

RAW/TH/DP4600

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2<sup>nd</sup> February 2021

Dear Sir/Madam,

## **New Southwark Plan Examination in Public**

### **Statement in Response to the Inspector's Main Issues and Questions**

#### **Matter 10 – Site Allocations – Issue 1**

We are writing on behalf of our client, Blyford Investment Co Ltd, to submit a statement in response to the Inspector's Main Issues and Questions on the New Southwark Plan 2020 in respect of Matter 10 – Site Allocations – Issue 1.

Our client is the owner of the site at 73-85 Newington Causeway, SE1. This site is included within the wider site allocation NSP43 at 63-85 Newington Causeway. We have previously submitted representations regarding the site allocation which do not appear to have been responded to directly by London Borough of Southwark (LBS) Officers. We now comment on the Inspector's main issues and questions which are most relevant to the representations submitted previously.

Matter 10 Issue 1 queries whether the overall approach to site allocations is justified, effective and consistent with national policy and in general conformity with the London Plan. With this overarching question in mind we respond directly to Questions 10.7 and 10.9 below.

**Question 10.7 – for each of the allocations that seeks to provide employment, is the requirement to increase the proportion of B class uses on allocations justified? Does this provide sufficient flexibility if there is insufficient demand or viability?**

The requirement to provide *“at least the amount of employment floorspace (B use class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater”* is too restrictive and has not been justified.

The site allocation identifies the site as being suitable for a tall building (defined as over 30m) and it is clear from the allocation that the net scale of any redevelopment will be much greater than the existing situation. Under the current policy wording it is therefore

likely that any redevelopment would be required to not only reprove the existing quantity of employment floorspace, but actually provide a substantial increase in addition (at least 50% of the total development).

In our view this provides insufficient flexibility to provide alternative uses on the site should there be insufficient demand or viability for increased employment uses. This could potentially result in new employment floorspace being delivered instead of other more viable uses for this location such as residential and affordable homes. This could be contrary to National Planning Policy Objective 11 'Making Effective Use of Land' and could inadvertently prevent the GLA and LBS from meeting their own objectives to increase the delivery, supply and type of new homes including affordable homes.

On this basis the policy as worded is currently unsound. To address, this part of the policy should be amended to say: "*a redevelopment of the site could provide a range of uses alongside residential uses that could include student accommodation, hotel and employment uses*".

**Matter 10.9 – Are main modifications necessary to any of the site allocations for soundness?**

The requirement to "*retain the existing theatre use or provide an alternative cultural use (D2)*" is unsound.

As explained in previous representations, the only existing community use on site is the theatre known as the Southwark Playhouse who benefit from a personal planning permission (application reference: 12/AP/2964). Condition 2 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*".

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 (now Class E(g)). In this scenario, it would be impossible to retain the existing theatre use. It is also not considered appropriate to require an alternative cultural use to be provided, given that the only cultural use on the site is allowed under a personal permission.

We therefore suggest the requirement to "*retain the existing theatre use or provide an alternative cultural use (D2)*" is deleted from the policy wording to make it sound in this regard.

Yours sincerely

A handwritten signature in blue ink that reads "DP9 Ltd." in a cursive, slightly slanted font.

**DP9 Ltd**