

Representation	Officer Response
<p data-bbox="188 317 506 347">London Bridge Area Vision</p> <p data-bbox="188 357 642 421">Organisation: GPE (St Thomas Street) NSPPSV67.1</p> <p data-bbox="188 464 1106 815">On behalf of our client, GPE (St Thomas Street) Limited (c/o Great Portland Estates plc), we wish to make representations pursuant to the New Southwark Plan: Proposed Submission Version. Our client are the freehold owners of the site at New City Court; Keats House; and Nos. 4-8 and 12-16 St Thomas Street in the London Bridge area. Our client's site currently accommodates office uses, and presents a significant development opportunity to deliver regeneration in the London Bridge area. These representations are made pursuant to Chapter Seven 'Development Management Policies' and Chapter Eight 'Area Visions and Site Allocations – AV 10. London Bridge'.</p>	<p data-bbox="1140 464 1223 491">Noted.</p>
<p data-bbox="188 900 642 963">Organisation: GPE (St Thomas Street) NSPPSV67.6</p> <p data-bbox="188 1007 627 1037">V.10 London Bridge Area Vision Map</p> <p data-bbox="188 1080 1099 1177">The London Bridge Area Vision Map is a helpful aid in visualising the location of the site allocations. However, the map should be amended to include the site allocation set out overleaf.</p> <p data-bbox="188 1220 613 1251">AV.10.1. London Bridge Area Vision</p> <p data-bbox="188 1294 1099 1431">The image of London Bridge as a globally significant central London business district, which is home to international business headquarters, is welcomed. Regenerating the area to provide new high quality office space will help reinforce this position.</p>	<p data-bbox="1140 1007 1223 1034">Noted.</p> <p data-bbox="1140 1080 2051 1177">Many of the site allocation require B class employment to be reprovided to ensure there is no loss of employment floorspace and we will encourage the provision of office floorspace.</p> <p data-bbox="1140 1220 2058 1318">Individual site allocations set out the requirements for town centre uses with active ground floor street frontages, this includes street frontages along St Thomas St.</p> <p data-bbox="1140 1361 2013 1431">The requirement for make sure 'the Shard remains significantly taller and more visible than surrounding buildings as the station's landmark' is not</p>

AV.10.2. Development in London Bridge

Global commerce is important to London Bridge and whilst recognition of the need to attract this is positive, the Area Vision should further emphasise this, with direct reference to the need to develop increased and high quality office provision which will further build on London Bridge's reputation for trade and commerce.

The inclusion of support for the development of a new high street on St Thomas Street is welcomed. This should include the introduction of new (and vibrant) retail uses alongside new public realm to promote streetscape activity and provide attractive amenity to workers, residents and visitors.

The requirement for development to make sure 'the Shard remains significantly taller and more visible than surrounding buildings as the station's landmark' is overly prescriptive. The development and regeneration of the London Bridge area is an evolving process, which the development of the Shard has made a significant contribution to. Policy should maintain flexibility in Opportunity Areas to ensure regeneration ambitions can be achieved.

AV.10.3. Growth opportunities in London Bridge

The acknowledgement of London Bridge as a growth opportunity is recognised as a positive contribution to the Area Vision. However, greater detail should be included on the potential the area has to develop its provision of commercial premises. Specifically, emphasis should be paid to the identification of the London Bridge, Borough and Bankside Opportunity Area in the London Plan. The Opportunity Area specifies an indicative employment capacity of 25,000 and states that there is scope to develop the strength of the area for strategic office provision. This should be incorporated into the Area Vision for London Bridge.

considered to be overly prescriptive as this is a landmark building in the borough. Any proposal for a tall building will have to adhere to Policy P16 (tall buildings).

The area vision acknowledges that London Bridge is a globally significant central London business district and all site allocations reflect this by requiring the reprovision or additional provision of employment uses. Many site allocations in the area require the provision of town centre uses to promote retail provision in the area.

Policy 2.13 of the current London Plan requires Boroughs to develop detailed policies for opportunity areas and Policy SD1 of the Draft London Plan requires Boroughs to clearly set out how they will encourage and deliver the growth potential of Opportunity Areas through Development Plans. To ensure consistency with the London Plan, it should be more clearly distinguished how the vision for London Bridge relates to the potential growth of the Opportunity Area.

Further consideration of retail as a growth opportunity in London Bridge should also be included. The anticipated growth in office provision in the area will necessarily result in an increase in office workers in the area, who will require retail premises to serve their needs. This presents a further opportunity for London Bridge to grow as a retail destination, and should be identified as such in the Area Vision.

The proposed wording should therefore be revised to read:

“London Bridge is part of central London and has been identified in the London Plan as part of the London Bridge, Borough and Bankside Opportunity Area with an indicative employment capacity of 25,000. London Bridge therefore has the potential to grow its strategic office provision, supported by new shops, leisure, culture, science and medical facilities. In particular, retail growth in the area will be important to support the delivery of new offices.”

Organisation: GPE (St Thomas Street)
NSPPSV67.7

London Bridge Site Allocations

9.1 We present an additional site below to be allocated as a key development opportunity in London Bridge. The inclusion of this site within the New Southwark Plan will provide an opportunity to achieve the spatial, social and

Representation noted.

Redevelopment of this site can be brought forward through other development management policies.

Planning application 18/AP/4039 is currently waiting determination on site.

economic objectives sought by the emerging development plan such as increased accessibility to London Bridge Underground Station, create a newly enhanced yard within the site and support a vibrant new high street on St Thomas Street.

9.2 Our client has engaged in discussions with the Council about a significant development opportunity on the site to deliver new office and retail uses alongside vibrant public realm. It is anticipated a formal planning submission will be made in summer 2018.

Proposed Site Allocation:

Site Description: The site is bounded by St Thomas Street to the north-east, King's College London and Guy's Hospital to the south-east, King's Head Yard to the south-west and 27-43 Borough High Street to the north-west. The site is occupied by New City Court and Keats House, and currently provides office floorspace approaching functional obsolescence. Grade II listed Georgian Terraces front onto St Thomas Street, which are interconnected with modern extensions to the south of the site. Buildings in the locality of the site vary in scale, design and use. To the north and east there are modern offices including The Shard, City Hall, More London and London Bridge Station. To the south and east are smaller offices and a variety of town centre uses. London Bridge Health Cluster is to the east.

Site Area: 3,400 m²

Site Vision:

Redevelopment of the site must:

- Contribute towards the thriving employment cluster in London Bridge by providing an uplift in office floorspace.
- Enhance the vitality of St Thomas Street and New City Court by providing high quality open spaces and active street frontages at ground floor level.
- Increase permeability through the site.

<p>Opportunity Site: New City Court; Keats House and Nos. 4-8 and 12-16 St Thomas Street</p> <p>PTAL and Density Area: 6b Central Activities Zone</p> <p>Required Uses: Office (B1a) Town Centre Uses at Ground Floor (A1/A2/A3/A4)</p> <p>Design and Accessibility Guidance: Any redevelopment should contribute towards creating a vibrant new high street along St Thomas Street and a new retail destination at New City Court. Redevelopment should provide an attractive street frontage that allow visitors to explore and enjoy the area.</p> <p>Redevelopment of this site should increase permeability for pedestrians through the site and explore the potential to provide an additional entrance to the London Bridge London underground station.</p>	
<p>Organisation: Greystar Europe Holdings NSPPSV73.1</p> <p>These representations are submitted to Southwark Council (the 'Council') on behalf of our client Greystar Europe Holdings Ltd ('Greystar') in respect of the Council's New Southwark Plan Submission Version ('the Submission Plan').</p> <p>Greystar is a global real estate company and currently owns and manages 420,000 homes worldwide comprising multifamily, student accommodation and senior living. Since entering the UK market in 2013, Greystar has acquired a rental portfolio by investing in new multifamily housing and student accommodation properties. Greystar currently owns and manages</p>	<p>Noted.</p>

5000 homes in London with a further 4,000 in planning or under construction.

Greystar has significant interest in the London Bridge Vision Area following its acquisition of Capital House at 40-46 Weston Street. Greystar is looking to bring forward a flagship student accommodation development on the site, its first development in the borough. As a result, Greystar is fully committed to investing in the London Bridge Vision Area, in particular site NSP52 (Land between Melior Street, St Thomas Street, Weston Street and Fenning Street — in which Capital House is located), and subsequently supports the principles in the Site Allocation.

It is within this context that Greystar welcomes the opportunity to make representations on the Submission Plan. We provide commentary on the relevant issues pertinent to the site and Greystar's proposals.

Individual
NSPPSV95.1

This extension is not justified

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The Bermondsey Street area is excluded from the London Bridge Vision area

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The Bermondsey Street area has a wide range of retail and commercial premises that are characteristics of a District Town Centre. Any development that is brought forward in this area will be assessed against the development management policies outlined in the plan. This considers design quality and that impact a development may have on the local heritage and cultural assets.

The NPPF states that boroughs should take a positive approach to the growth, management and adaption of town centres. In particular, through defining the extents of town centres. This approach is reiterated in the draft New London Plan, Policy SD8 Town centre network, states that the changing role of town centres should be proactively managed in relation to the town centre network as a whole, including reassessing town centre boundaries.

and indeed, the Bermondsey Street area is explicitly recognised in the London Bridge Vision as being different in character from London Bridge, and for that very reason being a valuable heritage and cultural asset, a draw for visitors and businesses.

Nowhere in the New Southwark Plan is the proposed extension justified.

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None of the supporting evidence (eg the Retail or High Street studies) identifies the London Bridge District Town centre as a target for significant growth.

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Once an area is defined as town centre, developments will be encouraged that include (P30 Reasons again) new shops, education facilities, leisure facilities and entertainment venues. It will, we believe put at risk the mixed residential- small business nature of our area, weakening any argument against non-residential uses or large scale development.

The area between Bermondsey Street, Tower Bridge Road and south of the railway at London Bridge station was included within the London Bridge District Town Centre to reflect its crucial role within this town centre, including the location of a number of key main town centre uses.

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Individual
NSPPSV99.1

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Individual
NSPPSV126.1

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Individual
NSPPSV132.6

Area Vision

AV10

Site Allocations

NSP52 and

NSP53

Not Justified

(robust
evidence)

Not Positively

Prepared or
effective

(no clear links
and not

monitorable)

DETAIL / PROPOSED CHANGES

Similarly the damaging imposition of high-rise development should be mitigated by simply stating a clear height limit. This could be an actual height (as per the London Plan) or at least in the form of a guide that tall buildings should be in line with Becket House to the West and No. 40 Bermondsey Street to the East.

A letter to this effect - which has also been left answered - is attached (17th January) giving more detail on the proposed changes to the site allocation text.

Noted. Proposals for tall buildings will be subject to P16 (tall buildings). The NSP is a strategic document intended to provide guidance and so specific detail regarding sites are not included.

Organisation: Port of London Authority
NSPPSV143.18

4. London Bridge

The PLA note that the area vision recognises the area as one of the UKs busiest and fastest growing transport hubs, that has increased rail and river capacity, and that the area is internationally renowned for its prominent riverfront location. The PLA welcome reference to the statement that developments should enhance the enhance the sense of place and visitor and cultural activities along the Thames riverfront, as well as encourage use of riverboat services, waterborne freight and the Thames Path in a safe and sustainable way, which all adheres to the PLAs Thames Vision.

Support noted.

Individual
NSPPSV150.1

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District Town Centre to reflect its crucial role within this town centre, including the location of a number of key main town centre uses.

Organisation: Team London Bridge
NSPPSV179.1

Team London Bridge welcomes this further opportunity to help shape the emerging New Southwark Plan. This is a critical land use document and we are keen to ensure it complements the needs and aspirations of the business community in London Bridge. The London Bridge Plan sets out our strategic vision for the London Bridge area and this informs our submission. The aims and projects of the London Bridge Plan have developed out of local public consultation with over 300 businesses and 400 individual comments, as well as taking into account existing and emerging local and strategic planning and economic strategies. The Plan was developed following a second BID

Representation noted.

The New Southwark Plan sets out the status of Area Visions, stating that they provide the strategic vision for the future of Southwark’s distinct places and neighbourhoods. It also highlights that development proposals should be formulated in the context of the relevant Area Vision and should demonstrate how they contribute towards the strategic vision for that area.

It is not appropriate to reference the London Bridge Plan in the New

extension to 2021 which was won in 2015. The London Bridge Plan can be found at www.teamlondonbridge.co.uk

2. We welcome the staged approach to developing the New Southwark Plan, bringing together the ambitions set out in Area Visions and key sites with the broader planning policy framework for managing future land use development and change. This process has helped to strengthen the Plan and we have welcomed changes which:

- Recognise the “local destination and town centre” role of London Bridge as well as its global role
- Afford greater importance to “riverside access”
- Acknowledge that London Bridge is one of the “fastest growing” as well as busiest transport hubs
- Address the need for the environment to be “inspiring” as well as distinctive
- Recognise the need for heritage to be “reactivated” as well as restored
- Recognise the role of “placemarks”
- Offer support for “greenery and innovations in environmental resilience to be incorporated into buildings”
- Recognise the need to “promote health and wellbeing in the local environment”
- Support development of Tooley Street as well as St Thomas Street as vibrant new high streets
- Provide a clearer spatial definition for the Low Line and green space in the Area Vision Map

3. We also welcome some of the changes to the site allocations in the London Bridge area, notably the reduced area of site NSP53 (including Vinegar Yard), recognition for the wider historic value of the site and a new requirement for new open space covering at least 15% of the site area (i.e 605 sq m).

4. We have identified a number of further areas where we do not consider the Plan to be sound and would welcome change.

London Bridge Area Vision

5. We welcome the thrust of the London Bridge Area Vision. It is important

Southwark, Plan. Team London Bridge will be added to the list of community advocates as part of the Statement of Community Involvement.

NSP 51, NSP52 and NSP53 are identified separate sites to identify the separate uses of the individual sites. Therefore it assumes a mix of uses could be provided, requiring the re-provision of employment uses in line with other policies in the CAZ and housing requirements. This includes NSP51 which intends to protect the existing land use although the site may also provide town centre uses. The site vision diagram also includes improved connectivity to St Thomas Street. Both NSP 52 and NPS 53 include direct reference to enhancing St Thomas Street.

this now carries the weight of planning policy in determining planning applications. This would also give traction to the other Area Visions throughout the Plan. It is stated on page 12 that Area Visions are one of six types of policy in the Plan but this is not clear from the document. One option is to include a separate Implementation Policy which activates the Area Visions as part of development plan policy.

6. The London Bridge Area Vision should also reference the London Bridge Plan as a material consideration. It is the primary document used to inform the Area Vision and has been robustly prepared with widespread public consultation.

Recommendations

- Confirm the status of Area Visions as development plan policy
- Include reference to the London Bridge Plan in the London Bridge Area Vision

26. The London Bridge Plan identifies the opportunity for a step change in the quality of development along the southern side of London Bridge Station through the creation of the St Thomas Street Boulevard. This will require a strong urban design framework, an integrated approach to its development and a shared space approach to the street.

27. We believe delivery of the Boulevard requires a more unifying approach than is evident in the three separate site allocations that run along St Thomas Street. Sites NSP 51, 52 and 53 form a contiguous allocation along the southern edge of St Thomas Street and so share common characteristics. We believe there would be significant advantages in combining NSP 52 and NSP 53 into a single allocation with its future development guided by a coherent masterplan.

28. The site allocations for NSP 51, 52 and 53 would be strengthened by:

- Recognising their individual and collective contribution to the development of St Thomas Street as a high street, including part pedestrianisation and support for town centre uses and active frontages at ground level (and also potentially above ground floor) and set back from the St Thomas Street frontage

- Supporting the need for a mix of floorplate sizes to encourage retail and office diversity
 - Avoiding a single, monolithic elevation along St Thomas Street
 - Acknowledging the need for future development to respect the food, culture and retail offer in Bermondsey Street and the station
 - Addressing the future impact of development on the microclimate and shading and requiring development to mitigate the impact of development on wind speeds along St Thomas Street and adjacent areas
 - Establishing a stronger expectation for retaining and enhancing the townscape and undesignated heritage assets
 - Increasing permeability and delivering an overall increase in public open space
 - Supporting the need for sustainable drainage given the area is a critical drainage zone
- Recommendation
- Amend site allocations NSP 51, 52 and 53 to secure a more integrated approach to the development of the St Thomas Street Boulevard.

Organisation: Theatres Trust
NSPPSV 189.3

The Trust welcomes the recognition of the important role these areas have in terms of arts and cultural provision. We recommend an additional bullet point to AV01.2 and AV10.2 which ensures that new development does not negatively impact on those and other existing uses.

Policies in the Plan seek to protect existing uses e.g. Policy P43 (Leisure, arts and culture) and Policy P54 (Protection of amenity).

<p>Individual NSPPSV294.3</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark 	<p>NSP is considered to be compliant with national and regional policies. Policies regarding environment and healthy active lives are outlined in the document.</p>
<p>Organisation: Shiva Ltd NSPPSV297.3</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 No</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p> <p>Do you consider that the New Southwark Plan is unsound because it is not:</p>	<p>Noted.</p>

<p>Justified</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Effective</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Consistent with national policy and the London Plan</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Positively Prepared</p>	
<p>Organisation: Old Bermondsey Village Neighbourhood Forum NSPPSV300.3</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 No</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Justified</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Effective</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Consistent with national policy and the London Plan</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Positively Prepared</p>	<p>Noted.</p>

Individual
NSPPSV303.3

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

No

Do you consider that the New Southwark Plan is sound? - Soundness

No

Do you consider that the New Southwark Plan is unsound because it is not: Justified

Do you consider that the New Southwark Plan is unsound because it is not: Effective

Do you consider that the New Southwark Plan is unsound because it is not: Consistent with national policy and the London Plan

Do you consider that the New Southwark Plan is unsound because it is not: Positively Prepared

Noted.