



NEW SOUTHWARK PLAN
PROPOSED SUBMISSION VERSION
CONSULTATION RESPONSES

Part One

JANUARY 2020



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New Southwark Plan
Planning Policy
Chief Executive's Department
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Dear Sir or Madam

NEW SOUTHWARK PLAN: PROPOSED SUBMISSION VERSION

On behalf of our client, GPE (St Thomas Street) Limited (c/o Great Portland Estates plc), we wish to make representations pursuant to the New Southwark Plan: Proposed Submission Version. Our client are the freehold owners of the site at New City Court; Keats House; and Nos. 4-8 and 12-16 St Thomas Street in the London Bridge area. Our client's site currently accommodates office uses, and presents a significant development opportunity to deliver regeneration in the London Bridge area.

These representations are made pursuant to Chapter Seven 'Development Management Policies' and Chapter Eight 'Area Visions and Site Allocations – AV 10. London Bridge'.

Chapter Seven – Development Management Policies

1. Policy P12: Design Quality

- 1.1 This policy requirement for all developments to provide high standards of design is welcomed and will ensure regeneration in Southwark positively contributes to the creation of a high class urban environment.

2. Policy P14: Tall Buildings

- 2.1 The policy directs tall buildings towards areas with highest levels of public transport and the greatest opportunity for regeneration, such as in the designated Town Centres, Opportunity Areas and the CAZ which is supported.
- 2.2 The requirement for tall buildings to provide publicly accessible space "*at or near to the top*" of the building however is overly prescriptive and does not recognise the value that publicly accessible space at lower levels of a building or at ground floor can provide.
- 2.3 The need for tall buildings to be located at a point of townscape significance does not recognise the role that tall buildings can play in creating new areas of townscape significance and stimulating regeneration. In addition, the height of tall buildings need

not necessarily be linked to the size of a site as Policy P12 sufficiently ensures development, of any height, will be of a high standard of design.

2.4 The proposed wording should therefore be revised as follows:

“Tall buildings are significantly higher than surrounding buildings or their context. The highest tall buildings will be located in areas that benefit from the highest levels of public transport access where there is the greatest opportunity for regeneration. Typically, this will be in our major town centres, Opportunity Areas and the Central Activities Zone.

New tall buildings must:

- 2.1 Be located at a point of townscape significance and have a height that is proportionate to the significance of the proposed location and the size of the site; and*
- 2.2 Respond positively to local character and townscape; and*
- 2.3 Be of exemplary architectural design and residential quality; and*
- 2.4 Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and*
- 2.5 Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough Views; and*
- 2.6 Avoid unacceptable harm to the significance of designated heritage assets or their settings; and*
- 2.7 Avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing and solar glare. Detailed modelling and analysis will be required to assess these impacts; and*
- 2.8 Maximise energy efficiency and prioritise the use of sustainable materials; and*
- 2.9 Have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience; and*
- 2.10 Provide a new, functional public space that is commensurate to the height and size of the proposed building when above a height of 30m, or 25m in the Thames Policy Area, and widened footways and routes to accommodate increased footfall; and*
- 2.11 Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m.”*

3. Policy P26: Office and Business Development

- 3.1 This policy requires sites in the CAZ, town centres and opportunity areas to increase the amount of employment floorspace on site. This is welcomed as an effective means of delivering the strategic objective of ensuring Southwark has a strong local economy.
- 3.2 However, the need to submit marketing strategy for the use and occupation of new employment floorspace does not appear to be justified, as there is an identified need to deliver around 460,000sqm of new office space to meet demand in Southwark.
- 3.3 The current wording of this policy is also unclear and would benefit from clarification to ensure it can be effectively applied. The condition should be reworded as follows:

*“1. In the Central Activities Zone, town centres, ~~and~~ opportunity areas and ~~where specified in site allocations~~ **identified for continued employment uses**, development **on existing employment sites** must:*

~~1.1 Retain or increase the amount of employment floorspace (GIA) on-site (B class use or sui generis employment generating uses), ~~and~~~~

*~~1.2 2. On sites where it is appropriate, feasible and viable for housing to be incorporated into existing employment sites without compromising their employment use, Promote the successful integration of homes and employment space **should be considered through in the physical layout of developments and approach to servicing.** ~~in areas that will accommodate mixed use development.~~ **Housing can be incorporated into mixed use development alongside** ~~This will include~~ a range of employment spaces including freight, logistics, light industry, co-working, maker spaces and offices; ~~and~~~~*

~~1.3 Provide a marketing strategy for the use and occupation of the employment space to be delivered to demonstrate how it will meet current market demand; or~~

23. In exceptional circumstances, the loss of employment floorspace may be accepted in the Central Activities Zone, town centres, opportunity areas and where specified in site allocations where the retention or uplift in employment floorspace on the site is not feasible. This must be demonstrated through a marketing exercise for two years immediately prior to any planning application, for both its existing condition and as an opportunity for an improved employment use through redevelopment which shows there is no demand.”

4. P50: Cycling

- 4.1 This policy encourages increased use of bicycles by requiring development to provide secure cycle parking for building users and visitors with commercial developments also required to provide showers and changing facilities that are proportionate to the number of cycle parking spaces. This commitment to cycling as a sustainable mode of travel is welcomed.
- 4.2 Whilst the delivery of cycle spaces in public areas is supported generally, provision should not be detrimental to the quality of public realm proposals, especially in congested urban spaces. The location of external cycle parking facilities should consider the impact on the usability of public realm and the wider regeneration ambitions for an area generally. The policy should incorporate flexibility to promote cycle spaces in the public realm but not to the detriment of achieving high quality public spaces.

Chapter Eight – Area Visions and Site Allocations

5. AV.10 London Bridge Area Vision Map

- 5.1 The London Bridge Area Vision Map is a helpful aid in visualising the location of the site allocations. However, the map should be amended to include the site allocation set out overleaf.

6. AV.10.1. London Bridge Area Vision

- 6.1 The image of London Bridge as a globally significant central London business district, which is home to international business headquarters, is welcomed. Regenerating the area to provide new high quality office space will help reinforce this position.

7. AV.10.2. Development in London Bridge

- 7.1 Global commerce is important to London Bridge and whilst recognition of the need to attract this is positive, the Area Vision should further emphasise this, with direct reference to the need to develop increased and high quality office provision which will further build on London Bridge's reputation for trade and commerce.
- 7.2 The inclusion of support for the development of a new high street on St Thomas Street is welcomed. This should include the introduction of new (and vibrant) retail uses alongside new public realm to promote streetscape activity and provide attractive amenity to workers, residents and visitors.
- 7.3 The requirement for development to make sure '*the Shard remains significantly taller and more visible than surrounding buildings as the station's landmark*' is overly prescriptive. The development and regeneration of the London Bridge area is an evolving process, which the development of the Shard has made a significant contribution to. Policy should maintain flexibility in Opportunity Areas to ensure regeneration ambitions can be achieved.

8. AV.10.3. Growth opportunities in London Bridge

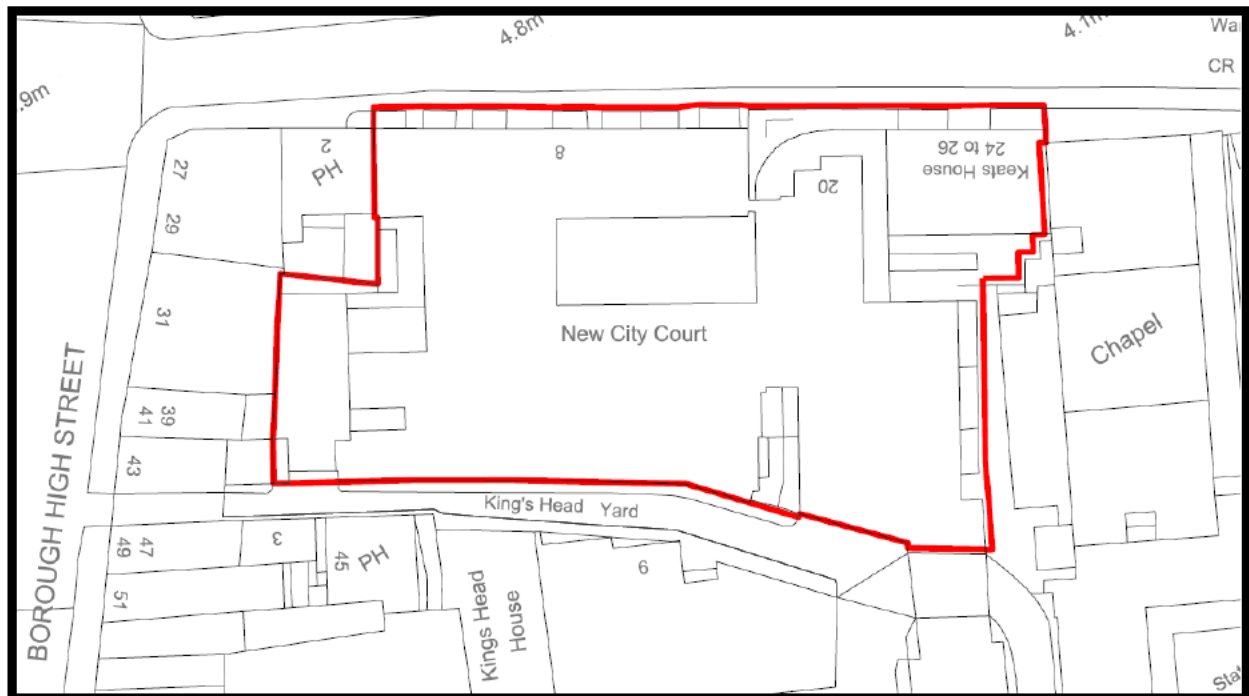
- 8.1 The acknowledgement of London Bridge as a growth opportunity is recognised as a positive contribution to the Area Vision. However, greater detail should be included on the potential the area has to develop its provision of commercial premises. Specifically, emphasis should be paid to the identification of the London Bridge, Borough and Bankside Opportunity Area in the London Plan. The Opportunity Area specifies an indicative employment capacity of 25,000 and states that there is scope to develop the strength of the area for strategic office provision. This should be incorporated into the Area Vision for London Bridge.
- 8.2 Policy 2.13 of the current London Plan requires Boroughs to develop detailed policies for opportunity areas and Policy SD1 of the Draft London Plan requires Boroughs to clearly set out how they will encourage and deliver the growth potential of Opportunity Areas through Development Plans. To ensure consistency with the London Plan, it should be more clearly distinguished how the vision for London Bridge relates to the potential growth of the Opportunity Area.
- 8.3 Further consideration of retail as a growth opportunity in London Bridge should also be included. The anticipated growth in office provision in the area will necessarily result in an increase in office workers in the area, who will require retail premises to serve their needs. This presents a further opportunity for London Bridge to grow as a retail destination, and should be identified as such in the Area Vision.
- 8.4 The proposed wording should therefore be revised to read:

"London Bridge is part of central London and has been identified in the London Plan as part of the London Bridge, Borough and Bankside Opportunity Area with an indicative employment capacity of 25,000. London Bridge therefore has the potential to grow its strategic office provision, supported by new shops, leisure, culture, science and medical facilities. In particular, retail growth in the area will be important to support the delivery of new offices."

9. London Bridge Site Allocations

- 9.1 We present an additional site below to be allocated as a key development opportunity in London Bridge. The inclusion of this site within the New Southwark Plan will provide an opportunity to achieve the spatial, social and economic objectives sought by the emerging development plan such as increased accessibility to London Bridge Underground Station, create a newly enhanced yard within the site and support a vibrant new high street on St Thomas Street.
- 9.2 Our client has engaged in discussions with the Council about a significant development opportunity on the site to deliver new office and retail uses alongside vibrant public realm. It is anticipated a formal planning submission will be made in summer 2018.

Proposed Site Allocation:





Site Description: The site is bounded by St Thomas Street to the north-east, King's College London and Guy's Hospital to the south-east, King's Head Yard to the south-west and 27-43 Borough High Street to the north-west. The site is occupied by New City Court and Keats House, and currently provides office floorspace approaching functional obsolescence. Grade II listed Georgian Terraces front onto St Thomas Street, which are interconnected with modern extensions to the south of the site. Buildings in the locality of the site vary in scale, design and use. To the north and east there are modern offices including The Shard, City Hall, More London and London Bridge Station. To the south and east are smaller offices and a variety of town centre uses. London Bridge Health Cluster is to the east.

Site Area: 3,400 m²

Site Vision:

Redevelopment of the site must:

- Contribute towards the thriving employment cluster in London Bridge by providing an uplift in office floorspace.
- Enhance the vitality of St Thomas Street and New City Court by providing high quality open spaces and active street frontages at ground floor level.
- Increase permeability through the site.

Opportunity Site:

New City Court; Keats House and Nos. 4-8 and 12-16 St Thomas Street

PTAL and Density Area:

6b

Central Activities Zone

Required Uses:

Office (B1a)

Town Centre Uses at Ground Floor (A1/A2/A3/A4)

Design and Accessibility Guidance:

Any redevelopment should contribute towards creating a vibrant new high street along St Thomas Street and a new retail destination at New City Court. Redevelopment should provide an attractive street frontage that allow visitors to explore and enjoy the area.

Redevelopment of this site should increase permeability for pedestrians through the site and explore the potential to provide an additional entrance to the London Bridge London underground station.

Concluding Remarks

We look forward to receiving acknowledgement of receipt of these representations and request that we be notified of further opportunities to comment on the draft plan accordingly. If you require further information or clarification on the representations above then please contact [REDACTED] at this office.

Yours sincerely,

[REDACTED]

DP9 LTD.