



Jacqueline Christie  
Programme Officer - EiP New Southwark Plan  
160 Tooley Street  
London  
SE1 2QH

1 February 2021

Dear Jacqueline,

## **MATTER STATEMENT - MATTER 2**

We write on behalf of our client, Guy's and St Thomas' NHS Foundation Trust ("the Trust"), in response to the Inspector's Matters, Issues and Questions published on 10 December 2020. The Trust submitted written representations to the modifications to the New Southwark Plan in October 2020 of the Plan regarding the site allocations and area visions included in the Draft Plan. The Area Visions for key areas of the Borough are discussed under Matter 2 and the points raised in this Matter Statement relate to Issue 1.

***MIQ 2.12 Does the Area Vision appropriately reflect the status and implications of Elephant & Castle being identified in the Intend to Publish London Plan 2019 as an opportunity area with an indicative capacity for 5,000 homes and 10,000 jobs? To what extent is existing regeneration likely to contribute to development targets having regard to the figures in Policy SP1b? Is the plan reliant on further phases of regeneration to sustain delivery in Elephant and Castle during the plan period?***

The above question from the Inspector is regarding the Elephant and Castle Area Vision included as Draft Policy AV.08 of the Plan. The Area Vision for Elephant and Castle states that Elephant and Castle has the potential to provide significant amounts of new homes, offices, shops, leisure and cultural uses, university facilities and community facilities.

The redevelopment of the area will significantly increase the number of residents and users in the area, which in turn will increase demand and strain on existing healthcare services. The importance of providing sufficient infrastructure to support the growing community in Elephant and Castle is heightened by its identification as an Opportunity Area in the emerging London Plan. Therefore, in order to be sound and satisfy this question from the Inspector, the Area Vision for Elephant and Castle should support the planned development and infrastructure within the area.

Elephant Park, a significant allocation in the adopted Southwark Local Plan, is nearing its final stages of implementation. The final phase of Elephant Park includes the provision of a healthcare facility. The Trust would like to reiterate that, in order for the Area Vision to appropriately reflect both the reality of the development happening within the first few years of the Plan period and the further phases of regeneration to be delivered, the Council must ensure that the New Southwark Plan specifically secures the delivery of new healthcare facilities as part of the Elephant and Castle Area Vision.



**MIQ 2.13 Is the vision consistent with NSP Policy P16 and the evidence base in relation to tall buildings, particularly in regards to the Shard?**

The Trust largely supports the London Bridge Area Vision included within the New Southwark Plan as drafted. This is particularly with regards to its references to the academic and health excellence of King's College London and Guy's Hospital and its support of a strong, dynamic and specialised economy centred around healthcare and science. In order to achieve these ambitions, it will be necessary to build within this already dense area and is likely to require taller buildings. This is already imagined within the Plan to a certain extent through the allocation of the London Bridge Health Cluster (NSP49).

The Area Vision currently states that the Shard should be significantly taller than its surrounding as it provides a landmark building for the station. The Trust also request that the presence of Guy's Hospital Tower is acknowledged, as an existing building of significant height and massing in the area. The Tower is a localised landmark of its kind and can be seen in more strategic views of London Bridge. It, therefore, provides context to heights coming forward in the area and should be recognised as such.

Any consideration of heights in the area should ultimately respond to the character, heritage and townscape of the local and strategic context.

We hope these representations are useful in the Inspector's consideration of modifications to the two Area Visions referenced above and we will be attending the Hearing Session on Tuesday 23 February.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Emily Taylor'.

Emily Taylor  
Principal Planner

XX/xx