

Representation	Officer Response
<a href="#">AV.02 Bankside and The Borough Area Vision</a>	
<p data-bbox="188 357 383 421">Living Bankside NSPPSV239.19</p> <p data-bbox="188 467 1106 671">Bankside &amp; Borough Area Vision The New Southwark Plan should give greater significance to the Draft Bankside Neighbourhood Plan and should reflect Living Bankside's Vision 2035. The area vision should mention that new developments should increase the community use spaces to ensure cohesion between its business and resident communities</p>	<p data-bbox="1140 429 2063 568">Specific information needs to be provided to know what needs to be amended to reflect the Living Bankside Vision 2035. On adoption, the Bankside Neighbourhood Plan will become part of the Development Plan and be given weight accordingly.</p> <p data-bbox="1140 608 2063 746">Site allocations that are required to provide community uses are identified in the Plan. Policy P46 (community uses) requires development to retain community facilities. In exceptional circumstances community facilities can be replaced by another use where they are surplus to requirements.</p>

Representation	Officer Response
<a href="#">NSP01 Site bordering Great Suffolk and Ewer Street</a>	
<p data-bbox="188 936 723 1000">DP9 on behalf of British Land Fixed Uplands NSPPSV27DP9</p> <p data-bbox="188 1046 1088 1398">Whilst we agree with LBS's Consultation Report response that the Site is located in the Central Activities Zone which is a suitable location for employment growth, in light of the above policy wording, we consider that the existing reference to the re-provision of employment floorspace detailed in the Site Vision is too prescriptive and would undermine the principle policy intention of P29. In summary, we do not consider this a sound approach given that the Plan prescribes a punitive approach for sites allocated within the Plan which is contradictory to the proposed policy intention set out in draft Policy P29. This diversion from policy would establish a separate approach to allocated</p>	<p data-bbox="1140 971 1413 1000">Representation noted.</p> <p data-bbox="1140 1046 2045 1254">Policy P29 sets out that development in the site allocations must retain or increase the amount of employment floor space on site. The site allocation requires at least the amount of employment floor space currently on site or at least 50% of the development as employment floor space to meet the employment needs of the area. Evidence base demonstrating need can be found on the Examination page – <a href="#">Employment Land Review</a>.</p>

and windfall sites, whereby the latter would not be subject to prescriptive thresholds for delivery. We therefore urge the Council to remove this wording from the Site Allocation.

Representation	Officer Response
<p data-bbox="188 751 483 778">NSP02 62-67 Park Street</p> <p data-bbox="188 791 378 858">Living Bankside NSPPSV239.22</p> <p data-bbox="188 900 271 927">NSP02</p> <p data-bbox="188 936 1032 1002">Active Frontages in the allocation at the west side of the site should be removed as they re not feasible due to the narrow road.</p> <p data-bbox="188 1010 1055 1107">The site must rather than should provide homes as the surrounding properties are residential/cultural use – homes would be complimentary here.</p> <p data-bbox="188 1117 822 1144">The site should also provide community/cultural use.</p>	<p data-bbox="1140 866 1435 893">Representation noted.</p> <p data-bbox="1140 940 2002 1037">The site allocation provides design and accessibility guidance. The opportunity for active frontages on the site allocation will be considered through detailed design when the site comes forward for development.</p> <p data-bbox="1140 1083 2033 1219">It is considered housing should remain as a ‘should’ requirement which is consistent with other sites in the CAZ to reflect any potential for mixed use development, community and cultural uses are allocate elsewhere in the NSP. Commercial development is prioritised in the site allocation.</p>

Representation	Officer Response
<a href="#">NSP04 London Fire and Emergency Planning Authority</a>	
TfL Spatial Planning NSPPSV181.12  NSP04 TfL welcomes additional clarification on linking the site to Cycle Superhighway 7 (now renamed Cycleway)	Support noted

Representation	Officer Response
<p data-bbox="188 317 741 347">NSP05 1 Southwark Bridge and Red Lion Court</p> <p data-bbox="188 357 427 421">TfL Spatial Planning NSPPSV181.12</p> <p data-bbox="188 467 943 568">NSP05 TfL welcomes additional clarification on linking the site to Cycle Superhighway 7 (now renamed Cycleway)</p>	<p data-bbox="1140 464 1312 491">Support noted</p>
<p data-bbox="188 612 763 676">Montagu Evans LLP on behalf of WWP 2005 Ltd NSPPSV477.2</p> <p data-bbox="188 722 1111 1107">A. DRAFT NEW SOUTHWARK PLAN SITE ALLOCATION NSP05 Draft Policy SP4 of the New Southwark Plan Submission Version states that the Council will seek to foster and promote a strong local economy through (among other policy objectives) delivering at least 460,000sqm of new office space from 2014 to 2036 and providing at least 84,000 new jobs. Draft Site Allocation NSP05 (1 Southwark Bridge Road and Red Lion Court) would contribute toward achieving these strategic objectives for the local economy. The draft allocation envisages the wholesale demolition and redevelopment of both the existing buildings on the site, comprising the FT Building and adjacent Red Lion Court building. The draft policy states redevelopment of the site must:</p> <ul data-bbox="188 1118 1093 1362" style="list-style-type: none"> <li>• “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; and</li> <li>• Enhance the Thames Path by providing public realm and active frontages with ground floor town centre uses (A1, A2, A3, A4, D1, D2); and</li> <li>• Provide new north-south green links; and</li> <li>• Provide new open space of at least 15% of the site area.”</li> </ul> <p data-bbox="188 1369 331 1396">And should:</p> <ul data-bbox="188 1406 510 1433" style="list-style-type: none"> <li>• Provide new homes (C3).</li> </ul>	<p data-bbox="1140 687 1406 715">Representation noted.</p> <p data-bbox="1140 759 2029 823">We will be addressing the changes to the use classes order and their effect on the policies in our responses to the matters raised by the Inspectors.</p> <p data-bbox="1140 868 2007 1002">With regards to the suggested change to the site allocation to include reference to the refurbishment or upgrading of the existing buildings, a Statement of Common Ground will be prepared to consider whether the wording change would be appropriate.</p>

In terms of Design and Accessibility, the allocation states:

“Redevelopment should provide a new link from Park Street to the Thames Path and improvements to the Thames Path. Redevelopment should also provide links to Cycle Super Highway 7 on Southwark Bridge Road.

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

Open space will be secured because:

- Bankside and the Borough are deficient in parks and other green space, which the new space will address; and
- It will mitigate the pressure from development on existing open space; and
- The site is large enough to accommodate a meaningful open space at an achievable level; and
- It will improve enjoyment of the Thames Path; and
- It will mark an arrival point into Southwark.”

Overall, we support the principle of the draft allocation for NSP05. The amount of employment floorspace required as part of future proposals seeks to ensure that the Site continues to contribute towards achieving the identified employment objectives in Southwark. We are supportive of the requirement to provide active frontages, with ground floor town centre uses, however, we note that the use classes will need to be updated to reflect the amendments made to the Town and Country Planning (Use Classes) Order 1987 on 1 September 2020.

Notwithstanding our support in principle for draft Policy NSP05, the draft site allocation should be amended to also allow for and support the refurbishment and upgrade of existing commercial buildings on the site. This approach is consistent with New Southwark Plan draft Policy P13 (Design Quality) which promotes “innovative design solutions” through “Buildings and spaces which are constructed and designed sustainably” and “utilise active design principles”. This is further highlighted in reason 3 of the draft

Policy P13 which states:

“Sustainable design must reduce energy consumption and carbon dioxide emissions, minimise the consumption of natural resources, reduce flood risk and pollution, ensure the avoidance of internal overheating, minimise the urban heat island effect, ensure the adaptive reuse of existing buildings, and creation of adverse local climatic conditions (e.g. wind shear).”

This approach is also supported by draft London Plan Policy SI 7 (reducing Waste and Supporting the Circular Economy) which strongly promotes maximising the re-use of existing building materials where possible and seeks to ensure development proposals recycle and reuse 95% of building materials over the demolition and construction process. The draft GLA Circular Economy statement Guidance (October 2020) also strongly promotes the recycling and reuse of existing building materials as part of development proposals in order to achieve net zero waste. Based on industry benchmarks, the structure and substructure of an office building can account for circa 65% of the building’s embodied carbon, and therefore this can be the rough level of embodied carbon savings achievable when reusing existing structures and substructures. Therefore, by making allowances for proposals that utilise the existing building fabric and materials, the draft allocation would better accord with emerging regional policy and guidance and support a much more sustainable approach to the delivery of the wider allocation.

LBS declared a climate emergency in March 2019, whereby the borough is seeking to achieve carbon neutral by 2030. When viewing these aspirations alongside both Southwark and GLA emerging policy in relation to sustainability, it is evident that there is a need for a more sustainable approach within draft allocation NSP05, which should support the refurbishment of existing buildings to renew and upgrade existing office stock.

Therefore, amendments to draft Site Allocation NSP05 to support the option for refurbishment of the existing buildings on the site are necessary in order to ensure consistency with wider regional and local policy objectives. In addition, as currently worded draft Policy NSP05 does not recognise the constraints posed to development through the reuse and upgrade of existing

building structures. The wider draft policy requirements sought by the redevelopment of NSP05 should be applied with flexibility so that they are commensurate with proposals that seek to refurbish and upgrade the existing buildings as opposed to proposals for wholesale demolition and redevelopment. This would facilitate the delivery of the Council's wider policy aspirations for the Site and would not unduly restrict proposals that seek to upgrade and reuse existing buildings currently situated on the site.

Living Bankside  
NSPPSV239.23

NSP05

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The site should also provide community/cultural use.

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Representation	Officer Response
NSP08 Swan Street Cluster	
<p data-bbox="188 357 786 421">South East London Clinical Commissioning Group NSPPSV453.3</p> <p data-bbox="188 464 790 496">Swan Street Cluster – may provide health facilities</p> <p data-bbox="188 536 1093 783">Several the site allocations include ‘may include a community health hub’ and it would be helpful if this were to include NHS facilities more generally. Where a hub is not required in a specific location, the development will nevertheless contribute to a demand for increased health facilities and we would need the developer to provide a contribution to expand or provide facilities elsewhere to mitigate the development and meet the needs of the new population.</p>	<p data-bbox="1140 461 1413 493">Representation noted.</p> <p data-bbox="1140 533 2069 780">SP5 Healthy, active lives set out a series of policies that will maintain and improve the health and wellbeing of our residents. SP5 is a strategic policy which sets out the council’s regeneration strategy to work with local people to improve neighbourhoods and create new opportunities for the future. The council are committed to delivering a new and improved health facilities and services. P44 Healthy developments, states that development must retain or re-provide existing health, community, sport and leisure facilities.</p>