

# London Borough of Southwark Response

## Examination of the New Southwark Plan

### Inspectors' Matters, Issues and Questions

#### Matters 10: Site allocations

##### Issue 1

Whether the overall approach to site allocations is justified, effective and consistent with national policy and in general conformity with the London Plan.

##### *Site allocations - general*

##### Question 10.1

**Is the 'must, should, may' approach sound? Is it clear as to the circumstances where planning permission would be granted, and will it be effective in securing the delivery of the site allocations?**

1. Yes, Page 147 of the Plan (EIP27A) confirms the meaning of 'must', 'should' and 'may' requirements for site allocations. These 'must', 'should' and 'may' requirements provide a degree of flexibility but also ensure we can meet the strategic needs of the borough.
2. As set out in the Site Allocations Methodology Report Paragraph 4.2 (EIP82) each site allocation contains guidance for development proposals within the site, including 'site requirements' and design and accessibility guidance. This provides further guidance on where planning permission will be granted.

##### Question 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]?**

1. As set out at Paragraph 4.6 and 4.7 of the Site Allocations Methodology Report (EIP82) the NSP Submission Version did not include indicative development capacities for each Site Allocation because the purpose of the Site Allocation was not to provide a detailed design brief for each site. Through the consultation process on the Preferred Option NSP the Council recognised various stakeholders were concerned that the inclusion of indicative development capacities in the NSP would pre-empt the outcome of the detailed development management process. With the exception of NSP71 (Aylesham Centre and Peckham Bus Station) the NSP does not provide detailed guidance regarding appropriate building height. Again, this is because the appropriateness of

building heights should be determined through a detailed assessment of genuine development proposals in relation to their context.

2. The New Southwark Plan (Southwark Council's Proposed Changes to the Submitted Plan, July 2020) Version now includes the indicative development capacities for each site as requested by the Inspectors.
3. The use of the indicative capacities provides a degree of flexibility. As set out in the Site Allocations Methodology Report (EIP82) Paragraphs 4.11-4.13, the indicative capacities do not in any way provide an indication of the maximum or minimum quantum of development that should or could be achieved on an individual site. An assessment of individual site capacities was undertaken to inform the aggregate land-use figures. This involved council officers assessing potential building footprints on each Site Allocation that made an efficient use of land and responded to their context. Buildings of merit were assumed to be retained. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments. In order to standardise the site capacities the measure of floor to area ratio (FAR) has been used instead of the mid point of building footprint coverage or number of storeys. The indicative floorspace figures are presented in GIA. These have been derived by reducing the GEA by 15%. Alongside the indicative floorspace, desk based estimates were made of the existing floorspace in different uses on each site except where known by planning applications. This allowed the potential uplift to be derived.
4. The site capacities shown in Appendix 2 are indicative as they have not undergone further detailed testing. As the FAR is based on a suitable average for each site they do not preclude the inclusion of taller or shorter buildings on part of a site. A FAR of 1 can mean 100% of a site developed to 1 storey or 50% of the site developed to two storeys and so forth.

### **Question 10.3**

**For each of the site allocations, can the Council provide an up-to-date position on what relevant planning permissions have been granted as of 31 March 2020 and whether, as of 1 April 2020 which of those permissions are under construction? What effect would any extant or implemented planning permission have on the allocation in terms of the amount of development approved and its coverage of the allocation area? Is each site allocation policy sufficiently clear as to when the sites are expected to come forward for development? If a site allocation is under construction, is it right for these to remain 'allocations' in the NSP? Would the allocation be viable and is it deliverable? To what extent would land ownership or the need for any land assembly affect the deliverability of the site? Are the respective criteria to guide the proposed development justified?**

1. The Site Allocations Methodology Report (EIP82) is accurate as of July 2020. As set out in Q1.3 the housing supply should be modified from the basis of 1 April 2020. This requires updates to the 5 and 15 Year Housing Land Supply Report (SP105), the Site Allocations Methodology Report (EIP82) and the Housing Trajectory on Page 31 of Plan (EIP27A) to reflect the updated supply and timeframes for delivery which are being undertaken. This will include an update to reference permissions that are now under construction. This matter will be updated on completion.
2. The Site Allocations Methodology Report (EIP82) at Appendix 2 illustrates each site with live or approved applications and schemes under construction or completed. Where there is a planning application / permission on part of a site allocation, the remaining capacity has been determined for the remainder of the site through the method set out under LBS response to question 10.2. The report also sets out the land owners and deliverability of each site, including when development is expected to come forward. We have not identified any land assembly issues that would impact deliverability at this stage, and significant public consultation has been undertaken on the Plan. However, this will be monitored in case any sites that are expected to come forward later in the plan period have any land assembly issues.
3. LBS responses to Matter 9 consider the viability of development coming forward with the consideration of planning policy requirements set out in the Plan. The Viability Background Paper also sets out that the viability analysis in the suite of viability studies prepared provide a high level understanding of the viability of potential development sites in the context of the cumulative impact of our emerging planning policies. Some sites may require more detailed site and scheme specific viability analysis when they come forward through the development management process.
4. The site allocations under construction are strategic sites which ensure we can deliver our strategic targets; therefore it is still relevant and important to keep them in the Plan.
5. The criteria to guide the proposed development is justified, as set out at Paragraph 4.2 of the Site Allocations Methodology Report (EIP82) in order to produce this guidance, the context of each site was investigated in terms of character, built form, planning designations, non-designated assets of heritage or other value, planning history and examples of nearby development. Information was assembled from the NSP evidence base, discussion with internal stakeholders and wider external input from previous stages of public consultation.

#### **Question 10.4**

##### **Are the site allocation policies sufficiently clear as to whether tall and taller buildings will be acceptable?**

1. Yes. The site allocation policies are sufficiently clear as to which sites would be acceptable for tall and taller buildings. This guidance is set out in the 'Approach to tall buildings' guidance for each relevant site, and is read in combination with the New Southwark Plan's suite of design and heritage policies, including P16 Tall Buildings.

### **Question 10.5**

**Can the Council identify where in the evidence base the planned net increase in B class employment space has been quantified for all of the site allocations?**

1. Yes this is quantified in the revised Table 1B for Policy SP1b for each vision area (please refer to information in the EIP161 Strategic Targets Background Paper). This is informed by the existing uses on the site as set out in the NSP and the proposed uses as set out in the Site Allocations Methodology Paper (EIP82).

### **Question 10.6**

**Is the plan is relying on the delivery of any sites that “should’ provide C3 Dwellings (rather than must)? If so, is this approach sound and what is the expected contribution?**

1. As set out in Q1.3 for Matter 1, the housing supply should be modified from the basis of 1 April 2020. This requires updates to the 5 and 15 Year Housing Land Supply Report (SP105), the Site Allocations Methodology Report (EIP82) and the Housing Trajectory on Page 31 of the Plan (EIP27A) to reflect the updated supply and timeframes for delivery which are being undertaken. This will include an update on how many homes will be provided on sites that ‘must’ and ‘should’ provide C3 dwellings. We do not rely on sites that ‘should’ provide homes to meet our housing target, however, housing is strongly encouraged on these sites. As set out in the NSP page 148 under site allocations guidance. This matter will be updated on completion.

### **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?**

1. Policy P29 requires site allocations (where identified) to retain or increase the amount of employment floorspace on site. Most of the site allocations require at least the amount of employment floorspace currently on the site to be re-provided. These are sites identified with capacity for intensification including mixed use development to include residential uses. Where it is possible to increase employment uses, this will be welcomed in accordance with Policy P29. The site allocations in the CAZ require either at least re-provision or 50% of the site as employment floorspace, whichever is greater. The evidence base justifies our approach to demand in different areas of the borough (also see our responses to Matter 5) and the site allocations in combination with Policy P29 are considered to accommodate this demand. Policy P29 is sufficiently flexible in point 2 which states a loss of employment floorspace may be accepted where specified in site allocations, in exceptional circumstances where it can be demonstrated through a marketing exercise for two years that there is no demand for employment uses.
2. The viability analysis in the relevant viability studies supporting the plan provides a high level understanding of the viability of potential development sites in the context of the cumulative impact of our emerging planning policies. The viability studies demonstrate that schemes can viably provide commercial floorspace within developments along with

other policy requirements including affordable housing. However, the degree to which this can be accommodated will differ from site to site and scheme to scheme. The studies demonstrates that the Council's flexible approach to applying its policy requirements, will ensure an appropriate balance between delivering affordable housing, sustainability objectives, necessary infrastructure and the need for landowners and developers to achieve competitive returns, as required by the NPPF.

3. Some sites may require more detailed site and scheme specific viability analysis when they come forward through the development management process. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.

### **Question 10.8**

**For each of the site allocations, what effects, if any, do the changes to the Use Classes Order (September 2020) have on those respective allocations where use classes are referenced?**

1. The impact of the changes to the Use Classes Order on the New Southwark Plan are set out in a note prepared separately (EIP162). The changes see the introduction of three new use classes: E, F.1 and F.2, which absorb use classes A, B and D. Sui generis use class has also been expanded to include some of the aforementioned uses. A summary of the changes are set out in Table 1: Changes to Use Class Order (UCO) - EIP162.
2. Each of the site allocations set out a number of site requirements, including which uses *must and should* be provided as part of any comprehensive or part redevelopment of the site. Since the site allocations were prepared prior to the introduction of the changes to the Use Classes Order, the sites refer to some Use Classes which have been revoked. Namely, site requirements which sought to manage retail, Class A, employment, Class B, and community/social infrastructure, Class D, uses.
3. Each of the requirements have been positively prepared to meet the needs as set out in our evidence base. For example, SP412 – Southwark's Employment Land Review, SP413 – Southwark Industrial and Warehousing Land Study, SP419 – Southwark Retail Study Old Kent Road Update, SP422 – Affordable workspace in Southwark – Evidence of needs, amongst the wider evidence base on related topics to SP4 Strong Local Economy. The requirements set out within the site allocation are in line with New Southwark Plan policies and reflect up-to-date deliverability information (EIP82).
4. Each site allocation provides information on the existing uses on the site and their floorspace, where possible. This information also refers to use classes which have since been revoked.
5. The NPPF, paragraph 16, states that plans should 'contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. The changes to the Use Classes Order have the effect of adding ambiguity into the site requirements, in particular, where they refer to revoked use classes. Although, the changes to the Use Classes Order are sufficiently clear how

the revoked uses map onto the three new use classes, amendments to the site allocations will be needed to ensure they are unambiguous.

6. The council will prepare an additional document setting out the amendments for each of the site allocations, to ensure they reflect the changes to the Use Classes Order. The changes will update where we refer to revoked uses in the site requirements and existing uses information.
7. The amalgamation of several uses into one Use Class E means that change of use between retail, employment, industrial and some community services cannot be effectively monitored and controlled and therefore, affects the plan led approach taken through the site allocations.
8. In order to address the consequences which will arise from the introduction of Class E and in order to plan positively in a way that is consistent with and meets all the requirements of the NPPF, and achieves general conformity with the London Plan, the Council considers that it will be necessary in some cases to use conditions and/or planning obligations to put restriction on uses within new Class E development.

#### **Question 10.9**

##### **Are main modifications necessary to any of the site allocations for soundness?**

1. The Plan includes an area vision for Aylesbury, and the Area Action Plan site allocations are identified in the vision map – as a factual update to the Plan, the AAAP P1, AAAP P2, AAAP P3 and AAAP P4 site allocations as one site allocation should be inserted into the Plan to provide further guidance on any developments coming forward on the sites. The site allocation can be provided as a factual update as this is bringing forward the site allocation data in the Aylesbury Area Action Plan or it could be main modifications to the plan if the Inspector were to decide that this is appropriate. We have provided a draft site allocation as part of the update to the site allocations methodology paper to clarify the requirement in the NSP.
2. Modifications are proposed to sites NSP25, NSP26, NSP71 and NSP53 as agreed in the updates Statement of Common Ground with TfL (SCG14a). The wording proposed is included in the relevant questions for the Inspectors to consider.
3. The council will prepare an additional document setting out the amendments for each of the site allocations in relation to use classes, to ensure they reflect the changes to the Use Classes Order. The changes will update where we refer to revoked uses in the site requirements and existing uses information.
4. The council is currently preparing a number of Statements of Common Ground with landowners and interested parties on specific site allocations. Modifications may be suggested depending on the outcomes of these discussions and further updates may be proposed to the council's response to Matter 10. The SOCG process will conclude two weeks prior to the Hearing sessions starting on Matter 10 as agreed with the Inspectors.

## **Issue 2**

Whether the site allocations in the Bankside and Borough are justified, effective, consistent with national policy and in general conformity with the London Plan.

### ***Bankside and the Borough site allocations***

#### ***Relevant Policies – NSP01 – NSP09***

#### ***NSP01 – Site Bordering Great Suffolk Street and Ewer Street***

##### **Question 10.10**

**Is the allocation soundly based having regard to the amount of floorspace to be allocated?**

1. An application (20/AP/1009) was given consent subject to S106 in December 2020. This application proposed an uplift in office uses totalling 50,155sqm and some additional retail uses. This application relates to the northern part of the site and it includes the existing office building at 25 Lavington Street. The southern half of the site (owned by Network Rail) is yet to come forward for redevelopment. It is expected that this site will be redeveloped in years 6-15. For this portion of the site it was expected that 166 homes could come forward, this will be reviewed as part of the sites methodology update. The site allocation states that employment uses 'must' come forward and new homes 'should' be provided. As stated in the site allocations methodology report (EIP82) we do not rely on housing 'should' to meet our housing requirements. Our housing requirements are met through site allocations which 'must' provide housing (para 4.29). There is flexibility for the remainder of the site to come forward for employment or residential uses.

#### ***NSP02 – 62-67 Park Street***

##### **Question 10.11**

**Is the policy sufficient clear as to what the quantum and land uses of new development are required to be developed on the site? Will the policy be effective in securing these?**

1. Yes. NSP02 is sufficiently clear on the required land uses as set out in the row titled 'Site'.
2. NSP02 does not define specific quantum of floorspace for each land use to allow for flexibility and a design led approach, except for B Class floorspace where the provision of at least the same amount of employment floorspace (B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater is required. In this instance a minimum of 3951.5sqm of B Class floorspace would be required. This policy provides sufficient clarity for the effective securing of required land uses. The site allocations methodology report (EIP82) suggests an uplift of employment uses to achieve 16,000sqm office floorspace and 80 homes. The indicative

number of homes is included in the site allocation. The site allocation states that employment uses 'must' come forward and new homes 'should' be provided. As stated in the site allocations methodology report (EIP82) we do not rely on housing 'should' to meet our housing requirements. Our housing requirements are met through site allocations which 'must' provide housing (para 4.29). There is flexibility for the site to come forward for employment uses or a mixed use proposal including residential.

## Question 10.12

### **Is the policy guidance and the requirements in relation to the impact on heritage assets and the LVMF sufficiently clear as to whether planning permission would be granted?**

1. The guidance in table for NSP02 identifies the relevant heritage considerations for the site. These heritage considerations are read in conjunction with the framework of design and heritage policies within the New Southwark Plan, and in particular the policy that relate to the identified heritage considerations. For example, the setting of Bear Gardens Conservation Area is identified. As such NSP policy P19 Conservation Areas would be applicable to site NSP02, where a development proposal would need to conserve and enhance the significance of this conservation area's setting. Each of the heritage considerations in NSP02 has a relevant NSP policy, and a wider development plan policy and planning guidance framework. For example, the Draft Heritage SPD (EIP55) provides further guidance on conservation areas.
2. In terms of the LVMF, the current London Plan policy 7.11 'London View Management Framework' and policy 7.12 'Implementing the London View Management Framework' , which form part of Southwark's development plan, define the policies for managing the LVMF. In this instance, NSP02 fails within the Background Assessment Area of LVMF view 1A.2 - Alexandra Palace Viewing Terrace to St Paul's Cathedral. Paragraph C of the Policy 7.12 states:  
*Development proposals in the background of a view should give context to landmarks and not harm the composition of the view as a whole.*
3. Mayor has prepared the LVMF supplementary planning guidance on the management of the designated views. This supplementary guidance provides advice on the management of the foreground, middle ground and background of each view. The guidance in NSP02 does not duplicate the guidance within the LVMG SPG paragraph 90 that states:

#### *Background*

*Development should reinforce the existing composition of the view. It should consolidate existing townscape elements and manage development near St Paul's Cathedral carefully. The dome and peristyle are clearly recognised in the panorama because they are vertical elements set against two distinct ranges of hills with a strong horizontal emphasis. Development in the Wider Setting Consultation Area should preserve or enhance the viewer's ability to recognise and appreciate the peristyle, drum, dome and western towers of St Paul's Cathedral when viewed from the Viewing Place.*

***NSP03 – 185 Park Street***

**Question 10.13**

**Does the capacity of the water network affect the Council's expected timeframe for the delivery of this site?**

1. No, this site is currently under construction.

**Question 10.14**

**Is the policy guidance and requirements in relation to the impact on heritage assets and the LVMF sufficiently clear as to whether planning permission would be granted?**

1. Yes, the guidance is clear in the site allocation regarding the setting of heritage assets, conservation areas and borough/LVMF views, and relevant development management policies apply to these. Planning permission has been granted and this site is under construction.

***NSP04 – London Fire and Emergency Planning Authority***

**Question 10.15**

**Is there sufficient capacity in the water network to support the allocation? Is the proposed allocation deliverable within the timeframe expected having regard to the capacity of utilities?**

1. Yes, this site is under construction.

**Question 10.16**

**Does the allocation provide sufficient guidance to ensure there is no harm to designated heritage assets or their setting?**

1. Yes, the guidance is clear in the site allocation regarding the setting of heritage assets including the Grade II listed buildings which must be retained and enhanced. Relevant heritage development management policies also apply. Planning permission has been granted and this site is under construction.

**10.17 Is the allocation sufficiently clear as to what is required of development in the Archaeological Priority Area?**

1. The site allocation identifies the site is within a Tier 1 APA designation. Policy P22 (Archaeology) applies alongside. Planning permission has been granted and this site is under construction.

***NSP05 – 1 Southwark Bridge and Red Lion Court***

**Question 10.18**

**Does the allocation provide sufficient guidance to ensure there is no harm to the designated heritage assets or their setting?**

**Question 10.19**

**Is the requirement for open space justified?**

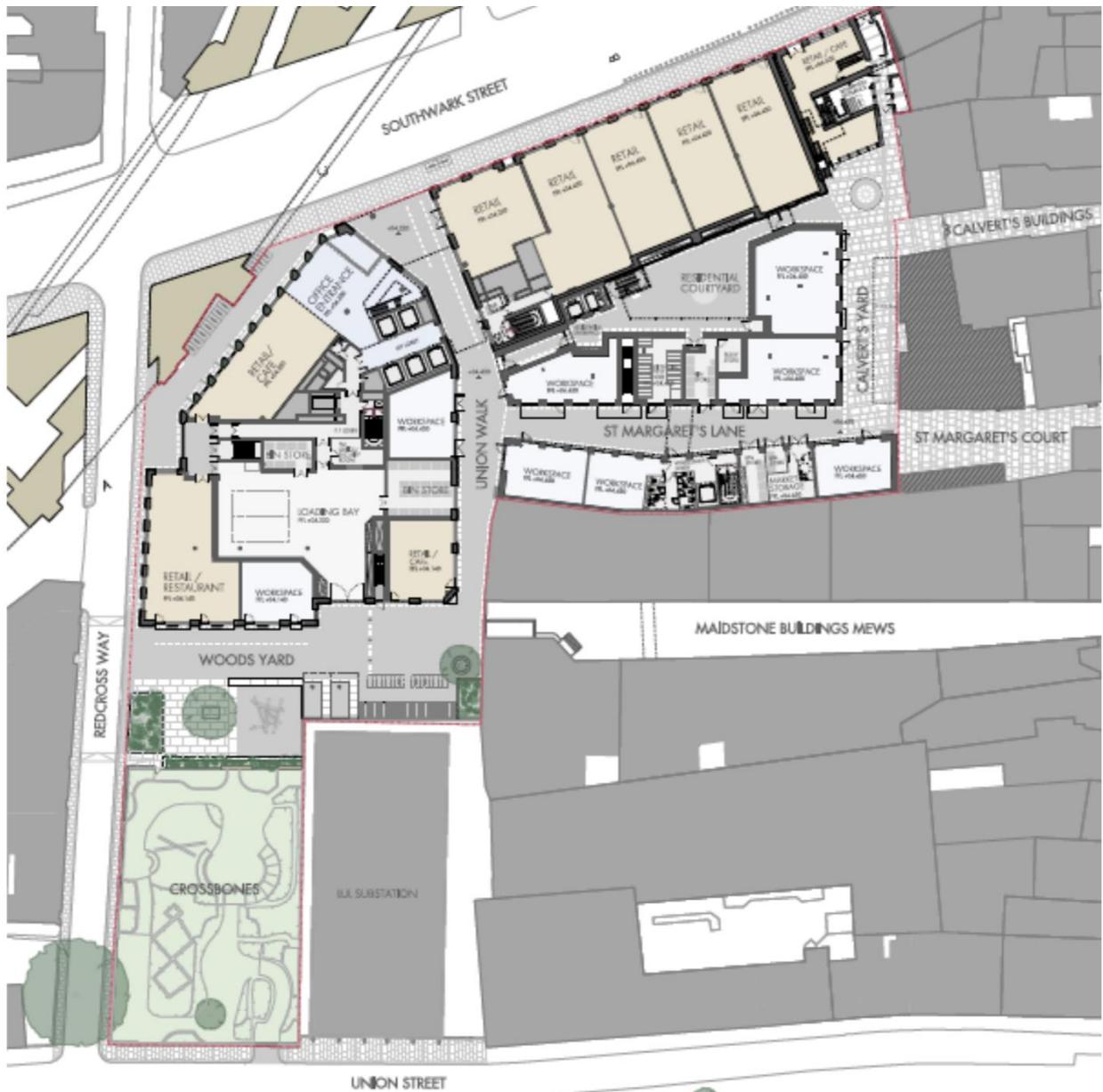
1. The council has received a Statement of Common Ground request to prepare with the landowner. These questions will be answered in combination with addressing the matters raised by parties who will be attending the examination and in advance of the Hearing date.

***NSP06 – Landmark Court***

**Question 10.20**

**Is the boundary of the allocation justified? What is the effect of the allocation on the Crossbones Cemetery?**

1. Yes. The site allocation boundary is justified. The exclusion of the Crossbones Graveyard site ensures its safeguarding or retention.
2. Planning permission 19/AP/0580 was granted on 7 January 2021 for the comprehensive redevelopment of the Landmark Court site with associated enhancements to the retained Crossbones Cemetery site.
3. Approved ground floor plan for 19/AP/0580



**Question 10.21**

**Does the allocation provide sufficient guidance to ensure there is no harm to designated heritage assets or their setting?**

1. The guidance in table for NSP06 identifies the relevant heritage considerations for the site. These heritage considerations are read in conjunction with the framework of design and heritage policies within the New Southwark Plan, and in particular the policy that relate to the identified heritage considerations. For example, the site is located within the setting of Grade II listed buildings on Southwark Street, Maidstone Buildings and Redcross Way. As such NSP policy P18 Listed Buildings and Structures would be applicable to site NSP02, where a development proposal would need to conserve and enhance the significance of the setting of the listed buildings. Each of the heritage

considerations in NSP02 has a relevant NSP policy, and a wider development plan policy and planning guidance framework. For example, the Draft Heritage SPD (EIP55) provides further guidance on conservation areas.

### ***NSP07 – Land between Great Suffolk Street and Glasshill Street***

#### **Question 10.22**

**Is the policy sufficiently clear as to the quantum of development of different uses that is allocated?**

1. Yes the policy requires at least the same amount of employment floorspace currently on the site or at least 50% of the development as employment floorspace, whichever is greater. The site also requires active frontages with commercial or community uses at ground floor level. The site should provide new homes. A mixed use development could therefore come forward. It is estimated 132 homes could come forward. The site allocations methodology paper (EIP82) estimates a retention of employment floorspace and an increase of town centre uses to support the policy. However floorspace estimates are an indication and employment uses may be required to be increased as a result of the policy and site specific considerations. The floorspace estimates in the site allocations methodology paper are estimations and have not been subject to further detailed testing. The site allocation states that employment uses 'must' come forward and new homes 'should' be provided. As stated in the site allocations methodology report (EIP82) we do not rely on housing 'should' to meet our housing requirements. Our housing requirements are met through site allocations which 'must' provide housing (para 4.29). There is flexibility for the site to come forward for employment or a mixed use proposal including residential uses.

### ***NSP08 – Swan Street Cluster***

#### **Question 10.23**

**Is the allocation sound having regard to the capacity of utilities infrastructure on the anticipated timing of development?**

1. Southwark will encourage early engagement with Thames Water to discuss drainage requirements for development and will, where necessary, support the use of phasing conditions to ensure that any necessary upgrades to the sewerage network are delivered ahead of the occupation of the relevant phase of development. The draft London Plan requires the incorporation of SuDS to alleviate and manage surface water flood risk. The SOCG with Thames Water (SCG12) agreed agree that developers should be encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. The site is expected to come forward in the later part of the plan period as there are currently no live planning applications on the site.

#### **Question 10.24**

##### **Is the policy sufficiently clear as to what is proposed on each parcel of land?**

1. The three sites are in different ownerships however the allocation has considered this cluster of sites together. One of the sites was proposed for a mixed use scheme in a planning application (16/AP/2355) however this has since expired. The sites individually are relatively small, and therefore the ability to provide the required uses across the sites would maximise flexibility and create the best opportunity to encourage development to be brought forward. This could allow an uplift in employment uses on one or two of the sites, not restricted by the need to also provide residential cores, whilst releasing one of the sites for residential use. This could better optimise the capacity of each of the three sites. The site allocation states that employment uses 'must' come forward and new homes 'should' be provided. As stated in the site allocations methodology report (EIP82) we do not rely on housing 'should' to meet our housing requirements. Our housing requirements are met through site allocations which 'must' provide housing (para 4.29). There is flexibility for the sites to come forward for employment or residential uses or mixed use proposals. All sites are proposed to have active frontages including town centre uses and the western site includes a new east-west pedestrian and/or cycle link between Borough High Street and Swan Street. One of the sites provides education uses (university level). Education uses are suggested as 'should' be provided and Policy P26 would apply in any consideration. There is a mistake in the clean version of the plan where education uses are also referred to in the 'must' part of the policy. In the tracked changes version this is not included and it is correctly referred to as 'should'. We suggest a modification to correct this drafting error in the clean version.

#### **Question 10.25**

##### **Is the policy sound with regards to the effects on designated heritage assets?**

2. Yes, the guidance is clear in the site allocation regarding the setting of heritage assets, conservation areas and borough/LVMF views, and relevant development management policies apply to these.

#### ***NSP09 – 19,21 and 23 Harper Road, 325 Borough High Street, 1-5 and 7-11 Newington Causeway***

#### **Question 10.26**

##### **Is there sufficient capacity in the water network to support the allocation? Does the capacity of utilities infrastructure affect the anticipated timing of development?**

1. The following condition was attached to the planning permission for the site (18/AP/0657) granted June 2020) as recommended by Thames Water. There is sufficient flexibility to allow building work to complete as the condition requires upgrades to the network or a phasing plan prior to occupation of the properties.

2. No properties shall be occupied until confirmation has been provided that either;
  - All water network upgrades required to accommodate the additional flows from the development have been completed; or
  - A housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.
  
3. Reason:

The development may lead to no/low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

### **Issue 3**

Whether the sites in Bermondsey Area Vision are justified, effective, consistent with national policy and in general conformity with the London Plan.

#### **Relevant Policies – NSP10 – NSP12**

##### ***NSP10 – Biscuit factory and Campus***

#### **Question 10.27**

**Is there sufficient water infrastructure available to support the allocation? Is the allocation sound having regard to the capacity of utilities infrastructure to support the anticipated timing of development?**

1. The following condition was attached to the planning permission for the site (17/AP/4088, granted June 2020) as recommended by Thames Water. There is sufficient flexibility to allow building work to complete as the condition requires upgrades to the network or a phasing plan prior to occupation of the properties. The developer has recently submitted details of a number of pre-commencement conditions.
2. Condition 39 – Waste (Thames Water)

Prior to the occupation of the residential development within each relevant Phase or Building, confirmation must be provided that either:

- (a) all combined water network upgrades required to accommodate the additional flows from the development have been completed; or
  - (b) a housing and infrastructure phasing plan (waste water) has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.
3. Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.

#### **Question 10.28**

**How has the proposed dwelling capacity been generated and is this supported by evidence?**

1. As set out in the Site Allocations Methodology Report (EIP182) the dwelling capacity reflects the planning permission on the site (17/AP/4088). Details are provided at Appendix 2 of the report.

## ***NSP11 – Tower Workshops***

### **Question 10.29**

**Is the allocation sound having regard to the capacity of utilities infrastructure on the anticipated timing of development?**

1. Southwark will encourage early engagement with Thames Water to discuss drainage requirements for development and will, where necessary, support the use of phasing conditions to ensure that any necessary upgrades to the sewerage network are delivered ahead of the occupation of the relevant phase of development. The draft London Plan requires the incorporation of SuDS to alleviate and manage surface water flood risk. The SOCG with Thames Water (SCG12) agreed that developers should be encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. The site is expected to come forward in the later part of the plan period as there are currently no live planning applications on the site.

## ***NSP12 – Chambers Wharf***

### **Question 10.30**

**Is there sufficient water infrastructure available to support the allocation?**

1. The scheme is being delivered in phases and part of the planning approval has already been developed. The remainder of the site will come forward when the Thames Tidal Tunnel is completed.

### **Question 10.31**

**Is the proposed phasing of the site justified having regard to the sites temporary use as a construction site for another project? What would be the effect if the temporary use as a construction site slipped?**

1. The scheme is being delivered in phases and part of the planning approval has already been developed. The remainder of the site will come forward when the Thames Tidal Tunnel is completed, which is expected to be in 2025. The remainder of the site is anticipated to come forward later in the plan period – 6-15 years.

## **Issue 4**

Whether the sites in Blackfriars Road Area Vision are justified, effective, consistent with national policy and in general conformity with the London Plan.

### ***Relevant Policies – NSP13 – NSP20***

***NSP13 - Conoco House, Quadrant House, Edward Edwards House and Suthring House (was NSP14)***

#### **Question 10.32**

**Is there sufficient water infrastructure available to support the allocation?**

1. Southwark will encourage early engagement with Thames Water to discuss drainage requirements for development and will, where necessary, support the use of phasing conditions to ensure that any necessary upgrades to the sewerage network are delivered ahead of the occupation of the relevant phase of development. The draft London Plan requires the incorporation of SuDS to alleviate and manage surface water flood risk. The SOCG with Thames Water (SCG12) agreed that developers should be encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. A planning application has recently been submitted for the site (20/AP/3250).

***NSP14 – Friars House, 157-168 Blackfriars Road (was NSP15)***

#### **Question 10.33**

**Is the site deliverable/ developable at the point envisaged?**

1. The landowner, AG EL 160 Blackfriars Road, is proposing to bring forward the car park part of the site only as a hotel development and the existing office building Friars House will be retained. The council refused the original scheme based on a number of reasons including land use and design considerations however it was dismissed on appeal for design considerations only. A subsequent revised application was approved in July 2020 subject to S106 (20/AP/0556) for a 169 bedroom hotel (Class C1), flexible office or community space (Class B1/D1) retail floorspace (Class A1/A3). As this proposal retains the office building and the remainder of the site contains a building of architectural and historic merit, it is unlikely further comprehensive development would occur. Therefore the housing target has been removed from the plan for this site. There would be a modest uplift in office, retail and community uses including affordable workspace as part of the planning application proposal.

#### **Question 10.34**

**What is the Council's position in respect of the building of architectural and historic merit on the site?**

1. The Blackfriars Foundry is identified as a building of architectural and historic merit and the council would expect it to be retained.

#### **Question 10.35**

**Does the policy provide sufficient certainty to enable delivery of the allocation within the Council's expected timeframe?**

1. Planning permission has been granted and it is expected this will come forward within the plan period.

#### **Question 10.36**

**Is there a reasonable prospect that the site will come forward for the intended uses? Should there be greater flexibility?**

1. The site allocation refers to the relevant approved planning application on the site which includes a hotel and some flexible employment, retail and community uses. The site allocations methodology paper (EIP82) refers to the delivery of an additional hotel in this location due to the planning approval in the overall monitoring. The office building was refurbished relatively recently, and with the recent approval of the hotel building in the rear service area it is unlikely that any more comprehensive scheme would be brought forward within the plan period.

***NSP15 – Land enclosed by Colombo Street, Meymott Street and Blackfriars Road (was NSP16)***

#### **Question 10.37**

**What evidence is available to indicate that there remains the prospect of a wider redevelopment of the site for the uses the policy anticipates?**

1. Application 15/AP/0237 is relevant to this site allocation and it only covers part of the site. This proposal relates to Wedge House, at 36 Blackfriars Road within the site allocation and the owner is Hoxton (Southwark) Ltd. Under this application the following proposal was granted planning permission: Redevelopment of land and buildings to provide a part 7, part 12, part 14 storey building plus basement, ground and mezzanine levels, comprising office (Class B1) and hotel (Class C1) with ancillary cafe/bar/restaurant and other associated supporting facilities, ancillary plant, servicing, and cycle parking and associated highway and public realm improvements. Under application 16/AP/1253 minor design changes have been approved to application 15/AP/0237. This development is now completed.

2. Application 16/AP/1660 was relevant to Friars Bridge Court at 41-45 Blackfriars Road within the site allocation. The following scheme was granted permission: demolition of existing office building (Class B1a) and redevelopment to provide a part 13, part 22 storey building plus basement comprising offices (Class B1a) with retail (Classes A1/A3 and A4) together with servicing, car parking and landscaping. This application has now expired. Friars Bridge Court is now undergoing an office refurbishment rather than redevelopment.
3. The remaining site is the Colombo Sport Centre which is a community gym owned freehold by Southwark Council and operated by Coin Street. Some intensification of the site to include residential and community uses may be possible but not at the scale originally envisaged with adjoining landowners. As comprehensive redevelopment is now unlikely the site capacity of 168 dwellings would need to be revisited in the update to the 5 and 15 year land supply and site allocations methodology update. This capacity was envisaged for years 10 to 15 of the plan period. The site allocation states that employment uses 'must' come forward and new homes 'should' be provided. As stated in the site allocations methodology report (EIP82) we do not rely on housing 'should' to meet our housing requirements. Our housing requirements are met through site allocations which 'must' provide housing (para 4.29).

***NSP16 – Ludgate House and Sampson House, 64 Hopton Street (was NSP17)***

**Question 10.38**

**Is there sufficient water infrastructure available to support the allocation?**

1. Yes, part of the site is currently under construction (Ludgate House) and Sampson House has been demolished and construction expected to start soon. The applications included pre-commencement conditions relating to submission of a drainage strategy.

***NSP18 – McLaren House, St. George's Circus (was NSP19)***

**Question 10.39**

**Is there sufficient water infrastructure available to support the allocation?**

1. Southwark will encourage early engagement with Thames Water to discuss drainage requirements for development and will, where necessary, support the use of phasing conditions to ensure that any necessary upgrades to the sewerage network are delivered ahead of the occupation of the relevant phase of development. The draft London Plan requires the incorporation of SuDS to alleviate and manage surface water flood risk. The SOCG with Thames Water (SCG12) agreed that developers should be encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. The site is expected to come forward in the later part of the plan period as there are currently no live planning applications on the site.

***NSP19 – Land between Paris Gardens, Colombo Street, Blackfriars Road and Stamford Street (was NSP20)***

**Question 10.40**

**Does the allocation provide sufficient guidance to ensure there is no harm to the designated heritage assets or their setting?**

1. Yes, the guidance is clear in the site allocation regarding the setting of heritage assets, conservation areas and borough/LVMF views, and relevant development management policies apply to these. Planning permission has been granted for this site and the scheme is under construction.

**Question 10.41**

**Is there sufficient capacity in the water supply and waste water network to support the allocation? What effect does this have on the anticipated timing of the development?**

1. Yes, the site is currently under construction. The application (16/AP/5239) included pre-commencement conditions relating to submission of a drainage strategy which were subsequently discharged.

***NSP20 – 1-5 Paris Garden and 16-19 Hatfields (was NSP21)***

**Question 10.42**

**Is there sufficient water infrastructure capacity to support the allocation?**

1. Yes, planning permission has been granted (17/AP/4230) and includes conditions relating to drainage and surface water.

**10.43 Does the allocation provide sufficient guidance to ensure there is no harm to the designated heritage assets or their setting?**

1. Yes, the guidance is clear in the site allocation regarding the setting of heritage assets, conservation areas and borough/LVMF views, and relevant development management policies apply to these. Planning permission has been granted for the site (17/AP/4230).

## **Issue 5**

Whether the sites in Camberwell are justified, effective, consistent with national policy and in general conformity with the London Plan.

### ***Relevant Policies – NSP22, NSP25, NSP32***

#### ***NSP22 - Burgess Business Park***

##### **Question 10.44**

**Given the character and location of the site is it necessary for plan soundness that a comprehensive redevelopment of the site is secured through the vision and guidance in NSP22? Can the site viably retain the existing amount of employment floorspace on the site in addition to the indicative capacity for 671 homes as part of a mixed-use neighbourhood? Are there any material consequences from the recent appeal decision that may generate a need to modify the policy approach to NSP22?**

##### **Question 10.45**

**Is it justified and effective that redevelopment of the site should provide industrial employment space in the form of B1c and B8 uses only? Is that consistent with evidence on need for employment premises?**

##### **Question 10.46**

**Is it acceptable in principle that tall buildings are considered as part of an approach to maximising the development potential of the site?**

1. The council has received Statement of Common Ground requests to prepare with landowners and interested parties on this site. These questions will be answered in combination with addressing the matters raised by parties who will be attending the examination and in advance of the Hearing date.

#### ***NSP25 - Camberwell Bus Garage and NSP26 Abellio Walworth Depot***

##### **Question 10.47**

**Noting the representations from TfL, how feasible is it to retain the existing bus garages and accommodate new residential development? Are these sites developable in the plan period?**

1. Yes, both sites are considered developable in years 6-15 subject to retaining bus capacity for the local network. TfL own the bus garages at NSP26 and NSP71 (Aylesham Centre) and Go Ahead run the bus garages at NSP25 and NSP72 (Blackpool Road). The council has agreed suggested amendments to the wording of site allocations NSP25, NSP26 and NSP71 in the updated SOCG with TfL (SCG14a) for the Inspectors to consider.
2. **NSP25 Policy**

Retain bus capacity for the local network. ~~Retain the bus garage if the use is still required.~~

**D&A guidance**

~~If the bus garage is required redevelopment should consider over the station development to provide new homes.~~

**NSP26**

**Policy**

Retain bus capacity for the local network. ~~Retain a bus garage if the use is still required.~~

**D&A guidance**

~~If the bus garage is required redevelopment should consider over the station development to provide new homes.~~

***NSP32 - Camberwell Green Magistrates Court***

**Question 10.48**

**Can the site viably yield 150 residential units as well as providing employment (B1, D class), town centre and community uses (A1, A2, A3, A4, D1, D2) of at least the amount of employment generating floorspace currently on the site?**

1. The policy requires a mixture of employment, town centre and community uses of at least the amount of employment generating floorspace on the site. The wording was altered in response to previous consultation responses which were concerned about providing the same amount of floorspace which is currently in the law courts building (9,932sqm). To give some guidance of the floorspace expectations for non-residential uses on the site, 'employment generating' uses was added in recognition of the existing building having an inefficient layout with significant amounts of ancillary space, circulation and waiting areas that are not employment generating. As a key town centre site, mixed use development is welcomed including residential, employment, retail and community uses and the policy is sufficiently flexible to enable a range of town centre uses and promote active ground floors and frontages. In the site allocations methodology paper 5,298sqm of town centre uses was estimated as well as 150 dwellings. However this is an estimate and has not been subject to further detailed testing. A mixed use development is reasonable and viable for this location. The site was sold by the Ministry of Justice with this planning context.

## **Issue 6**

Whether the sites in Crystal Palace and Gipsy Hill are justified, effective, consistent with national policy and in general conformity with the London Plan.

### ***Relevant Policy – NSP34***

#### ***NSP34 – Guys and St. Thomas Trust Rehabilitation Centre, Crystal Palace***

#### **Question 10.49**

##### **Is there sufficient water infrastructure capacity to support the allocation?**

1. Southwark will encourage early engagement with Thames Water to discuss drainage requirements for development and will, where necessary, support the use of phasing conditions to ensure that any necessary upgrades to the sewerage network are delivered ahead of the occupation of the relevant phase of development. The draft London Plan requires the incorporation of SuDS to alleviate and manage surface water flood risk. The SOCG with Thames Water (SCG12) agreed that developers should be encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. The site is expected to come forward in the later part of the plan period as there are currently no live planning applications on the site.

#### **Question 10.50**

##### **Is the allocation justified having regard to the existing uses?**

1. Yes, this allocation is justified in having regard to the existing uses. The site allocation identifies the floorspace of the existing Rehabilitation Centre, Use Class D1, 1,986m<sup>2</sup>.
2. The need for health facilities is set out in the Infrastructure Background Paper - SP201. NHS Southwark CCG have been working with partners to project future primary and community health service needs and plan to meet them with new health facilities within NSP34, NSP39, NSP65 and NSP78. Having regard for the existing uses is justified in order to so that any redevelopment of the site can retain the rehabilitation centre or provide an alternative health facility of at least equivalent size, provided there is a need for such a facility.
3. The site allocation has the potential for some intensification including reprovision of a health facility of the same size and 51 homes.

## **Issue 7**

Whether the sites in Dulwich are justified, effective, consistent with national policy and in general conformity with the London Plan.

### **Relevant Policy – NSP35**

#### ***NSP35 - The Grove Tavern, 520 Lordship Lane***

### **Question 10.51**

**How has the indicative dwelling capacity been generated and is this supported by evidence?**

1. Within the capacity table the capacity of a site allocation was determined by using the methodology set out within the Site Allocations Methodology (EIP82).
2. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.
3. The IIA (EIP72A, Appendix 12) provides information on the Council's considerations of reasonable alternatives for planning for growth. As part of this the IIA includes further information on the options testing for the identification of sites for growth and the site allocation capacities which informed the final indicative site capacity assumptions that are provided within this document and the New Southwark Plan site allocation (63 homes). A higher option of 120 homes was considered but this was discounted.

### **Question 10.52**

**Is the allocation sufficiently flexible if the building is retained in its existing use?**

1. Yes, the site includes an extensive car park which could be redeveloped.

### **Question 10.53**

**How will the extent of any demand to retain the use as a public house be assessed?**

1. The criteria of Policy P41 (Pubs) will be the relevant policy to assess this.

## **Issue 8**

Whether the sites in East Dulwich are justified, effective, consistent with national policy and in general conformity with the London Plan.

### **Relevant Policies NSP36 – NSP40**

#### ***NSP36 – Kwik Fit and Gibbs and Dandy, Grove Vale***

##### **Question 10.54**

**Is the policy effective in respect of ensuring any main town centre uses are compatible with adjoining residential occupiers? How will it achieve this?**

1. The site is currently operating car tyre and builders merchant uses adjacent to residential development. To the west of the site there are ground floor uses in commercial uses as part of a designated secondary shopping frontage. Requiring active frontages to Grove Vale and town centre/employment uses on the site both addresses re-provision of employment uses of a similar typology where possible (e.g. builders merchants) and/or ensuring commercial uses continue to provide an active frontage to Grove Vale. The design and accessibility guidance of the site requires that development should respond positively to maintaining established building lines on Grove Vale. Development management policies would apply (such as policies relating to design quality/residential amenity) to ensure compatibility between commercial and residential uses including adjoining residential occupiers.

#### ***NSP37 – Dulwich Hamlet Champion Hill Stadium, Dog Kennel Hill***

##### **Question 10.55**

**What are the landowners intentions for the site, and what are the implications of the allocation for the existing community facilities?**

1. Southwark's Planning Committee resolved, in July 2020, to grant permission to develop the stadium land and the adjacent Greendale Artificial Pitch, which falls outside of the site allocation boundary (19/AP/1867). The related s106 agreement is currently being finalised, and the decision would then need to be referred to the GLA for a 'Stage 2' direction. The permission would enable the redevelopment of the site to provide a new stadium with a relocated playing pitch, and part two-part three storey clubhouse building with sports and leisure facilities, with capacity for 4,000 spectators (Use Class D2); the construction of a multi-use games area (MUGA), and the erection of a series of buildings between four and six storeys in height to provide 219 residential dwellings. The application was submitted jointly by the owners of the stadium (Headley Development Solutions/Greendale Property Company) and Dulwich Hamlet Football Club with the intention of providing enhanced sport and community facilities alongside new homes.

#### **Question 10.56**

**Is there a reasonable prospect of the redevelopment of the site and the inclusion of new homes as part of that redevelopment?**

1. Yes, see LBS response to question 10.55. The application demonstrated that, with assumed public grant, it would be viable to deliver both homes and the new stadium facilities, and for the development to be phased to allow continuity of use by the Club

#### **Question 10.57**

**Is the boundary of the allocation justified, and will it be effective in supporting a comprehensive redevelopment of the stadium?**

1. The boundary of the site allocation does not reflect the boundary of the approved planning application. The approved planning application includes the adjacent Greendale artificial pitch, further details on the inclusion of the pitch is set out in the Officer's Report for the planning application (19/AP/1867). The boundary of the site allocation has not prohibited an alternative proposal being considered and approved which optimised the delivery of new homes.

#### **Question 10.58**

**Does the allocation provide a sound basis for the redevelopment of the site having regard to the requirements of open space designations? Is the retention of site OS128 as MOL appropriate?**

1. Planning permission (19/AP/1867) has been agreed for the site (which includes the adjacent Greendale artificial pitch which falls outside the site allocation) in July 2020. OS128 (Greendale Playing Fields) and OS129 (Greendale artificial pitch) fall outside of the site allocation, the retention of the MOL designation is important to retain open space in the borough and allow proper scrutiny and consideration of any proposals on the land. The relocation of the football club pitch onto the MOL was assessed in relation to adopted and emerging development plan policies relating to MOL, and it was concluded that the pitch could be accommodated on MOL without significant harm to openness.

#### ***NSP38 – Railway Rise, East Dulwich***

#### **Question 10.59**

**Is there sufficient water infrastructure capacity to support the allocation?**

1. Southwark will encourage early engagement with Thames Water to discuss drainage requirements for development and will, where necessary, support the use of phasing conditions to ensure that any necessary upgrades to the sewerage network are delivered ahead of the occupation of the relevant phase of development. The draft London Plan requires the incorporation of SuDS to alleviate and manage surface water

flood risk. The SOCG with Thames Water (SCG12) agreed that developers should be encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. The site is expected to come forward in the later part of the plan period as there are currently no live planning applications on the site.

### ***NSP39 – Dulwich Community Hospital, East Dulwich Grove***

#### **Question 10.60**

**What evidence is available to indicate the proposed school and health centre are deliverable on the site? Are they viable?**

1. The proposed school and health centre are deliverable on the site and viable. This is demonstrated by the current status of development within this site allocation, part completed. The Tessa Jowell Health Centre has been complete, the Charter East Dulwich School is open. The Main hospital buildings are currently being demolished, and the final phase of the school will be finished this year.

### ***NSP40 – Goose Green Trading Estate***

#### **Question 10.61**

**Is there sufficient water infrastructure capacity to support the allocation?**

1. Southwark will encourage early engagement with Thames Water to discuss drainage requirements for development and will, where necessary, support the use of phasing conditions to ensure that any necessary upgrades to the sewerage network are delivered ahead of the occupation of the relevant phase of development. The draft London Plan requires the incorporation of SuDS to alleviate and manage surface water flood risk. The SOCG with Thames Water (SCG12) agreed that developers should be encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. The site is expected to come forward in the later part of the plan period as there are currently no live planning applications on the site.

#### **Question 10.62**

**Does the policy provide adequate guidance in respect of the adjacent heritage assets?**

1. Yes. NSP40 provides sufficient guidance and identifies the relevant heritage considerations for the site. These heritage considerations are read in conjunction with the framework of design and heritage policies within the New Southwark Plan, and in particular policies that relate to the identified heritage considerations. For example, the site is located within the setting of the Grade II listed Dulwich Public Baths. As such NSP

policy P18 Listed Buildings and Structures would be applicable to site NSP40, where a development proposal would need to conserve and enhance the significance of the setting of this listed building. Each of the heritage considerations in NSP02 has a relevant NSP policy, and a wider development plan policy and planning guidance framework. For example, the Draft Heritage SPD (EIP55) provides further guidance on conservation areas.

## **Issue 9:**

Whether the sites in Elephant and Castle are justified, effective, consistent with national policy and in general conformity with the London Plan.

### ***Relevant Policies - NSP44, NSP45***

#### ***NSP41 - Newington Triangle***

##### **Question 10.63**

##### **Is the indicative residential capacity of the site justified?**

1. The council has received a Statement of Common Ground request to prepare with the landowner. This question will be answered in combination with addressing the matters raised by parties who will be attending the examination and in advance of the Hearing date.

#### ***NSP44 – Salvation Army Headquarters, Newington Causeway***

##### **Question 10.64**

##### **Is the site developable during the plan period as a comprehensive mixed-use site having regard to the site requirements and other NSP policy requirements? Is the indicative residential capacity of the site justified?**

1. The site has an estimated capacity of 57 homes, 7,346sqm employment uses and 554sqm town centre uses in the site allocations methodology paper. The capacity is indicative and has not been subject to further detailed testing. The landowner, The Salvation Army Trustee Company (PSV consultation ref: NSPPSV188.1) is in general support of the redevelopment of the site for mixed uses subject to the detail of their representation. The site allocation guidance identifies the site could include taller buildings. The indicative capacity would meet the policy requirements for an uplift of employment uses, provision of new town centre uses and 57 new homes. There is currently 7,030sqm office floorspace on the site.
2. The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments. A higher option for residential was considered for this site and not taken forward.

3. As stated in the site allocations methodology report (EIP82) we do not rely on housing 'should' to meet our housing requirements. Our housing requirements are met through site allocations which 'must' provide housing (para 4.29). There is flexibility for the site to come forward for employment or mixed use to include residential.

**Issue 10:**

Whether the sites in Herne Hill and North Dulwich are justified, effective, consistent with national policy and in general conformity with the London Plan.

**Relevant Policy NSP48*****NSP48 – Bath Trading Estate*****Question 10.65**

**Does the policy provide sufficient guidance in respect of the designated heritage assets?**

1. Yes. NSP48 provides sufficient guidance in respect of the heritage assets relevant to the site. Southwark has also agreed a Statement of Common Ground with Lambeth Council, as NSP48 is located on the boundary with Lambeth Council. Further guidance on Conservation Areas can be found in the borough's Heritage SPD (EIP55), alongside New Southwark Plan (EIP27A) policies P18 – Listed buildings and structures and P19 – Conservation areas, that work in tandem to conserve and enhance the boroughs designated Heritage assets.

**Issue 11:**

Whether the London Bridge sites are justified, effective, consistent with national policy and in general conformity with the London Plan.

**Relevant Policies NSP49-52*****NSP49 – London Bridge Health Cluster*****Question 10.66****Is there sufficient water infrastructure capacity to support the allocation?**

1. Southwark will encourage early engagement with Thames Water to discuss drainage requirements for development and will, where necessary, support the use of phasing conditions to ensure that any necessary upgrades to the sewerage network are delivered ahead of the occupation of the relevant phase of development. The draft London Plan requires the incorporation of SuDS to alleviate and manage surface water flood risk. The SOCG with Thames Water (SCG12) agreed that developers should be encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. The site is expected to come forward in the later part of the plan period as there are currently no live planning applications on the site.

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

1. Yes, the boundary of the propose site allocation is justified. The boundary reflects the land ownerships by health and education bodies of buildings and sites within the London Bridge Campus.

***NSP50 – Land between Melior Street, St. Thomas Street, Weston Street and Fenning Street*****Question 10.68****Is there sufficient water infrastructure capacity to support the allocation?**

1. Yes, Thames Water considered the site to have sufficient capacity in their response to both the approved and live applications on the site.

***NSP51 – Land between St. Thomas Street, Fenning Street, Melior Place and Snowsfields*****Question 10.69**

**Should there be a single, more comprehensive allocation covering NSP50-51 and what would be the effect of doing so?**

1. The council is preparing a Statement of Common Ground with interested parties on this site. This question will be answered in combination with addressing the matters raised by parties who will be attending the examination and in advance of the Hearing date.

**Question 10.70**

**Is there sufficient water infrastructure capacity to support the allocation?**

1. Thames Water have suggested pre-occupation conditions relating to water flows on proposed applications on this site but otherwise raised no objection.

**Question 10.71**

**Does the policy provide suitable guidance in respect of the impact on any heritage assets or their setting?**

1. The council is preparing a Statement of Common Ground with interested parties on this site. This question will be answered in combination with addressing the matters raised by parties who will be attending the examination and in advance of the Hearing date.

## **Issue 12:**

Whether the Old Kent Road sites are justified, effective, consistent with national policy and in general conformity with the London Plan.

### ***Relevant Policies - NSP53, NSP55, NSP56, NSP63-NSP67***

#### ***NSP53 - Bricklayers Arms***

#### **Question 10.72**

**Is the site developable or suitable as a broad location for development? Does the policy appropriately recognise the location as an area of potential for a Bakerloo Line Extension station?**

1. The Bricklayers Arms site is part of the draft Old Kent Road AAP in terms of envisaging significant change to the Opportunity Area over the next 20 years. The flyover is part of the TFL strategic road network and at the moment funding for the project has yet to be identified. The capacity of the site is therefore more uncertain and it has not been included in the calculations for growth in either the NSP or OKR AAP site allocations capacity figures. It is not relied upon in either our 5 or 15 year supply calculations. Nevertheless we consider its inclusion as a site allocation necessary to achieve place-making objectives of the Old Kent Road and its role as a Healthy Street. The inclusion of the allocation stresses the importance of securing funding for the project in future and also is transparent about the potential future plans for the site. It may come forward in Phase 2 of the Old Kent Road AAP delivery. The allocation is supported by TfL (PSV consultation ref: NSPPSV181.24) and TfL are currently reviewing development options supported by a recently awarded central government grant. The Old Kent Road AAP (December 2020) outlines two options for the future of the site (EIP128, OKR1, page 103). Option 1 is to remove the flyover and reconfigure the junction and road layout. Option 2 is to reconfigure the roads and convert the flyover to a "Flyover Park". The introduction of new street frontages would improve permeability for people walking and cycling and reduce severance created by the existing junction layout and the flyover. Landscaping would be improved with the retention of good quality trees.
2. The site is no longer a potential site for a Bakerloo Line station. The preferred options are locations at the Tesco and former Toysrus sites which is included in the relevant site allocations. The council agreed with TfL in the update SOCG (SCG14a) that the site allocation in the NSP should remove the following reference. We would suggest this to the Inspectors as a modification.

~~The site has the potential to host a new underground station as part of the Bakerloo Line Extension.~~

## ***NSP55 - Mandela Way***

### **Question 10.73**

**Is the plan justified in retaining the status of this allocated site as a “Locally Significant Industrial Site” (LSIS) and will it be effective in securing an intensification of employment uses, including displacement from other employment sites?**

1. Yes, the Old Kent Road AAP (December 2020, EIP128) identifies this site as distribution and storage, stand-alone industrial and small industrial mixed use typologies (page 107). The Old Kent Road Existing and Proposed document (EIP149) identifies the site currently accommodates 74,355sqm industrial uses and 99,646sqm of employment uses are proposed in the masterplan (also see EIP139). There has been a change in the recent AAP to accommodate a stand-alone industrial building on the Tate storage facility which would increase industrial capacity of the site. It is estimated around 81% of the proposed employment uses would be industrial, contributing to the overall no net loss of industrial uses, and provision and uplift of industrial uses, in accordance with Publication London Plan 2020 Policy E6. The site is likely to be delivered in Phase 2 of the Old Kent Road plan. The development would be phased and may be able to accommodate business relocation from businesses on the site itself and from wider parts of the opportunity area, overall adding to new industrial supply whilst intensifying the site to include residential uses.

### **Question 10.74**

**Is the designation and definition of the detailed boundaries of this site as a LSIS, including the types of uses that are acceptable in this location and the potential for intensification, co-location and substitution in conformity with the London Plan?**

1. Yes. The site allocation requires industrial uses to be provided as well as new homes, open space and community uses and this is in accordance with Policies SD1, E6 and E7 of the London Plan.

## ***NSP56 - 107 Dunton Road (Tesco store and car park) and Southernwood Retail Park***

### **Question 10.75**

**Is the policy justified and effective in securing a comprehensive approach to the site, recognising land ownerships and the location as an area of potential for a Bakerloo Line Extension station?**

1. Yes. Planning application 18/AP/3551, which relates to Southernwood Retail Park, has been approved subject to s106 agreement indicating a delivery of 541 homes within 0-5 years and a further 183 homes to be delivered in years 6-15. The site has been masterplanned to include ongoing discussions with the developer for the Tesco site which indicates a remaining capacity of 876 homes (also see EIP139). The site may be required for the construction of the Bakerloo Line Extension so will not be available until the late 2020s. The requirements for the site to incorporate station, tunnelling and worksite requirements in the site design and phasing is included in the site allocation. The permission for Southernwood Retail Park allows development of the northern part to

come forward in Phase 1 with a section 106 obligation securing the Old Kent Road frontage hotel development post BLE tunnel design being confirmed.

***NSP63 - Land bounded by Glengall Road, Latona Road and Old Kent Road***

**Question 10.76**

**Is the proposed approach to employment land/premises at this location, including the extent of Strategic Industrial Land and balance of Locally Significant Industrial Sites, justified, effective, positively prepared and in general conformity with the London Plan?**

1. Yes. SPIL is maintained on the Glengall Road Business Park which has access from Glengall Road and is outside the boundary of the site allocation. This is in accordance with Policies E4 and E5 of the Publication London Plan 2020. Adjacent to the SPIL (industrial uses only), the sites along Ossory Road are identified as LSIS. The Old Kent Road AAP (December 2020, EIP128, page 133) identifies this area as bringing forward stand-alone industrial, distribution and small industrial uses which can be mixed with residential in accordance with Policies SD1, E6 and E7 of the Publication London Plan 2020. The site allocation is clear that new homes and industrial uses must be provided on the LSIS part of the site allocation which is clearly defined on the Policies Map. The remainder of the site will deliver a mix of retail and office uses on Asda, McDonalds, Cantium Retail Park and sites close to the Old Kent Road frontage which are currently mainly in retail use. To the western part of the site where there are currently industrial uses present, the proposal is to release the site from its current designation as SIL however the masterplan requires provision of small industrial mixed use development and some small office space as part of mixed use development as well as delivering part of the Surrey Canal linear park. The site is in multiple ownerships and there are several planning applications approved on the site and some live applications including for industrial mixed use or stand-alone industrial development in the LSIS part of the site. Please also refer to our response on Matter 1 Question 1.9.

***NSP64 - Marlborough Grove and St James's Road***

**Question 10.77**

**Are the policy requirements for the site justified and can the site effectively and viably deliver retained employment floorspace together with an indicative capacity for 1,000 – 1,200 homes?**

1. Yes. The site has been masterplanned and the latest capacity study indicates the site can deliver 1,200 homes, a small loss of retail uses and an increase in industrial uses. The Old Kent Road AAP (December 2020, EIP128, page 133) identifies this site to deliver large scale storage and distribution uses on the Six Bridges Industrial Estate and other small industrial and office uses on St James's Road (EIP149, EIP140).

## ***NSP65 - Sandgate Street and Verney Road***

### **Question 10.78**

**Is the proposed approach to employment land/premises at this location, including the extent of Strategic Industrial Land, justified, effective, positively prepared and in conformity with the London Plan?**

1. Yes. The majority of SPIL is located adjacent to the site boundary to the east on the former gasworks, national grid and IWMF sites. A small part of the site at the top end south of Verney Road is included as part of the SPIL boundary and would be subject to the requirements of NSP Policy P28. The SPIL boundary is identified on the site map and the Policies Map. The Old Kent Road AAP (December 2020, EIP128, page 157) shows the masterplan for this part of the site as stand-alone stacked industrial uses. This is in accordance with Publication London Plan 2020 policies E4, E5 and E7 relating to industrial intensification. The remainder of the site is proposed to be released from SIL designation for mixed use development to incorporate a range of uses. This includes industrial mixed use development including medium-large storage and distribution uses at the top end of Verney Road, as well as light industrial, office, retail, community uses, 3 parks, a primary and secondary school and a new sports hall. This is in accordance with Publication London Plan 2020 policies SD1 and E7. Please also refer to our response on Matter 1 Question 1.9.

### **Question 10.79**

**Does the presence of National Grid infrastructure affect the capacity and deliverability of the site?**

1. No. The main National Grid infrastructure is located on the SPIL and there would be a buffer of stand-alone industrial uses on the edges of the site allocation (EIP128, page 157). One application for mixed use development has been approved adjacent to the National Grid site however this is the only site proposed for residential uses that would be directly adjacent to the infrastructure. The application (18/AP/2895) was submitted with a noise impact assessment to assess whether the site would be suitable for residential development. The permission including a condition to secure appropriate internal noise levels is recommended, which should minimise the likelihood of noise complaints against the existing industrial occupiers. Mitigation measures such as alternative ventilation for all habitable rooms and higher than standard specification glazing have been recommended. The rear balconies to the first and second floors are proposed as winter gardens which provides some protection from noise emitting from the neighbouring site.
2. Other National Grid infrastructure is a smaller sub-station to the south of Verney Road. One planning application has been approved adjacent with ground light industrial uses and residential uses above (17/AP/4508). Similarly this application proposes winter gardens, acoustic glazing and noise mitigation conditions to generally protect residential amenity from adjacent industrial uses and ensure their continued operation to promote industrial and residential co-location as per Policy E7 of the Publication London Plan 2020.

### **Question 10.80**

**Are the site requirements justified, including the ability of the site to effectively and viably deliver a mix of uses alongside 3,700 – 5,300 new homes?**

1. Yes the new masterplan as part of the Old Kent Road AAP (EIP128, EIP149, EIP150, EIP141, EIP143, EIP144) update indicates the site could deliver 5,300 new homes, a new health hub, a new sports hall, 3 parks, a primary and secondary school, as well as re-provision of employment and retail uses. There would be a small loss of retail and employment uses on the site shown by the masterplan to accommodate other uses, however when individual planning applications come forward there is the opportunity for further detailed capacity testing. Overall the masterplan for Old Kent Road achieves a significant increase of employment floorspace. This site is required for the delivery of strategic objectives including major park space and community, health and education facilities to support a growing population.

### **Question 10.81**

**Given the strategic nature and capacity of the site with the Opportunity Area, what is the profile for delivery of both the c.2,000 homes already consented, and the remaining balance of the allocation? How does comprehensive redevelopment of the site relate to a phased approach for growth in the opportunity area consistent with necessary transport infrastructure upgrades?**

1. The site allocations methodology paper (EIP82) identifies which parts of the site fall within Phase 1 and Phase 2 (page 228). All sites which have consent are in Phase 1 in this site allocation (unless excluded) and the remainder are in Phase 2. Phase 2 development is triggered by the confirmation of the letting of the construction contract for the Bakerloo Line extension. Please also refer to our joint response with TfL on Matter 2 Q2.15.

### ***NSP66 - Devon Street and Sylvan Grove***

#### **Question 10.82**

**To what extent does the Old Kent Road Gas Holder Site, with its Hazardous Substances Consent (HSC), affect delivery and/or timing of delivery of this site?**

1. The Hazardous Substances Consent has now been revoked. This is confirmed in EIP146.

### ***NSP67 - Hatcham Road, Penarth Street and Ilderton Road***

#### **Question 10.83**

**Is the proposed approach to employment land/premises at this location, including the extent of Strategic Industrial Land, justified, effective, positively prepared and in conformity with the London Plan?**

1. A small part of the site allocation at the Penarth Centre is identified as SPIL, which adjoins the other SPIL designation for premises on Ormside Street adjacent to the IWMF. The Penarth Centre is also a building of townscape merit. The site allocation in the Old Kent Road AAP (December 2020, EIP128, OKR16, page 178) requires the Penarth Centre to be retained as SPIL however arts and cultural uses will be permitted in the Penarth Centre. This would be an exception to Policy P28 in the NSP. The wording from the AAP regarding the Penarth Centre could be brought into the NSP67 site allocation if necessary.
2. The majority of the remainder of the site is designated as LSIS. The AAP (page 183) demonstrates the typologies expected ranging of storage, distribution and light industrial mixed use development. The NSP site allocation requires industrial uses and new homes on the site. This is in accordance with Policies E6 and E7 in the Publication London Plan 2020.

**Issue 13:**

Whether the Peckham sites are justified, effective, consistent with national policy and in general conformity with the London Plan.

**Relevant Policies – NSP71, NSP72, NSP74*****NSP71 - Aylesham Centre and Peckham Bus Station*****Question 10.83**

**Is the site developable during the plan period? Is the bus station facility on the site required to be accommodated as part of the redevelopment and is the policy justified in seeking ‘small business space’ in lieu of any surplus bus infrastructure?**

**Question 10.84**

**Does the allocation make the most of the opportunity to reduce the quantum of car parking on the site given its PTAL rating?**

**Question 10.85**

**What evidence and assumptions of density/building heights have informed the indicative capacity of the site to accommodate a mix of uses including some 850 new homes? Is the indicative capacity reflective of the site’s location within the Borough View of St Paul’s Cathedral from One Tree Hill?**

**Question 10.86**

**Does heritage and townscape assessment of the site in the Peckham and Nunhead Area Action Plan (PNAAP 26), which concluded that development of up to 20 storeys could be appropriate in this location remain valid in justifying the NSP approach to tall buildings on this site?**

**Question 10.87**

**Is it necessary for plan soundness in respect of the NSP71 allocation that the view (undefined) from the Bussey Building is protected? Is the policy justified and effective in its guidance on the approach to tall buildings and the Bussey Building?**

**Question 10.88**

**Is the policy justified in requiring intermediate affordable housing to be provided through a community land trust?**

1. The council has received a Statement of Common Ground request to prepare with interested parties. This question will be answered in combination with addressing the matters raised by parties who will be attending the examination and in advance of the Hearing date.

### ***NSP72 - Blackpool Road Business Park***

#### **Question 10.89**

**Is the Policy for NSP72 effective in enabling the site to come forward in a comprehensive and viable form?**

1. The council has received a Statement of Common Ground request to prepare with interested parties. This question will be answered in combination with addressing the matters raised by parties who will be attending the examination and in advance of the Hearing date.

### ***NSP73 – Land Between the Railway Arches (East of Rye Lane)***

#### **Question 10.90**

**Would the Policy for NSP73 facilitate effective and deliverable regeneration of this site? Is there a realistic potential for the site to accommodate residential development as part of a mix of uses?**

1. The council has received a Statement of Common Ground request to prepare with the landowner. A number of other interested parties have stated they would also like to prepare a Statement of Common Ground with the council. This question will be answered in combination with addressing the matters raised by parties who will be attending the examination and in advance of the Hearing date.

### ***NSP74 - Copeland Industrial Park and 1-27 Bournemouth Road***

#### **Question 10.91**

**Is the site developable against the requirements and guidelines set out in the policy? Is the site alternatively allocated in the Peckham and Nunhead Area Action Plan (PNAAP)? If so, would the PNAAP allocation be rescinded on the adoption of the NSP?**

1. The council has received a Statement of Common Ground request to prepare with interested parties. This question will be answered in combination with addressing the matters raised by parties who will be attending the examination and in advance of the Hearing date.
2. It is the intention that the NSP site allocation would supersede the PNAAP allocation and therefore it can be rescinded upon adoption of the NSP.

#### **Issue 14:**

Whether the Rotherhithe sites are justified, effective, consistent with national policy and in general conformity with the London Plan.

#### **Relevant Policies – NSP76-NSP77**

##### ***NSP76 - St Olav's Business Park, Lower Road***

#### **Question 10.92**

**Are the requirements for the allocation justified and enabling effective delivery of the site, including retaining the existing quantum of employment floorspace?**

1. The land is suitable for mixed use development with new homes and replacement employment floorspace (B use class) providing active frontages at ground floor level. It should provide increased permeability across the site and high quality public realm at the centre and at the confluence of three routes towards Christopher Jones Square open space, Southwark Park and the retail frontage on Albion Street. The site currently contains 4,550sqm employment floorspace and it is envisaged this could be replaced in order to maintain the borough's supply of employment floorspace on key site allocations. Additionally the indicative residential capacity is 125 homes.
2. The site allocation relates to a number of plots within a variety of landownerships. Prospective landowner Southern Grove Real Estate Ltd(PSV ref NSPPSV372) has responded in support of the redevelopment potential of the site for mixed use development subject to the detail in their representation.

##### ***NSP77 - Decathlon Site and Mulberry Business Park and NSP78 Harmsworth Quays, Surrey Quays Leisure Park, Surrey Quays Shopping Centre and Robert's Close***

#### **Question 10.93**

**Is the significant estimated delivery of these two sites (in combination in excess of 4,000 homes) realistic and informed by evidence from the site developers/promoters?**

1. The council is preparing a Statement of Common Ground request with the landowner. This question will be answered in advance of the Hearing date.

## **Issue 15**

Whether the Walworth sites are justified, effective, consistent with national policy and in general conformity with the London Plan.

### ***Relevant Policies – NSP80 and NSP81***

#### ***NSP80 – Morrisons, Walworth***

##### **Question 10.94**

**Is the policy justified and do the proposed amendments provide sufficient flexibility to secure an appropriate intensification of the site?**

1. The council is preparing a Statement of Common Ground with the Walworth Society relating to this site. This question will be answered in advance of the Hearing date.

#### ***NSP81 – 330-344 Walworth Road***

##### **Question 10.95**

**Is the policy justified and would it be effective in securing an appropriate redevelopment of site, including retaining any buildings of architectural merit or heritage value?**

1. The council is preparing a Statement of Common Ground with the Walworth Society relating to this site. This question will be answered in advance of the Hearing date.