

Representation	Officer Response
<p data-bbox="188 260 613 288">NSP10: Biscuit Factory and Campus</p> <p data-bbox="188 300 353 363"><b>Individual</b> NSPPSV40.16</p> <p data-bbox="188 408 1093 512">The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p data-bbox="1137 408 2051 651">Representation noted. It should be acknowledged that each version of the NSP has been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online.</p>
<p data-bbox="188 663 804 727"><b>Organisation: Education and Skills Funding Agency</b> NSPPSV55.5</p> <p data-bbox="188 772 1111 906">The ESFA supports the continued inclusion of requirements for new or expanded schools in site allocations NSP04, NSP10 and NSP40 and supportive statements on provision of school places in area visions AV.05, AV.06, AV.07, AV.12 and AV.14.</p>	<p data-bbox="1137 772 1350 801">Support is noted.</p>
<p data-bbox="188 970 412 1034"><b>Organisation: GLA</b> NSPPSV61.15</p> <p data-bbox="188 1078 1106 1391">A number of the sites in the Area Vision and Site Allocations document currently provide premises for industrial and distribution uses, including the Biscuit Factory, Burgess Business Park, Tower Workshops, Valmar Trading Estate, 49 Lomond Grove, Bath Trading Estate, and Copeland Road Industrial Park. The London Plan classifies Southwark as a limited transfer borough, with exceptional planned release related to the Old Kent Road opportunity area. The London Industrial Land Supply and Economy Study 2015 has established that there has been significant loss of industrial land across London, significantly outstripping the benchmark set in the Land for Industry</p>	<p data-bbox="1137 1078 2040 1212">Representation noted. The evidence base for the NSP, including the justification for P25 (Strategic Protected Industrial Land), Policy P26 (Office and business development), Policy P27 (Railway Arches) and Policy P38 (Business Relocation).</p> <p data-bbox="1137 1257 2051 1391">Existing employment sites for redevelopment / change of use are assessed on a site by site basis. Article 4 Directions have been imposed which restrict the change of use of from B1 (c) (light industrial) to C3 (dwellinghouse) of which there is a threat in the Borough. Article 4 Directions for changes of use</p>

and Transport SPG.

Most site allocations for these existing industrial sites require small business space (use class B1) to be provided. This is not broken down into sub-classes, so this allocation could potentially allow the loss of all industrial activity on these sites, with mixed use redevelopment only providing office floorspace as a replacement. Whilst support for SME businesses is welcome, it is important that this is not to the detriment of the needs of London's industrial economy and logistics functions. Many existing SME businesses on these sites will be industrial in nature. It is recommended that clarification is provided for these allocations to ensure that industrial premises are provided as part of the mix of uses on these sites.

The provision of a substantial quantity of additional office floorspace in some of these locations may also have potential impacts on the economic viability of town centres; the rationale behind requiring offices in these locations should be clarified as this should follow the sequential approach set out in the NPPF.

As stated previously, it would be useful for the document to state the sum total of all industrial and employment land, including floorspace that is proposed for release and any additional provision.

Previous comments have been partially addressed including acknowledging that the site is outside a town centre and a retail capacity assessment would be required to demonstrate the need for town centre uses in conjunction with a retail impact assessment to look at impacts on The Blue.

The loss of light industrial workspace is still a matter for concern. The site vision should specify that replacement business floorspace should include the B sub-classes B1c, B2 and B8.

from office use (Class B1a) to a dwellinghouse (Class C3) in the Central Activities Zone (CAZ) is also in place to further protect employment land.

Southwark Council, and the GLA, have, by exchange of letter have confirmed an agreed approach to the phased release of Strategic Industrial Land for mixed use development that would include a range of commercial uses including distribution and light industrial uses in the Old Kent Road Opportunity Area. These letters, and associated plans are available to view on our website. This includes the introduction of 3 sites for Locally Significant Industrial Land (LSIS) and site allocations in the NSP now include reference to this designation and the requirement for replacement industrial uses on site. Other mixed use sites would need to conform to the design guidance in the Old Kent Road AAP which includes a variety of workspaces 'from laptops to forklifts'.

Non-designated industrial sites are covered by Policy P26 regarding re-provision of employment (B class) uses where they are located in the opportunity areas, town centres or it is specified in a site allocation. Policy P26 requires a marketing strategy to be provided for the use and occupation of the employment floorspace to be delivered to demonstrate how it will meet market demand. Therefore planning applications must ensure the delivery of employment space is suitable to the local market and meeting demand. This means we would encourage a range of workspaces to suit demand in different parts of the borough. We are currently working on the types of affordable workspace that are in demand across different parts of Southwark to better inform developers.

Emerging London Plan policy does not require no net loss of industrial floorspace capacity on non-designated sites. However the New Southwark Plan offers stronger protection to ensure no net loss of employment floorspace capacity which meets market demand.

The emerging draft London Plan Policy E7 Part D states that mixed use or residential development proposals on Non-Designated Industrial Sites should

	<p>be supported where either:</p> <ol style="list-style-type: none"> <li>1) There is no reasonable prospect of the site being used for industrial purposes; or</li> <li>2) <b>It has been allocated in an adopted development plan document for residential or mixed-use development;</b> or</li> <li>3) Industrial, storage or distribution floorspace is provided as part of mixed-use intensification.</li> </ol> <p>The council has taken measures to ensure the continuation of business uses on non-designated industrial sites. All currently adopted preferred industrial locations and proposed or adopted site allocations containing industrial land are protected by an Article 4 Direction which restricts the permitted development change of B1c (light industrial uses) to residential. Additionally all railway arches in B1a, B1c or B8 uses benefit from an Article 4 Direction restricting the change of use to residential.</p>
<p><b>Organisation: Grosvenor</b> <b>NSPPSV74.1</b></p> <p>In October 2017 Grosvenor submitted a planning application for the comprehensive mixed-use redevelopment of its 5.4 hectare strategic site comprising the Biscuit Factory and Bermondsey Campus sites located in Bermondsey within the London Borough of Southwark.</p> <p>Grosvenor is proposing to deliver up to 1,343 new build to rent1 homes alongside a new school, employment space, new shops and amenities and a significant provision of new, public open space, play space and public realm .</p> <p>In September 2017 we made written representations on Grosvenor's behalf to the previous consultation version of the New Southwark Plan in relation to the Site Allocation NSP082 Biscuit Factory and Campus and the draft private rented homes policy DM43.</p>	<p>Representation is noted (see comments below on further representation) and the planning application has been acknowledged.</p>

Building upon the previous representations, this document focusses primarily on the Site Allocation NSP10, the boundary of The Blue Local Centre and New Southwark Plan Policy P4 - private rented homes. It reiterates a number of points made previously which have not, in our view, been addressed in the latest version of the policy.

Grosvenor's strategic planning application ("Grosvenor's proposals") is scheduled to be determined in June 2018. We are keen to ensure that the site allocation and private rented homes policy adequately reflect the specific site conditions and the distinct economics of delivering build to rent housing. This will enable the timely delivery of new homes on these sites thereby making a positive contribution to the supply of new housing of all types in Southwark.

Organisation: Grosvenor  
NSPPSV74.2

The Proposed Submission Version of the Plan includes a site-specific allocation for the Biscuit Factory and Bermondsey Campus Site (NSP10).

The Site Allocation promotes the residential-led redevelopment of the site, as well as the provision of business, retail and leisure floor space and a replacement school. Design and Accessibility Guidance within the Site Allocation acknowledges the potential for the delivery of taller buildings on the site, subject to the assessment of impacts on character and townscape, and supports the delivery of improved pedestrian and cycle links in the area to The Blue Local Town Centre (The Blue) and Bermondsey Underground Station.

Grosvenor strongly supports the proposed site allocation NSP10 which aligns closely with their aspirations for the site and the current planning application.

Representation is noted.

The site requirements have been amended to 'provide new homes' rather than provide 1500 homes. This allows the site to be consistent with all other site allocations that do not specify a number of units to be provided. As the NSP is a strategic document which provides guidance for future development in Southwark, site specific information is not provided in order to allow flexibility in design. However, all developments will be expected to meet the criteria set out in the relevant policies of the NSP, including those relating to housing.

In order to protect the character of the area, it is considered necessary for the text to refer to integrating unlisted heritage assets where possible on the site.

Regarding the reference to the Low Line Walking Route, P49 has set out that development will not be considered acceptable if it hinders these routes and

These representations seek to make minor amendments to the wording of the Site Allocation to ensure it accurately reflects the capacity of the site and is clear and consistent as to the requirements for redevelopment. For clarity, we have set out our comments and suggested amendments to the Site Allocation text in the table below.

Current Draft Text - Deliver a comprehensive mixed use development including at least 1,500 homes.

Our Comments - The Site Allocation should be amended to refer to an approximate residential capacity for the site, rather than an 'at least' minimum to allow some flexibility above or below the target. The current planning application is for 1,343 new homes.

Our Suggested Text - "Deliver a comprehensive mixed use development including approximately at least 1,500 homes"

Current Draft Text - "A number of the original warehouse buildings are unlisted heritage assets and these should be retained and integrated into any comprehensive redevelopment where possible."

Our Comments - Celebration of the site's heritage and historic buildings is central to Grosvenor's masterplan proposal, which includes retention of the largest warehouse on site. As the site is not within a Conservation Area and in the absence of a register of 'Locally Listed' buildings for the Borough, we request that this reference to unlisted heritage assets is removed.

Our Suggested Text - A number of the original warehouse buildings are unlisted heritage assets and these should be retained and integrated into any comprehensive redevelopment where possible.

Current Draft Text - "Provide active frontages with town centre uses (A1, A2, A3, A4, D1, D2) at ground floor level, enhancing the adjacent Low Line walking route"

Our Comments - An integral component of Grosvenor's masterplan is active ground floor uses. It is proposed to provide an appropriate and varied mix of commercial uses across the site at ground floor to help meet the needs of

so the Low Line Route must be integrated into the site.

There is potential for the entire site to have active frontage at ground floor level and this must be emphasised along the purple line in particular to enhance new linkages from the station to the site.

Active frontages are not limited to the Low Line but should be provided here as a priority.

Bermondsey, establish identity and support a vibrant and active mixed-use community which will also grow pritical mass of, and generate additional footfall and custom for The Blue. We therefore support reference to active frontages within the site allocation but suggest a slight amendment to the proposed wording to reflect that appropriate active uses are supported lacross the site.

Our Suggested Text - Provide active frontages with town centre uses (A1, A2, A3, A4, D1, D2) at ground floor level across the site, as well as enhancing the adjacent Low Line walking route

Current Draft Text - Site Vision Diagram: Opportunity for Active Frontages

Our Comments - Grosvenor appreciates that this is illustrative, however he Vision Diagram implies that the opportunities for active frontages are limited to spaces adjacent to the Low Line which, we consider, is not the intention of the ~raft policy (or our suggested amendment) above.

Our Suggested Text - We suggest that the Opportunity for Active Frontages (dashed purple line) is removed and, instead he site allocation as a whole is colour shaded to represent Opportunity for Active Frontages site-wide.

The site allocation seeks to ensure that the quantum of retail, restaurants and other town centre leisure uses are commensurate with, and will complement The Blue Local Town Centre. This approach is supported and should be explicitly stated within the allocation text.

In other respects the site allocation is fully supported.

Organisation: Historic England

NSPPSV83.15

We would reiterate previously-expressed views that there are unlisted buildings of heritage that are nonetheless of value and interest on the site. The design section should reflect the positive contribution these buildings make and make clear that development proposals should retain them within any new scheme. Our comments about 'taller' buildings elsewhere also

Representation noted. The NSP will be revised taking on comments given to ensure that policies and all area visions with design guidance will be strengthened. This particularly applies to the site allocations that anticipate tall building developments to ensure that consideration is given to heritage assets and the context of local character

apply.

Vital OKR  
Individual  
NSPPSV91.5

Objection 10.

We object to the failure to define requirements for industrial accommodation within mixed-development on the following sites that are currently SPIL and LSIS. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the site allocation policies for each of these be revised to include requirements for a defined minimum quantum of industrial accommodation.

We object to the failure to define requirements for industrial accommodation within mixed-development site allocations for the following Non-Designated industrial Sites. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the allocation policies for each be revised to include requirements for a defined minimum quantum of industrial accommodation.

NPPF para 14 requires Local Plans to meet objectively assessed needs.

London Plan para 6.2.1 emphasises that smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. Hence it is stated that to deliver a diverse economy, it is important

The Biscuit Factory is not an adopted SPIL site but the site allocations require new and replacement business floorspace including space for small businesses. NSP23 (Burgess Business Park) site allocation states that industrial floorspace should be provided. The other sites are in Old Kent Road and the strategy relating to industrial land and designation for LSIS has been described in response to objection 7.

that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole, and that ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

London Plan para 6.2.4 requires that where there is demand for workspace or viable existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the intensification or reconfiguration of space. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to accommodate replacement workspace and existing businesses on-site through intensification or reconfiguration. What constitutes a reasonable proximity should be determined on the circumstances of each case having regard to the impact on business supply chains and access to labour supply. Relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.

London Plan Policy E2 regarding low-cost business space requires that the provision, and where appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand. Hence development proposals that involve the loss of existing B1 space in areas where there is an identified shortage of lower-cost space should demonstrate that there is no reasonable prospect of the site being used for business purposes, or ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they

are subject to relocation support arrangements before the commencement of new development

Organisation: Thames Water Utilities Ltd  
NSPPSV84.26

The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered.

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage..

Representation	Officer Response
<p data-bbox="185 316 495 344">NSP11 Tower Workshops</p> <p data-bbox="185 355 353 421">Individual NSPSSV40.17</p> <p data-bbox="185 464 1093 564">The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p data-bbox="1137 464 2051 708">Representation noted. It should be acknowledged that each version of the NSP has been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online.</p>
<p data-bbox="185 719 416 785">Organisation: GLA NSPPSV66.17</p> <p data-bbox="185 828 1106 1179">A number of the sites in the Area Vision and Site Allocations document currently provide premises for industrial and distribution uses, including the Biscuit Factory, Burgess Business Park, Tower Workshops, Valmar Trading Estate, 49 Lomond Grove, Bath Trading Estate, and Copeland Road Industrial Park. The London Plan classifies Southwark as a limited transfer borough, with exceptional planned release related to the Old Kent Road opportunity area. The London Industrial Land Supply and Economy Study 2015 has established that there has been significant loss of industrial land across London, significantly outstripping the benchmark set in the Land for Industry and Transport SPG.</p> <p data-bbox="185 1222 1113 1431">Most site allocations for these existing industrial sites require small business space (use class B1) to be provided. This is not broken down into sub-classes, so this allocation could potentially allow the loss of all industrial activity on these sites, with mixed use redevelopment only providing office floorspace as a replacement. Whilst support for SME businesses is welcome, it is important that this is not to the detriment of the needs of London's industrial</p>	<p data-bbox="1137 828 2040 963">Representation noted. The evidence base for the NSP, including the justification for P25 (Strategic Protected Industrial Land), Policy P26 (Office and business development), Policy P27 (Railway Arches) and Policy P38 (Business Relocation).</p> <p data-bbox="1137 1007 2063 1216">Existing employment sites for redevelopment / change of use are assessed on a site by site basis. Article 4 Directions have been imposed which restrict the change of use of from B1 (c) (light industrial) to C3 (dwellinghouse) of which there is a threat in the Borough. Article 4 Directions for changes of use from office use (Class B1a) to a dwellinghouse (Class C3) in the Central Activities Zone (CAZ) is also in place to further protect employment land.</p> <p data-bbox="1137 1259 2063 1431">Southwark Council, and the GLA, have, by exchange of letter have confirmed an agreed approach to the phased release of Strategic Industrial Land for mixed use development that would include a range of commercial uses including distribution and light industrial uses in the Old Kent Road Opportunity Area. These letters, and associated plans are available to view</p>

economy and logistics functions. Many existing SME businesses on these sites will be industrial in nature. It is recommended that clarification is provided for these allocations to ensure that industrial premises are provided as part of the mix of uses on these sites.

The provision of a substantial quantity of additional office floorspace in some of these locations may also have potential impacts on the economic viability of town centres; the rationale behind requiring offices in these locations should be clarified as this should follow the sequential approach set out in the NPPF.

As stated previously, it would be useful for the document to state the sum total of all industrial and employment land, including floorspace that is proposed for release and any additional provision.

on our website. This includes the introduction of 3 sites for Locally Significant Industrial Land (LSIS) and site allocations in the NSP now include reference to this designation and the requirement for replacement industrial uses on site. Other mixed use sites would need to conform to the design guidance in the Old Kent Road AAP which includes a variety of workspaces 'from laptops to forklifts'.

Non-designated industrial sites are covered by Policy P26 regarding re-provision of employment (B class) uses where they are located in the opportunity areas, town centres or it is specified in a site allocation. Policy P26 requires a marketing strategy to be provided for the use and occupation of the employment floorspace to be delivered to demonstrate how it will meet market demand. Therefore planning applications must ensure the delivery of employment space is suitable to the local market and meeting demand. This means we would encourage a range of workspaces to suit demand in different parts of the borough. We are currently working on the types of affordable workspace that are in demand across different parts of Southwark to better inform developers.

Emerging London Plan policy does not require no net loss of industrial floorspace capacity on non-designated sites. However the New Southwark Plan offers stronger protection to ensure no net loss of employment floorspace capacity which meets market demand.

The emerging draft London Plan Policy E7 Part D states that mixed use or residential development proposals on Non-Designated Industrial Sites should be supported where either:

- 1) There is no reasonable prospect of the site being used for industrial purposes; or
- 2) **It has been allocated in an adopted development plan document for residential or mixed-use development;** or
- 3) Industrial, storage or distribution floorspace is provided as part of mixed-use intensification.

	<p>The council has taken measures to ensure the continuation of business uses on non-designated industrial sites. All currently adopted preferred industrial locations and proposed or adopted site allocations containing industrial land are protected by an Article 4 Direction which restricts the permitted development change of B1c (light industrial uses) to residential. Additionally all railway arches in B1a, B1c or B8 uses benefit from an Article 4 Direction restricting the change of use to residential.</p>
<p>Vital OKR Individuals NSPPSV91.15</p> <p>We object to the failure to define requirements for industrial accommodation within mixed-development site allocations for the following Non-Designated industrial Sites. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the allocation policies for each be revised to include requirements for a defined minimum quantum of industrial accommodation.</p> <p>NPPF para 14 requires Local Plans to meet objectively assessed needs.</p> <p>London Plan para 6.2.1 emphasises that smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. Hence it is stated that to deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole, and that ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.</p> <p>London Plan para 6.2.4 requires that where there there is demand for</p>	<p>This site allocation requires re-provision of employment uses that are currently on the site, including space for small businesses. Policy P26 requires re-provision of employment (B class) uses where sites are located in opportunity areas, town centres or it is specified in a site allocation. Policy P26 requires a marketing strategy to be provided for the use and occupation of the employment floorspace to be delivered to demonstrate how it will meet market demand. Therefore planning applications must ensure the delivery of employment space is suitable to the local market and meeting demand. This means we would encourage a range of workspaces to suit demand in different parts of the borough. We are currently working on the types of affordable workspace that are in demand across different parts of Southwark to better inform developers.</p>

workspace or viable existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the intensification or reconfiguration of space. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to accommodate replacement workspace and existing businesses on-site through intensification or reconfiguration. What constitutes a reasonable proximity should be determined on the circumstances of each case having regard to the impact on business supply chains and access to labour supply. Relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.

London Plan Policy E2 regarding low-cost business space requires that the provision, and where appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand. Hence development proposals that involve the loss of existing B1 space in areas where there is an identified shortage of lower-cost space should demonstrate that there is no reasonable prospect of the site being used for business purposes, or ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.

Organisation: Port of London Authority  
NSPPSV143.15

2. Bermondsey

Representation is noted. The NSP sets out a series of policies which promotes modes of sustainable transport.

<p>As with the Bankside and the Borough area vision the reference to improving the Thames Path is welcome. It is noted that this section includes site NSP12 Chambers wharf, which is identified as a potential mixed use development with enhancements to the Thames Path. The PLA broadly support the design and accessibility guidance, stating that proposals for tall buildings should be set back by at least one block from the riverbed, and the promotion of the Thames Path and active frontages. However the PLA consider that there must be reference to promoting the use of the River Thames as an alternative sustainable mode of transport, as well as making use of the Thames for the transportation and delivery of construction materials and waste associated with any future development.</p>	<p>Reference has been added to Policy P22 (River Thames) to the use of the River Thames as an alternative means of transport during construction.</p>
<p>Organisation: Thames Water Utilities Ltd MSPPSV184.28</p> <p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered.</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage..</p>

Representation	Officer Response
<p data-bbox="185 316 481 343">NSP12 Chambers Wharf</p> <p data-bbox="185 355 353 422">Individual NSPPSV40.18</p> <p data-bbox="185 467 1093 566">The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p data-bbox="1137 467 2056 710">Representation noted. It should be acknowledged that each version of the NSP has been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan. Southwark Council's SCI is currently in the process of being updated and any form of feedback received has been acknowledged and responded to, with all responses being uploaded online.</p>
<p data-bbox="185 719 353 818">Vital OKR Individual NSPPSV91.41</p> <p data-bbox="185 863 353 890">Objection 12.</p> <p data-bbox="185 935 1111 1145">We object to the failure to define any requirement for industrial accommodation within mixed-development on the following allocated sites where there is clear potential to incorporate such uses. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the allocation policies for each be revised to include requirements for a defined minimum quantum of industrial accommodation.</p>	<p data-bbox="1137 826 2056 930">This site is a construction site for Thames Tideway Tunnel. Employment uses alongside housing and town centre uses are encouraged for its future redevelopment.</p>
<p data-bbox="185 1155 667 1222">Organisation: Port of London Authority NSPPSV143.15</p> <p data-bbox="185 1267 376 1294">2. Bermondsey</p> <p data-bbox="185 1339 1115 1437">As with the Bankside and the Borough area vision the reference to improving the Thames Path is welcome. It is noted that this section includes site NSP12 Chambers wharf, which is identified as a potential mixed use development</p>	<p data-bbox="1137 1267 2067 1326">Representation is noted. The NSP sets out a series of policies which promotes modes of sustainable transport.</p> <p data-bbox="1137 1370 2011 1437">Reference has been added to Policy P22 (River Thames) to the use of the River Thames as an alternative means of transport during construction.</p>

<p>with enhancements to the Thames Path. The PLA broadly support the design and accessibility guidance, stating that proposals for tall buildings should be set back by at least one block from the riverbed, and the promotion of the Thames Path and active frontages. However the PLA consider that there must be reference to promoting the use of the River Thames as an alternative sustainable mode of transport, as well as making use of the Thames for the transportation and delivery of construction materials and waste associated with any future development.</p>	
<p><b>Organisation: Thames Water Utilities Ltd</b>  <b>NSPPSV184.28</b></p> <p>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered.</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage</p>
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p><a href="#">NSP13 Old Jamaica Road Business Estate</a></p>	<p>This site has been deleted and is now SPIL. Representations were published in full with officer responses in the Consultation Report on the NSP Amended Policies January 2019.</p>