

| Representation   | Officer Response  |
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| <p data-bbox="188 317 506 347">NSP50: Bath Trading Estate</p> <p data-bbox="188 357 405 421">Organisation: GLA<br/>NSPPSV66.20</p> <p data-bbox="188 466 1442 687">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="188 726 1458 948">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="188 986 1442 1082">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="188 1120 1408 1182">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.</p> | <p data-bbox="1487 456 2047 614">Representation noted. The evidence base for the NSP, including the justification for P25 (Strategic Protected Industrial Land), Policy P26 (Office and business development), Policy P27 (Railway Arches) and Policy P38 (Business Relocation).</p> <p data-bbox="1487 652 2063 940">Existing employment sites for redevelopment / change of use are assessed on a site by site basis. Article 4 Directions have been imposed which restrict the change of use of from B1 (c) (light industrial) to C3 (dwellinghouse) of which there is a threat in the Borough. Article 4 Directions for changes of use from office use (Class B1a) to a dwellinghouse (Class C3) in the Central Activities Zone (CAZ) is also in place to further protect employment land.</p> <p data-bbox="1487 978 2056 1430">Southwark Council, and the GLA, have, by exchange of letter have confirmed an agreed approach to the phased release of Strategic Industrial Land for mixed use development that would include a range of commercial uses including distribution and light industrial uses in the Old Kent Road Opportunity Area. These letters, and associated plans are available to view on our website. This includes the introduction of 3 sites for Locally Significant Industrial Land (LSIS) and site allocations in the NSP now include reference to this designation and the requirement for replacement industrial uses on site. Other mixed use sites would need to conform to the design guidance in the Old Kent Road AAP which</p> |

includes a variety of workspaces 'from laptops to forklifts'.

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

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

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

- 1) There is no reasonable prospect of the

site being used for industrial purposes;  
or

2) **It has been allocated in an adopted development plan document for residential or mixed-use development;**  
or

3) Industrial, storage or distribution floorspace is provided as part of mixed-use intensification.

The council has taken measures to ensure the continuation of business uses on non-designated industrial sites. All currently adopted preferred industrial locations and proposed or adopted site allocations containing industrial land are protected by an Article 4 Direction which restricts the permitted development change of B1c (light industrial uses) to residential. Additionally all railway arches in B1a, B1c or B8 uses benefit from an Article 4 Direction restricting the change of use to residential.

This site allocation specifies the existing uses and requires that development must contribute towards the small business cluster, including creative and cultural industries, providing at least the amount of employment floorspace (B use class) currently on the site.

Organisation: Historic England  
NSPPSV83.21

We welcome the identification of the Grade II\* Half Moon public house on the accompanying map. This should also be referenced in the policy text at the end of the third paragraph.

The representation has been acknowledged, and reference is made to the Grade II\* Half Moon public house both within the site guidance text and on the site map. Policies P16 'Listed buildings and structures' and P18 'Conservation of the historic environment and natural heritage' are in place to guide development to ensure the protection of the Half Moon public house.

Organisation: LB Lambeth  
NSPPSV333.13

The site lies immediately to the south of the Herne Hill District centre.

Site vision needs to acknowledge that the site sits on the borough boundary and that development should preserve or enhance the setting of Brockwell Park (a Registered Landscape and Conservation Area).

Lambeth is currently preparing a draft Conservation Area Statement for Brockwell park CA. It includes suggested extensions to the conservation area including at Dulwich Road and Railton Road. The draft document also acknowledges the importance of the Bath Road Trading Estate:

The current parade of shops is generally low, uniform and unobtrusive in form. This means that in views from the historic landscape it has a positive role in allowing views of open sky and distant tree canopies.

The site design and accessibility guidance reflects its proximity to the borough boundary and the Brockwell Park Registered Landscape and Conservation Area.

The site guidance is clear that development must consider the setting of heritage assets in Lambeth, in addition to the provisions of policies and site allocations within reasonable proximity as set out in the Lambeth Local Plan.

The site allocation would allow for comprehensive redevelopment of the site however this must be sensitive to the two adjacent conservation areas and this is reflected in the updated site guidance. It also acknowledges the railway viaduct as a locally listed asset in Lambeth. The site opportunities include intensifying employment uses, providing residential development on upper floors of the shops (sensitive to the settings of the conservation areas) and provide better linkages as part of the town centre to Half Moon Lane.

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|   | <p>The inclusion of the site allocation discourages ad hoc development due to securing an overall aspiration for the site’s future development and design guidance in the context of important heritage settings. Therefore it is appropriate to remain a site allocation.</p>  |
| <p>Organisation: Vital OKR<br/>NSPPSV205<br/>Individuals<br/>NSPPSV91.29 and NSPPSV128.29</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 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.</p> <p>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</p> | <p>This site is a non-designated industrial site. The site allocation and 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> <p>This site allocation specifies the existing uses and requires that development must contribute towards the small business cluster, including creative and cultural industries, providing at least the amount of employment floorspace (B use class) currently on the site.</p> |

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| <p>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>  |  |
| <p>Organisation: Thames Water Utilities Ltd<br/>NSPPSV184.6</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>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p> | <p>Representation is acknowledged and the representative is invited to consult the NSP50: Bath Trading Estate allocation, which indicates the council's vision for the site and outlines the guidance by which development must adhere to.</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> |
| <p>Organisation: The Dulwich Estate<br/>NSPPSV52</p> <p>The site has been included in the draft Area Visions and Site Allocations document for intensification of existing employment uses to contribute towards the business cluster in Herne Hill, and to provide high quality active frontages at appropriate ground floor locations, including the arches of the railway viaduct, with opportunities to provide Class C3 residential accommodation on upper floors along Norwood Road. Whilst our client is supportive of the potential for mixed-use development on the site, there is concern for the proposals to provide a public route through the site towards Half Moon Lane. The site is private land which is not publically accessible, and our client intends for this part of the site to remain as private land. It is</p>   | <p>Representation noted. We consider that providing a new link to Half Moon Lane will improve the permeability and legibility of the site, and believe that this aspiration should be maintained within the site requirements. Applications to develop the site will be reviewed on a case-by-case basis and concerns regarding the use of private land can be dealt with at the application stage.</p>  |

considered that the improvement of the retail frontage along Norwood Road would have the same effect in connecting pedestrian and cyclists to Half Moon Lane and as such, we would recommend improving the pedestrian and cyclist linkages along Norwood Road, underneath the railway and around Half Moon Lane, and removing the proposals to provide a public route through the site.