

Representation	Officer Response
<p data-bbox="188 320 546 352">NSP42: Newington Triangle</p> <p data-bbox="188 360 680 424">Organisation: Elephant Amenity Network NSPPSV57.17</p> <p data-bbox="188 469 1308 533">The site visions and uses are unsound because they fail to meet evidenced need. To be sound they should be amended as follows:</p> <ul data-bbox="188 541 1319 788" style="list-style-type: none"> • When referring to new homes, a significant proportion should be social rented housing. • Where retail is provided, a proportion of these should be replacement units for traders relocated from site 47. • Where open space is referred to, this should be described as green space unless there will be hard standing, in which this should be open and transparent • All sites should include small business space. • All sites should include community facilities. <p data-bbox="188 828 1330 963">In accordance with the Site Allocations methodology paper, we asked for meetings with the Council officers (at preferred options stage) to discuss how these changes to the site allocations could be achieved. We received no response from the Council, which is a further example of consultation failings under the legal requirements.</p>	<p data-bbox="1386 469 2103 1035">Any proposal coming forward will be assessed against the development plan. A number of these points are addressed in other policies of the Plan. P1 (Affordable homes) sets out further information on the affordable housing requirements; P29 (Small shops) sets out the requirement with regards to small shops and P44 (Community uses) sets out the requirement with regards to community facilities. P28: Affordable workspaces will contribute to the protection of existing local retailers, in conjunction with policy P38: Business Relocation. Replacement employment floorspace is specified in accordance with the Employment Land Review. We encourage sites to deliver open space as green spaces with parks and playspace facilities where appropriate. This will be determined and delivered on a site by site basis in accordance with the specific scheme designs.</p>
<p data-bbox="188 1299 582 1402">Organisation: Vital OKR Individual NSPPSV91.43 and NSPPSV128.43</p>	

Objection 12.

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.

This site allocation specifies the existing uses and requires that development must reprovide the same amount of employment floorspace on the 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. 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.

Organisation: Lawford and Sons Ltd/Capital Homes
NSPPSV105.3,3,46,7,8,

The methodology for the NSP Site Allocations states that the 'opportunity to contribute to area regeneration' will be 'given greater weight than site size'. Therefore, based on the potential of the site for redevelopment, and given that it is only 0.03 hectares below the 'general size' of sites which are to be included in the NSP Site Allocations going forward, we consider that 136 – 142 New Kent Road should remain as an 'opportunity site' of strategic importance, within the NSP. We also note that there are 7 number sites which have been allocated which fall below the 'general size', these are; NSP49, NSP59, NSP61, NSP62, NSP63, NSP73 and NSP74.

Representation noted. The site was identified in the Elephant and Castle SPD 2012 and the NSP Options version as a potential site for mixed use development. It has not been taken forward as a site allocation in the preferred options NSP due to the limited site area and limited development potential as a strategic development site. The site is located on the edge of two opportunity areas but it is not considered to be a gateway development site to achieve the aspirations of either the Elephant and Castle or Old Kent Road strategic visions. New Kent Road and the area surrounding the site is characterised by low-mid rise

buildings along a linear route. The council remain supportive of redevelopment of the site for mixed use and consider this could be achieved in the context of applying adopted planning policies i.e. to provide high quality development that is consistent with the character of the area. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF & London Plan. For further details, see the site allocations methodology report.

Organisation: Peabody
NSPPSV137.1

NEW SOUTHWARK PLAN: PROPOSED SUBMISSION VERSION (DECEMBER 2017)

REPRESENTATIONS SUBMITTED ON BEHALF OF PEABODY: NEWINGTON TRIANGLE (NSP42)

We are instructed by our client, Peabody, to submit representations in relation to the above site, in response to the London Borough of Southwark's (LBS) consultation on the New Southwark Plan (NSP): Proposed Submission Version.

As a general comment, we note that the National Planning Policy Framework (NPPF) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how this presumption should be applied at the local level.

The NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF and should be aspirational but realistic.

In responding to the Council's current Regulation 19 consultation, we have also made reference to the guidance set out in paragraph 182 of the NPPF, which requires Local Plans to be sound. To meet this requirement they should be:

- Positively Prepared – be based on objectively assessed development requirements, consistent with

Support noted.

achieving sustainable development.

- Justified – be the most appropriate strategy based on proportionate evidence.
- Effective – be deliverable over its period and based on effective joint working.
- Consistent with National Policy – enable the delivery of sustainable development in accordance with the policies of the NPPF.

The following representations have been prepared with regard to these criteria and we set out below our comments on the soundness of the New Southwark Plan Proposed Submission Version (2017), taking into account its compliance with national planning policy.

1. Previous Representations

We have made representations on behalf of our client in response to the previous consultation versions of the NSP, most recently being the NSP Preferred Options: New and Amended Policies (September 2017). The Newington Triangle site has been retained as an allocated site throughout the emerging versions of the NSP and we have sought to engage with the Council to ensure that the allocation is appropriate and will not restrict the emerging redevelopment proposals from coming forward. We have sought to ensure that that the site allocation is justified and effective.

2. The Site Allocation (NSP42: Newington Triangle)

The Newington Triangle site extends to approximately 1.34 hectares in size and is located within the Elephant & Castle Opportunity Area and Central Activities Zone (CAZ), as defined in the London Plan, Southwark UDP and Southwark Core Strategy. The site comprises brownfield land in an accessible location (PTAL 6a) and is not located within a Conservation Area and does not contain any listed buildings.

The site is allocated for comprehensive redevelopment in the NSP: Site NSP42. Acceptable uses for this site are considered to include residential, employment and retail floorspace. Commercial uses are required at ground floor level in order to provide active frontages along Newington Causeway and Borough Road.

We strongly support the allocation of this site for significant residential-led mixed use redevelopment which is considered to be consistent with the sites location within the Elephant and Castle Opportunity Area and CAZ. The site allocation is considered to be consistent with the

<p>NPPF core principles which promote mixed use development and encourage multiple benefits from the use of previously developed urban land.</p>	
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.56</p> <p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered.</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Noted. Applicants of major developments will be advised to consult Thames Waters’ free pre-application advice at the earliest stage.</p>
<p>Representation</p>	<p>Officer Response</p>
<p>NSP43: Bakerloo Line Sidings and 7 St George’s Circus</p>	
<p>Organisation: Elephant Amenity Network NSPPSV57.18</p> <p>The site visions and uses are unsound because they fail to meet evidenced need. To be sound they should be amended as follows:</p> <ul style="list-style-type: none"> • When referring to new homes, a significant proportion should be social rented housing. • Where retail is provided, a proportion of these should be replacement units for traders relocated from site 47. • Where open space is referred to, this should be described as green space unless there will be hard standing, in which this should be open and transparent • All sites should include small business space. • All sites should include community facilities. <p>In accordance with the Site Allocations methodology paper, we asked for meetings with the Council officers (at preferred options stage) to discuss how these changes to the site allocations</p>	<p>Any proposal coming forward will be assessed against the development plan. A number of these points are addressed in other policies of the Plan. P1 (Affordable homes) sets out further information on the affordable housing requirements; P29 (Small shops) sets out the requirement with regards to small shops and P44 (Community uses) sets out the requirement with regards to community facilities. P28: Affordable workspaces will contribute to the protection of existing local retailers, in conjunction with policy P38: Business Relocation. Replacement employment floorspace is specified in accordance with the Employment Land Review. We encourage sites to deliver open space as green spaces with parks and playspace facilities where appropriate in. This will be determined and delivered on a site by site basis in accordance with the specific schemes</p>

<p>could be achieved. We received no response from the Council, which is a further example of consultation failings under the legal requirements.</p>	<p>designs.</p>
<p>Organisation: Vital OKR Individuals NSPPSV91.27 and NSPPSV128.27</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 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>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</p>	<p>This site allocation specifies the existing uses which doesn't include any employment (B class) uses however employment is required to be provided in the site allocation, at the Lambeth Road junction.</p> <p>Policy P26 requires reprovision 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>commencement of development to ensure that disruption to existing businesses is minimised.</p> <p>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.</p>	
<p>Organisation: TfL City Planning NSPPSV181.20</p> <p>This is a part/wholly TfL-owned site, so TfL Commercial Development would be best placed to provide comments.</p>	<p>Representation noted.</p>
<p>Organisation: TfL Commercial Development NSPPSV182.3</p> <p>We welcome some of the proposed changes that have been made as a result of our previous representations, particularly the removal of references to a quantum of open space and its indicative location.</p> <p>However, the requirement to “retain the amount of employment floorspace currently on the site” should be removed as it is incorrect. There is no existing ‘employment’ floorspace on the site. The existing operational rail carriage depot is used for the stationing of trains; it is sui-generis (ie. not a Class B business use) and supports very few jobs. Paragraph 6.4.5 of the emerging DLP is clear that “The principle of no net loss of [industry, services to support London’s economic function etc] floorspace capacity does not apply to sites previously used for utilities infrastructure</p>	<p>Noted. The site requirements have been amended. Employment floorspace is now encouraged as a new use particularly on the junction of Lambeth Road. The site allocation is situated in a major town centre, therefore the site also promotes town centre uses on the ground floor to promote active frontages.</p>

or land for transport functions which are no longer required". Whether there is an ongoing requirement for the rail carriage depot will be informed by operational considerations, including the possible Bakerloo Line extension. For this reason redevelopment / partial redevelopment of this site will be a longer term (likely 5-15 years) opportunity.

The Preferred Options Consultation Report indicates that the site includes "employment floorspace in the form of A use classes". However, for planning purposes, the A Use Classes (shops; financial and professional services; food and drink; drinking establishments; and hot food takeaways) are not normally considered to be 'employment' floorspace; 'employment' is usually restricted to uses within the B Use Classes (business; general industry; and storage and distribution). Indeed, the 2016 Southwark Employment Land Study confirms this by focussing on B class land uses, noting that "while facilities such as schools, further education colleges, health services and retail premises are important employers within some parts of Southwark, they do not fall within these land use classes and are therefore not directly relevant to this [employment land study] review".

Therefore, for the sake of clarity, we suggest that the second bullet point is amended to read:

- Retain the amount of ~~employment~~ Class A (shops; financial and professional services; food and drink; drinking establishments; and hot food takeaways) floorspace currently on the site;

We acknowledge the vision for active frontages in this location and would consider this as part of any comprehensive redevelopment scheme, both in the interests of good place-making and delivering revenue for re-investment into the transport network. This requirement for wider town centre uses should (as currently drafted) be mentioned separately from the retained Class A floorspace.

Organisation: Thames Water Utilities Ltd.
NSPPSV184.57

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

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

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.

Representation

Officer Response

NSP44: 63-85 Newington Causeway

Organisation: Blyford Investment Co
NSPPSV25.1

We are writing on behalf of our client, Blyford Investment Co Ltd, to submit representations to the Proposed Submission Version of the New Southwark Plan.

Our client is the owner of the site at 73-85 Newington Causeway, SE1. The majority of the site has been within their ownership since 1959 with further plots acquired in the 1980s. This site is included within the wider site allocation NSP44 at 63-85 Newington Causeway. Representations have been made on previous versions of the emerging New Southwark Plan dated 28 April 2017.

We welcome the opportunity to make representations on the emerging New Southwark Plan and would like to reiterate our previous comments in relation to the site allocation NSP44.

We support the principle of the allocation of the site within with wider site allocation NSP44 relating to 63-85 Newington Causeway. The recognition that the site can accommodate taller buildings subject to consideration of impacts on existing character, heritage and detailed townscape analysis is supported alongside the overall redevelopment for comprehensive mixed-used scheme. It is also recognised and supported that the future development within the site has capacity to provide high levels of homes and jobs.

We are keen to ensure that maximum flexibility in relation to mixed-use development for this site is maintained through the site allocation to ensure that regeneration areas can reach their full potential in meeting and exceeding targets set by the New Southwark Plan. The intended uses and

The property on the corner of Newington Causeway and Avonmonth Street is a residential building currently occupied, therefore it is not considered appropriate for the site allocation to be extended to include this building for redevelopment.

The Site Allocation specifies at least 50% of the employment floorspace as this is required to retain / meet employment needs in the borough as set out in the evidence base. Replacement employment floorspace is specified in accordance with the Employment Land Review.

The vision and business plan for Southwark Playhouse included the relocation of the theatre to London Bridge Station. The relocation to this location is no longer possible; therefore the most suitable alternative option is the existing premises on Newington Causeway. As such the retention of the existing theatre use or the provision of an alternative cultural use (D2) subject to need in this location is considered acceptable.

The reference to planning application 12/AP/2694 has been added to the site allocation.

figures will be crucial to future deliverability and this therefore needs careful consideration.

We remain of the view that in order for future proposals to maximise the redevelopment opportunities for the whole site allocation, it is recommended that the site should be extended to include the properties on the corner of Newington Causeway and Avonmouth Street.

In respect of the Site Vision requirement to provide “at least 50% of the development as employment floorspace” is considered too restrictive and should be amended to “provide employment generating floorspace” to allow for future flexibility in the type of uses that could be provided on site. This description should be added to the Site Vision for the NSP44 site allocation.

We note that the current planning permission for the Southwark Playhouse is a personal permission (application reference: 12/AP/2964). Condition 2 attached to the aforementioned planning permission states that upon vacation of Southwark Playhouse from the building, “the use shall be discontinued and the property will revert back to B1 Use Class”. The existing lawful use of the building is therefore B1 Use Class. It is possible that the Southwark Playhouse could move to a different location in the future which would mean the building would revert back to B1 office use if this were to occur. It is therefore considered that the theatre should not be a ‘required use’ as part of the site allocation.

We support the opportunity for active frontages along Newington Causeway and welcome the flexibility in relation to the variety of land uses in order to improve the vitality and viability of the town centre.

The site allocation relates to a number of different plots that are within a variety of ownerships. In light of this, it is important to consider that the redevelopment of the site allocation could come forward in a number of different phases. We therefore feel it would be more appropriate for the site allocation to acknowledge the various plots within the site description and recognise that redevelopment of the individual plots could come forward at various times within the site vision.

It is important that redevelopment of these plots is not delayed or hampered and the allocation should encourage redevelopment at different stages whilst also ensuring that the redevelopment of individual or multiple plots should future proof the deliverability of the remaining and

surrounding plots.

Organisation: Elephant Amenity Network
NSPPSV57.19

The site visions and uses are unsound because they fail to meet evidenced need. To be sound they should be amended as follows:

- When referring to new homes, a significant proportion should be social rented housing.
- Where retail is provided, a proportion of these should be replacement units for traders relocated from site 47.
- Where open space is referred to, this should be described as green space unless there will be hard standing, in which this should be open and transparent
- All sites should include small business space.
- All sites should include community facilities.

In accordance with the Site Allocations methodology paper, we asked for meetings with the Council officers (at preferred options stage) to discuss how these changes to the site allocations could be achieved. We received no response from the Council, which is a further example of consultation failings under the legal requirements.

The site proposal is not sound because the existing use includes an industrial site and yet there is no requirement for industrial accommodation. To be sound, there should be requirement for a defined minimum amount of industrial accommodation.

Any proposal coming forward will be assessed against the development plan. A number of these points are addressed in other policies of the Plan. P1 (Affordable homes) sets out further information on the affordable housing requirements; P29 (Small shops) sets out the requirement with regards to small shops and P44 (Community uses) sets out the requirement with regards to community facilities. P28: Affordable workspaces will contribute to the protection of existing local retailers, in conjunction with policy P38: Business Relocation. Replacement employment floorspace is specified in accordance with the Employment Land Review. We encourage sites to deliver open space as green spaces with parks and playspace facilities where appropriate. This will be determined and delivered on a site by site basis in accordance with the specific scheme designs.

The site includes a small amount of industrial floorspace. The site allocation and Policy P26 (Office and business development) 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. It is expected this site could achieve an uplift in employment floorspace. Policy P26 (Office and business development) 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.

	<p>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>Organisation: Vital OKR Individuals NSPPSV91.28 and NSPPSV128.28</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 sufficient supply of business space of different types and sizes will help to</p>	<p>The site includes a small amount of industrial floorspace. The site allocation and Policy P26 (Office and business development) 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. It is expected this site could achieve an uplift in employment floorspace. Policy P26 (Office and business development) 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>

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: Vital OKR
Individuals
NSPPSV91.42 and NSPPSV128.42

Objection 12.

The site includes a small amount of industrial floorspace. The site allocation and Policy P26 (Office and business development) 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. It is expected this site could achieve an uplift in employment

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.

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Organisation: RDI Reit
NSPPSV144.1

NEW SOUTHWARK PLAN – PROPOSED SUBMISSION VERSION CONSULTATION

We are writing on behalf of our client, RDI REIT, to submit representations to the Proposed Submission Version of the New Southwark Plan. Redefine International own the buildings at 63-67 Newington Causeway. We welcome the opportunity to make representations on the emerging New Southwark Plan.

We support the principle of the allocation of the site within with wider site allocation NSP44 relating to 63-85 Newington Causeway. The recognition that the site can accommodate taller buildings subject to consideration of impacts on existing character, heritage and detailed townscape analysis is supported alongside the overall redevelopment for comprehensive mixed-used scheme. It is also recognised and supported that the future development within the site has capacity to provide high levels of homes and jobs.

We are keen to ensure that maximum flexibility in relation to mixed-use development for this site is maintained through the site allocation to ensure that regeneration areas can reach their full potential in meeting and exceeding targets set by the New Southwark Plan. The intended uses and figures will be crucial to future deliverability and this therefore needs careful consideration.

We are of the view that in order for future proposals to maximise the redevelopment opportunities for the whole site allocation, it is recommended that the site should be extended to

The property on the corner of Newington Causeway and Avonmonth Street is a residential building currently occupied, therefore it is not considered appropriate for the site allocation to be extended to include this building for redevelopment.

The Site Allocation specifies at least 50% of the employment floorspace as this is required to retain / meet employment needs in the borough as set out in the evidence base. Replacement employment floorspace is specified in accordance with the Employment Land Review.

The vision and business plan for Southwark Playhouse included the relocation of the theatre to London Bridge Station. The relocation to this location is no longer possible; therefore the most suitable alternative option is the existing premises on Newington Causeway. As such the retention of the existing theatre use or the provision of an alternative cultural use (D2) subject to need in this location is considered acceptable.

include the properties on the corner of Newington Causeway and Avonmouth Street. In respect of the Site Vision requirement to provide “at least 50% of the development as employment floorspace” is considered too restrictive and should be amended to “provide employment generating floorspace” to allow for future flexibility in the type of uses that could be provided on site. This description should be added to the Site Vision for the NSP44 site allocation.

We note that the current planning permission for the Southwark Playhouse is a personal permission (application reference: 12/AP/2964). Condition 2 attached to the aforementioned planning permission states that upon vacation of Southwark Playhouse from the building, “the use shall be discontinued and the property will revert back to B1 Use Class”. The existing lawful use of the building is therefore B1 Use Class. It is possible that the Southwark Playhouse could move to a different location in the future which would mean the building would revert back to B1 office use if this were to occur. It is therefore considered that the theatre should not be a ‘required use’ as part of the site allocation.

We support the opportunity for active frontages along Newington Causeway and welcome the flexibility in relation to the variety of land uses in order to improve the vitality and viability of the town centre.

The site allocation relates to a number of different plots that are within a variety of ownerships. In light of this, it is important to consider that the redevelopment of the site allocation could come forward in a number of phases. We therefore feel it would be more appropriate for the site allocation to acknowledge the various plots within the site description and recognise that redevelopment of the individual plots could come forward at various times within the site vision. It is important that redevelopment of these plots is not delayed or hampered and the allocation should encourage redevelopment at different stages whilst also ensuring that the redevelopment of individual or multiple plots should future proof the deliverability of the remaining and surrounding plots.

The reference to planning application 12/AP/2694 has been added to the site allocation.

Organisation: Thames Water Utilities Ltd
NSPPSV184.58

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

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

<p>encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered.</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	
<p>Organisation: Theatres Trust NSPPSV189.5</p> <p>AV08.1 recognises the area’s cultural provision, with AV08.3 noting the area has the potential to deliver significant amounts of new uses including leisure and cultural. This is welcomed by the Trust. However, we have some concerns regarding individual site allocations as set out subsequently.</p>	<p>Support noted for the area visions.</p>
<p>Organisation: Theatres Trust NSPPSV189.6</p> <p>The supports retention of the Southwark Playhouse as part of redevelopment. While the Trust recognises the need for new development in Southwark especially where it provides much-needed new homes and employment, it is also important to secure facilities for the long term social and cultural wellbeing of local people as part of sustainable development. We therefore recommend greater consideration for and protection of the Playhouse within the design guidance, and that ‘subject to need’ is deleted both there and within the Site vision. We also recommend that the design guidance makes it explicitly clear that any replacement theatre is designed to meet the needs of audiences and performers, preferably with a further stipulation that the existing operator or an alternative recognised theatre provider is committed to the scheme, so as to avoid a token ‘shell’ being delivered that is unsuitable and unviable for future theatre use.</p> <p>As per the Trust’s comments during the previous Area Visions and Site Allocations consultation, the Trust requests amendment of the vision and design and accessibility guidance to make reference to redevelopment providing a replacement cultural venue to replace the Coronet. This is to ensure such a venue is delivered, and corresponds with our objection to the planning</p>	<p>The site allocation specifies that development must retain the existing theatre use or provide an alternative cultural use (D2). Subject to need has now been removed.</p>

<p>application on the site which is currently subject to re-consultation. We look forward to being further updated on the progress of your new Local Plan as it moves towards adoption.</p>	
<p>Representation</p>	<p>Officer Response</p>
<p>NSP45: Salvation Army, Headquarters, Newington Causeway</p> <p>Organisation: Elephant Amenity Network NSPPSV57.20</p> <p>The site visions and uses are unsound because they fail to meet evidenced need. To be sound they should be amended as follows:</p> <ul style="list-style-type: none"> • When referring to new homes, a significant proportion should be social rented housing. • Where retail is provided, a proportion of these should be replacement units for traders relocated from site 47. • Where open space is referred to, this should be described as green space unless there will be hard standing, in which this should be open and transparent • All sites should include small business space. • All sites should include community facilities. <p>In accordance with the Site Allocations methodology paper, we asked for meetings with the Council officers (at preferred options stage) to discuss how these changes to the site allocations could be achieved. We received no response from the Council, which is a further example of consultation failings under the legal requirements.</p>	<p>Any proposal coming forward will be assessed against the development plan and the policies within. A number of these points are addressed in other policies of the Plan. P1 (Affordable homes) sets out further information on the affordable housing requirements; P29 (Small shops) sets out the requirement with regards to small shops and P44 (Community uses) sets out the requirement with regards to community facilities. P28: Affordable workspaces will contribute to the protection of existing local retailers, in conjunction with policy P38: Business Relocation. Replacement employment floorspace is specified in accordance with the Employment Land Review. We encourage sites to deliver open space as green spaces with parks and playspace facilities where appropriate. This will be determined and delivered on a site by site basis in accordance with the specific scheme designs.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.59</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. Notwithstanding the above, applicants will still be notified to consult with Thames Water.</p>

Organisation: The Salvation Army Trustee Company
NSPPSV188.1

These representations relate to the site at 101 Newington Causeway and form part of the proposed site allocation 'NSP45: Salvation Army Headquarters, Newington Causeway' ("NSP45") in the NSP. No. 101 Newington Causeway is outlined in red in the attached site plan in Appendix A. These representations also take into account our Client's other land holding at 1 Princess Street, as shown outlined in blue, also in the attached site plan in Appendix A. Having reviewed the NSP, it is our view that elements of the NSP are not sound as they do not meet all of the tests for the reasons set out below.

Background

No.101 Newington Causeway comprises an 11 storey building located on the north-eastern junction of Newington Causeway and Rockingham Street and is bounded by Tiverton Street and the railway line. The site currently accommodates office space for the headquarters of the Salvation Army. The site also houses space for band practice, as well as the Salvation Army Church which is located on the ground floor. At the rear of the site, a five storey building accommodates the Salvation Army's shop as well as its publishing department. Cycle and car parking spaces are also provided at the rear of the site on ground level. No.101 Newington Causeway is directly served by multiple bus routes from a stop outside of the building, with Elephant and Castle Station located approximately 200m to the south west, providing access to London Underground Bakerloo and Northern lines, as well as National Rail services.

No. 1 Princess Street is located on the north-western junction of Princess Street and is currently used as a Church by the Salvation Army. This site does not form part of the proposed site allocation NSP45.

Planning Context

Both sites are within the Elephant and Castle Major Town Centre, the Central Activities Zone (CAZ) and the Elephant & Castle Opportunity Area. Both sites also have a high level of transport connectivity i.e. rating of 6b (the highest) in terms of its Public Transport Accessibility Level (PTAL)

Any proposal coming forward will be assessed against the development plan and the policies within. P1 (Affordable homes) sets out further information on the affordable housing requirements. Comprehensive redevelopment schemes that propose private rented homes will be assessed on a case by case basis against the development plan. The density matrix has been removed from the policy to be in line with the London Plan. The site allocation sets out flexibility in relation to providing a community facility through stating 'may provide'. The potential of providing D1 use has been identified on this site, as such it is acceptable to be included within the site vision. The requirement of 50% employment floorspace necessary to meet the employment needs of the area and grow employment space in the CAZ. The Site Allocation requires at least replacement employment floorspace to be provided in redevelopment or 50% of the site, whichever is greater. This has been determined through the Employment Land Review.

as denoted by Transport for London (TfL).

The Elephant and Castle Opportunity Area provides a policy context supportive of regeneration and growth as a local and regional (London) level, with the adopted Core Strategy, Saved Southwark Plan Policy 3.20 and adopted Policy SPD17 (Building Heights) in the Elephant & Castle SPD (2012) identifying the locality as suitable for tall buildings.

In the context of the Council's aspiration for the regeneration of the wider Elephant and Castle area, already there are a number of large-scale developments currently under construction or which have been granted planning permission in the immediate area surrounding 101 Newington Causeway. This includes 80-94 Newington Causeway (formerly Eileen House), a 41 and 8 storey comprising office, residential and retail space, with construction works nearing completion. Adjacent to the site to the north is the recently completed 80-94 Newington Causeway residential scheme. To the south west of the site at Skipton House, planning permission was recently granted for a major mixed use residential and commercial scheme of up to 39 storeys in height.

In this context of substantial change and regeneration, the site at 101 Newington Causeway has the potential to accommodate significant growth and to contribute towards London's need for housing, commercial and other town centre uses.

NEW SOUTHWARK PLAN – REPRESENTATIONS

Our Client is currently exploring the future options at the 101 Newington Causeway site and we fully support the principles behind site allocation NSP45 to deliver a large-scale comprehensive mixed use redevelopment to include residential and commercial uses. Our client also fully supports the Emerging Policy P14 (Tall Buildings) of the NSP which sets out that tall buildings will be located in areas that benefit from the highest levels of public transport access, typically major town centres, Opportunity Areas and the CAZ i.e. in which 101 Newington Causeway is located, and consider that the principle of tall buildings can be accommodated on site allocation NSP45. Our client fully supports NSP45 which states that a comprehensive mixed-use redevelopment of the site could include taller buildings.

Residential

Our client fully supports that redevelopment of proposed site allocation NSP45 should provide new homes (C3). However, some of the emerging policies are unduly restrictive and we have set out our comments as below. Making this change would provide flexibility and it will ensure that the NSP is effective in its delivery. We also consider that Emerging Policy P9 (Optimising delivery of new homes) of the NSP which requires development to be within specified residential density is also restrictive and inflexible. This would have the effect of unnecessarily constraining development and design, and would therefore not be effective in its delivery. Draft Policy D6 (Optimising housing density) of the Draft London Plan (December 2017) seeks to optimise the use of land through a design led approach with regard to context, connectivity and infrastructure capacity. It could be held that Emerging Policy P9 is not consistent with the London Plan. Whilst Emerging Policy P9 sets out that in exceptional circumstances development may exceed the specified density ranges where it achieves an exemplary standard of residential development, to ensure flexibility we would request that the following underlined text is added to Emerging Policy P9: A flexible approach to density guidance should be taken when considering comprehensive redevelopment proposals, with the optimum density of a development resulting from a design-led approach.

Making this change would provide flexibility and it will ensure that the NSP is effective in its delivery. We note Emerging Policy P1 (Affordable homes) sets out the thresholds and criteria in the provision of affordable homes. We support the policy's approach that the provision of affordable homes is subject to viability.

We note Emerging Policy P4 (Private rented homes) sets out a range of criteria if more than 100 new homes in developments are self-contained, private rented homes. The criteria could have the effect of unnecessarily constraining development and would therefore not be effective in its delivery. To ensure there is flexibility, we would request that the following underlined text is added to Emerging Policy P4: A flexible approach to private rented homes should be taken when considering comprehensive redevelopment proposals. Making this change would provide flexibility and it will ensure that the NSP is effective in its delivery.

Employment Floorspace

We note that the proposed site allocation NSP45 includes the following text:

"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.”

While our Client is supportive of the principle of encouraging a comprehensive mixed use redevelopment to include employment floorspace (B class uses), the current wording provides little flexibility and is far too restrictive. It is also unduly prescriptive. Paragraph 22 of the National Planning Policy Framework states that the long-term protection of sites for employment uses should be avoided where there is no reasonable prospect of the site being used for the allocated employment use. We therefore consider this particular requirement of proposed site allocation NSP45 is not consistent national policy. This could also have the effect of unnecessarily constraining development and would therefore not be effective in its delivery. As such, we request that the site allocation wording is amended as follows:

“Redevelopment of the site must:

- Re-provide at least the amount of employment floorspace (B class) currently on the site, except where there is no demand for use or re-provision or provide at least 50% of the development as employment floorspace, whichever is greater.”

Making this change would provide flexibility and it will ensure that the NSP is effective in its delivery. We also note Emerging Policy P26 (Office and business development) of the NSP requires proposals in the CAZ and OAs, and where specified in site allocations to retain or increase employment floorspace (our emphasis). The emerging policy does not set out any specific thresholds or percentages regarding employment floorspace increases and as such, we don't consider that the proposed site allocation NSP45 should include any thresholds/percentages.

Community Health Hub / Community Uses

We note that the proposed site allocation NSP45 includes the following text:

“Redevelopment of the site may:

- Provide a new community health hub (D1)”

Whilst community uses are supported in principle, we consider that the possible inclusion of a community health hub within a redevelopment proposal is unduly prescriptive and therefore would not be effective in its delivery.

Proposals that come forward in the future could provide a range of community uses, but only if they are part of a comprehensive major mixed use redevelopment scheme. Indeed the site allocation already indicates the inclusion of D1 uses, stating the following:

“Redevelopment of the site must:

- Provide active frontages with ground floor town centre uses (A1, A2, A3, A4, D1, D2)”

As such, we request that the following wording is deleted:

“Redevelopment of the site may:

- Provide a new community health hub (D1)”

This would ensure that the NSP is effective in its delivery.

In any event, the Salvation Army is in a unique position to offer a range of community services. If a future redevelopment option involves the relocation of the Salvation Army’s headquarters to an alternative site, it is essential to approach the redevelopment options flexibly as it relates to its existing community uses at 101 Newington Causeway and at 1 Princess Street.

Public Examination

On behalf of our client we consider it is necessary we attend the oral part of the examination. We would be grateful if you could keep us updated.

Conclusion

In summary, our client supports a high quality, major mixed use redevelopment at 101 Newington Causeway site which would provide significant public benefits including employment and new housing. However, the proposed site allocation NSP45 and the policies mentioned above in their current form would constrain potential redevelopment options and they would not be effective in their delivery, and would not be consistent with national policy. The NSP is therefore not sound. However, with the suggested amendments, we consider that NSP would be sound.

Organisation: The Salvation Army Trustee Company
NSPPSV188.2

Any proposal coming forward will be assessed against the development plan and the policies within. P1 (Affordable homes) sets out further information on the affordable

We are instructed by the Salvation Army Trustee Company (“our Client”) to submit representations in response to the London Borough of Southwark’s (LBS) consultation on the New Southwark Plan (NS).

These representations relate to the site at 101 Newington Causeway and form part of the proposed site allocation ‘NSP45: Salvation Army Headquarters, Newington Causeway’ (“NSP45”) in the NSP. No. 101 Newington Causeway is outlined in red in the attached site plan in Appendix A. These representations also take into account our Client’s other land holding at 1 Princess Street, as shown outlined in blue, also in the attached site plan in Appendix A.

Having reviewed the NSP, it is our view that elements of the NSP are not sound as they do not meet all of the tests for the reasons set out below.

Background

No.101 Newington Causeway comprises an 11 storey building located on the north-eastern junction of Newington Causeway and Rockingham Street and is bounded by Tiverton Street and the railway line. The site currently accommodates office space for the headquarters of the Salvation Army. The site also houses space for band practice, as well as the Salvation Army Church which is located on the ground floor. At the rear of the site, a five storey building accommodates the Salvation Army’s shop as well as its publishing department. Cycle and car parking spaces are also provided at the rear of the site on ground level. No.101 Newington Causeway is directly served by multiple bus routes from a stop outside of the building, with Elephant and Castle Station located approximately 200m to the south west, providing access to London Underground Bakerloo and Northern lines, as well as National Rail services.

No. 1 Princess Street is located on the north-western junction of Princess Street and is currently used as a Church by the Salvation Army. This site does not form part of the proposed site allocation NSP45.

Planning Context

Both sites are within the Elephant and Castle Major Town Centre, the Central Activities Zone (CAZ) and the Elephant & Castle Opportunity Area. Both sites also have a high level of transport connectivity i.e. rating of 6b (the highest) in terms of its Public Transport Accessibility Level (PTAL)

housing requirements. Comprehensive redevelopment schemes that propose private rented homes will be assessed on a case by case basis against the development plan. The density matrix has been removed from the policy to be in line with the London Plan. The site allocation sets out flexibility in relation to providing a community facility through stating ' may provide'. The potential of providing D1 use has been identified on this site, as such it is acceptable to be included within the site vision. The requirement of 50% employment floorspace necessary to meet the employment needs of the area and grow employment space in the CAZ. The Site Allocation requires at least replacement employment floorspace to be provided in redevelopment or 50% of the site, whichever is greater. This has been determined through the Employment Land Review.

as denoted by Transport for London (TfL).

The Elephant and Castle Opportunity Area provides a policy context supportive of regeneration and growth as a local and regional (London) level, with the adopted Core Strategy, Saved Southwark Plan Policy 3.20 and adopted Policy SPD17 (Building Heights) in the Elephant & Castle SPD (2012) identifying the locality as suitable for tall buildings.

In the context of the Council's aspiration for the regeneration of the wider Elephant and Castle area, already there are a number of large-scale developments currently under construction or which have been granted planning permission in the immediate area surrounding 101 Newington Causeway. This includes 80-94 Newington Causeway (formerly Eileen House), a 41 and 8 storey comprising office, residential and retail space, with construction works nearing completion. Adjacent to the site to the north is the recently completed 80-94 Newington Causeway residential scheme. To the south west of the site at Skipton House, planning permission was recently granted for a major mixed use residential and commercial scheme of up to 39 storeys in height.

In this context of substantial change and regeneration, the site at 101 Newington Causeway has the potential to accommodate significant growth and to contribute towards London's need for housing, commercial and other town centre uses.

NEW SOUTHWARK PLAN – REPRESENTATIONS

Our Client is currently exploring the future options at the 101 Newington Causeway site and we fully support the principles behind site allocation NSP45 to deliver a large-scale comprehensive mixed use redevelopment to include residential and commercial uses. Our client also fully supports the Emerging Policy P14 (Tall Buildings) of the NSP which sets out that tall buildings will be located in areas that benefit from the highest levels of public transport access, typically major town centres, Opportunity Areas and the CAZ i.e. in which 101 Newington Causeway is located, and consider that the principle of tall buildings can be accommodated on site allocation NSP45.

Our client fully supports NSP45 which states that a comprehensive mixed-use redevelopment of the site could include taller buildings.

Residential

Our client fully supports that redevelopment of proposed site allocation NSP45 should provide new homes (C3). However, some of the emerging policies are unduly restrictive and we have set out our comments as below. It is considered that Emerging Policy P2 (New family homes) of the NSP which sets out a specific housing mix to be achieved is restrictive. This would have the effect of unnecessarily constraining development and would therefore not be effective in its delivery. As such, we request that the following underlined text is added:

A flexible approach to housing mix should be taken when considering comprehensive redevelopment proposals.

Making this change would provide flexibility and it will ensure that the NSP is effective in its delivery. We also consider that Emerging Policy P9 (Optimising delivery of new homes) of the NSP which requires development to be within specified residential density is also restrictive and inflexible. This would have the effect of unnecessarily constraining development and design, and would therefore not be effective in its delivery. Draft Policy D6 (Optimising housing density) of the Draft London Plan (December 2017) seeks to optimise the use of land through a design led approach with regard to context, connectivity and infrastructure capacity. It could be held that Emerging Policy P9 is not consistent with the London Plan. Whilst Emerging Policy P9 sets out that in exceptional circumstances development may exceed the specified density ranges where it achieves an exemplary standard of residential development, to ensure flexibility we would request that the following underlined text is added to Emerging Policy P9:

A flexible approach to density guidance should be taken when considering comprehensive redevelopment proposals, with the optimum density of a development resulting from a design-led approach.

Making this change would provide flexibility and it will ensure that the NSP is effective in its delivery. We note Emerging Policy P1 (Affordable homes) sets out the thresholds and criteria in the provision of affordable homes. We support the policy's approach that the provision of affordable homes is subject to viability.

We note Emerging Policy P4 (Private rented homes) sets out a range of criteria if more than 100 new homes in developments are self-contained, private rented homes. The criteria could have the

effect of unnecessarily constraining development and would therefore not be effective in its delivery. To ensure there is flexibility, we would request that the following underlined text is added to Emerging Policy P4:

A flexible approach to private rented homes should be taken when considering comprehensive redevelopment proposals.

Making this change would provide flexibility and it will ensure that the NSP is effective in its delivery.

Employment Floorspace

We note that the proposed site allocation NSP45 includes the following text:

“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.”

While our Client is supportive of the principle of encouraging a comprehensive mixed use redevelopment to include employment floorspace (B class uses), the current wording provides little flexibility and is far too restrictive. It is also unduly prescriptive.

Paragraph 22 of the National Planning Policy Framework states that the long-term protection of sites for employment uses should be avoided where there is no reasonable prospect of the site being used for the allocated employment use. We therefore consider this particular requirement of proposed site allocation NSP45 is not consistent national policy. This could also have the effect of unnecessarily constraining development and would therefore not be effective in its delivery. As such, we request that the site allocation wording is amended as follows:

“Redevelopment of the site must:

· Re-provide at least the amount of employment floorspace (B class) currently on the site, except where there is no demand for use or re-provision or provide at least 50% of the development as employment floorspace, whichever is greater.”

Making this change would provide flexibility and it will ensure that the NSP is effective in its

delivery. We also note Emerging Policy P26 (Office and business development) of the NSP requires proposals in the CAZ and OAs, and where specified in site allocations to retain or increase employment floorspace (our emphasis). The emerging policy does not set out any specific thresholds or percentages regarding employment floorspace increases and as such, we don't consider that the proposed site allocation NSP45 should include any thresholds/percentages.

Community Health Hub / Community Uses

We note that the proposed site allocation NSP45 includes the following text:

"Redevelopment of the site may:

- Provide a new community health hub (D1)"

Whilst community uses are supported in principle, we consider that the possible inclusion of a community health hub within a redevelopment proposal is unduly prescriptive and therefore would not be effective in its delivery.

Proposals that come forward in the future could provide a range of community uses, but only if they are part of a comprehensive major mixed use redevelopment scheme. Indeed the site allocation already indicates the inclusion of D1 uses, stating the following:

"Redevelopment of the site must:

- Provide active frontages with ground floor town centre uses (A1, A2, A3, A4, D1, D2)"

As such, we request that the following wording is deleted:

"Redevelopment of the site may:

- Provide a new community health hub (D1)"

This would ensure that the NSP is effective in its delivery.

In any event, the Salvation Army is in a unique position to offer a range of community services. If a future redevelopment option involves the relocation of the Salvation Army's headquarters to an alternative site, it is essential to approach the redevelopment options flexibly as it relates to its existing community uses at 101 Newington Causeway and at 1 Princess Street.

Emerging Policy P44 (Community Uses) of the NSP currently requires that development retain community uses. However, this emerging policy also sets out that in exceptional circumstances there may no longer be a need for a facility, and that this must be demonstrated through

evidence of suitable marketing for a continuous period of two years. In the context of proposed site allocation NSP45 and its significant potential to provide a major mixed scheme redevelopment and associated planning and public benefits, it is essential that a flexible approach is taken with respect to retaining any existing community facilities. A flexible approach would ensure that the site is not unnecessarily constrained. For example, an inflexible approach to retain all community uses could possibly restrict the provision of a significant number of much-needed new homes.

In this context, we would therefore request that the following wording of the policy be amended, and that the underlined text is added:

P44: Community uses

1 New community facilities (Use Class D1, D2 and Sui Generis) will be permitted where provision is made for the facility to be used by all members of the community.

2 Development should retain community facilities. In exceptional circumstances there may no longer

be a local need for a facility. This must be demonstrated through evidence of suitable marketing for

continuous period of at least two years, immediately prior to any planning application, for both its existing condition and as an opportunity for an improved community facility.

3. A flexible approach to retaining community facilities will be taken when considering comprehensive redevelopment proposals.

This would ensure that the NSP is effective in its delivery.

Public Examination

On behalf of our client we consider it is necessary we attend the oral part of the examination. We would be grateful if you could keep us updated.

Conclusion

In summary, our client supports a high quality, major mixed use redevelopment at 101 Newington Causeway site which would provide significant public benefits including employment and new housing. However, the proposed site allocation NSP45 and the policies mentioned above in their

current form would constrain potential redevelopment options and they would not be effective in their delivery, and would not be consistent with national policy. The NSP is therefore not sound. However, with the suggested amendments, we consider that NSP would be sound.

Please do not hesitate to contact me or my colleague to arrange a meeting, and/or if you have any further queries. In any event, we would be grateful if you could keep us updated of the progress of the New Southwark Plan.

Representation

Officer Response

NSP47: Elephant and Castle Shopping Centre and London College of Communication

Organisation: Elephant Amenity Network
NSPPSV57.22

The site visions and uses are unsound because they fail to meet evidenced need. To be sound they should be amended as follows:

- When referring to new homes, a significant proportion should be social rented housing.
- Where retail is provided, a proportion of these should be replacement units for traders relocated from site 47.
- Where open space is referred to, this should be described as green space unless there will be hard standing, in which this should be open and transparent
- All sites should include small business space.
- All sites should include community facilities.

In accordance with the Site Allocations methodology paper, we asked for meetings with the Council officers (at preferred options stage) to discuss how these changes to the site allocations could be achieved. We received no response from the Council, which is a further example of consultation failings under the legal requirements.

To make this site sound:

The vision for the site and the required uses must include replacement affordable retail units for existing traders. The existing distinctive and irreplaceable character of the ethnic and migrant

Any proposal coming forward will be assessed against the development plan and the policies within. A number of these points are addressed in other policies of the Plan. P1 (Affordable homes) sets out further information on the affordable housing requirements; P29 (Small shops) sets out the requirement with regards to small shops and P44 (Community uses) sets out the requirement with regards to community facilities. P28: Affordable workspaces will contribute to the protection of existing local retailers, in conjunction with policy P38: Business Relocation. Replacement employment floorspace is specified in accordance with the Employment Land Review. We encourage sites to deliver open space as green spaces with parks and playspace facilities where appropriate. This will be determined and delivered on a site by site basis in accordance with the specific scheme designs.

<p>retail should be made clear, as duties apply under the Equality Act.</p> <p>By not supporting the Latin Quarter, the site allocation fails to follow through on the proposed area vision for the Elephant and Castle.</p> <p>Affordable housing must be provided that meets the needs of the local population (much of this will need to be social rented housing).</p>	
<p>Organisation: TfL City Planning NSPPSV181</p> <p>Site vision diagram: It is not clear what the ‘vertical’ ‘Improved connectivity for pedestrians and cyclists’ arrow in the middle of Newington Butts signifies. TfL has recently completed the northern roundabout removal scheme, so it is suggested this arrow is deleted.</p> <p>A matter of detail, but the ‘horizontal’ arrow should link, at its western end, to the pedestrian crossings on Newington Butts ie kinked slightly down, as it ends in the carriageway as shown currently.</p> <p>The ‘curved’ arrow relies on access through the National Rail station, which is not a public right of way and is not always open, so this is perhaps slightly misleading. The arrow should be curtailed at the eastern end, to the entrance to the station.</p>	<p>Representation notes. The diagram will be amended for clarity.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.61</p> <p>The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to 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 water infrastructure is required, where, when and how it will be delivered. Due to the complexities of water networks the level of information contained in this document does not allow Thames Water</p>	<p>Noted. Applicants of major developments will be advised to consult Thames Waters’ free pre-application advice at the earliest stage.</p>

to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the water infrastructure needs relating to the Local Plan.

The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure 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.

Representation

Officer Response

NSP48: London Southbank University Quarter

Organisation: Elephant Amenity Network
NSPPSV57.23

The site visions and uses are unsound because they fail to meet evidenced need. To be sound they should be amended as follows:

- When referring to new homes, a significant proportion should be social rented housing.
- Where retail is provided, a proportion of these should be replacement units for traders relocated from site 47.
- Where open space is referred to, this should be described as green space unless there will be hard standing, in which this should be open and transparent
- All sites should include small business space.
- All sites should include community facilities.

In accordance with the Site Allocations methodology paper, we asked for meetings with the Council officers (at preferred options stage) to discuss how these changes to the site allocations could be achieved. We received no response from the Council, which is a further example of

Any proposal coming forward will be assessed against the development plan and the policies within. A number of these points are addressed in other policies of the Plan. P1 (Affordable homes) sets out further information on the affordable housing requirements; P29 (Small shops) sets out the requirement with regards to small shops and P44 (Community uses) sets out the requirement with regards to community facilities. Replacement employment floorspace is specified in accordance with the Employment Land Review. P28: Affordable workspaces will contribute to the protection of existing local retailers, in conjunction with policy P38: Business Relocation. The sites methodology paper sets out that the site allocation is a land use policy designed to protect the use of the site, and is not an opportunity for comprehensive redevelopment. Any potential redevelopment would have to re provide the

<p>consultation failings under the legal requirements.</p> <p>This site is unsound and should be deleted for the following reasons:</p> <p>South Bank University is an asset to the Elephant and Castle and we want the quarter to continue in its current form as a fully functioning place of learning.</p> <p>The listing of the site seems highly speculative, drawing a red line around a substantial part of South Bank University. We note that the size of this site is greater than the combined Shopping Centre and LCC site.</p> <p>Existing uses and development capacity are deemed to be not applicable.</p> <p>The assumptions and approach in the mind of officers and other stakeholders should be made open and transparent.</p>	<p>research and education facilities currently on site. The capacity of individual sites is outlined in the Sites Capacity Methodology Report where different options were assessed and their potential capacities calculated. This process is outlined in the Sites Methodology Report.</p> <p>We encourage sites to deliver open space as green spaces with parks and playspace facilities where appropriate. This will be determined and delivered on a site by site basis in accordance with the specific scheme designs.</p> <p>The site requirements set out the potential development on the site to include education and research facilities, ancillary uses to support the University and walking routes.</p>
<p>Organisation: TfL City Planning NSPPSV181.22</p> <p>This could specifically mention the need for development to protect and enhance CS7, which runs alongside the site.</p>	<p>Representation is noted, and reference to CS7 has been added. All proposals on site will be subject to meeting the design criteria set out under P11 (Design of places) and P12 (Design qualities) which would require any development to be sensitive to the character and distinctiveness of the area.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.62</p> <p>Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the water infrastructure needs relating to the Local Plan.</p>	<p>Noted. The Council has met with Thames Water to discuss their representations relating to anticipated growth in terms of wastewater infrastructure. Thames Water will be consulted on formally once a detailed planning application is received to provide further comments on each site.</p>

<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	
<p>Representation</p>	<p>Officer Response</p>
<p>NSP49: 1-5 Westminster Bridge Road</p> <p>Organisation: Elephant Amenity Network NSPPSV57.24</p> <p>The site visions and uses are unsound because they fail to meet evidenced need. To be sound they should be amended as follows:</p> <ul style="list-style-type: none"> • When referring to new homes, a significant proportion should be social rented housing. • Where retail is provided, a proportion of these should be replacement units for traders relocated from site 47. • Where open space is referred to, this should be described as green space unless there will be hard standing, in which this should be open and transparent • All sites should include small business space. • All sites should include community facilities. <p>In accordance with the Site Allocations methodology paper, we asked for meetings with the Council officers (at preferred options stage) to discuss how these changes to the site allocations could be achieved. We received no response from the Council, which is a further example of consultation failings under the legal requirements.</p> <p>This site is unsound and should be deleted for the following reasons:</p> <p>The description of the site, and the existing uses, fail to mention that the current uses are voluntary sector office and meeting space and an advice service and that the library is the internationally renowned Feminist Library. The consultation is flawed by not drawing to public attention these current uses of the site and the protected status under the Equality Act.</p> <p>The site will only contribute 7 residential units to Southwark’s housing target</p>	<p>Any proposal coming forward will be assessed against the development plan. A number of these points are addressed in other policies of the Plan. P1 (Affordable homes) sets out further information on the affordable housing requirements; P29 (Small shops) sets out the requirement with regards to small shops and P44 (Community uses) sets out the requirement with regards to community facilities. P28: Affordable workspaces will contribute to the protection of existing local retailers, in conjunction with policy P38: Business Relocation. Replacement employment floorspace is specified in accordance with the Employment Land Review. We encourage sites to deliver open space as green spaces with parks and playspace facilities where appropriate. This will be determined and delivered on a site by site basis in accordance with the specific scheme designs.</p> <p>The existing uses are outlined within the site allocation. The Feminist Library has been relocated to Peckham now.</p> <p>The capacity of individual sites is outlined in the Sites Capacity Methodology Report where different options were assessed and their potential capacities calculated. This process is outlined in the Sites Methodology Report. Allocations do not include indicative development capacities for each site allocation because their purpose is not to provide a detailed design brief for each site..</p>

<p>We are opposed to the loss of voluntary sector office and meeting space and support existing uses.</p>	<p>Residential use is required to be provided as part of the site requirements, and this will contribute to us meeting and exceeding our housing target which is set out in the evidence base. The site requires the re provision of the full office floorspace currently on site.</p>
<p>Organisation: Historic England NSPPSV83.20</p> <p>Comments made elsewhere in this response regarding ‘taller’ buildings apply here. As per a previous response to consultation on the New Southwark Plan, we regard this location as inappropriate for a taller building as a landmark in the area is already provided by the Grade II* obelisk. Given the presence also of a range of designated heritage assets, including the St George’s Circus conservation area, we consider that testing of the impacts of any taller buildings on the site be undertaken before they can be confirmed.</p>	<p>Representation noted. All proposals for tall buildings are subject to P14 (Tall buildings) which takes into account the site context, impact on heritage, design quality and local assets.</p>
<p>Organisation: Lawford and Sons Ltd/Capital Homes. NSPPSV105.2</p> <p>The methodology for the NSP Site Allocations states that the ‘opportunity to contribute to area regeneration’ will be ‘given greater weight than site size’. Therefore, based on the potential of the site for redevelopment, and given that it is only 0.03 hectares below the ‘general size’ of sites which are to be included in the NSP Site Allocations going forward, we consider that 136 – 142 New Kent Road should remain as an ‘opportunity site’ of strategic importance, within the NSP. We also note that there are 7 number sites which have been allocated which fall below the ‘general size’, these are; NSP49, NSP59, NSP61, NSP62, NSP63, NSP73 and NSP74.</p>	<p>As set out in the Site Allocation Methodology Report the site at 136 – 142 New Kent Road was considered for allocation, but was deemed to be a ‘small site without the clear opportunity for major intensification where acceptable redevelopment could be achieved under other NSP policies’.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.63</p>	<p>Noted. Notwithstanding the above, applicants will still be notified to consult with Thames Water.</p>

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.