs.</p> <p data-bbox="181 686 1435 932">London Plan para 6.2.1 emphasises that smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. Hence it is stated that to deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole, and that ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.</p> <p data-bbox="181 973 1451 1289">London Plan para 6.2.4 requires that where there there is demand for workspace or viable existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the intensification or reconfiguration of space. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to accommodate replacement workspace and existing businesses on-site through intensification or reconfiguration. What constitutes a reasonable proximity should be determined on the circumstances of each case having regard to the impact on business supply chains and access to labour supply. Relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.</p> <p data-bbox="181 1331 1323 1362">London Plan Policy E2 regarding low-cost business space requires that the provision, and where</p>	<p data-bbox="1473 293 2051 932">This site is a non-designated industrial site. The site allocation and policy P26 requires re-provision of employment (B class) uses where sites are located in opportunity areas, town centres or it is specified in a site allocation. Policy P26 requires a marketing strategy to be provided for the use and occupation of the employment floorspace to be delivered to demonstrate how it will meet market demand. Therefore planning applications must ensure the delivery of employment space is suitable to the local market and meeting demand. This means we would encourage a range of workspaces to suit demand in different parts of the borough. We are currently working on the types of affordable workspace that are in demand across different parts of Southwark to better inform developers.</p>

<p>appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand. Hence development proposals that involve the loss of existing B1 space in areas where there is an identified shortage of lower-cost space should demonstrate that there is no reasonable prospect of the site being used for business purposes, or ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.</p>	
<p>Organisation: Peckham Society NSPPSV140.11</p> <p>NSP 37 and NSP 39 and see also OKR and Blackpool Road Where will alternative builders merchants be located? This is contrary to the aspiration for a resilient community, and maintenance of employment uses</p>	<p>Site allocation NSP37 dictates within the site vision that development must provide at least the amount of floorspace (B use class) currently on the site.</p> <p>Amended Policy P28 dictates that development must retain small and independent business and that where existing small and independent businesses are at risk of displacement from a development there should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development..</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.53</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>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Noted.</p>

<p>Individual NSPPSV325.4</p> <p>CONSIDERS THE NEW SOUTHWARK PLAN TO BE SOUND AND LEGALLY COMPLIANT</p>	<p>Positive representation is acknowledged.</p>
<p>Representation</p>	<p>Officer Response</p>
<p>NSP40: Dulwich Community Hospital, East Dulwich Grove</p>	
<p>Organisation: Education and Skills Funding Agency NSPPSV55.6</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>Positive representation is acknowledged.</p>
<p>Organisation: Vital OKR Individuals NSPPSV91.36 and NSPPSV128.36</p> <p>Objection 12.</p> <p>We object to the failure to define any requirement for industrial accommodation within mixed-development on the following allocated sites where there is clear potential to incorporate such uses. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the allocation policies for each be revised to include requirements for a defined minimum quantum of industrial accommodation.</p>	<p>This site does not provide industrial accommodation. It is not considered appropriate to require industrial uses on sites which are not currently used for this purpose and are required for mixed use. Policy P26 requires re-provision of employment (B class) uses where sites are located in opportunity areas, town centres or it is specified in a site allocation. Policy P26 requires a marketing strategy to be provided for the use and occupation of the employment floorspace to be delivered to demonstrate how it will meet market demand. Therefore planning applications must ensure the delivery of</p>

	employment space is suitable to the local market and meeting demand. This means we would encourage a range of workspaces to suit demand in different parts of the borough. We are currently working on the types of affordable workspace that are in demand across different parts of Southwark to better inform developers.
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.54</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>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	Noted.
Representation	Officer Response
NSP41: Goose Green Trading Estate	
<p>Vital OKR, Individuals NSPPSV91.26 and NSPPSV128.26</p> <p>We object to the failure to define requirements for industrial accommodation within mixed-development site allocations for the following Non-Designated industrial Sites. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the allocation policies for each be revised to include requirements for a defined minimum quantum of industrial accommodation.</p> <p>NPPF para 14 requires Local Plans to meet objectively assessed needs.</p> <p>London Plan para 6.2.1 emphasises that smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. Hence it is stated that to deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole, and that ensuring a</p>	<p>This site is a non-designated industrial site. The site allocation and policy P26 requires re-provision of employment (B class) uses where sites are located in opportunity areas, town centres or it is specified in a site allocation. Policy P26 requires a marketing strategy to be provided for the use and occupation of the employment floorspace to be delivered to demonstrate how it will meet market demand. Therefore planning applications must ensure the delivery of employment space is suitable to the local market and meeting demand. This means we would encourage a range of workspaces to suit demand in different parts of</p>

sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

London Plan para 6.2.4 requires that where there is demand for workspace or viable existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the intensification or reconfiguration of space. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to accommodate replacement workspace and existing businesses on-site through intensification or reconfiguration. What constitutes a reasonable proximity should be determined on the circumstances of each case having regard to the impact on business supply chains and access to labour supply. Relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.

London Plan Policy E2 regarding low-cost business space requires that the provision, and where appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand. Hence development proposals that involve the loss of existing B1 space in areas where there is an identified shortage of lower-cost space should demonstrate that there is no reasonable prospect of the site being used for business purposes, or ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.

Organisation: Thames Water Utilities Ltd
NSPPSV184.55

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

the borough. We are currently working on the types of affordable workspace that are in demand across different parts of Southwark to better inform developers.

Representation is acknowledged and the representative is invited to consult the NSP41: Goose Green Trading Estate allocation, which indicates the council's vision for the site and outlines the guidance by which development must adhere to.

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.

Due to the complexities of wastewater 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 wastewater infrastructure. 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 Southwark Council to discuss the wastewater infrastructure needs relating to the Local Plan.

The Council met with Thames Water on 21 November 2018 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.