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Date: 2nd March 2018

SENT VIA EMAIL ONLY TO: londonplan@london.gov.uk

Sadiq Khan, Mayor of London
New London Plan
GLA City Hall
London Plan Team
London SE1 2AA

Dear Sir / Madam,

**DRAFT LONDON PLAN, GREATER LONDON AUTHORITY
RPS GROUP PLANNING CONSULTANCY REPRESENTATIONS ON BEHALF OF KING'S
COLLEGE HOSPITAL, DENMARK HILL, BRIXTON, LONDON SE5 9RS**

I am writing on behalf of Kings College Hospital (KCH) NHS Foundation Trust to submit representations to the draft London Plan.

Background to the Site

The KCH is located within the London Borough of Southwark, on the eastern side of Denmark Hill and contains part of the King's College London Denmark Hill campus and the Maudsley Hospital. Denmark Hill Station is located immediately to the south.

Support of Social Infrastructure Policies

KCH are supportive of the social infrastructure policies outlined in Chapter 5 of the Draft London Plan. In particular, the following two policies are beneficial to not just KCH, but to the general long term development opportunities of healthcare in London:

- Draft Policy S1 – Developing London's social infrastructure
- Draft Policy S2 – Health and social care facilities

London is home to some of the world's most renowned health care facilities and it is imperative for regional policies to support their long term development potential to ensure London remains competitive in this field. It is in our view that draft policies S1 and S2 will support the delivery of high quality health care needs to Londoners and visitors alike.

Draft Policy D8 – Tall Buildings (Chapter 3 Design)

Draft Policy D8 outlines that tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. KCH broadly support the policy in general; however, they believe that an element of public benefit should be added to the wording when assessing the appropriateness of tall buildings. The following additions (underlined) to the wording of B2 of Policy D8 are proposed:

“... and should indicate *the general building heights that would be appropriate, taking account of:*
2) their potential contribution to new homes, economic growth, regeneration and public benefit when this outweighs any possible harm caused.”

Draft Policies E5 – Strategic Industrial Locations and E6 - Locally Significant Industrial Sites, (Chapter 6 Economy)



Parts of the KCH Estates are located within Strategic Industrial Locations (SILs) and Locally Significant Industrial Location (LSIS). Thus, we have carefully considered the wordings of related draft policies of in order to safeguard future development potential at KCH, as this would likely have an effect on public health care services.

We propose an additional section to part C of Policy E5 (outlined and named part C7) which will allow flexibility for research and development for health related uses to encourage investment from MedTech and Pharmaceutical Organisations.

Development proposals in SILs should be supported where the uses proposed fall within the board industrial-type activities set out below:

Part C7 of Policy E5: “allowing flexibility for research and development for health related uses.”

We propose the following additions (underlined) to widen the ‘related uses’ within LSILs to allow medical uses outlined in part A2 of Policy E6:

Part A2 of Policy E6: “make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and distinguish these from local employment areas that can accommodate a wider range of business uses, allowing flexibility for research and training allied to medicine and the development of bio-medical hubs and science centres.

I trust these comments will be taken into consideration in the preparation of the forthcoming Local Plan submission to the Secretary of State. If in the interim you have any queries, please do not hesitate to contact me or my colleague Maggie Zhu at this Office.

Yours faithfully,

Matthew Roe
Director

c.c. Jane Bond, KCH