

Representation	Officer Comments
<p data-bbox="188 317 539 347">NSP22 Camberwell Station</p> <p data-bbox="188 357 745 424">Vital OKR - NSPPSV205 Individuals - NSPPSV91.17 and NSPPSV128.17</p> <p data-bbox="188 467 1120 675">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 data-bbox="188 719 1025 750">NPPF para 14 requires Local Plans to meet objectively assessed needs.</p> <p data-bbox="188 794 1173 1074">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 data-bbox="188 1118 1173 1431">London Plan para 6.2.4 requires that where there 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</p>	<p data-bbox="1202 467 2047 1002">This site is a non-designated industrial site. The site allocation requires re-provision at least the amount of employment floorspace (B use class) currently on the site and acknowledges the vibrant cluster of SME businesses in the railway arches. 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>

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: LB Lambeth
NSPPSV333.10

This site lies immediately to the west of the borough boundary and Camberwell Trading Estate KIBA.

Please include the same paragraph about cross border issues that has been included in site allocation 26.

The proposed new station at Camberwell promotes improved connectivity and we think an entrance into Lambeth but it would be coming out into the middle of a residential street, so may have some adverse impact. Please could the site allocation acknowledge this and seek mitigated as required.

PSV states:

We have revised the site design and accessibility guidance to state that the access from the west would likely be in the vicinity of the wider Knatchbull Road/ McDowall Road area.

Specific access requirements would be reviewed in a detailed scheme design.

<p>Any new station must have direct access from both Camberwell Station Road and McDowall Road to ensure the station is accessible to all.</p> <p>New Lambeth Comment - Southwark do not seem to have addressed the need to mitigate the impact on residential amenity of creating a station entrance in the middle of a residential street.</p>	
<p>Organisation: TfL City Planning NSPPSV181.16</p> <p>The case for a new station at Camberwell is currently being looked at by TfL, Network Rail and the Council. The supporting text should acknowledge this. The design guidance for NSP22 (page 166) seems to be for another site</p>	<p>It is noted that TfL and Network Rail are looking at the potential of providing a new station which is supported by the Council. This detail is not necessary in the design guidance. The design text has been reviewed and is the correct design guidance.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.8</p> <p>Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the water infrastructure needs relating to the Local Plan</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>The Council met with Thames Water on 21 November 2018 to discuss their representations relating to anticipated growth in terms of wastewater infrastructure. Thames Water will be consulted on formally once a detailed planning application is received to provide further comments on each site.</p>

Representation	Officer Response
<p data-bbox="188 943 568 975">NSP23 Burgess Business Park</p> <p data-bbox="188 983 537 1050">Organisation: Dolphin Living NSPPSV49.2</p> <p data-bbox="188 1094 1115 1369">Dolphin Living Ltd strongly supports the principles of proposed site allocation, particularly the transition to a mixed use neighbourhood, which incorporates residential uses (Class C3). In respect of the re-provision of employment floor space, we would suggest including Class B1 (b&c) as an acceptable use for the following reasons: ☑ Class B1 (b&c) are appropriate industrial uses within a residential areas and therefore aligns with the Council’s aspirations to create mixed use neighbourhoods;</p>	<p data-bbox="1202 1094 2049 1302">The site allocation sets out that the redevelopment of the site must re-provide at least the amount of employment floorspace (B class) currently on the site or at least 50% of the development as employment space. Therefore this includes the provision of B1 floorspace. It also allows for alternative employment generating uses (A1, A2, A3, A4, D1 and D2).</p>

It would take into consideration the constrained nature of smaller sites within the allocation where it may not be practical to provide uses falling within Class B2 and B8; and

Existing uses within Burgess Business Park may fall within Class B1 and therefore the proposed alteration below would make for a reasonable approach to re-providing existing uses.

Support should also be provided (within the supporting text of the site allocation) to provide scope for alternative employment generating uses, or uses which deliver other planning benefits where these are aligned with planning objectives.

Organisation: Friends of Burgess Park
NSPPSV62.6

The Burgess Business Park site allocation description is not effective because it does not provide sufficient local context to interpret the design policies and tall buildings policies in relation to the redevelopment of the site.

The immediate area around the Burgess Business Park has diverse neighbourhoods and land use of strikingly different character: adjoining this part of Burgess Park, the Georgian Addington Square and Victorian Evelina Mansions are cheek by jowl with the new high density Camberwell Fields development, which itself neighbours the remaining Victorian housing on Southampton Way and the light industrial units on Parkhouse Street. This variety in the fine grain of the neighbourhood would be swamped by a large and monolithic design across the site.

The existing buildings along the southside of Burgess Park are a maximum of seven storeys. This height is replicated across the Camberwell area between the park to the town centre.

It is not appropriate for buildings to abut the park and reduce the light and sunlight and impact on the park trees and other plants, including damage to roots

Other policies in the Plan will be considered within any redevelopment of the site allocations, e.g. Policy P11: design of places, P12: design quality, P17: conservation areas. As such, the heritage and character of the area will be protected through these policies. It is not the intention of the Area Visions to go into a lot of detail.

Policy P14 has been amended within the Amended Policies 2019 to include the site allocations that have potential for tall buildings in Camberwell.

The NSP does not provide detailed guidance regarding appropriate building heights as this should be determined through a detailed design assessment of genuine development proposals in relation to their context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings).

A revised tall buildings background research paper has been prepared to support the New Southwark Plan. The general height of tall

and tree canopies.

Wells Way is a residential street which is a recognised through route between Walworth and Camberwell with two buses. Any additional residential accommodation will place additional strain on the local transport which is already over-crowded.

Wells Way opposite the site consists of Georgian cottages. The mass and height of new buildings should respect the scale of the buildings on the opposite side of the road. As well as the listed buildings in the immediate location.

The site description should require contributions to support social infrastructure such as early years provision, schools, health provision and transport.

The site should also make adequate provision for green space and play space. Burgess park is already heavily used and it is not appropriate for the development to rely solely on the park.

This information as above should be included in the site description to guide development which is sympathetic to the local area.

Organisation: GLA
NSPPSV66.16

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.

buildings accepted on each appropriate site location will be specified within AAP's and SPD's where relevant. It should also be acknowledged that this document and its policies must be read as a whole. Tall building development will be assessed against all policies in the NSP, including policy P14: tall buildings to understand the impact and suitability. This ensures that developers pay regard to all possible factors and constraints relevant to the site when developing, and that tall building development is correctly implemented.

A planning application for residential development will need to consider the transport impacts and will be assessed and mitigation required accordingly.

Other policies in the plan set out the requirements for social infrastructure within proposed development subject to need. CIL/S106 will also need to be paid for any redevelopment proposals which will go towards funding infrastructure.

The allocation sets out a requirement for public realm and green links. Any proposed residential development will be required to meet the private and communal amenity standards set out in Policy P13.

This site states industrial floorspace should be provided. This is in acknowledgement of its change from a local PIL site to a mixed use site that could accommodate industrial uses in mixed use development. Policy P26 requires these to accommodate a range of employment spaces in mixed use development including freight, logistics, light industry, co-working, maker spaces and offices and a marketing strategy must be delivered to show how the space will meet current market demand.

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.

Organisation: Historic England
NSPPSV83.17

We welcome the identification of a number of designated heritage assets on the site map. We would suggest the first sentence of fifth paragraph be amended to read 'Redevelopment must conserve and enhance the setting of ...'

Individual
NSPPSV85.2

I wish the inspector to rule the current Southwark Plan unsound due to its provisions on maximising housing units for all applications in most of the area and its abolition of the existing height restrictions in the current Southwark Plan. Combined these two provisions make almost all the rest of national and

This has been amended.

The Mayor of London has set a housing target for Southwark to deliver in the London Plan and the Draft London Plan, there is also a need to encourage economic growth, therefore as required by the NPPF, we need to identify and allocate sites to deliver housing, employment and

regional planning policy redundant. If any developer wishes to develop any site across the borough, no matter how inappropriately over-developed or how high the development, the local community will have no clear planning grounds to object. The existing national planning policy on a presumption in favour of development has clear policy caveats laid out in various policy documents nationally and in the London Plan. The provisions in the new Southwark Plan spelling out in clear terms that all developments will be expected to maximise number of residential units provided means all other planning policies would be neutered and any decisions made by the planning committee rejecting very dense and very tall skyscrapers across the borough, could be immediately legally challenged and due to costs incurred by the council in such appeals, would severely disable the planning committee from carrying out its legal functions laid out in national and regional planning policies. The removal of the 8 and 10 storey height restrictions for residential and commercial tall buildings across the borough, outside of the exempted core action areas, again limits the ability of the planning committee to carry out its legal functions to ensure all applications adhere to national and regional planning policies. The Camberwell Area Action Plan and the Burgess Business Park exemplifies these problems. This is a largely urban residential community and the removal of all height restrictions and the requirement to maximise housing units in all plans, will radically alter the area, without any real knowledge in the community or in the Southwark Plan consultation process that such a radical change was proposed in the new plan, to change the character of the community, into one that mirrors that of the high rise, very high densities of the redeveloped Elephant & Castle.

The Burgess Business Park is located within a neighbourhood of 2 story Victorian terraced housing. To introduce very high density, tall buildings that reflect the Elephant and not Camberwell deeply damages the established character of the area.

In addition, as Burgess Park is covered by the CAAP and is immediately to the north of the Burgess Business Park, changing the planning policies as outlined, means the park will be overshadowed from the south and the New Church Road

commercial floorspace needed making use of previously developed land. As such, the site allocations have been formulated through evidence. Planning applications on these sites will be considered on a case by case basis with consideration of all the policies of the Plan.

Other policies in the Plan will be considered within any redevelopment of the site allocations, e.g. Policy P11: design of places, P12: design quality, P17: conservation areas. As such, the heritage and character of the area will be protected through these policies.

Policy P14 has been amended within the Amended Policies 2019 to include the site allocations that have potential for tall buildings in Camberwell.

The NSP does not provide detailed guidance regarding appropriate building heights as this should be determined through a detailed design assessment of genuine development proposals in relation to their context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings).

A revised tall buildings background research paper has been prepared to support the New Southwark Plan. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's where relevant. It should also be acknowledged that this document and its policies must be read as a whole. Tall building development will be assessed against all policies in the NSP, including policy P14: tall buildings to understand the impact and suitability. This ensures that developers pay regard to all possible factors and constraints relevant to the site when developing, and that tall building development is correctly implemented.

wildlife site which is immediately adjacent to the proposals site, will have its wildlife potential destroyed.

This is just one key example of why the plan's proposed policies make it unsound.

The council needs to remove these provisions before the plan can be considered to be sound.

Individual
NSPPSV100.4

I live in the middle of a site currently earmarked for a major private development: 'Camberwell Union' on the site of the current Burgess Business Park. The site lies adjacent to the Nature Zone of Burgess Park, an ecologically important area. The application is for 505 residential units in 13 blocks, with heights varying from 3 to 14 storeys. Most of the blocks are 10 storeys or more. The current site is mainly low-rise light industrial units, and the housing stock in the immediate area is mainly 2-storey Victorian properties.

Recent decisions about new-builds in the area have been based on the current Southwark plan, and developments have generally only one storey higher than the existing housing stock.

If the new Southwark plan is adopted, because it is not consistent with the current London plan or the new draft London plan:

- There would be no plan-led approach to changing this low-rise light-industrial area to mixed-use high rise
- There would be no overarching planning policy to prevent the construction of 10-14-storey buildings in the midst of an area of low-rise dwellings
- There would be no definition about what is "significantly higher than surrounding buildings or their context".
- There would be inadequate emphasis placed on the protection of Burgess Park, which is adjacent to this site and which will be overlooked and overshadowed by tall buildings.

Because the NSP is not consistent with the current London plan, there would be no consideration as to whether this area is appropriate, sensitive or inappropriate

The Mayor of London has set a housing target for Southwark to deliver in the London Plan and the Draft London Plan, there is also a need to encourage economic growth, therefore as required by the NPPF, we need to identify and allocate sites to deliver housing, employment and commercial floorspace needed making use of previously developed land. As such, the site allocations have been formulated through evidence. Planning applications on these sites will be considered on a case by case basis with consideration of all the policies of the Plan.

Any planning applications will be considered through the planning application process and assessed against the relevant New Southwark Plan policies to assess whether the proposed development is acceptable and whether impact can be mitigated. A number of policies in the New Southwark Plan address the concerns raised regarding affordable housing (Policy P1), tall buildings (Policy P14 amended Policies) and design (Policy P11).

Policy P14 has been amended within the Amended Policies 2019 to include the site allocations that have potential for tall buildings in Camberwell.

The NSP does not provide detailed guidance regarding appropriate building heights as this should be determined through a detailed

for tall and large buildings.
 Because the NSP is not positively prepared, there is no clear definition about the 'context' of the existing Victorian residential buildings, which of the 14 blocks would be classed as the 'surrounding buildings' or how it would be assessed whether the proposed new buildings are 'significantly higher'.
 Because the NSP is not effective, private developers could get the green light to build 505 residential units, despite the fact that the developer's own viability statement claims that the target of 35% affordable housing is not deliverable.
 There is very little in the application which mitigates the impact of a huge increase in population density on a site which has poor transport links and is ecologically and architecturally sensitive.
 The New Southwark Plan will leave local residents with reduced grounds on which to lodge some very valid concerns and objections about this development.
 On a more theoretical level, the removal of the restrictions on high buildings in the NSP will provide such an incentive to developers to build high, that pockets of existing low-density housing could become vulnerable to CPOs as the value of the land that they sit on skewed upwards. This could lead to further social distortion and have far-reaching implications on the social fabric of the Borough.

design assessment of genuine development proposals in relation to their context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings).

A revised tall buildings background research paper has been prepared to support the New Southwark Plan. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's where relevant. It should also be acknowledged that this document and its policies must be read as a whole. Tall building development will be assessed against all policies in the NSP, including policy P14: tall buildings to understand the impact and suitability. This ensures that developers pay regard to all possible factors and constraints relevant to the site when developing, and that tall building development is correctly implemented.

Vital OKR – NSPPSV205
 Individuals - NSPPSV91 and NSPPSV128

Objection 8.

We object to the failure to designate the following currently industrial sites as protected industrial, and the inclusion of most within site allocations that require no replacement of industrial capacity. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest all of these as SPIL / LSIS designations.

10. Part of NSP23 (Burgess Business Park)

And 30 other small areas (not listed here, but a map can be provided) that are

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.

All sites allocations include figures for the current quantum of employment floorspace on the site and in which use class it is. Policies and guidance in the NSP and the site allocations require these quantum and uses to be reprovided where specified.

This site states industrial floorspace should be provided. This is in

currently industrial and we have identified as suitable for designation, each being modest settings where the likely disruption to businesses and the potential reduction in capacity outweighs the modest scope for residential development, and where delivery of mixed schemes including replacement industrial space would be challenging or impossible.

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.

NSP23 (Burgess Business Park)

Objection 27.

We object to the failure to adequately specify in site allocations sufficient detail about how developments should responded to P26, most notably the inadequacy of the facts given about existing floorspace and existing use types, and the lack of quantum and accommodation type requirements for development.

Office accommodation required to be reprovided through site allocations where mixed development that includes residential is proposed totals over 3.1m sq ft, which is around 20% of the borough's total current office accommodation of approx 15m sq ft (according to one of the evidence base documents).

Objection 21 applies to the site allocations on the following 43 sites, on which the current main use is industrial, where proposed policy requires mixed-use redevelopment that includes housing as well as replacement B use class accommodation, but where type and quantum is inadequately defined.

NSP23 (Parkhouse)

acknowledgement of its change from a local PIL site to a mixed use site that could accommodate industrial uses in mixed use development. Policy P26 requires these to accommodate a range of employment spaces in mixed use development including freight, logistics, light industry, co-working, maker spaces and offices and a marketing strategy must be delivered to show how the space will meet current market demand.

Organisation: Peachtree Services Ltd
NSPPSV138.1

The requirements set out in Site Allocation NSP23: Burgess Business Park are not achievable and the Plan is therefore not effective.

Our client is the freehold owner of a large proportion of this identified site, owning Units 1-9 of the Burgess Business Park, nos. 2, 10-12 and 15-19 Parkhouse Street and 45 Southampton Way.

The site is currently the subject of a planning application (ref: 17/AP/4797) for the redevelopment of the site to provide 505 residential units, up to 3375sqm of Class B1 Floorspace, up to 117sqm of Class D2 leisure floorspace and up to 570sqm of Class A1-A3 retail floorspace.

The Site Vision for NSP23 requires that redevelopment of the site must 're-provide at least the amount of employment floorspace (B class) currently on the site or provide at least 50% of the development as employment floorspace'. This requirement is too general as it does not take into consideration the nature of the existing uses and whether these are desirable or appropriate for inclusion within the redevelopment of the site.

Less than half the commercial floorspace at Burgess Business Park is currently occupied, and many of the buildings are vacant and in poor condition. This is itself evidence that the demand for such a high quantum of this type of Class B floorspace in this location does not exist, and we would note that no evidence of market demand for this amount of commercial floorspace at the Burgess Business Park has been provided within the evidence base of the New Southwark Plan.

The requirement to re-provide the full quantum of existing floorspace within a new mixed use neighbourhood would not be achievable, both from a practical point of view and from a viability perspective. It is essential that any new commercial floorspace is compatible with the proposed residential use, both in terms of the type of use and quantum of floorspace. Aspects associated with the operation of commercial uses, such as servicing, need to be taken in to account and need to work alongside the residential uses. The requirement for like for like provision does not give any consideration to what may work best for the site and

We expect development in the borough to grow the number of jobs, resources knowledge and innovation in a range of sectors. Therefore in order to satisfy the growing demand as highlighted within the ELR, Southwark needs to deliver significant growth of employment space and is forecast to increase employment by approximately 84,000 jobs. The re-provision of floorspace at least is appropriate to secure this uplift in jobs and meaningful employment space to be provided. This site is changing from a Local PIL to mixed use and demand for industrial accommodation is high in this location, therefore the requirements of Policy P26 with respect to meeting demand and the requirement of the site to delivery industrial floorspace is also relevant.

future occupiers.

The requirement within NSP23 does not take into account the employment benefits of the intensification of commercial uses on site, whereby the provision of a smaller quantum of floorspace can provide an increased number of jobs. The viability implications of the Site Vision should also be taken into consideration. When set in the context of planning policy requirements for mixed use development (including the provision of affordable housing), it is not viable to fully re-provide the existing quantum of floorspace. This is demonstrated within the current planning application, which provides the maximum viable amount of commercial floorspace, as set out within the submitted Financial Viability Assessment, which is currently undergoing independent assessment. Taking the above into consideration, we believe that the Site Vision for NSP23 is unachievable, as it would not be practical or viable for the required quantum of commercial floorspace to be delivered, and the New Southwark Plan is therefore unsound.

CHANGES

The Site Vision for NSP23 should be amended to remove the requirement to 're-provide at least the amount of employment floorspace (B class) currently on the site or provide at least 50% of the development as employment floorspace'
The remaining requirements within the Site Vision are achievable and are carried forward within the current planning application.

Organisation: Thames Water Ltd
NSPPSV 184.7

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.

<p>Individual NSPPSV296.4</p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant No</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Justified</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Effective</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Consistent with national policy and the London Plan</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Positively Prepared</p>	<p>Noted.</p>
<p>Individual NSPPSV299.2</p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant Yes</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p>	<p>These points are noted.</p> <p>The vision for the site being mixed use has been determined by the Employment Land Review to intensify the site and the intention of the Plan is to develop innovative solutions for industry to work with other uses e.g. residential.</p> <p>Any proposed development will need to comply with Annex 1: Cycle</p>

Do you consider that the New Southwark Plan is unsound because it is not: Justified

Do you consider that the New Southwark Plan is unsound because it is not: Effective

Do you consider that the New Southwark Plan is unsound because it is not: Positively Prepared

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

Site allocation NSP23 proposes that the existing Burgess Business Park should change from being an employment allocation to a mixed use allocation including residential and employment development.

The objector considers any development should respect the existing industrial and commercial uses and users. The current wording of NSP 23 is silent on this point. The design of all new development (especially residential development) should be required to demonstrate that it will not adversely impact on the operational capability of the existing commercial and industrial uses, including no restrictions on commercial vehicles currently or planned to be used by existing commercial users.

Existing employment enterprises at Burgess Business Park have unrestricted working hours. Flexibility in hours of operation is important to many of these enterprises, particularly where they provide services to organisations operating in and around central London and this should be preserved.

Furthermore, Parkhouse Street should not have any on-street parking close to or

and car parking standards. Any proposed development will also be assessed against Policy P47: highway impacts, which states development must minimise the need for private car journeys and sets requirements for delivery and servicing.

Some of these points are addressed in other policies of the Plan e.g. Policy P11: design of places, Policy P12: design quality, Policy P13: residential design and Policy P54: protection of amenity. These policies seek to protect amenity and ensure the design of places respond positively to the area and providing innovative design solutions. This includes demonstrating that employment sites will not be negatively impacted by new development e.g. residential uses and vice versa.

The site allocation does not include indicative development capacities because their purpose is not to provide detailed design brief for each site. Stakeholders are concerned that the inclusion of indicative development capacities would pre-empt the outcome of the detailed development management process.

The council expects a comprehensive redevelopment of the site to come forward through collaboration of the multiple landowners to ensure efficient use of land and to achieve the aspirations of the site allocation.

near to employment uses and their vehicular access points. Residential development will encourage on-street parking and therefore restrictions on on-street parking will be required. Employment uses should be protected from the impacts of on-street parking which hinder accessibility to their premises.

Achieving the Local Plan's objectives for a mixed use redevelopment of Burgess Business Park while protecting established businesses operating there will be challenging. One challenge will be to co-ordinate re-development of multiple sites to achieve the design and accessibility objectives set out in site proposal NSP23. The objector considers that this will only be achieved through the Council preparing, consulting upon and adopting supplementary planning guidance for Burgess Business Park.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Plan should be amended to acknowledge the rights of existing enterprises to continue to operate at Burgess Business Park without imposition of new restrictions. The onus should be on those seeking to carry out redevelopment to ensure adequate protection for new residential development from existing employment uses. Likewise, both revised highways layouts and car parking provision to serve new residential development should make adequate provision for ongoing employment uses and ensure these are not adversely impacted by on-street parking.

The Local Plan should provide for master planning of the mixed use redevelopment of the site allocation so that the above objections are addressed prior to any redevelopment occurring.

Individual
NSPPSV 305.7

Do you consider that the New Southwark Plan is unsound because it is not: -
Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

The design guidance specifies "developing at a higher density", which in practice will necessitate use of tall buildings.

This policy is therefore not sound because it is not consistent with the Mayor's Current London Plan (2016), through failure to comply with:

"Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations".

The inclusion of tall buildings on the site will significantly and insensitively change the character of the area, both for residents and for visitors to Burgess Park. Several new housing developments on Southampton Way and around over the past several years have avoided the use of tall buildings, presumably on the above grounds of appropriateness and sensitivity to the park and nearby residents.

Do you consider that the New Southwark Plan is unsound because it is not: -
Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The site should be removed from the New Southwark Plan.

The NSP does not provide detailed guidance regarding appropriate building heights as this should be determined through a detailed design assessment of genuine development proposals in relation to their context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings).

Policy P14 has been amended within the Amended Policies 2019 to include the site allocations that have potential for tall buildings in Camberwell.

The NSP does not provide detailed guidance regarding appropriate building heights as this should be determined through a detailed design assessment of genuine development proposals in relation to their context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings).

A revised tall buildings background research paper has been prepared to support the New Southwark Plan. The general height of tall buildings accepted on each appropriate site location will be specified within AAP's and SPD's where relevant. It should also be acknowledged that this document and its policies must be read as a whole. Tall building development will be assessed against all policies in the NSP, including policy P14: tall buildings to understand the impact and suitability. This ensures that developers pay regard to all possible factors and constraints relevant to the site when developing, and that tall building development is correctly implemented.

Representation	Officer Response
<p data-bbox="188 759 790 791">NSP24 Butterfly Walk and Morrison's Car Park</p>	
<p data-bbox="188 802 687 866">Organisation: Thames Water Utilities Ltd NSPPSV184.3</p> <p data-bbox="188 911 1155 1118">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 data-bbox="188 1163 1149 1227">On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p data-bbox="1202 911 2007 975">Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage.</p>

Representation	
NSP25 Valmar Trading Estate	
<p>Organisation: GLA NSPPSV66.18</p> <p>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>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,</p>	<p>Other uses such as small business spaces are encouraged. The sites are not designated industrial sites however all are required to re-provide the same amount of B class employment floorspace by the site allocation. Policy P26 requires these to accommodate a range of employment spaces in mixed use development including freight, logistics, light industry, co-working, maker spaces and offices and a marketing strategy must be delivered to show how the space will meet current market demand.</p>

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.

Vital OKR NSPPSV205

Individual NSPPSV128.18 and NSPPSV91.18

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 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

This site is a non-designated industrial site. 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.

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.

<p>Organisation: Thames Water Utilities Ltd NSPPSV184.28</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</p>	<p>Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage.</p>
<p>Representation</p>	<p>Officer Response</p>
<p>NSP26 Camberwell Bus Garage</p> <p>Vital OKR NSPPSV205 Individual NSPPSV91.19 NSPSV128.19</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</p>	<p>This site is a bus depot which has been acknowledged within the site requirements if it is still required. This site does not provide industrial accommodation. It is not considered appropriate to require industrial uses on sites which are not currently used for this purpose and are required for mixed use. 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</p>

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.

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.

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>Organisation: LB Lambeth NSPPSV333.11</p> <p>These sites lie in reasonable proximity to (the west of) the Camberwell Trading Estate KIBA.</p> <p>If the bus stations are considered to be surplus to requirements, please could any potential impacts on any service provision in Lambeth be acknowledged and mitigated as required.</p> <p>Please include the same paragraph about cross border issues that has been included in site allocation 26 for 27.</p>	<p>The site design and accessibility guidance has been updated to reflect its proximity to the borough boundary.</p> <p>The guidance states that if the bus garage is deemed surplus to requirements any potential impacts on the bus network must be mitigated.</p> <p>We have stated: ‘Development proposals must recognise the site’s close proximity to the borough boundary and must consider the function of Camberwell Trading Estate, in addition to any cross-boundary issues and the provisions of policies and site allocations within reasonable proximity of the site as set out in the Lambeth Local Plan.’</p>
<p>Organisation: TfL City Planning NSPPSV181.17</p> <p>Given it is unlikely that this bus garage will be ‘surplus to requirement’ within the plan period, an option for developing ‘over’ the garage, whilst retaining or enhancing the garage function, could be included</p>	<p>The site allocation has been amended accordingly.</p>
<p>Organisation: Thames Water Utilities NSPPSV184.40</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="181 248 698 284">NSP27 Abellio Bus Garage, Camberwell</p> <p data-bbox="181 288 725 360">Vital OKR NSPPSV205 Individual NSPPSV91.20 and NSPPSV128.20</p> <p data-bbox="181 400 1120 611">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 data-bbox="181 651 1025 686">NPPF para 14 requires Local Plans to meet objectively assessed needs.</p> <p data-bbox="181 726 1173 1010">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 data-bbox="181 1050 1169 1367">London Plan para 6.2.4 requires that where there 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</p>	<p data-bbox="1189 400 2045 970">This site is a bus depot which has been acknowledged within the site requirements if it is still required. This site does not provide industrial accommodation. It is not considered appropriate to require industrial uses on sites which are not currently used for this purpose and are required for mixed use. 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>

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: TfL City Planning
NSPPSV181.18

Perhaps more accurately this should be called 'Walworth Bus Garage' (Abellio are the operator and thus may change during the plan period). Given it is unlikely that this bus garage will be 'surplus to requirement' within the plan period, an option for developing 'over' the garages, whilst retaining or enhancing the garage function, could be included
This is a part/wholly TfL-owned site, so TfL Commercial Development would be best placed to provide more detailed comments.

Organisation: TfL Commercial Development
NSPPVS182.5

We welcome the changes to this allocation, which functions of the bus garage should remain, if required, as part of a residential-led development. We suggest

The site allocation has been amended to reflect the name on the bus garage.

The site allocation has been amended accordingly.

that the first bullet is amended to be consistent with NSP75 above:

Retain the bus garage if the use is still required. If the bus garage is surplus to requirements; There is the potential opportunity to collocate a new bus garage with new homes. If the bus garage is surplus to requirements, new homes, business space (B1) and other town centre uses could be provided.

Organisation: Thames Water Utilities Ltd
NSPPSV184.41

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="181 248 1048 288">NSP28: Land Between Camberwell Station Road and Warner Road</p> <p data-bbox="181 288 730 363">Vital OKR NSPPSV205 Individuals NSPPSV91.21 and NSPPSV128.21</p> <p data-bbox="181 400 1120 611">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 data-bbox="181 651 1025 687">NPPF para 14 requires Local Plans to meet objectively assessed needs.</p> <p data-bbox="181 727 1173 1010">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 data-bbox="181 1050 1173 1367">London Plan para 6.2.4 requires that where there 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</p>	<p data-bbox="1189 331 2042 826">This site is a non-designated industrial site. The site requires re-provision of at least the amount of employment floorspace (B use class) currently on the site. 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>

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
NSPPSV184.42

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="188 253 743 285">NSP29: Iceland, 120-132 Camberwell Road</p> <p data-bbox="188 295 577 327">Organisation: Crown Properties</p> <p data-bbox="188 331 340 363">NSPPSV41.1</p> <p data-bbox="188 403 1133 539">As a general comment, we note that the National Planning Policy Framework (NPPF) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how this presumption should be applied at the local level.</p> <p data-bbox="188 582 1173 756">The NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF and should be aspirational but realistic.</p> <p data-bbox="188 799 1155 898">Our client supports the site allocation for mixed use residential development. However we would like the opportunity to clarify the existing floor areas that are set out in the draft allocation.</p> <p data-bbox="188 943 564 971">The existing uses are as follows</p> <ul data-bbox="188 978 481 1043" style="list-style-type: none"> · Residential 342 Sqm · Commercial 1,386 Sqm <p data-bbox="188 1050 949 1080">We enclose the existing plans are part of these representations.</p>	<p data-bbox="1202 403 1491 432">This has been amended.</p>
<p data-bbox="188 1125 687 1157">Organisation: Thames Water Utilities Ltd</p> <p data-bbox="188 1161 369 1193">NSPPSV184.43</p> <p data-bbox="188 1233 1158 1369">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</p>	<p data-bbox="1202 1233 2009 1299">Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage.</p>

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.

Representation	Officer Response
<p data-bbox="181 248 524 284">NSP30: 49 Lomond Grove</p> <p data-bbox="181 288 412 360">Organisation: GLA NSPPSV66.19</p> <p data-bbox="181 400 1171 719">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="181 759 1171 1078">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.</p> <p data-bbox="181 1118 1171 1262">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.</p> <p data-bbox="181 1302 1171 1369">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</p>	<p data-bbox="1189 400 2058 679">Other uses such as small business spaces are encouraged. The sites are not designated industrial sites however all are required to re-provide the same amount of B class employment floorspace by the site allocation. Policy P26 requires these to accommodate a range of employment spaces in mixed use development including freight, logistics, light industry, co-working, maker spaces and offices and a marketing strategy must be delivered to show how the space will meet current market demand.</p>

<p>release and any additional provision.</p>	
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.44</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>Vital OKR NSPPSV205 Individual NSPPSV91.22 and NSPPSV128.22</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 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</p>	<p>This site is a non-designated industrial site however it is required to re-provide the same amount of B class employment floorspace by the site allocation. 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>

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

Representation	Officer Response
<p data-bbox="188 253 524 284">NSP31: 99 Lomond Grove</p> <p data-bbox="188 295 470 325">Organisation: BizSpace</p> <p data-bbox="188 331 340 362">NSPPSV23.1</p> <p data-bbox="188 403 1090 504">In this context, it is noted the Council has made some amendments to the allocation (formerly NSP33) following the concerns raised in our letter of 18 January 2018, notably:</p> <ul data-bbox="188 510 1146 719" style="list-style-type: none"> <li data-bbox="188 510 1133 576">☑ The allocation no longer shows photographs of my client’s property at No. 99 and No. 101-103 Lomond Grove, but of the adjacent site; <li data-bbox="188 582 1055 612">☑ The reference to ‘Camberwell Business Centre’ has been removed, and <li data-bbox="188 619 1146 719">☑ The ‘Design and Accessibility’ criteria of the allocation now specifically confirm any redevelopment should not prejudice the existing or future operations at Camberwell Business Centre. <p data-bbox="188 762 607 793">These amendments are welcomed.</p> <p data-bbox="188 836 1173 866">However, the allocation as it currently stands still remains confusing and incorrect.</p> <p data-bbox="188 909 1167 1080">Firstly, it now refers to ‘No. 99 Lomond Grove’ which is the listed building within my client’s ownership and forms part of the Camberwell Business Centre. This should therefore be replaced with the correct address of the site allocation, which we understand is 83 Lomond Grove, albeit no doubt the Council will make its own checks.</p> <p data-bbox="188 1123 1167 1294">Secondly, the NSP31 Site Boundary continues to include the area land falling within my client’s ownership (encompassing the area of hard standing immediately adjacent to the northern elevation of No. 99), which is used as car parking by occupants of the BizSpace buildings. This should therefore be excluded from the site allocation.</p> <p data-bbox="188 1337 1167 1367">We have previously requested this information is corrected. Accordingly, we have</p>	<p data-bbox="1202 403 1993 469">The site allocation name has been amended to NSP31: 83 Lomond Grove.</p> <p data-bbox="1202 512 2013 649">It is noted the car parking for BizSpace is located within the site boundary. The boundary remains as such to ensure that the site can come forward as a comprehensive redevelopment should the opportunity arise.</p>

prepared objections to the New Southwark Local Plan, attached for your information, which is formally submitted.
I trust that the Council will confirm the above amendments as part of a modification through the New Southwark Local Plan examination process, to ensure that the plan is sound and justified. This shall be closely monitored by Rapleys.

Vital OKR NSPPSV205
Individual NSPPSV91.23 and NSPPSV128.23

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 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 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

This site is a non-designated industrial site. The site is required to re-provide the same amount of B class employment floorspace by the site allocation. 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.

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.

Representation	Officer Response
<p data-bbox="188 256 495 284">NSP32: 123 Grove Park</p> <p data-bbox="188 296 356 360">Individual NSPPSV91.38</p> <p data-bbox="188 405 353 432">Objection 12.</p> <p data-bbox="188 477 1167 683">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="1202 405 2018 504">It is not considered appropriate to require industrial uses on sites which are not currently used for this purpose. This site is suitable for conversion and possible extension.</p>
Representation	Officer Response
<p data-bbox="188 788 775 815">NSP33: Camberwell Green Magistrates Court</p> <p data-bbox="188 828 882 892">Organisation: Her Majesty's Courts and Tribunals Service NSPPSV81.3</p> <p data-bbox="188 936 1167 1110">This Representation also seeks to amend the site allocation for Camberwell Green Magistrates' Court (Site Allocation NSP33). The Local Plan Review proposes a potential site allocation for Camberwell Green Magistrates' Court for comprehensive mixed-use redevelopment. As part of this, the site must "provide employment floorspace (B1, D class) of at least the amount currently on site".</p> <p data-bbox="188 1155 1167 1329">We support the proposed re-use of this site for residential use. However, we consider that the expectation that the same amount of employment floorspace as is on the current site is not appropriate for this site, and propose that the site allocation is amended for residential development with ground floor employment uses of between 1,000-2,000 sqm.</p>	<p data-bbox="1202 936 2045 1070">This site allocation has been amended to the provision of employment (B1), town centre and community uses (A1, A2, A3, A4, D1, D2) of at least the amount of employment generating floorspace currently on the site.</p> <p data-bbox="1202 1155 1957 1219">The site allocation states that redevelopment of the site should provide new homes (C3).</p>

Lost opportunity for delivering housing and affordable housing

Adherence to this draft policy in its current format will have a dramatic impact in reducing both the overall amount of housing that can be delivered on site (as employment floorspace will replace the potential to provide additional housing numbers) and the proportion of affordable housing (as the scheme viability will demonstrate that a much smaller proportion of affordable housing can be supported by replacing residential with a large amount of lower value employment uses). Initial feasibility studies on this site estimate that if the site allocation is adopted as drafted to “provide employment floorspace (B1, D class) of at least the amount currently on site” less than 50 residential units could be delivered, compared to up to 150 residential units with a more appropriate provision of c.10,000 sqft of employment floorspace.

Financial viability

We question the financial viability of such a significant quantum of employment floorspace in this location and believe that there is a strong possibility that a large proportion of the floorspace could remain unoccupied for a long period after construction if planning policy dictates such a provision.

We have undertaken research to support this position by obtaining sample data using the CoStar Realty Information Database in February 2018. The search includes all B1 office properties on the CoStar database within 1 mile of the subject property. The results show 143 properties containing a total of 1,128,467 sq ft of B1 office floorspace.

The vast majority of the 1 million sq ft is contained within small buildings or makes up a small proportion of a larger mixed-use development. 112 of the 143 properties have less than 10,000 sq ft of employment floorspace. Only 15 of the buildings within a 1 mile radius of the property contain greater than 20,000 sq ft of B1 floorspace and these properties make up approximately half of the overall floorspace totalling 558,812 sq ft. We have analysed data from these 15 office

properties to compare against the subject site.

These buildings are situated in prominent, visible positions on major roads and in close proximity to major public transport interchanges i.e. London Underground stations or mainline rail stations. The average weighted walking distance of the 558,812 sq ft to the nearest public transport interchange is circa. 0.35 miles (circa. 6.6 minutes' walk). The unweighted averages of this dataset are circa. 0.40 miles (circa. 7.7 minutes' walk). The subject site is situated 0.7 miles (15 minutes' walk) from the nearest public transport interchange (Denmark Hill station) and is not located in a prominent or visible position, as it sits two streets back from both Camberwell Road and Peckham Road.

Only two buildings within 1 mile of the subject property contain over 38,000 sq ft of floorspace and both are located less than a two minute walk from Oval London Underground station, in a typical location for an office building. Locating a building of this size in a location such as the Camberwell Green Magistrates' Court site would represent a significant commercial risk that a developer or investor would likely be very reluctant to pursue.

Summary

Camberwell Green Magistrates' Court can contribute capacity for housing numbers on previously developed land. This is consistent with the Core Principles of the NPPF and also Paragraph 111 of the NPPF which seeks to encourage the effective re-use of brownfield land. This should remain a priority within the emerging Local Plan in order to meet Southwark's Objectively Assessed Housing Needs in its entirety.

We consider the Proposed Submission New Southwark Local Plan is unsound in this regard, as it is not justified on the most appropriate strategy when based on proportionate evidence, as is required by NPPF policy 182. Therefore, we request that the site allocation is amended to remove the requirement that development must "provide employment floorspace (B1, D Class) of at least the amount

<p>currently on site”.</p>	
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.6</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>Individual NSPPSV327.4</p> <p>I am concerned about Tall buildings which would destroy the character of the area, place the area in shade and cause distress to existing residents .</p>	<p>Policy P14 has been amended within the Amended Policies 2019 to include the site allocations that have potential for tall buildings in Camberwell. This is reflected in the Amended Policies which proposes amendments to the Town Centre boundary of Camberwell to include these sites.</p> <p>The NSP does not provide detailed guidance regarding appropriate building heights as this should be determined through a detailed design assessment of genuine development proposals in relation to their context. An indiscriminate height restriction would fail to optimise the full potential of all development sites (some of which may be suitable for taller buildings).</p> <p>A revised tall buildings background research paper has been prepared to support the New Southwark Plan. The general height of tall</p>

	<p>buildings accepted on each appropriate site location will be specified within AAP's and SPD's where relevant. It should also be acknowledged that this document and its policies must be read as a whole. Tall building development will be assessed against all policies in the NSP, including policy P14: tall buildings to understand the impact and suitability. This ensures that developers pay regard to all possible factors and constraints relevant to the site when developing, and that tall building development is correctly implemented.</p>
<p>Representation</p>	<p>Officer Response</p>
<p>NSP34: Denmark Hill Campus East</p>	
<p>Organisation: King's College Hospital NHS Foundation Trust NSPPSV102.3</p> <p>I write on behalf of our client, King's College Hospital NHS Foundation Trust, to submit representations to the draft New Southwark Plan (NSP) to support the Area Vision known as 'NSP34' at Denmark Hill Campus East. We previously submitted representations to the NSP New and Amended Policies Preferred Option (June 2017) issue, in which we were largely supportive of the draft policies. Policies we supported in the Preferred Options issued were either retained – Area Vision NSP70 (now known as NSP34) or replaced with a very similar alternative – SP7 Social Regeneration (similar alternative SP2 Social regeneration to revitalise neighbourhoods).</p> <p>King's College Hospital (KCH) is not within the boundary of Area Vision NSP34 or Southwark itself; however, it is adjacent to the boundaries outlined by NSP34. Therefore, any forthcoming policies, designations and area visions are likely to</p>	<p>Noted.</p>

have any impact on KCH.

We wholly support Area Vision NSP34 and consider the site vision, required uses and design and accessibility guidance found in NSP34 to be appropriate to the context of the local area. However, we do believe that the site is a suitable location for the development of tall buildings and is also within context of the guidance on intensification. The representations set out in this letter reflect our views on how this site is suitable for the intensification of health, research and education facilities.

Background to the Site

The site is located on the eastern side of Denmark Hill and contains part of the King's College Denmark Hill campus and the Maudsley Hospital. Denmark Hill Station is located immediately to the south.

Area Vision – NSP34: Denmark Hill Campus East (NSP – Dec 2017)

The site vision for the area states that redevelopment of the site must provide health, research and education facilities or otherwise support the functioning of the Denmark Hill health cluster. Redevelopment of the site may also provide student or key worker housing. Required uses would be health, research and education facilities or uses that would otherwise support the functioning of the Denmark Hill health cluster. Other acceptable uses would be student or key worker housing.

The design and accessibility guidance in Area Vision NSP34 states that parts of the site may be redeveloped and intensified to support the functioning of the two hospitals to enhance their services. The site is located within Camberwell Grove Conservation Area and contains several Grade II listed buildings, which should be protected or enhanced.

We strongly agree with the area vision on Denmark Hill Campus Hill and also believe that the intensification to support the functioning of hospitals in the nearby area can be achieved through the introduction of tall buildings appropriately designed to their setting. Furthermore, any forthcoming policy with regard to the Area Vision NSP34 should not hinder intensified and improved healthcare development.

Health and Social Care Facilities – Policy 3.17 (London Plan 2016)

The Area Vision for NSP34 is in line with London Plan Policy 3.17. Strategically, the

Mayor will support the provision of high quality health and social care appropriate for a growing and changing population, particularly in areas of under provision or where there are particular needs.

Part B of Policy 3.17 states that development proposals which provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking.

Part D of Policy 3.17 states that in Local Development Framework preparation, boroughs should identify and address significant health and social care issues facing their area for example by utilising findings from Joint Strategic Needs Assessments. Part E states that Boroughs should ensure their public health team work with the local NHS to regularly assess the need for health facilities at the local and sub-regional levels and secure sites and buildings to contribute to future provision. Part F states that boroughs should promote the continued role and enhancement of London as a national and international centre of medical excellence and specialised facilities.

Emerging New London Plan (Dec 2017)

Draft Policy S2 Health and social care facilities

A. Boroughs should work with Clinical Commissioning Groups (CCG) and other NHS and community organisations to:

1. Identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning Documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies
2. Understand the impact and implications of service transformation plans and new models of care on urgent and future health infrastructure provision in order to maximise health and care outcomes
3. Regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross boundary issues
4. Identify sites in Development Plan for future provision, particularly in areas with significant growth and/or under provision
5. Identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services and facilitate the release of surplus buildings and land for other uses.

B. Development proposals that support the provision of high-quality new and enhances facilities to meet identified need and new models of care should be supported.

C. New facilities should be easily accessible by public transport, cycling and walking.

We believe the Area Vision for NSP34 has interpreted both the London Plan and emerging London Plan positively and that the provision of high quality health care can be further advocated with the addition of high quality, sustainable buildings that enhance the local area and improve the public realm for visitors and locals alike.

Organisation: Thames Water Utilities Ltd
NSPPSV184.48

Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet to discuss the water infrastructure needs relating to the Local Plan.

Noted. The Council has met with Thames Water to discuss their representations relating to anticipated growth in terms of wastewater infrastructure. Thames Water will be consulted on formally once a detailed planning application is received to provide further comments on each site.