



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

1 February 2021

Dear Jacqueline,

### **MATTER STATEMENT - MATTER 10**

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 regarding their allocations included within the Plan. The subject of site allocations is discussed under Matter 10 and the points raised in this Matter Statement relate to Issues 1, 6 and 11, which cover the Council's general approach to site allocations, the London Bridge Health Cluster and the Rehabilitation Centre at Bowley Close.

#### ***MIQ 10.2 Is the use of an indicative capacity sound? Is it sufficiently clear what the minimum dwelling contribution from each site would be? How have the indicative capacities been calculated and what is the evidence, including the Sites Methodology Paper [EIP82]?***

In the Trust's representations to the modifications to the Plan in October 2020, it was queried why the Council had reduced the capacity anticipated from the Trust's site, the Rehabilitation Centre at Bowley Close (NSP34). This is directly relevant to the Inspector's above question, as the Trust consider that the calculation of indicative capacity for the site is an underestimation that is contrary to national and regional policy approaches to well connected sites and should not have been reduced. The Inspector invites discussion on the methodology behind the use of indicative capacities for sites in this question. The Southwark Sites Allocation Methodology Report (2019 and 2020) states that residential capacity is calculated notionally by dividing the assumed residential floorspace for each site allocation by 73.9sqm (average unit size). For each site, the assumed residential floorspace has been included in Appendix 2 to the Site Selection Methodology and the Council has stated that this was arrived at through an iterative process of consulting with officers and reviewing the site characteristics. It is noted that the Council has been clear that the capacities are indicative only.

Any identification of capacity should be done in consultation with landowners who can provide insights into the work undertaken thus far on sites and include an appreciation of the site context and importantly, public transport accessibility. As seen in the recently approved new London Plan, there is a wider move away from prescriptive densities applied by area to focus on sites that are well located with regards to amenities and transport links. This can be seen nationally, in the



publication of the Revised National Planning Policy Framework in 2019, which promotes the efficient use of land whereby that land is well served by public transport.

The Trust are seeking an amendment specifically to the site allocation included within the Plan for NSP34, to increase the indicative capacity from 51 dwellings. The Trust welcome discussion with both the Inspector and the Council on this matter and consider that it is more a matter of clarifying, from their perspective as a landowner, what work has been done and what an appropriately opportunistic figure is for the site. The Trust has already begun to discuss this with Council officers and thanks the Council for the engagement thus far.

The 2019 Report found that the indicative residential capacity for the Rehabilitation Centre would be 103.23 dwellings. In the 2020 Report, the residential capacity reduced to 51 dwellings. This amounts to a density of just 102 dwellings per hectare when put in this context. The justification for this reduction is not given in the summary of changes to the New Southwark Plan nor can it be understood from other Examination documents why such a reduction has been made to this allocation specifically. The Trust does not support this reduction in capacity and we set out reasoning below for this and to provide a basis for productive discussions around what an appropriate revised figure could be.

The Rehabilitation Centre is located off Bowley Close, to the west of Crystal Palace Parade (A212). Opposite the site to the east is the Crystal Palace Parade Bus Station and Crystal Palace Park. It is separated from Crystal Palace Park by the dual carriageway of the main road and there is dense tree planting in this area on both sides of the arterial road. The site is neighboured by residential development ranging from two to four storeys to the north and west, with higher densities and heights found to the south in Upper Norwood and around Crystal Palace Station. The site itself is set below the road level and comprises of a single storey building with internal courtyards and landscaping. Ancillary parking is found around the main building of the facility. The site has excellent public transport connections with Gipsy Hill Railway Station and Crystal Palace Railway Station situated 0.5 miles to the west and south respectively providing regular trains to Central London and the South of England. Crystal Palace Overground Station is 0.5 miles from the site providing links to Clapham Junction and Croydon to the south and Highbury and Islington to the north. The site is situated opposite the Crystal Palace Parade Bus Station providing bus connections to the local area and Central London. The site's PTAL rating is 6a, the second highest rating found in London for public transport accessibility.

The site's characteristics, context and accessibility make it an excellent location for residential development and a clear opportunity to push for higher density development, in line with regional and national policy. The site is very well sheltered on its eastern boundary and to an extent to the west, with existing tree planting. Furthermore, its inset nature, below road level, means it sits significantly below surrounding heights currently. Whilst design and thinking around the site remains at an early stage, it is clear that there is capacity to achieve higher density through a design-led approach to height and massing on the site. It is worth noting that there is currently an application with the neighbouring Borough, Bromley, for the redevelopment of Crystal Palace Park, including some areas of residential development. Within this application, the scheme is proposing 210 residential dwellings, of which the closest are within close proximity to the Rehabilitation Centre, just north along Crystal Palace Parade. Within these residential areas of the masterplan for the Park, the proposals include development of 527 habitable rooms per hectare, which is way

above 100 dwellings per hectare, more likely to be around the 130-150 dwellings per hectare mark, with potential density probably mitigated due to the dwellings inner park location.

The Trust undertook initial feasibility work in 2018 that looked at options for the site and found that it could support densities of up to 220 dwellings per hectare and a significantly higher quantum of residential floorspace than has been allowed for in the New Southwark Plan currently. Clearly, from the summary of the site analysis and context above, taking into account other development coming forward in the area, there is much further scope to deliver capacity above 51 dwellings, which reflects only 102 dwellings per hectare, in the Council's current draft of the New Southwark Plan. In our view, the Plan is unsound with regards to the allocation at the Rehabilitation Centre as it has not reflected the wider policy direction of higher densities related to public transport accessibility and has underestimated the site's potential. Imposing a limit as is included in the Plan may impair the site's ability to deliver its redevelopment aspirations that include the potential redevelopment of its healthcare offer, so this is a key issue of soundness and deliverability with regards to its allocation. The Trust would like to discuss an appropriate capacity for the site with officers and agree this through a Statement of Common Ground.

The capacity is indicative and therefore any realistic and evidenced capacity for the site will be defined through any future planning application, which can provide a figure that is based on detailed design development and assessment of the site. The Trust requests that the application of policy allows for further development capacity to come forward if it is robustly evidenced as suitable for the site as part of the application process also.

***MIQ 10.50 – is the allocation justified having regard to the existing uses?***

This question from the Inspector is regarding the allocation of the Guys and St Thomas Trust Rehabilitation Centre at Bowley Close in Crystal Palace. The Trust has been considering the long term plans and aspirations for this asset for some time, taking into account the site's excellent location and the opportunity to secure the delivery of much-needed housing on the site. This housing will be assessed as part of any application for its suitability to be used to accommodate Trust staff and form part of the provision of key worker housing, if there is an area need. The site's allocation in the Plan is a starting point to realise these emerging plans for the centre.

The site is currently being used as a Rehabilitation Centre. The healthcare services on site comprise of specialist regional outpatient services for children and adults who need buggies and wheelchairs, assistive communication aids, orthotics, prosthetics (for arms and legs) and counselling.

In response to the Inspector's question, the site's primary healthcare function will not cease and in any redevelopment of the site. In-kind facilities will be re-provided and the Trust is not proposing to release this land completely from its portfolio of healthcare sites within Southwark at present. Any scheme for the site would provide residential dwellings in addition to the re-provision of the health facilities on site and all feasibility work undertaken by the Trust has reflected a replacement health facility with comparable floorspace. The Council's identification of the 'must' requirements for the site, within the Plan, reflect this and are sound in this regard. Therefore, the allocation is justified with regard to its exiting use as a regional healthcare facility, as this use will not be compromised in any way through the allocation.



***MIQ 10.67 Is the boundary of the proposed allocation justified?***

This question from the Inspector is regarding the allocation of the London Bridge Health Cluster, allocation reference NSP49. The Trust is supportive of the current site allocation boundary proposed in the New Southwark Plan, and as a significant landowner and operator of the land concerned within the site allocation, support that the Plan is sound in this regard.

We hope these representations are useful in the Inspector's consideration of site allocations NSP49 and NSP34. We will be attending the relevant Hearing Sessions, on behalf of the Trust, scheduled for Tuesday 16 March and Thursday 18 March 2021.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'emily taylor'.

Emily Taylor  
Principal Planner

XX/xx