

London Borough of Southwark Response

Examination of the New Southwark Plan

Inspectors' Matters, Issues and Questions

Matters arising from the Examination Part 1

Aylesbury Area Vision and Site Allocation

1. This is set out in the note M2.00B.

Vision Areas

1. The map on page 21 of the New Southwark Plan 'Policy Areas' will be updated to be named 'Policy Areas and Area Visions' (EIP181). This map includes the boundaries of each of the Vision Areas featured in the plan. The boundary for London Bridge Area Vision has been amended to take into account comments from the Old Bermondsey Neighbourhood Forum and to better reflect the neighbourhood plan boundary. The Area Vision boundaries will be added as an additional layer to the Planning Policies Map and map schedule (minor modifications).

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. There is a clearly designed strategy for the capacities of Site Allocations within the NSP as set out within Site Allocations Methodology Paper Update (April 2021, EIP82a). For clarity we are proposing to add the following text (paragraphs 2-4 below) to the 'Site Allocations' introduction section of the NSP.
2. *We have taken a proactive role in identifying and helping to bring forward land that is suitable for meeting development needs considering the appropriate uplift for each site within the local context. Each site has an indicative capacity to set out the quantum of housing development that we expect to be delivered on each site to deliver the optimal development capacity. This is more certain for the sites where housing is required as a 'must', where housing is a 'should' this figure is less certain.*
3. *The key purpose of the indicative development capacities is to inform Southwark's strategic growth projections and ensure the Council has a high-level understanding of the strategic distribution of development expected to come forward across the borough over the course of the plan period for housing, employment, retail, leisure and community uses and open space.*
4. *The efficient use of land Policy P17 requires optimisation of the use of land for all developments in Southwark. The indicative capacities set out the quantum of development that we consider should deliver the principles of sustainable development as set out in the NPPF. Where there is an ambition to further optimise development capacity by including more housing. Residential capacity could be increased beyond the baseline number as part of the planning application through excellent design and careful consideration of the impact on character, amenity and local environment. This will be particularly in regard to scale, distribution and type of development which may require collaborative working and consideration of any adverse or cumulative impacts within the local environment.*
5. We use 'indicative' rather than a 'minimum' capacity as there are sites where a requirement for housing under 'should' and in some cases 'must' are flexible on quantum. Therefore a minimum capacity could prioritise housing and constrain the most effective use of the site which might reduce the opportunity to optimise the range of town centre, employment and community uses.
6. Indicative capacities for each site set out a minimum expected capacity to optimise the development on the site, this will be determined through detailed design and may be lower on sites that are 'should' for housing.

National legislation / guidance

7. Section 19(1B) - (1E) of the Planning and Compulsory Purchase Act 2004 sets out that each local planning authority must identify their strategic priorities and have policies to address these in their development plan documents (taken as a whole).
8. The National Planning Policy Framework (NPPF) provides the overarching national planning guidance on Local Plan making and identification of sites for allocation. Paragraph 17 requires local plans to set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities. Paragraph 67 states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Appendix 2 of this report provides further information on the availability and suitability of sites. Viability has been assessed on a plan-wide basis as set out in the Viability Background Paper (EIP20). Further information of the suitability of the site allocations is provided in the NSP.
9. Paragraph 122 of the Framework states that planning policies and decisions should support development that makes efficient use of land, taking into account the following:
 - 1) the identified need for different types of housing and other forms of development and the availability of land suitable for accommodating it;
 - a) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - b) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - c) the importance of securing well-designed, attractive and healthy places.
13. The design-led approach taken to calculating indicative development capacities in the NSP is broadly in line with the considerations listed in paragraph 122 of the Framework.
14. Paragraph 123 of the Framework advises that the use of minimum density standards should be considered to ensure that developments make optimal use of the potential of each site. This was considered as an alternative option as explained below.
15. The NPPG (Plan-Making) paragraph 002 states that where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development. The indicative capacities appear alongside site descriptions and requirements to clearly detail the expected level of development on site.
16. The NPPG (Effective use of land) paragraph 004 states that a range of considerations should be taken into account in establishing appropriate densities on a site. This can include accessibility measures such as distances and travel times to key facilities, including public transport stops or hubs; characterisation studies and design strategies, dealing with issues such as urban form, historic character, building typologies, prevailing sunlight and daylight levels, green infrastructure and amenity space; and environmental and infrastructure assessments. The Council's use of indicative capacity for allocated

sites is strongly aligned with this guidance and promotes a design-led approach to site optimisation and development.

Regional Guidance

London Plan 2021

17. Policy GG2 Making the best use of land requires that a design-led approach is applied to determine the optimum development capacity of sites. Policy D1 London's form, character and capacity for growth Section B advises that boroughs should plan to meet borough-wide growth requirements, including their overall housing targets, by following the design-led approach to establish optimised site capacities for site allocations'. Policy D3 Optimising site capacity through the design-led approach Section A states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.
18. The London Plan 2021 details that a design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity.
19. Paragraph 3.3.4 of the London Plan 2021 states that designating appropriate development capacities through site allocations enables boroughs to proactively optimise the capacity of strategic sites through a consultative design-led approach.

Draft Good Quality Homes for All Londoners SPG (October 2020)

20. The Mayor's draft Good Quality Homes for All Londoners SPG was out to consultation between October 2020 – January 2021. It provides guidance on assessing the capacity of land and buildings to accommodate housing by optimising site capacity at all stages of the planning process. Module A – Optimising Site Capacity: A Design-led Approach sets out a design-led approach to intensification, using residential types to identify the indicative capacity of a site or area.
21. The Draft SPG provides a detailed methodology for calculating indicative capacity on an allocated site. The required steps for this calculation are:
 1. Locate site movement infrastructure;
 2. Locate existing open space and allocate proposed open space;
 3. Allocate non-residential uses;
 4. Select the residential type(s) based on the site context;
 5. Run site through modelling and select the optimal option based on conserve, enhance and transform;
 6. Calculate the residential Gross External Area (GEA) m²;
 7. Apply the GEAm² against the appropriate tenure and type mixes to provide an indicative capacity.
22. Section 2 of the draft SPG states that site analysis, including planning history and surrounding context is the crucial first stage of determining the optimum site capacity. A list of capacity factors are provided which closely matches the same factors that were

considered during the preparation of the New Southwark Plan site allocations. However the recommended approach of calculating capacity using the prescribed residential building types in section 3 is considered to be overly restrictive in the context of Southwark given the borough's wide variety of urban forms and character areas and does not allow for flexibility during the design process.

Southwark's methodology for calculating indicative density

23. The indicative capacities presented in the NSP are informed by:

1. Sites that benefit from Planning Permissions that have undergone detailed design
2. Masterplans that have a high level design (e.g. live planning applications or Old Kent Road site allocations where masterplanning has been undertaken)
3. Sites that have not had previous development design work, and this is where the design-led approach has been applied.

Design-led approach methodology

24. Where there are sites that have not come forward at present reasonable estimates are provided and from which a more detailed design process can be undertaken. The context of each of these sites was investigated in terms of character, built form, planning designations, non-designated assets of heritage or other value, consideration of any relevant characterisation studies, 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. These are generally consistent with the considerations set out within national and regional policy.
25. During the preparation of the NSP 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.
26. The existing and potential or required uses were then considered e.g. what is required on the site to meet our strategic targets, is the re-provision of employment or other uses required, is the site suitable for residential, retail, leisure or community or other uses, is there sufficient space for open space to be provided.
27. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters.
28. The final capacity figures are based on mid-points between the assumptions made in individual officer assessments. The indicative floorspace figures are presented in GIA. These have been derived by reducing the estimated 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.

29. The site capacities shown in Appendix 2 are indicative as they have not undergone further detailed testing. In order to provide flexibility, the site capacities are also expressed as the measure of floor to area ratio (FAR) instead of the mid point of building footprint coverage or number of storeys. The floor area ratio (FAR), also known as the plot ratio, is a measure of the total permitted floor area of a building, in relation to the total area of the lot (or plot) on which the building stands:

$$\text{Gross floor area of all floors of the building} / \text{Site area} = \text{FAR}$$

30. A higher ratio indicates a higher-density environment.
31. 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. The FAR was calculated following the design-led approach for each site which informed the GEA. This was then divided by site area and the FAR was calculated for information.
32. The Council considers that the methodology used in the New Southwark Plan (a design led approach) is consistent with national policy and generally conforms with the London Plan 2021 and the emerging guidance set out in the draft Good Quality Homes for All Londoners SPG. The indicative site allocation capacities deliver the level of certainty required.

Other options considered for calculating site capacity

Density

33. Paragraph 123 of the Framework advises that the use of minimum density standards should be considered to ensure that developments make optimal use of the potential of each site. The Council has considered the use of minimum density standards but has concluded that a more flexible approach is appropriate in ensuring that the optimal potential is achieved on each site. This is partly because some sites have already undergone masterplanning at the application stage, and also to take into account the varied urban form and character of different areas of the borough which requires a tailored approach. The prescription of a minimum density standard is therefore not the best approach and may limit the development potential of Southwark sites. The decision not to use a minimum density standard does not represent a significant departure from the national guidance, as evidenced by the recent adoption of the Hackney and Tower Hamlets local plans where minimum density standards were also not used.

Floor to area ratio

34. The sole use of a floor to area ratio (FAR) methodology was not considered to be appropriate for the purposes of assessing indicative development capacities for sites. This is because FAR does not allow for site specific circumstances to be taken into account.

35. The Council considers that FAR is a useful starting point or benchmark for delivering minimum amount of housing, and that a design led optimisation approach offers a less restrictive methodology for assessing development capacities for sites and achieving optimal land use. The actual capacity that can be delivered should then be agreed at the planning application stage following careful consideration of design options and detailed masterplanning.

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?

10. The Site Allocations Methodology Report Update (EIP82a) is accurate as of April 2021. As set out in Q1.3 the housing supply should be modified from the basis of 1 April 2020. The 5 and 15 Year Housing Land Supply Report (EIP198) has been updated (April 2021). The Site Allocations Methodology Report Update (EIP82a) has been updated and the Housing Trajectory on Page 31 of Plan (EIP27A) will be updated 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.
11. The Site Allocations Methodology Report Update (EIP82a) 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.
12. 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.

13. 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.
14. The criteria to guide the proposed development is justified, as set out in the Site Allocations Methodology Report (EIP82a) 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.
15. As set out in LBS response to 10.2 the council has followed a design-led approach for site allocations that is consistent the NPPG and the London Plan 2021.

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 Site Allocations Methodology Report Update April 2021 EIP82a](#)). 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.

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?

16. As set out in Q1.3 for Matter 1, the housing supply has been modified from the basis of 1 April 2020. [The 5 and 15 Year Housing Land Supply Report \(EIP198\) has been updated \(April 2021\). The Site Allocations Methodology Report \(EIP82a\) has been updated and the Housing Trajectory on Page 31 of Plan \(EIP27A\) will be updated 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.](#)

The Site Allocations Methodology Report (EIP82a) includes 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 will be updated as follows:

Housing

The level of housing expected from development was estimated from the capacity remaining after other land use requirements are met. Our housing requirements are met through Site Allocations which 'must' provide housing. These sites will provide approximately ~~31,983~~ 33,429 new homes. These are required to contribute to our 5 and 15 year supply of housing land. Site Allocations which 'should' provide housing result in an uplift of approximately ~~4,386~~ 4,193 housing units in the borough. ~~These are identified within the 5 and 15 Year Housing Land Supply Report for years 6-15.~~ Housing on these sites is strongly encouraged to maintain a healthy land supply and allow for contingency when meeting housing targets later in the plan period. If the Site Allocation states that redevelopment 'must' provide housing it means that this absolute requirement in order to meet the strategic needs of the borough.

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 demonstrate 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 (EIP82a).
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 has prepared an additional document **Changes to the Use Classes Order, Impact on the New Southwark Plan Site Allocations (EIP204)** 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 within the Action Area Core are identified in the vision map. For soundness the sites AAAP P1, AAAP P2, AAAP P3 and AAAP P4 should be inserted into the plan as a site allocation (NSP01A) to provide further guidance on any developments coming forward on the sites. The proposed site allocation has been provided as set out in the Aylesbury Background Paper (M2.00a) and it should be added as a minor modification as a factual update to the Plan.
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 has prepared an additional document **Changes to the Use Classes Order, Impact on the New Southwark Plan Site Allocations (EIP204)** 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 has prepared 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 has been reviewed in the site allocations methodology update (EIP82a) and it is estimated that 40 homes could come forward as part of a mixed use proposal on the remainder of the site. This has been taken into account in the housing supply update (EIP198) and would need to be amended in the site allocation indicative residential capacity in the plan.** 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?

1. Yes. The site allocation provides sufficient guidance as it names and illustrates adjacent listed buildings and conservation areas. The site allocation would be read in conjunction with the suite of design and heritage policies within the plan that set out how heritage assets should be considered in the design and application process. The council's draft Heritage SPD (EIP55) provides further guidance, alongside Conservation Area Appraisals, Characterisation Studies and the wider planning policy framework.

Question 10.19

Is the requirement for open space justified?

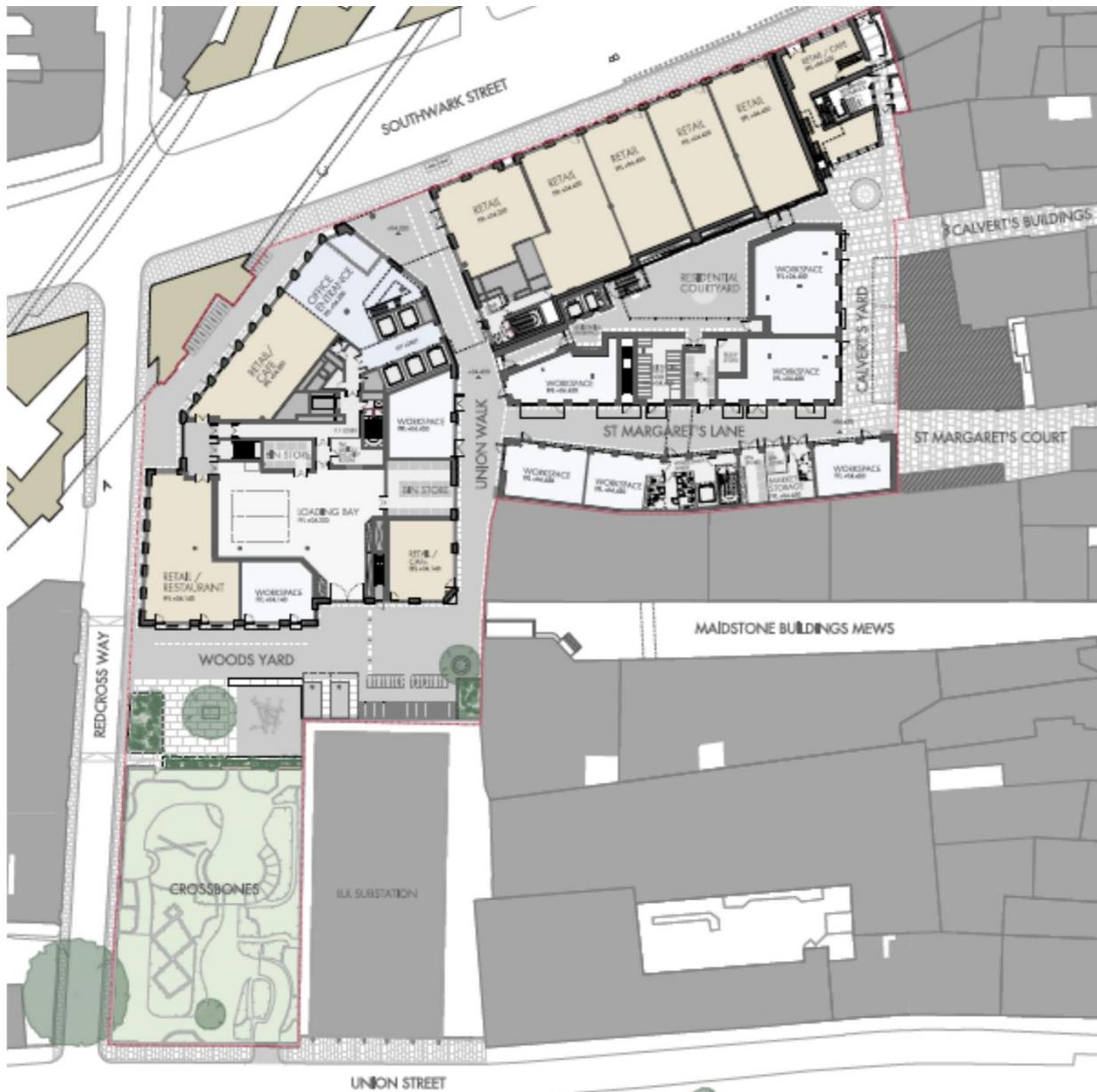
1. Yes. The requirement for open space is justified as Bankside and the Borough are deficient in parks and other green space. A new open space would also mitigate the pressure and use from the occupants of new development on existing low provision. The site is large enough to accommodate a meaningful open space and deliver a substantial development opportunity. A new open space at this location would improve the enjoyment of the Thames Path as it receives a high footfall of residents, visitors and workers. The feature of 'pockets' of open space positioned along the Thames Path is well established and it is the council's ambition to deliver new opportunities for open space on appropriate sites. A new open space will offer opportunities for enhanced biodiversity, green infrastructure and sustainable urban drainage where there is currently a low provision.

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

The council previously indicated interested parties may have wanted to prepare Statements of Common Ground on this site however no requests have subsequently been submitted.

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 681 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?

1. The site is the only remaining locally designated preferred industrial site outside of the Old Kent Road. The site is proposed to be released from industrial designation and allocated for mixed use development. This was the recommended approach in the various evidence base studies supporting the New Southwark Plan (SP412, SP413, SP431). Part 11 of the NPPF requires that planning policies and decisions must make effective use of land. In this case there is the opportunity to transform a low density industrial site to a mixed use development incorporating housing as well as a range of employment uses. This approach is consistent with the London Plan and the nearby draft Old Kent Road Area Action Plan (OKR AAP) which contains policies and guidance for the co-location of industrial and residential uses to make effective use of land in central London locations.
2. The allocation site is 3.8ha and is made up of several landowners. It is appropriate that the comprehensive redevelopment of the site is guided by the vision and guidance in the site allocation particularly given the size, character and location of the site. The site is an existing industrial site close to the southern boundary of Burgess Park, and otherwise surrounded by predominantly a residential neighbourhood in northern Camberwell.
3. There are a range of businesses present in the cluster, including a scaffolding and storage yard, a church, a recording studio, a furniture maker, Worldwide Beers (a brewery) and PHS (washroom hygiene services). A Big Yellow Storage warehouse was permitted in 2017 and is now completed and operational. The range of recent and live planning applications is also relevant in terms of demonstrating the demand and feasibility of different types of employment uses on the site.
4. The site is considered within the 2019 Old Kent Road Workspace Demand Study (undertaken by Avison Young/00 Architecture) (SP431) as a separate sub area. The study considers that the redevelopment of the site could see good levels of demand for relatively affordable creative and light industrial businesses. The study recommends the wholesale re-provision of current employment space (not just occupied space) is

appropriate, and references a number of suitable typologies. The types of employment development that will remain in demand and continue to grow in this location include last mile distribution, small scale industrial and hybrid/studio workspaces (SP431, page 59).

5. Some of the difficulties outlined in the earlier evidence base studies included the close proximity with residential properties. It is therefore vital to ensure that mixed use development ensures that commercial and residential uses can co-exist effectively.
6. The Council is working proactively with landowners with live applications within the site allocation as well as consultation with the local community. Three live schemes, as well as part of the dismissed appeal site, abut Burgess Park. The site allocation in the NSP specifically references the value of Burgess Park and how green links should be established into Burgess Park opening up access for new and existing residents with improved public realm across the site. The relationship between the park and the sites within the allocation is sensitive and the need to avoid harm to the park and its ecology will be an important consideration in the ongoing dialogue with landowners and the determination of planning applications in this location.
7. There are two approved applications that are relevant to this site.
8. The development approved under 17/AP/4381 (PHS Waste Transfer site) has been completed. This included the demolition of the existing building located at 41-43 Parkhouse Street, and the construction of an extension to the existing building located at 66 Wells Way to be used for B2/B8 and Sui Generis (Waste Transfer) uses in connection with the existing use of the retained building. The new extension provides 798sqm of floorspace (net increase of 287sqm) and is attached to the southern elevation of the existing building to be retained.
9. The development approved under 17/AP/4778 (Big Yellow Storage site) was recently completed. This included the demolition of existing warehouse (Use Class B8) and office buildings (Use Class B1A) and the erection of a part 2, part 4-storey building plus basement comprising self storage facility (Use Class B8) and flexible office space (Use Class B1A) together with vehicular and pedestrian accesses, parking, associated works and landscaping. The building would provide a 4,444sqm (GIA) self-storage facility (use Class B8) and 1,994sqm (GIA) of flexible office space (use Class B1a). For the storage facility, permanent floors would be provided at basement, ground and second floor levels. Notional mezzanines shown on the other floors would increase the storage floorspace to 8,499sqm (GIA). The net increase of employment uses is 1,999sqm or 4,060sqm including mezzanines.
10. The total net employment floorspace as a result of permissions on the site allocation under construction or built is 2,286sqm (minimum) or 4,347sqm (maximum, with mezzanines).
11. The following three live applications are relevant to this site allocation and they are still under consideration:
12. The development under 19/AP/2011 (Dolphin Square Charitable Trustee landowner) includes the demolition of existing buildings and construction of a mixed use building ranging from six to 10 storeys in height (35.15m AOD) comprising 100 residential units

(Use Class C3) and 1,323 sqm (GIA) of Class B1/B2/B8 floorspace) with associated car parking, landscaping and other associated works.

13. The development under 19/AP/0469 (Southwark Council landowner) includes the demolition of existing building and erection of two blocks (Block A and Block B) of 5 storeys and part 7/part 10 storeys. Block A would comprise of a 5-storey block for commercial/employment use (962 sqm) and Block B would comprise of a ground floor commercial/employment use (129sqm), 33 residential dwellings (3 x studios; 6 x 1b flats, 18 x 2b flats, 6 x 3b flats), 1 accessible car parking space with associated landscaping, cycle parking and refuse store.
14. The development under 20/AP/0858 (JH Parkhouse landowner) would redevelop the site to provide a mixed-use development comprising buildings up to 11 storeys in height and accommodating new homes (Use Class C3) and commercial floorspace (Use Class B1c), car parking, cycle parking and associated landscaping. The proposal is for 109 dwellings and 1,351sqm (GIA) of commercial floorspace.
15. The above three developments are broadly following the policy requirements of Policy P29 and site allocation NSP22 and providing replacement employment floorspace as well as meeting other policy requirements such as affordable housing. The council owned scheme is proposing 52% affordable housing. All schemes include provisions for light industrial floorspace.
16. The largest site in single landownership in the site allocation is the central Burgess Business Park site. An appeal submitted in 2019 by Peachtree Services Ltd was dismissed (17/AP/4797, APP/A5840/W/19/3225548) for 499 residential units, up to 3,725m² (GIA) of Class B1 commercial floorspace, up to 128m² (GIA) of Class D2 leisure floorspace and up to 551m² of Class A1-A3 floorspace within 13 blocks of between 2-12 storeys (max AOD height 41.95m), with car and cycle parking and associated hard and soft landscaping. The appeal was dismissed relating to reasons of density, standard of accommodation, harm to neighbour amenity and design quality.
17. The changes to the NSP site allocation in August 2020 took account of the appeal decision. The Inspector considered the draft policy was not constructed on a site-by-site basis and its provisions relate to the allocation as a whole (para 387). The policy amendments (August 2020) now make it clearer what is expected on individual site proposals within the site allocation as there are multiple landowners. The other live planning applications are following this policy approach which has remained the council's position. Policy P29 now requires development to retain or increase the amount of employment floorspace on individual plots within site allocations where re-provision is required.
18. This approach is consistent with other site allocations and the requirements of Policy P29. The site allocation (August 2020 amendment) removes the requirement for 50% of the site to be employment floorspace in the development requirements section. We would suggest a further minor modification to remove this reference in the Design and Accessibility Guidance section.

19. *By developing at a higher density there is the opportunity to deliver new light industrial, distribution and studio/hybrid workspaces. ~~the amount of small business space will represent at least 50% of the proposed floorspace.~~*
20. The site is currently designated as a Local PIL and the council proposes to remove this designation in the NSP. This is in accordance with the principles of London Plan Policy E4 Part C which requires any release of industrial land to achieve wider planning objectives should be facilitated through the processes of industrial intensification, co-location and substitution as set out in Policy E7. The release and proposal for mixed use development is justified by using a plan-led process in terms of setting out requirements in the site allocation. The site allocation requires re-provision of employment floorspace and that redevelopment should provide industrial uses. The re-provision of employment floorspace is also informed by Policy P29 that the type of employment floorspace must meet market demand. Current market demand is established in evidence base document SP431 and strong demand for industrial floorspace is also established in the appeal decision. The Inspector notes:
21. *“The proximity of existing residential uses, limitations with road access and distance from strategic routes would tend to favour light industrial and smaller scale storage uses providing services to support the central London economy rather than Class B2 and larger scale logistics uses. Nevertheless, the evidence suggests that the PIL is functioning well as an industrial location as demonstrated by the redevelopment of the PHS and Big Yellow sites. The Local Group provided informed evidence of strong demand for industrial premises in the local area. The Council has indicated that it has received strong interest from workspace providers about the affordable workspace in its proposed development at 21-23 Parkhouse Street. Furthermore, I note that Arbeit, the curator of the meanwhile uses currently operating from the site, has indicated interest in taking creative workspace in the appeal development. It seems therefore that there would be demand for the sort of uses that could be provided on this site.” (paragraph 391).”*
22. This justifies the ‘should’ requirement in the site allocation to provide industrial floorspace, however there is also sufficient flexibility in the policy to ensure future provision continues to meet market demand.
23. The Inspector noted in her decision that *“there was no evidence that a redevelopment with B classes would not be viable and I consider that it is not unreasonable to surmise that a scheme of about 8,502m² could be provided”* (para 401).
24. This was based on a 65% plot ratio calculation as previously referenced in the draft New London Plan (reasoned justification to Policy E4 - floorspace capacity defined by either existing amount of industrial floorspace on the site or potential industrial floorspace that could be accommodated by a 65% plot ratio, whichever is the greater) but which has been omitted from the adopted version as directed by the Secretary of State.
25. The 8,502sqm figure is more than double the employment floorspace proposed in the appeal proposal and just less than double the amount of total non-residential floorspace proposed. It would also be closer to achieving the re-provision of employment floorspace on the site as the policy requires, depending on site-specific circumstances including

viability, and the changes that have been made to the London Plan since the decision was issued, which would be discussed in more detail in any future application.

26. The Inspector goes on to note:
27. *“The emerging New Southwark Plan introduces a different mixed-use approach to the PIL, under draft allocation NSP23. One of the requirements is that the existing Class B floorspace must be re-provided within the allocation site. Whilst on the site itself there would be a considerable loss of Class B floorspace, on the allocation the net loss would be relatively small. It is recognised that there is strong demand for industrial premises in Southwark but on the evidence, I do not consider that the appeal proposal would compromise that demand through a significant diminution in quantum or quality of Class B stock. In such circumstances I do not consider that policy 4.4 in the London Plan would be offended.*
28. *There would be conflict with draft policy P26 and draft allocation NSP23, although this would be relatively limited, especially when the increase in jobs is taken into account. I conclude overall that the proposal would not result in a detrimental effect on the Borough’s stock of employment land and premises, notwithstanding the above policy conflicts. I return to this matter in the planning balance.” (para 402 and 403).*
29. The Inspector reached a view in the overall planning balance that a loss of employment floorspace on the appeal site would not result in a detrimental impact on the Borough’s stock of employment land and premises.
30. The council has a target to provide a net additional 90,000sqm industrial, distribution, hybrid and studio workspace over the plan period. The PHS and Big Yellow Storage schemes will increase industrial floorspace on the site allocation by between 2,286sqm (minimum) or 4,347sqm (maximum, with mezzanines in Big Yellow Storage). However if this was used to consider an offset a loss of employment floorspace on other sites within the allocation, it would be difficult to apportion this as a policy construct when other parts of the site are in at least five separate land ownerships. The policy requirement is to re-provide or increase the amount of employment floorspace on the site. Without this policy requirement applying to all individual development schemes, there would be a risk of a loss of employment floorspace on multiple individual sites within the allocation which would negatively impact on the council’s target.
31. The appeal site contains a significant proportion of existing employment buildings (up to 12,559sqm), some of which are occupied or occupied by meanwhile uses (by an affordable workspace provider). Other schemes within the site allocation are committing to providing the policy requirements of re-provision of existing workspace as well as other policy requirements including affordable housing. The council will consider viability as part of any individual scheme that may come forward. However it would be expected that individual development proposals include as close to re-provision of the employment floorspace as is possible, taking into account viability in particular circumstances.
32. For these reasons outlined above and in combination with the changes made to the policy since the appeal was issued and changes made to the London Plan, the policy is sound.

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?

1. The site allocation removed B2 uses as it is unlikely more B2 uses would be provided on the site as it is difficult to accommodate B2 uses alongside residential within a higher density mixed use development. B2 uses are already present on the site and an extension to the PHS premises recently constructed has provided more B2 uses on the site. B1c would be replaced by Class E (g) (ii and iii). Light industrial uses would be conditioned to any planning application in line with our proposed approach to updating Policy P29 (Use Classes Note EIP162).
2. B8 uses have recently been provided as part of the Big Yellow Storage scheme. It is expected that mixed use development will mainly include light industrial uses in accordance with the demand evidence outlined in SP431 and summarised above. This may include a range of sectors and types including last mile distribution, small scale industrial and hybrid/studio workspaces. It is not considered the site is suitable as an office location in general, however some ancillary or hybrid office uses may be appropriate to supplement the overall employment offer. This would be assessed based on current market demand and a marketing strategy required by Policy P29.

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 site allocation includes the potential for taller buildings in a comprehensive mixed-use redevelopment of the site, subject to the consideration on existing character, heritage and townscape. In accordance with Policy P16 (Tall buildings), tall buildings must be proportionate and respond positively to local character and townscape. The site allocation provides a significant development opportunity to optimise the site. The proximity to one of the boroughs largest open spaces, Burgess Park, is also a consideration in terms of taller buildings being located at a point of landmark significance. There is the opportunity for significant public realm improvements and new walking routes through the site to improve the townscape.

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, 1,986m².
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 residential development. **The council has agreed to revise the indicative site capacity from 51 dwellings to the previously consulted on indicative capacity of 103 dwellings in the Statement of Common Ground with Guys and St Thomas.**

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 prepared a Statement of Common Ground with Berkeley Homes which sets out the council's position with respect to the indicative residential capacity.
2. The Indicative capacity has been tested as set out in the Site Allocations Methodology Report EIP 82a and sets an appropriate capacity for residential units within the context of the policies in the NSP. If there were to be a higher capacity on this particular site this would require a detailed application to test all of the different impacts and how they would stretch the option for sustainable growth which is being taken forward as set out in the IIA.
3. There is updated wording being proposed to the introduction page for the Site Allocations as set out in LBS response to Question 10.2 to provide clarity on the Site Allocation indicative capacity.

NSP43 – No Inspector question but will be discussed at the hearing

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 (EIP82a) 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 sites are all within different ownerships. The land owners have prepared a development framework from their perspective.
2. Whilst this is helpful, the Council considers going further and pulling all of the sites together as a single site to be unhelpful as each site has considerable capacity and it is more effective to consider them separately in the context of the wider area.
3. As set out in the Site Allocations Methodology Report Update (EIP82A) there is a temporary permission on the site for temporary uses. There are also two live planning applications (18/AP/4171 and 19/AP/0404) on this site for mixed use commercial developments, one of which has been called in by the Mayor for determination (19/AP/0404).

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. Yes. The site allocation provides sufficient guidance as it names and illustrates adjacent listed buildings and conservation areas. The site allocation would be read in conjunction with the suite of design and heritage policies within the plan that set out how heritage assets should be considered in the design and application process. The council's draft Heritage SPD (EIP55) provides further guidance, alongside Conservation Area Appraisals, Characterisation Studies and the wider planning policy framework.

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. Policy E6 of the London Plan requires that in development plans, boroughs should designate and define detailed boundaries and policies for LSIS in policies maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution (as set out in Policy E7). Policy E6 also requires development plans to make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible light industrial/B2/B8 uses suitable for SMEs and distinguish these from local employment areas that can accommodate a wider range of business uses. We have allocated three LSIS sites on the proposed policies map, and LSIS is referenced in each of the site allocation policies where they are relevant. For NSP55, the site allocation map shows the entire site is designated as LSIS and this is referenced in the policy design and accessibility guidance. The site allocation requires industrial uses to be provided (light industrial or B8 use class) which accords with Policy E6 of the London Plan.
2. The site is also a draft site allocation in the Old Kent Road AAP. The AAP shows particular typology plans for each site allocation outlining the range of uses that would be expected, including large distribution and storage units co-located with residential, as well as a stand-alone industrial building and smaller light industrial units.
3. 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.
2. Policy E6 of the London Plan requires that in development plans, boroughs should designate and define detailed boundaries and policies for LSIS in policies maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution (as set out in Policy E7). Policy E6 also requires development plans to make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible light industrial/B2/B8 uses suitable for SMEs and distinguish these from local employment areas that can accommodate a wider range of business uses. We have allocated three LSIS sites on the proposed policies map, and LSIS is referenced in each of the site allocation policies where they are relevant. For NSP65, the site allocation map shows

the part of the site designated as LSIS and this is referenced in the policy site requirements. The site allocation requires industrial uses to be provided in LSIS (light industrial or B8 use class) which accords with Policy E6 of the London Plan.

3. The site is also a draft site allocation in the Old Kent Road AAP. The AAP shows particular typology plans for each site allocation outlining the range of uses that would be expected, including large distribution and storage units co-located with residential, as well as a stand-alone industrial building and smaller light industrial units.
4. 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. *We would suggest an amendment to incorporate the wording from the AAP regarding the Penarth Centre into the NSP67 site allocation for clarity:*

Redevelopment of the site may:

- *Provide arts and cultural uses in the Penarth Centre. The Penarth Centre is in Strategic Protected Industrial Land (SPIL). Residential and other sensitive uses will not be permitted in SPIL.*
2. Policy E6 of the London Plan requires that in development plans, boroughs should designate and define detailed boundaries and policies for LSIS in policies maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution (as set out in Policy E7). Policy E6 also requires development plans to make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible light industrial/B2/B8 uses suitable for SMEs and distinguish these from local employment areas that can accommodate a wider range of business uses. We have allocated three LSIS sites on the proposed policies map, and LSIS is referenced in each of the site allocation policies where they are relevant. For NSP67, the site allocation map shows the majority of the site is designated as LSIS and this is referenced in the policy design and accessibility guidance. The site allocation requires industrial uses to be provided (light industrial or B8 use class) which accords with Policy E6 of the London Plan.
 3. The site is also a draft site allocation in the Old Kent Road AAP. The AAP shows particular typology plans for each site allocation outlining the range of uses that would be expected, including large distribution and storage units co-located with residential, as well as smaller light industrial units. 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?

1. Yes there is consultation by the land owner on proposals taking place at present.
2. The bus station is an integral requirement to retain the capacity of the bus network in Peckham and South London. There will need to be a strategic consideration of the bus network as part of the consideration of the planning application by Transport for London and Southwark Council.
3. The policy is justified in seeking small business space in lieu of any surplus bus infrastructure because in the unlikely event that the bus station is not required then the priority would be for a mix of employment and town centre uses due to the central location.

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?

1. This is now set out in the SOCG with TfL, and document EIP177, the parking is zero except for disabled parking.

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?

1. There is a clearly designed strategy for the capacities of Site Allocations within the NSP as set out within Site Allocations Methodology Paper Update (April 2021, EIP82a). This sets out an indicative capacity of 850 homes. The IIA sets out a minimum capacity of 400 homes. 850 homes is an indicative capacity that could be achieved through detailed-design consideration through the development management process.

The indicative capacity and taller building opportunities for this site are informed by a number of spatial considerations including townscape and heritage considerations, prevailing and contextual buildings heights in and around the site, opportunities for new public realm and routes through the site, regeneration opportunities, and the Borough View 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?

1. Yes the review is still up to date and this is justified by the Council's consideration of proposals on the site. The heritage and townscape assessment prepared for the Peckham and Nunhead Area Action Plan remains valid in justifying the approach for tall buildings for this site. The heritage and townscape context is broadly consistent in terms of heritage designations particularly adjoining conservation areas at Rye Lane and Peckham Hill Street. The townscape and urban design considerations are also consistent, for example the prevailing contextual building heights and required town centre land use and public realm requirements for the 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?

1. No it is not necessary for plan soundness to protect the view. However it is referred to in NSP71 site allocation guidance to encourage developers to take account of the view as an urban design consideration. It is a locally cherished view, but it can currently only be viewed from private land and is not publicly accessible at all times.

Question 10.88

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

1. The Council considers the Community Land Trust to be a really positive organisation which will be set up and run by ordinary people to develop and manage homes. They act as long term stewards of housing, ensuring that they remain genuinely affordable based on how much people earn for their area for every future occupier.

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. A Statement of Common Ground has been agreed with Eileen Conn, which addresses a number of matters on the effectiveness of NSP72.
2. The Statement of Common Ground has agreed an update to the existing uses on the site. The existing uses will be updated to reflect the use of the Bus Garage separately, and include a residential building uses as temporary accommodation. The Statement of Common Ground also agrees to a clarification of the wording around the location of the Peckham Coal Line to this site allocation.
3. The site provides an indicative residential capacity of 250 homes with taller buildings located towards the north of the site, this would support the reprovision of the Bus Garage as part of the redevelopment of this site as well as replacement employment uses. The site allocation also requires the provision of new amenity space and the enhance permeability of the site. This is an approach which is supported by the landowner Grafton, albeit with a request for further design guidance. Southwark Council also owns part of the site.
4. There has not been a request for a Statement of Common Ground from one of the landowners Grafton, who submitted a response in support of this site allocation during the consultation on the Proposed Submission Version of the New Southwark Plan, see SA012 - Proposed Submission Version consultation responses – Peckham site allocations.
5. The representation on behalf of the Grafton Group supported overarching approach of this site allocation. In particular, the reprovision of employment uses on the site, in the context of their contribution to the local economy. The representation also supports that there is sufficient flexibility in this site allocation around comprehensive site development, and the potential reprovision of the bus garage.
6. The representation did comment on the accuracy of the current uses on site, which has been addressed in the Statement of Common Ground with Eileen Conn. The representation also requested further design guidance, in particular relating to the southern section of the site allocation.
7. The Council's Statement of Common Ground with TfL does not raise any matters in relation to this site. TfL's representation on the Proposed Changes to the Submitted New Southwark Plan supported the approach which required the Bus Garage to be retained or re-provided subject to need. See EIP120 PCSNSP consultation responses - AV14 Peckham Area Vision and sites.

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 do not consider residential development is suitable for the site. However, the site could be intensified to deliver employment and town centre uses to the benefit of the town centre and the local community.

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. Yes the site is developable and would deliver a range of uses as set out in the site allocation. This includes 3,000sqm employment uses, 3,000sqm retail, leisure or community uses and 270 homes. This was tested in the PNAAP.
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 NSP set an indicative capacity for the NSP77 site of 1,371 homes, 7,290sqm employment uses and 19,015sqm GIA retail uses based on approved planning applications on the site. The Mulberry Business Park forms the northern part of the site allocation. The full application (Ref: 13/AP/1429) was approved with legal agreement in 2013 for student housing-led mixed use development, including 33 affordable residential units. With London Plan setting out non-conventional housing as part of housing supply, the 770 student rooms will provide an equivalent of 308 residential units on the 2.5:1 ratio. The scheme in total provides 341 residential units. The redevelopment of four building blocks is already under construction. Therefore it is expected to be delivered in the first five years.
2. The Decathlon site forms the southern part of the site allocation. An outline application for a comprehensive redevelopment on the plot (Ref: 12/AP/4126) was approved with legal agreement in 2013. As set out in the officer report, the mixed use redevelopment will be delivered in four phases over approximately eight years. Phase 1 has been

completed, delivering 234 residential units and town centre uses in 2019. The five year supply report (2019) anticipated all 1,030 homes approved would come forward by 2023.

3. The site for Phase 2, 3 and 4 has been sold and the new owners have been in discussion with the council through a Statement of Common Ground about the future use and development of the site which could result in the reduction of 796 units coming forward on the site and increasing the employment provision. Therefore the remaining delivery of 796 homes has been included in the 6-15 year supply of the updated 5 and 15 year land supply report (to be published shortly). The council has a five year supply plus 20% buffer for the updated period 2020-2025 without this site included, therefore the loss of homes on the site would not affect the immediate five year supply position. The council has planned for the delivery of homes for years 6-15 which includes the potential for at least 796 homes to come forward on this site. If these homes do not come forward, the council still has sufficient capacity in years 6-15 for the housing supply however the buffer will be reduced.
4. The NSP sets an indicative capacity for the NSP78 site of between 2,000 and 3,995 homes as well as minimum and maximum parameters for non-residential uses as set out in the outline application, the sites methodology paper (EIP182) and Table 1b in the NSP. The site is subject to the approved application 'Canada Water masterplan'. For the purposes of 5 year supply, the council have taken the mid-point of housing delivery (3000 homes) and anticipated the site could deliver 665 homes in the first five years and the remainder in years 6-15.
5. Office delivery in the borough would be 375,836sqm net overall based on the minimum scenario at Canada Water and 611,884sqm maximum scenario (Strategic Targets background paper EIP161). It is likely the target of 460,000sqm office delivery (Policy SP1a) would be achieved with significant growth in offices at Canada Water (NSP78). Additional employment uses on NSP77 would also contribute to achieving the overall office target.
6. The council considers either employment or housing uses would be acceptable for the remaining phases to be delivered in NSP77.

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.