

Representation	Officer Response
<p data-bbox="188 316 510 347">NSP55: Bricklayers Arms</p> <p data-bbox="188 357 338 421">Individual NSPPSV31.3</p> <p data-bbox="188 464 931 564">Internal inconsistency and Inconsistent with Tall Buildings Historic England Advice Note 4 and New London Plan</p> <p data-bbox="188 608 1115 671">1. No green space provided and current proposal will remove greenspace and trees. See P58 and P60</p> <p data-bbox="188 681 1106 852">2. Tall buildings proposed which would overshadow a conservation area, school, seniors' home and listed buildings. See P14, 2.2 Respond positively to local character and townscape; and 2.6 Avoid unacceptable harm to the significance of designated heritage assets or their settings ...</p> <p data-bbox="188 861 416 887">HEA Note 4 states:</p> <p data-bbox="188 896 1111 960">“What might be considered a tall building will vary according to the nature of the local area.”</p> <p data-bbox="188 970 1106 1034">NLP D8 points out “...the height of [a tall building] may vary in different parts of London but it should be defined.</p> <p data-bbox="188 1077 734 1102">This will block views along the Old Kent Road.</p>	<p data-bbox="1144 357 2040 639">Representation noted. Point 1, part of the site is covered by Borough Open Land, policy P56 Open Space protects Borough Open Land against redevelopment except in exceptional circumstances named in the policy. The Old Kent Road Area Action Plan proposes a wider network of green spaces that are interconnected and form a “Greener Belt”. Point 2, policy P14 Tall Buildings provides overarching guidance for taller buildings along with the tall buildings strategy in the Old Kent Road AAP. The London View Management Framework also contributes to protecting important views.</p>
<p data-bbox="188 1187 353 1251">Individual NSPPSV40.24</p> <p data-bbox="188 1294 1088 1394">The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p data-bbox="1144 1187 2036 1358">Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF and London Plan.</p>

<p>Organisation: TfL City Planning NSPPSV181.24</p> <p>Any proposals for reconfiguring Bricklayers Arms junction would need to be subject to a detailed assessment of the impacts (particularly bus impacts, as the policy mentions) and appropriate mitigation measures, as well as identifying and securing funding. TfL would have to agree any changes, as Highway Authority. The policy should acknowledge this.</p> <p>Note that the BLE team are currently investigating the feasibility of a BLE station at Bricklayers Arms, and this could clearly have significant implications for the site and the junction should it be chosen as a station location.</p> <p>The 'Existing uses' box seems to be incorrect – currently it is open space, highway and footway.</p>	<p>Representation noted. Within any proposal for reconfiguration, we will work with TfL.</p> <p>The potential locations of the BLE stations have been updated according to the most recent consultation which is recognised in the relevant site allocations. NSP53 (Bricklayers Arms) has been updated to state - the site has the potential to host a new underground station as part of the Bakerloo Line extension.</p> <p>Existing uses have been updated.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.69</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>Due to the complexities of wastewater 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</p>	<p>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.</p>

<p>wastewater infrastructure. 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 Southwark Council to discuss the wastewater infrastructure needs relating to the Local Plan.</p>	
<p>Individual NSPPSV317.4</p> <p>There is very little mention about the licensed taxi trade in the report and yet this must be a key part of the transport infrastructure. We are able to move wheelchair users and other mobility impaired people. Some of my customers say that they use taxis rather than owning a car. Please don't remove the flyover at the Bricklayers Arms Junction as this will be harder for the taxi trade to move around.</p>	<p>Representation noted. There is a move towards more sustainable modes of travel and the removal of the flyover at the Bricklayers Arms contributes to a better quality of environment and discourages car usage. Car parking spaces specifically for mobility impaired people and wheelchair users are required as part of new developments. The site allocation recognises that the redevelopment of the site must avoid an adverse impact on the surrounding local highway network.</p>
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p><a href="#">NSP56: Crimscott Street and Pages Walk</a></p>	
<p>Individual NSPPSV31.4</p> <p>Internal consistency</p> <p>Design and accessibility guidance neglects to address improved connectivity for pedestrians and cyclists. See P48.1</p>	<p>Representation noted. Design and accessibility guidance effectively addresses pedestrian and cycle need, which is reinforced in the New Southwark Plan through SP5 Healthy and Active Lives and P50 Cycling which is supported by P50 Cycling ensures that cycling is an attractive option for more people by a proportionate and substantial evidence base which covers the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019). Further design guidance is provided in the Old Kent Road AAP for this site.</p>
<p>Individual NSPPSV40.25</p> <p>The proposals for redevelopment of the following sites are not justified</p>	<p>Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring</p>

<p>because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p>compliance with the NPPF &amp; London Plan.</p>
<p>Organisation: Elephant Amenity NSPPSV57.26</p> <p>The following sites have industrial accommodation as an existing use, but this is not included in the site allocation. For the Plan to be sound, these sites should include a defined minimum amount of industrial accommodation. Where these sites include Strategic Protected Industrial Land and Locally Significant Industrial Sites, this use should be retained.</p>	<p>Representation noted. These sites are not currently designated as strategic industrial sites in Southwark. We have designated further parcels of industrial land at Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate, which covers some of the railway viaducts in Bermondsey. The other sites suggested are all sites proposed for redevelopment in the NSP therefore expected to deliver housing to help meet the future housing needs of the borough. Nevertheless mixed use would be expected on the majority of these sites where these are specified in particular site allocations or they fall within the requirements of re-provision as per P26. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites. Development must comply with guidance in the Old Kent Road AAP.</p>
<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91.7 and NSPPSV128.7</p> <p>This objection applies to the site allocations on the following 42 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.</p>	<p>Representation noted. There is currently 83ha of protected industrial land in Southwark (64ha is strategic and 19ha is local). We are proposing to retain 32ha of SPIL in Southwark (strategic) which includes the designation of 2 new sites for SPIL which were previously undesignated (Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate). These sites are suitable for industrial uses only (Policy P25) including potential for intensification at the South Bermondsey diveunder site. In addition and following agreement with the GLA on our industrial strategy, we have designated 20ha of LSIS at Mandela Way, Ossory Road and Hatcham Road. The NSP site allocations have been amended and these sites will accommodate mixed use including a requirement for industrial uses as part</p>

	<p>of that mix, in accordance with New London Plan draft policy. In total we will retain 52ha of industrial land either as SPIL or LSIS in Southwark. The majority of the boroughs industrial land is situated in the Old Kent Road which is also designated as an opportunity area in the London Plan and will deliver significant change and benefits to the area including the Bakerloo Line extension. As such we have agreed the release of sites in the Old Kent Road from SPIL with the GLA to accommodate growth as part of mixed use development. Whilst the industrial land designation will no longer apply, our policies require full reprovion of employment (B class) floorspace on all of these sites and will follow the economy strategy in the Old Kent Road AAP requiring a wide range of employment uses including industrial. Planning applications approved in the OKR are providing B1c (light industrial uses) in mixed use developments. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites.</p> <p>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 reprovion of employment (B class) uses where sites are located in opportunity areas, town centres or it is specified in a site allocation. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites. Development must comply with guidance in the Old Kent Road AAP.</p> <p>.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.70</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>Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage.</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><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p><a href="#">NSP58: 107 Dunton Road (Tesco store and car park) and Southernwood Retail Park</a></p>	
<p><b>Individual</b> NSPPSV40.27</p> <p>The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p>Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p><b>Organisation: Greenpruce GP</b> NSPPSV72.2</p> <p>The high-level site allocation which includes this Site is supported in principle. Detailed comments will be made as part of additional representations which will be submitted at a later stage in respect of the draft Old Kent Road AAP. Similarly, the aspirations of the proposed Old Kent Road Area Vision are supported but will be commented on in more detail as part of the draft Old Kent Road AAP consultation.</p> <p>It is, however, worth noting that the draft allocation stipulates that the Site "must" provide new homes, retail, community uses and public open space; "should" provide employment uses and "may" provide visitor accommodation. The potential for hosting a new underground station is referred to. In addition to this, the allocation states that the Site should "respond positively to the objectives of the AAP and provide the appropriate facilities for health care, education, and leisure facilities as well as community energy and transport infrastructure." As noted previously, the potential space, cost, complexity and deliverability complications associated with</p>	<p>Support noted. The site requirements are considered appropriate to meet the aspirations for growth in a range of uses in this new town centre location and as part of the Old Kent Road Area Action Plan.</p> <p>The site allocation assumes comprehensive redevelopment of the entire site and requires effective coordination between landowners in terms of design and phasing of development, including the provision of a range of community uses, public open space, retail and employment floorspace, and new homes.</p>

<p>delivering substantial transport infrastructure should be factored into consideration in respect of the expectations of this Site to deliver extensive public benefits and community facilities, in addition to a range of land uses, including, importantly, potentially over 1,000 new homes. This Site is only one amongst many that will ultimately be regenerated along the Old Kent Road and it is therefore suggested that the wording highlighted above be slightly amended to simply acknowledge the complexity of the development opportunity. It is suggested that the Site should:</p> <p>"respond positively to the objectives of the AAP and provide the appropriate facilities, <u>if practically feasible and viable</u>, for health care, education, and leisure facilities as well as community energy and transport infrastructure."</p> <p>It is important to acknowledge that the single Site Allocation falls within two distinct land ownerships. Therefore, it is further suggested that the Site Allocation wording should explicitly acknowledge this and emphasise that delivery of public benefits and community infrastructure should be considered holistically to ensure that one or either of the land parcels is not burdened with, for example, the expectation of delivering an unreasonable level or mix of land uses, facilities or public space such that deliverability of either development opportunity would be compromised.</p>	
<p>Organisation: TfL City Planning NSPPSV181.26</p> <p>A statement on the approach to future car parking provision could be made here, given the high level of current surface car parking and the possibility of a future BLE station in the vicinity.</p> <p>There is currently an important bus stand adjacent to the site, in Humphrey Street. This will need to be protected/enhanced in any future redevelopment.</p>	<p>Representation noted. The New Southwark Plan encourages more active and green methods of travel, and reducing the amount of car parking. Car parking provisions must be made in line with policy P52: Car Parking. Further detail is set out in the Old Kent Road AAP, for area OK4 which aims to remove the gyratory to reduce its car dominated character, to create a place which is much easier and more attractive for people walking and cycling.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.72</p> <p>"The water network capacity in this area is unlikely to be able to support the</p>	<p>Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage.</p>

<p>demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to 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 water infrastructure is required, where, when and how it will be delivered. 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><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p><a href="#">NSP59: Sailsbury Estate Car Park</a></p>	
<p>Individual NSPPSV40.28</p> <p>The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p>Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.73</p> <p>On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.</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. Notwithstanding the above, applicants will still be notified to consult with Thames Water.</p>

Representation	Officer Response
<b>NSP60: Old Kent Road (Lidl Store) London</b>	
<p data-bbox="188 336 353 400">Individual NSPPSV40.29</p> <p data-bbox="188 443 1093 544">The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p data-bbox="1144 336 2040 507">Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p data-bbox="188 592 674 655">Organisation: Thames Water Utilities Ltd NSPPSV184.74</p> <p data-bbox="188 699 1111 938">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="188 986 1122 1066">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="1144 592 2051 655">Noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage.</p>
Representation	Officer Response
<b>NSP61: Former petrol filling station, 233-247 Old Kent Road</b>	
<p data-bbox="188 1198 353 1262">Individual NSPPSV40.30</p> <p data-bbox="188 1305 1093 1369">The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and</p>	<p data-bbox="1144 1198 2040 1369">Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>

<p>taken into account. I can expand on this at the oral examination.</p>	
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.5</p> <p>On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.</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 noted. Applicants of major developments will be advised to consult Thames Waters' free pre-application advice at the earliest stage.</p>
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p>NSP62: Kinglake Street Garages</p>	
<p>Individual NSPPSV40.31</p> <p>The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p>Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.75</p> <p>On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site. On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site</p>	<p>Noted. Notwithstanding the above, applicants will still be notified to consult with Thames Water.</p>
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p>NSP63: 4/12 Albany Road</p>	

<p>Individual NSPPSV31.5</p> <p>Internal consistency</p> <p>Any development should recognise the historical assets on the Old Kent Road either side of this development: The Thomas a Becket pub and the listed Fire Station which should be listed in the Design guidance.</p>	<p>Representation noted. Changes will be made to highlight the protection of these assets on the map and in the design and accessibility guidance. Despite these two falling outside the site allocation, their proximity to the site, located adjacent to the pub and the grade II listed Fire Station on the other side of Shaun Cliff Road means these are valuable assets.</p>
<p>Individual NSPPSV40.32</p> <p>The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p>Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p><a href="#">NSP64: Former Southern Railway Stables</a></p>	
<p>Individual NSPPSV31.6</p> <p>Internal inconsistency with P18 and inconsistent with New London Plan Policy HC1 Heritage conservation and growth</p> <p>NSP64 states: The former Southern Railway Stables are identified as a building of architectural and historic interest. The space immediately adjacent is designated as 'Other Open Space' although it is not publicly accessible. Together, the sites could provide a new publicly accessible open space. The stables should be retained or repurposed for employment uses. Further design requirements should be added that any redevelopment should not harm the architectural structure (including the forge) or distort it because</p>	<p>The Forge has been added to the map and design guidance as a building of architectural and historic interest. It is proposed as a building to retain in the OKR AAP and a feasibility study has been prepared for the development of the site. An Article 4 Direction also covers these buildings to prevent demolition. Cobbled paving could potentially be retained around the buildings to retain.</p>

<p>it is a valuable heritage asset and together with the open space represents an historical environment which should be conserved. The cobbled pavements are clearly visible in the NSP photograph and should not be damaged. See London Plan Policy HC1.</p>	
<p>Individual NSPPSV40.33</p> <p>The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p>Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p>Organisation: Elephant Amenity Network NSPPSV57.28</p> <p>The following sites have industrial accommodation as an existing use, but this is not included in the site allocation. For the Plan to be sound, these sites should include a defined minimum amount of industrial accommodation. Where these sites include Strategic Protected Industrial Land and Locally Significant Industrial Sites, this use should be retained.</p>	<p>Representation noted. These sites are not currently designated as strategic industrial sites in Southwark. We have designated further parcels of industrial land at Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate, which covers some of the railway viaducts in Bermondsey. The other sites suggested are all sites proposed for redevelopment in the NSP therefore expected to deliver housing to help meet the future housing needs of the borough. Nevertheless mixed use would be expected on the majority of these sites where these are specified in particular site allocations or they fall within the requirements of re-provision as per P26. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites. Development must comply with guidance in the Old Kent Road AAP.</p>
<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91.30 and NSPPSV128.30</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</p>	<p>Representation noted. There is currently 83ha of protected industrial land in Southwark (64ha is strategic and 19ha is local). We are proposing to retain 32ha of SPIL in Southwark (strategic) which includes the designation of 2 new sites for SPIL which were previously undesignated (Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate). These sites are suitable for industrial uses only (Policy P25) including potential for intensification at the South Bermondsey diveunder site. In addition and following agreement with the GLA on our industrial strategy, we have</p>

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 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

designated 20ha of LSIS at Mandela Way, Ossory Road and Hatcham Road. The NSP site allocations have been amended and these sites will accommodate mixed use including a requirement for industrial uses as part of that mix, in accordance with New London Plan draft policy. In total we will retain 52ha of industrial land either as SPIL or LSIS in Southwark. The majority of the boroughs industrial land is situated in the Old Kent Road which is also designated as an opportunity area in the London Plan and will deliver significant change and benefits to the area including the Bakerloo Line extension. As such we have agreed the release of sites in the Old Kent Road from SPIL with the GLA to accommodate growth as part of mixed use development. Whilst the industrial land designation will no longer apply, our policies require full re-provision of employment (B class) floorspace on all of these sites and will follow the economy strategy in the Old Kent Road AAP requiring a wide range of employment uses including industrial. Planning applications approved in the OKR are providing B1c (light industrial uses) in mixed use developments. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites.

<p>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: Peckham Society NSPPSV140.12</p> <p>NSP 64 PS believes new development should retain existing area of employment space</p>	<p>Representation noted. It is a requirement of any redevelopment of the site that employment uses (B class) be provided, which was the existing use on the site.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.77</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>Due to the complexities of wastewater 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</p>	<p>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.</p>

<p>wastewater infrastructure. 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 Southwark Council to discuss the wastewater infrastructure needs relating to the Local Plan.</p>	
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p><b>NSP66: Marlborough Grove and St James's Road</b></p>	
<p>Individual NSPPSV40.35</p> <p>The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p>Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p>Organisation: Elephant Amenity Network NSPPSV57.29</p> <p>The following sites have industrial accommodation as an existing use, but this is not included in the site allocation. For the Plan to be sound, these sites should include a defined minimum amount of industrial accommodation. Where these sites include Strategic Protected Industrial Land and Locally Significant Industrial Sites, this use should be retained.</p>	<p>Representation noted. These sites are not currently designated as strategic industrial sites in Southwark. We have designated further parcels of industrial land at Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate, which covers some of the railway viaducts in Bermondsey. The other sites suggested are all sites proposed for redevelopment in the NSP therefore expected to deliver housing to help meet the future housing needs of the borough. Nevertheless mixed use would be expected on the majority of these sites where these are specified in particular site allocations or they fall within the requirements of re-provision as per P26. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites. Development must comply with guidance in the Old Kent Road AAP.</p>
<p>Organisation: Helix International Group NSPPSV80.1</p>	<p>Support noted.</p>

Troy Planning + Design (Troy Hayes Planning Limited) has been instructed as agents to prepare representations to the London Borough of Southwark on behalf of our clients Helix International Group Limited, the landowners of 328 St James's Road. This property is included in the proposed Allocation Policy NSP66 'Marlborough Grove and St James's Road'.

The landowners, Helix International Group Limited are in discussions with other surrounding landowners, seeking to work together to bring forward a comprehensive scheme.

Helix International Group Limited, their agents and other landowners would welcome the opportunity to meet and work with Officers from Southwark Council to support the delivery and aspirations of the New Southwark Plan, in particular Allocation Policy NSP66 'Marlborough Grove and St James's Road' and the Old Kent Road Area Action Plan.

References made within this document to 'the site' relate to 328 St James's Road and land surrounding this building. As identified in Site Allocation NSP 66 'Marlborough Grove and St James's Road' of the New Southwark – Proposed Submission Version (December 2017).

The contents of these representations does not prejudice any future representation or future negotiation with the London Borough of Southwark (Southwark Council) or any other interested party.

We wish to attend and appear at examination for all matters raised in this representation so that the Inspector in order to express through further written submissions and verbally the points key matters we set out in these representations.

Summary of Representations

Representations are made primarily in relation to the Old Kent Road Area Vision, Old Kent Road Allocation Policy NSP 66 'Marlborough Grove and St James's Road', P26 'Office and business development' and P54 'Protection of amenity'.

In summary, we support the Old Kent Road Area Vision and Allocation Policy SP66 'Marlborough Grove and St James's Road'. The allocation of the site for mixed-use development provides an important opportunity to provide new homes in a way that compliments and intensifies existing commercial activity at the site and within the Old Kent Road area.

Representations are also made in relation to those policies which are likely to have the greatest significance to the future development of Allocation Policy NSP66, including 328 St James's Road, and neighbouring properties. Concern is expressed in relation to how Allocation Policy NSP 66 relates to other policies within the New Southwark Plan, principally P26 'Office and business development' and P56 'Protection of amenity'.

The allocation of 328 St James's Road, and neighbouring properties, as identified in Old Kent Road Allocation Policy NSP 66 'Marlborough Grove and St James's Road', is welcomed and supported. The allocation of the site acknowledges the suitability of the site to provide the necessary development and the willingness of the landowners to deliver the site.

3.2 The inclusion of the site in the proposed submission version of the New Southwark Plan demonstrates that the site is considered suitable and deliverable and in conformity with other aspects and policies of the submission version of the plan. Commentary and observations are offered in relation to specific policies and their soundness.

Old Kent Road Area Action Plan

The preparation of more detailed plans associated with the preparation of the Old Kent Road Area Action Plan are acknowledged. We will prepare representations to this as part of the separate public consultation for the Old Kent Road Area Action Plan.

The overarching principle of the vision is welcomed and supported. The aspiration to provide new homes, jobs and a revitalised high street and town centre in a sustainable and sensitive manner with regard to existing residents and companies is particularly supported.

3.4 The site, 328 St James's Road, offers an opportunity to contribute towards realising the aspirations, aims and objectives of the New Southwark Plan, including the Vision for the Old Kent Road Area. The opportunity of the site is represented in its potential for high quality mixed use redevelopment.

Organisation: Helix International Group  
NSPPSV80.3

The allocation of 328 St James's Road, and neighbouring properties, as identified in Old Kent Road Allocation Policy NSP 66 'Marlborough Grove and St James's Road', is welcomed and supported. The allocation of the site acknowledges the suitability of the site to provide the necessary development and the willingness of the landowners to deliver the site.

The inclusion of the site in the proposed submission version of the New Southwark Plan demonstrates that the site is considered suitable and deliverable and in conformity with other aspects and policies of the submission version of the plan. Commentary and observations are offered in relation to specific policies and their soundness

In relation to Allocation Policy NSP 66, it is unclear how the promotion of mixed use development will be deemed compatible with the desire to protect the existing function of commercial activities which surround the site. Surrounding land broadly accommodated industrial and employment uses. There is concern that the delivery of allocation policy NSP 66 could be hindered where new and existing uses conflict.

Where conflict with Policy P54 'Protection of amenity' arises, or is likely to arise, development proposals may be refused and the aspirations of Allocation Policy NSP 66 compromised. Conversely the introduction of new uses, such as residential and office uses, could result in the interference with established businesses. It is therefore recommended that reference is made to the potential conflict within the body of the text of Allocation Policy NSP66.

Representation noted. Point one, as set out in the Old Kent Road Area Action Plan, the vision is driven by the need to accommodate housing growth whilst retaining a wide range of commercial uses that help support the central London economy and provide a wide range of jobs to local people. Point two, the possible interference with established business is addressed in policy P38: Business Relocation. Point three, the plan is designed to be so prescriptive in this sense, to allow for appropriately site specific development. P25 Strategic protected industrial land, sets out for SPIL sets the amount of industrial accommodation.

It will be vital that a pragmatic approach to redevelopment and phasing is fostered. Any re-wording should acknowledge that measures to mitigate against potential short and long term amenity concerns will be required or other mechanisms agreed to help deliver development and protect existing businesses and enterprise.

328 St James's Road has lawful use as an office (B1a Use Class) as confirmed by a Certificate of Lawful Development (see London Borough of Southwark reference number '12/AP/0335'). This use remains different to the uses of surrounding buildings.

Policy P26 'Office and business development' relates to land that is identified as being located within an opportunity area. In the case of 328 St James's Road its office use could facilitate development that introduces a mix of uses, including residential, provided it meets the criteria of Policy P26. It is however not clear how the development of 328 St James's Road could take place with land that immediately adjoins the site. Specifically, where mixed-use development as specified by Allocation Policy NSP 66 is proposed.

The site identified by Policy NSP 66 forms an area with multiple uses. These range from live-work, industrial, light manufacturing, office, community and sui generis uses. The complexity is further amplified by a large number of different building types and fragmented ownership. The policy wording and supporting text of Policy P26 should be amended to clarify that when development proposals which incorporate multiple existing commercial uses what specific mix of commercial uses should be provided as part of any redevelopment.

At present Policy P26 shows a preference for 'B Use Classes', listing a wide range of largely incompatible employment uses. It is unclear whether the predominant existing lawful use would be expected to be provided on site as part of any redevelopment or if the same mix of uses would be expected to be delivered on site. The New Southwark Plan must make this position clear to demonstrate deliverability and soundness of the plan.

It is strongly advised that emphasis within Allocation Policy NSP66 and the Old Kent Road Area Vision is made to acknowledge that the site allocation policy expresses support for sites being brought forward together concurrently by multiple land owners.

Organisation: Indigo Planning  
NSPPSV88.3

To ensure that the vision for NSP 66: Marlborough Grove and St James's Road is aligned with that of OKR11 of the emerging Old Kent Road Area Action Plan, the site vision should specifically reference the delivery of student accommodation as being acceptable in this location.

Organisation: Vital OKR

The delivery of student accommodation will be determined under the relevant development management policy in the NSP.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91.8 and NSPPSV128.8

#### 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.

Representation noted. There is currently 83ha of protected industrial land in Southwark (64ha is strategic and 19ha is local). We are proposing to retain 32ha of SPIL in Southwark (strategic) which includes the designation of 2 new sites for SPIL which were previously undesignated (Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate). These sites are suitable for industrial uses only (Policy P25) including potential for intensification at the South Bermondsey diveunder site. In addition and following agreement with the GLA on our industrial strategy, we have designated 20ha of LSIS at Mandela Way, Ossory Road and Hatcham Road. The NSP site allocations have been amended and these sites will accommodate mixed use including a requirement for industrial uses as part of that mix, in accordance with New London Plan draft policy. In total we will retain 52ha of industrial land either as SPIL or LSIS in Southwark. The majority of the boroughs industrial land is situated in the Old Kent Road which is also designated as an opportunity area in the London Plan and will deliver significant change and benefits to the area including the Bakerloo Line extension. As such we have agreed the release of sites in the Old Kent Road from SPIL with the GLA to accommodate growth as part of mixed use development. Whilst the industrial land designation will no longer apply, our policies require full re-provision of employment (B class) floorspace on all of these sites and will follow the economy strategy in the Old Kent Road AAP requiring a wide range of employment uses including industrial. Planning applications approved in the OKR are providing B1c (light industrial uses) in mixed use developments. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites.

It is not considered appropriate to require industrial uses on sites which are

	<p>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 P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites. Development must comply with guidance in the Old Kent Road AAP.</p>
<p>Individual NSPPSV92.5</p> <p>The NSP Annexe states that the number of storeys and locations of tall buildings will be monitored and ‘a selection will be reviewed’ to make sure that they ‘avoid unacceptable harm to heritage assets and their settings’ but they have not demonstrated how this will be overseen and what positive action the Council will take to make sure heritage assets are protected.</p> <p>Adjacent sites to Canal Grove are NSP 65, 66 and 68 all of which can consider the inclusion of tall buildings subject to consideration of impacts on existing character, heritage and townscape. There is no evidence of how the cumulative impact of such developments on Canal Grove will be monitored.</p> <p>To make this policy sound, an additional point should be added at P16:</p> <p>3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning applications. The cumulative impact of adjoining developments (massing, density and height) on listed buildings must be taken into account when individual planning applications are considered.</p>	<p>Tall buildings are proposed as part of the overall tall buildings strategy in the OKR AAP and will take into account local character and townscape. P14 Tall Buildings provides overarching guidance for taller buildings along with the tall buildings strategy in the Old Kent Road AAP. The London View Management Framework alongside policy P19: Borough Views protect important Borough and Strategic London views. Heritage assets, like the buildings of architectural and historic interest and the buildings of townscape merit in OKR have been added to the site allocations maps.</p>
<p>Organisation: Six Bridges Estate NSPPSV163.1</p>	<p>Noted. Point one, this site allocation will accommodate mixed use including a requirement for industrial uses as part of that mix, in accordance with New</p>

NEW SOUTHWARK PLAN REPRESENTATIONS, NEW SOUTHWARK PLAN – PROPOSED SUBMISSION VERSION

SIX BRIDGES INDUSTRIAL ESTATE AND LAND TO THE EAST ADJOINING ST JAMES ROAD, SE1

We submit on behalf of our client Royal London Asset Management (herein referred to as Royal London), representations in response to your consultation on the New Southwark Plan (Proposed Submission Version published November 2017), herein referred as the NSP. CBRE Limited ('CBRE' hereafter) act as planning advisors to Royal London Asset Management herein referred to as Royal London) with respect to their Six Bridges Estate site (referred to as 'the site' hereafter) encompassing a collection of industrial buildings, servicing and car parking areas to the east, SE1 5JT (Location Plan attached in Appendix A). CBRE are instructed to submit representations to the New Southwark Plan with respect to their site.

Royal London welcomes the opportunity to engage with Southwark Council in respect of its emerging planning policies in the Old Kent Road Opportunity Area and specifically the publication of the New Southwark Plan. Representations will also be submitted to the Draft Old Kent Road Area Action Plan consultation which closes on the 21st March 2018.

Our client would welcome further engagement with the Council regarding the future of their site.

BACKGROUND

The site and surrounding area

The site extends to around 2.06 ha (5 acres) and encompasses a collection of low density industrial and warehouse shed buildings and associated servicing and car parking areas. The site is bounded by St James's Road to the east, Old Kent Road to the south, Marlborough Grove to the west and Eveline Lowe Primary School to the north.

London Plan draft policy. Site allocations on currently designated industrial land are required to comply with design guidance for the effective mixing of industrial and residential uses. Point two, the mix of residential and industrial is policy compliant with the London Plan. OKR11 sets out the phasing will happen incrementally and recognises the need for some temporary accommodation for businesses in this process. P38 Business relocation sets out the expectations for redevelopment and the impacts on existing businesses.

The current main occupiers currently within the site are Selco (builders warehouse), Travis Perkins (builders warehouse), Jayhawk Limited (art storage vehicles), Place Settings (catering specialists), Plumb Centre (plumbing supplies), DX Network Services Ltd and Business Mail Solutions (courier services) and Edmundson Electrical (electrical distribution company). Most of the leases will come to an end in the mid-late 2020's with the longest lease expiry being in 2027 (Selco).

The area immediately surrounding site is predominantly residential with flats and houses located to the west, north and east. Immediately to the north is Eveline Lowe Primary School. Further industrial/commercial buildings are located to the south and east, however as part of the Draft Old Kent Road Area, a number of masterplans for comprehensive mixed use redevelopment are coming forward including OKR 10 to the south of Old Kent Road and OKR 13 to the east. A number of planning applications for comprehensive mixed-use development are coming forward within these wider masterplan areas. Other landowners within OKR 11 are also planning to bring forward plots for redevelopment in line with the AAP masterplan.

The site has a PTAL rating of 3-4 (good) with a number of key bus routes (21, 53, 78, 172, 453 and N21) going directly to the site. South Bermondsey train station is approximately a 15 minute walk to the north-east. Furthermore there are aspirations for an extension to the Bakerloo line which would provide better connections into central London.

#### Designations

The site is designated in the Southwark Proposals Map (2014) for the following land uses:

- ¼ Strategic - Preferred Industrial Location (PIL)
- ¼ The southern part of the site (where it borders Old Kent road) is located within an Archaeological Priority Zone
- ¼ Old Kent Road Action Area – Designated for regeneration and

redevelopment by both the GLA and Southwark Council.

¾ The site is not situated within a Conservation Area, nor near any Listed buildings.

Within the NSP the Strategic Industrial Land designation will be removed and the site is proposed to be allocated for comprehensive mixed-use development of the site which could include taller buildings under Allocation NS 66: Marlborough Grove and St James's Road.

Within the Draft London Plan (2017) the GLA has identified Old Kent Road as an Opportunity Area which will directly benefit from the proposed Bakerloo Line Extension.

We are aware that the Draft Old Kent Road Area Action Plan is currently out for consultation, which provides more detail in relation to the policies and masterplan requirements specific to the Old Kent Road area and the site. The site is the largest ownership within the OKR 11 masterplan within Sub Area 2 of the AAP (Cantium Retail Park and Marlborough Grove). We will be providing separate representations on this document.

#### Draft Old Kent Road Area Action Plan (2017) Requirements

There are a number of policies and requirements within the Draft Area Action Plan (2017) that apply for OKR 11 which also encompasses a number of other landownerships. These include:

- ¾ Replace existing employment floorspace (B use class) and provide a range of employment spaces which is consistent with the building and land use types shown in Figure SA2.3; and
- ¾ Provide retail space (A class use) and activate frontages on Old Kent Road through provision of retail (A use class), business (B use class) or community uses (D use class); and
- ¾ Provide housing; and
- ¾ Provide land for closing the central part of Marlborough Grove and re-

landscaping it as a green space, for use of the Phoenix Primary School and surrounding neighbourhoods; and

¼ Provide a new park between the Selco and Six Bridges estate sites; and

¼ Provide on-site servicing.

OKR11 is stated as having a development capacity of 1,012 homes and 900 jobs. Royal London's site is the largest site within this allocation and forms the majority of the allocation.

In terms of building typologies and land use, Figure SA2.3 of the Draft AAP shows that majority of the site is identified for a mixed-use development with a focus on storage, wholesale, distribution, depots (Class B1c, B8 and sui generis depot uses). As such the Six Bridges Estate will need to demonstrate considerable innovation in relation to the mixing of industrial and residential uses which has not been achieved in London before. This is likely to be challenging and complex to deliver in relation to a range of factors such as design, servicing, managing issues of amenity, phasing and viability. There are considerable risks and uncertainties for the owners of such sites. As such throughout these representations and forthcoming representations to the Old Kent Road Area Action Plan we request as much flexibility as possible with respect to a range of planning considerations to ensure that the site can be deliverable going forwards.

Within the tall buildings strategy for the Old Kent Road, two tall buildings are identified for the site.

#### SOUTHWARK PLAN CONSULTATION

Proposals Map – Strategic Industrial Land Designation

As part of the revised Proposals Map which has been published alongside the New Southwark Plan consultation, Royal London strongly support the removal of the Strategic Industrial Land designation in order to facilitate mixed use development and deliver a range of benefits in line with the aspirations of the Draft Old Kent Road Area Action Plan.

<p>Organisation: Six Bridges Estate NSPPSV163.2</p> <p>Allocation NS 66: Marlborough Grove and St James's Road</p> <p>Allocations are set out within the NSP document. Allocation NS 66 covers the area within which the Six Bridges Estate is located along with a range of other landownerships. The allocation includes a range of uses and supports comprehensive mixed-use development of the site which could include taller buildings. As the largest landowner within this allocation, Royal London strongly supports the allocation of the site and the potential for taller buildings. More details on the masterplan and detailed policies for this area are provided within the AAP. Royal London will comment on these details within representations to the Draft AAP.</p>	<p>Support noted.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.10</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>Due to the complexities of wastewater 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 wastewater infrastructure. To enable us to provide more specific comments</p>	<p>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.</p>

<p>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 Southwark Council to discuss the wastewater infrastructure needs relating to the Local Plan.</p>	
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p><b>NSP67: Sandgate Street and Verney Road</b></p>	
<p>Organisation: GL Hearn NSPPSV17.1</p> <p>Employment/Strategic Industrial Land</p> <p>As a future applicant within the area, our client is wholly supportive of Policy AV.12 and the Old Kent Road Site Allocation NSP67, relating to Sandgate Street and Verney Road.</p> <p>However, it is recognised that Policy 2.17 of the current London Plan (2016) identifies Strategic Industrial Locations (SIL) as London’s main reservoirs of industrial and related capacity. The Old Kent Road is identified as SIL, specifically as a Preferred Industrial Location (PIL), which are particularly suitable for industrial uses, logistics, waste management and recycling, utilities, wholesale markets and some transport functions.</p> <p>However, the Policy also allows for the “strategic coordination of SIL consolidation through an opportunity area planning framework or borough development plan”. Whilst it is presumed that this is the process that is being undertaken by Southwark, this is not explained within the NSP. Of concern is that the New London Plan (published after that of the NSP PSV) and its draft Policy E5 relating to Strategic Industrial Locations, continues to identify the Old Kent Road area as a Strategic Industrial Location.</p>	<p>Support noted.</p> <p>Point one, this site is now proposed for mixed use development. Part of the site should be intensified as SIL.. 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 can be viewed on our website.</p> <p>Point two, it should be acknowledged that each version of the NSP has been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>

<p>It is understood that there have been discussions with the GLA on the de-designation of areas of the SIL within the OKRAAP, but this needs to be clarified and established within the NSP as well as the OKRAAP.</p>	
<p>Individual NSPPSV40.36</p> <p>The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p>Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p>Organisation: Elephant Amenity Network NSPPSV57.30</p> <p>The following sites have industrial accommodation as an existing use, but this is not included in the site allocation. For the Plan to be sound, these sites should include a defined minimum amount of industrial accommodation. Where these sites include Strategic Protected Industrial Land and Locally Significant Industrial Sites, this use should be retained.</p>	<p>Representation noted. These sites (with the exception of NSP13 which is now proposed as SPIL) are non-designated industrial sites. Some do not provide industrial accommodation at the moment as they are retail sites. 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>
<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91.9 and NSPPSV128.9</p>	

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.

Representation noted. There is currently 83ha of protected industrial land in Southwark (64ha is strategic and 19ha is local). We are proposing to retain 32ha of SPIL in Southwark (strategic) which includes the designation of 2 new sites for SPIL which were previously undesignated (Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate). These sites are suitable for industrial uses only (Policy P25) including potential for intensification at the South Bermondsey diveunder site. In addition and following agreement with the GLA on our industrial strategy, we have designated 20ha of LSIS at Mandela Way, Ossory Road and Hatcham Road. The NSP site allocations have been amended and these sites will accommodate mixed use including a requirement for industrial uses as part of that mix, in accordance with New London Plan draft policy. In total we will retain 52ha of industrial land either as SPIL or LSIS in Southwark. The majority of the boroughs industrial land is situated in the Old Kent Road which is also designated as an opportunity area in the London Plan and will deliver significant change and benefits to the area including the Bakerloo Line extension. As such we have agreed the release of sites in the Old Kent Road from SPIL with the GLA to accommodate growth as part of mixed use development. Whilst the industrial land designation will no longer apply, our policies require full reprovion of employment (B class) floorspace on all of these sites and will follow the economy strategy in the Old Kent Road AAP requiring a wide range of employment uses including industrial. Planning applications approved in the OKR are providing B1c (light industrial uses) in mixed use developments. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites.

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 reprovion of employment (B class) uses where sites are located in opportunity areas, town centres or it is specified in a site allocation. Policy P25: Strategic and protected industrial land sets out more

	<p>specific requirements for SPIL sites. Development must comply with guidance in the Old Kent Road AAP.</p>
<p>Individual NSPPSV92.2</p> <p>The NSP is not sound because it has not included the participation of the local community, that is the residents of Canal Grove SE15 (a row of listed cottages) other than a letter dated 7 February from the Council referring residents to the website and with an enclosed site map.</p>	<p>Representation noted. The NSP has been consulted on in compliance with statutory requirements. Site allocations have been through rigorous amendments with the support of input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan. It should be acknowledged that Southwark Council's SCI is currently in the process of being updated and improvements to our ways of communicating with residents shall be a key focal point of this. Consultation has been ongoing with community groups and residents as part of the Old Kent Road AAP.</p>
<p>Individual NSPPSV92.6</p> <p>The NSP Annexe states that the number of storeys and locations of tall buildings will be monitored and 'a selection will be reviewed' to make sure that they 'avoid unacceptable harm to heritage assets and their settings' but they have not demonstrated how this will be overseen and what positive action the Council will take to make sure heritage assets are protected.</p> <p>Adjacent sites to Canal Grove are NSP 65, 66 and 68 all of which can consider the inclusion of tall buildings subject to consideration of impacts on existing character, heritage and townscape. There is no evidence of how the cumulative impact of such developments on Canal Grove will be monitored.</p> <p>To make this policy sound, an additional point should be added at P16:</p> <p>3. When development is proposed affecting listed buildings and/or structures, a detailed consultation plan, including appropriate specialist assessments and with extended timelines for appraisal, should be presented with planning</p>	<p>Tall buildings are proposed as part of the overall tall buildings strategy in the OKR AAP and will take into account local character and townscape. P14 Tall Buildings provides overarching guidance for taller buildings along with the tall buildings strategy in the Old Kent Road AAP. The London View Management Framework alongside policy P19: Borough Views protect important Borough and Strategic London views. Heritage assets, like the buildings of architectural and historic interest and the buildings of townscape merit in OKR have been added to the site allocations maps.</p>

applications. The cumulative impact of adjoining developments (massing, density and height) on listed buildings must be taken into account when individual planning applications are considered.

Organisation: L&G  
NSPPSV104.1

LAND AT 585-589 OLD KENT ROAD, LONDON, SE15 1LA

We submit on behalf of our client, Legal & General Assurance Society Ltd ('L&G' hereafter), a representation in response to your consultation on the representations in response to your consultation on the New Southwark Plan (Proposed Submission Version published November 2017), herein referred as the NSP.

Consultation closes on 27 February 2018. CBRE Limited ('CBRE' hereafter) act as planning advisors with respect to land on the corner of Old Kent Road and Rotherhithe New Road (referred to as 'The Site' hereafter) shown within the Location Plan attached in Appendix A.

The Site currently comprises a modern retail warehouse unit (Use Class A1) currently occupied by Currys PC World with associated car parking, which fronts Old Kent Road.

L&G welcomes the opportunity to engage with Southwark Council in respect of its emerging policies in the Old Kent Road Opportunity Area and specifically the publication of the New Southwark Plan with respect to their site. In addition to these representations, representations will be issued as part of the Draft Old Kent Road Area Action Plan consultation which closes on the 21st March 2018.

As you will be aware, we have already met with Officers to discuss the emerging Old Kent Road Area Action Plan and to discuss the emerging development plans and principles surrounding the redevelopment of the site.

Support noted.

We would welcome further engagement with the Council regarding the future of the site.

#### Site Location and Description

The Site currently comprises modern retail warehouse units and associated car parking as shown in the enclosed site location plan. The site area comprises 0.55 hectare. The site fronts Old Kent Road, with modern industrial warehouse buildings and hardstanding located to the north.

The adjoining sites, consist of a modern warehouse building used for storage with associated hardstanding service yard to the north, a small 3 storey building currently used as a dentist surgery and a modern retail warehouse with associated car parking to the east. To the west are parking areas and the Selco builders' warehouse.

In addition to the north is a large electrical substation building situated on Verney Road. At 399 Rotherhithe New Road to the north of the site a residential led mixed use scheme is under construction. This consists of a part 6, part 19 storey building comprising of a primary school and 158 residential dwellings. A planning application has also been submitted for 6-10 Verney Road for mixed use redevelopment which comprises three tall buildings of 23, 18 and 17 storeys as well as lower elements comprising 340 residential units, A1 retail use (197.18 m2 GEA), B1 office use/workspace (4435 m2 GEA), D1 community use (394 m2 GEA) as well as a section of the Surrey Canal Linear Park.

Whilst the area as a whole is currently characterised by large retail and industrial sheds with parcels of land dominated by areas of hard standing in the form of surface car parking and service yards, there is a changing emerging context. Strategic masterplans as part of the emerging Old Kent Road Area Action Plan will see much of the surrounding area coming forward for mixed use redevelopment including masterplan OKR 10 to the south and

masterplan OKR 11 to the west. A number of planning applications are now coming forward within these masterplan areas.

#### Draft Old Kent Road Area Action Plan (2017) Requirements

The site falls within the allocation OKR 13 within the Draft AAP within Sub Area 3 Sandgate Street, Verney Road and Old Kent Road. Within the Draft AAP for OKR 13 indicative capacity is identified for 3,680 homes and 2,820 jobs.

Key requirements set out for the site within OKR 13 that relate to the site are as follows:

- ¼ Replace existing retail space (A class use) and activate frontages on Old Kent Road through provision of retail (A use class), business (B use class) or community uses (D use class); and
- ¼ Provide housing; and ¼ Provide a new park on the alignment of the former Surrey Canal.

Within the tall buildings strategy within the AAP (Figure 9) a Tier 1 tall building is identified for the site (above 30 storeys). In terms of land use the site is identified for mixed use redevelopment within the 'high street' typology where new retail use is to be provided below residential flats or office uses.

The masterplan shows the Surrey Canal Linear Park cutting through the centre of the site which reduces to the developable area to approximately 75% of the site area and restricts the potential building footprints of any redevelopment proposal.

#### REPRESENTATIONS

##### Allocation NSP67: Sandgate Street and Verney Road

The site forms part of this wider allocation for mixed use redevelopment, which in turn forms allocation OKR 13 within the Draft Old Kent Road AAP masterplan. Our client strongly

<p>supports the allocation of the site under allocation NSP67.</p>	
<p>Organisation: National Grid NSPPSV123.2</p> <p>Southwark Council: New Southwark Plan Proposed Submission Version SUBMISSION ON BEHALF OF NATIONAL GRID National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operates the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p>Specific Comments - Proposed sites crossed or in close proximity to National Grid infrastructure: Electricity Transmission</p>	<p>Representation noted. Applicants will be advised to consult National Grid and 'A Sense of Place' when considering the redevelopment of any site that is in proximity of overhead lines. Where National Grid has a Deed of Easement on an asset, a developer will be required to obtain permission before any works commence within the National Grid easement strip and a deed of consent for any development that crosses the easement.</p>

- Land bounded by Glengall Road, Latona Road and Old Kent Road (NSP65) (our reference ET174)
- Sandgate Street and Verney Road (NSP67) (our reference ET174)
- Hatcham Road and Penarth Street (NSP69) (our reference ET174)
- Ilderton Road (NSP70) (our reference ET174)

Please see enclosed plan referenced ET174 at Appendix 1. The proposed Residential and Employment sites are crossed by a National Grid underground cables. National Grid prefers that buildings are not built directly above underground cables. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to underground cables.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.

Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government.

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

'A Sense of Place' is available from National Grid and can be viewed at:

<http://www.nationalgrid.com/uk/Senseofplace/Download/>

Further information regarding development near overhead lines and substations is available here:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohlfinal/pdf/brochure.htm>

General information:

Electricity Transmission

National Grid has five high voltage underground cables (listed below) within Southwark LBC's administrative area. These form an essential part of the electricity transmission network in England and Wales.

Line Ref. Description

Underground  
cable

265886

Underground  
cable

265670

Underground  
cable

270540

Underground  
cable

262792

Underground  
cable

270530

National Grid has provided information in relation to electricity transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

The following substation is also located within the administrative area of Southwark LBC's

NewX2B substation – 275kV

National Grid has provided information in relation to gas transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

National Grid requests that any High Pressure Major Accident Hazard Pipelines (MAHP) are taken into

account when site options are developed in more detail. These pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to retain our existing transmission pipelines in situ.

National Grid may have a Deed of Easement for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the easement. In the first instance please consider checking with the Land Registry for the development area. If further information is required in relation to an easement please contact

If you require any further information in relation to the above please contact National Grid's Plant Protection team via

#### Electricity Distribution

UK Power Networks owns and operates the local electricity distribution network in Southwark LBC.

Contact details can be found at [www.energynetworks.org.uk](http://www.energynetworks.org.uk).

#### Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides maps of the sites referenced above in relation to the affected National Grid

Transmission assets outlined above.

#### Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:

- National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy;
- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and
- A sense of place - design guidelines for development near high voltage overhead lines.
- T/SP/SSW22 – Specification for safe working in the vicinity of National Grid high pressure gas pipelines and associated installations – requirements for third parties.  
<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968>
- IGE/SR/18 – Safe working practices to ensure the integrity of gas pipelines

<p>and associated installations.</p> <ul style="list-style-type: none"> <li>▪ HS(G)47 – Avoiding Danger from Underground Services.</li> </ul> <p>Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.</p>	
<p>Organisation: TfL City Planning NSPPSV181.28</p> <p>The possibility that this is a potential site for a Bakerloo line extension station should be acknowledged (see also general comments on site allocations, above)</p>	<p>The potential locations of the BLE stations have been updated according to the most recent consultation which is recognised in the relevant site allocations. NSP 68 (760 and 812 Old Kent Road (Toysrus store) and 840 Old Kent Road (Aldi Store)) has been updated to state - the site has the potential to host a new underground station as part of the Bakerloo Line extension. The station, worksite and tunnelling requirements will need to be incorporated into the site design.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.78</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>Due to the complexities of wastewater 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 wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for</p>	<p>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.</p>

<p>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 Southwark Council to discuss the wastewater infrastructure needs relating to the Local Plan.</p>	
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p><b>NSP68: Devon Street and Sylvan Grove</b></p>	
<p>Individual NSPPSV31.8</p> <p>Internal inconsistency and inconsistent with New London Plan Policy HC1 Heritage conservation and growth</p> <p>The following should be mentioned in the design requirements:</p> <ol style="list-style-type: none"> <li>1. Contains low rise listed housing (formerly canal side) which will be overwhelmed by tall buildings. See P14, 2.2 Respond positively to local character and townscape; and 2.6 Avoid unacceptable harm to the significance of designated heritage assets or their settings ...</li> <li>2. The linear park will run next to a new school which has inadequate play space. A linear park may not provide the kind of space which will be useful for children’s play but merely act as a transport (cycle) route as has happened with the Surrey Canal Walk. See P11 and P13</li> <li>3. Area includes a Victorian gasholder which should be listed as a historical asset. See P18 and AV.12.1. The gasholder can be seen very clearly in the photo for NSP68 forming a group with another gas holder which has been listed. This is part of the South Metropolitan Gas Works which should be conserved in accordance with London Plan Policy HC1 “utilising the heritage significance of a site or area in the planning and design process. This is part of the industrial heritage of the Old Kent Road and should be part of the assets left and enhanced in the area including the Livesey Museum and Camberwell Christ Church.</li> </ol>	<p>Representation noted. Point 1, tall buildings are proposed as part of the overall tall buildings strategy in the Old Kent Road AAP and will take into account local character and townscape. Point 2, the Surrey Canal linear park will link neighbourhoods to Burgess Park, Canada Water and Deptford. On either side of the corridor will be outdoor green rooms, each with their own character, and suited to being play space. Point 3, the largest gasholder has been listed, the remaining two have been demolished.</p>

<p>Individual NSPPSV31.9</p> <p>Internal inconsistency and inconsistent with New London Plan Policy HC1 Heritage conservation and growth</p> <p>The gasholder has been listed. This is part of the South Metropolitan Gas Works which should be conserved in accordance with London Plan Policy HC1 “utilising the heritage significance of a site or area in the planning and design process. This is part of the industrial heritage of the Old Kent Road and should be part of the assets left and enhanced in the area including the Livesey Museum and Camberwell Christ Church.</p>	<p>Noted. The Livesey Museum and Camberwell Christ Church sit outside of the site allocation boundary. Listed buildings are marked on site vision diagrams, and policies, listed buildings, conservation areas, and local lists will apply.</p>
<p>Individual NSPPSV40.37</p> <p>The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p>Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p>Organisation: Elephant Amenity Network NSPPSV57.31</p> <p>The following sites have industrial accommodation as an existing use, but this is not included in the site allocation. For the Plan to be sound, these sites should include a defined minimum amount of industrial accommodation. Where these sites include Strategic Protected Industrial Land and Locally Significant Industrial Sites, this use should be retained.</p>	<p>Representation noted. These sites are not currently designated as strategic industrial sites in Southwark. We have designated further parcels of industrial land at Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate, which covers some of the railway viaducts in Bermondsey. The other sites suggested are all sites proposed for redevelopment in the NSP therefore expected to deliver housing to help meet the future housing needs of the borough. Nevertheless mixed use would be expected on the majority of these sites where these are specified in particular site allocations or they fall within the requirements of re-provision as per P26. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites. Development must comply with guidance in the Old Kent Road</p>

	AAP.
<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91.12 and NSPPSV128.12</p> <p>Objection 10.</p> <p>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.</p>	<p>Representation noted. There is currently 83ha of protected industrial land in Southwark (64ha is strategic and 19ha is local). We are proposing to retain 32ha of SPIL in Southwark (strategic) which includes the designation of 2 new sites for SPIL which were previously undesignated (Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate). These sites are suitable for industrial uses only (Policy P25) including potential for intensification at the South Bermondsey diveunder site. In addition and following agreement with the GLA on our industrial strategy, we have designated 20ha of LSIS at Mandela Way, Ossory Road and Hatcham Road. The NSP site allocations have been amended and these sites will accommodate mixed use including a requirement for industrial uses as part of that mix, in accordance with New London Plan draft policy. In total we will retain 52ha of industrial land either as SPIL or LSIS in Southwark. The majority of the boroughs industrial land is situated in the Old Kent Road which is also designated as an opportunity area in the London Plan and will deliver significant change and benefits to the area including the Bakerloo Line extension. As such we have agreed the release of sites in the Old Kent Road from SPIL with the GLA to accommodate growth as part of mixed use development. Whilst the industrial land designation will no longer apply, our policies require full re-provision of employment (B class) floorspace on all of these sites and will follow the economy strategy in the Old Kent Road AAP requiring a wide range of employment uses including industrial. Planning applications approved in the OKR are providing B1c (light industrial uses) in mixed use developments. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites.</p> <p>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</p>

	<p>located in opportunity areas, town centres or it is specified in a site allocation. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites. Development must comply with guidance in the Old Kent Road AAP.</p>
<p>Organisation: Safestore Plc (Safestore) NSPPSV157.1</p> <p>We write on behalf of our client, Safestore Plc (Safestore), to submit representations to your consultation on the New Southwark Plan Proposed Submission Version December 2017 (NSP).</p> <p>At a national level, the NPPF supports a presumption in favour of sustainable development, and it is noted that local plans are prepared positively and are instructed to not be onerous or place restrictive requirements that could stifle investment and regeneration opportunities.</p> <p>With this in mind, we have the following comments relating to the proposed policies within the NSP which are discussed in detail below. We look forward to engaging with you further in relation to the proposed NSP in the future.</p> <p>Background</p> <p>Safestore are the UK's largest provider of self-storage solutions and operate two employment sites within the London Borough of Southwark (LBS) :</p> <ul style="list-style-type: none"> <li>• 737 Old Kent Road</li> <li>• 24 Old Jamaica Road</li> </ul> <p>This letter of representation focuses on the specific site allocations which include the Safestore self-storage facilities which are located at 737 Old Kent Road, and under the railway arches at 24 Old Jamaica Road.</p> <p>Safestore operates over 100 stores across the UK, with 40 located within the M25. Safestore self-storage provides an essential service to local and national</p>	<p>Representation noted. See policy 18: Business relocation for further details on this issue. NSP13 has been deleted as a site allocation and is proposed as SPIL.</p>

businesses plus residents. Many businesses rely on Safestore as a viable and cost effective place from which to operate and/or use for storage. Safestore suggest given the importance of the product to the local business and residential population LBS should be seeking to retain or re-provide such uses in their existing locations. Our Client's priority is to retain the operation of their existing use at their sites, they are however willing to consider the possibility of mixed use development where appropriate, subject to their existing use being retained or re-provided.

On behalf of Safestore, we have engaged continually in the Old Kent Road AAP consultation process with LBS, and look forward to the opportunity to submit further representations in March to the revised Old Kent Road Area Action Plan Proposed New and Amended AAP Policies June 2017 (OKR AAP). The representation letter below focuses specifically on the proposed NSP. Proposed Site Allocation NSP68: Devon Street and Sylvan Grove

Safestore's self-storage facilities at 737 Old Kent Road are located within part of the proposed Old Kent Road Site Allocation NSP68: Devon Street and Sylvan Grove on pages 294 and 295 of the proposed NSP.

We note that the proposed site allocation states that:

"The site falls within the Old Kent Road Opportunity Area. Further details regarding development of this area will be provided through the Old Kent Road Area Action Plan. Development in the opportunity area will need to demonstrate that the site responds positively to the objectives of the AAP and provides the appropriate facilities for health care, education and leisure facilities as well as community, energy and transport infrastructure."

In response to the proposed site allocation NSP68 which notes further details will be provided through the Old Kent Road Area Action Plan which is currently out for consultation, we will provide a detailed response to the proposals for the site and wider area through representations to the OKR AAP.

In relation to these NSP representations, we note that the 'design and

accessibility guidance' section of the proposed site allocation NSP68 states that:

“Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.”

As we have previously discussed with LBS, our client is willing to consider exploring Southwark’s vision for comprehensive mixed use redevelopment at the site including the potential for tall buildings. The store has been an essential service in the area for 30 years and has consistently performed well, underlining its importance to the local population, and therefore as part of any redevelopment proposals Safestore would seek to continue their existing operation.

Proposed Site Allocation NSP13: Old Jamaica Road Business Estate  
Safestore’s operational business at 24 Old Jamaica Road is located under the railway arches within part of the proposed Bermondsey Site Allocation NSP13: Old Jamaica Road Business Estate detailed on pages 134 and 135 of the proposed NSP.

The site vision sets out that:

“Redevelopment of the site must:

- Provide business and industrial space (B class) of at least the existing level of provision.

Redevelopment of the site may:

- Provide new homes (C3)”

The Bermondsey Area Vision notes Jamaica Road as an employment cluster, and our client supports Southwark’s proposals within NSP13 to ensure that at least existing levels of business and industrial space (B class uses) are re-provided as part of any redevelopment proposals, incorporating existing

businesses where possible.

### Railway Arches

We note that proposed policy P27:Railway Arches states that:

“development within railway arches must provide commercial activities including business uses (B Use Classes), town centre uses (A1, A2, A3 and A4 Use Classes) and community facilities (D Use Classes and sui generis).”

Safestore support the ambition of this proposed policy to provide continued active and viable use of railway arches for commercial purposes, incorporating existing uses where possible.

### Employment

We note that proposed policy SP4: Strong Local Economy seeks to ensure that Southwark retain the industrial premises London needs, and Safestore support the retention of the existing B8 uses as part of the Old Jamaica Road Business Estate.

Proposed policy P25: Office and business development notes that:

“...where specified in site allocations development must:

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

1.2 Promote the successful integration of homes and employment space in physical layout and

servicing in areas that will accommodate mixed use development. This will include a range of

employment spaces including freight, logistics, light industry, co-working, maker spaces and offices...”

Safestore support Southwark’s ambition to retain or increase employment floorspace including B class uses to contribute to a strong local economy.

LBS seek the promotion of successful integration between homes and employment space, and to achieve this aim, we note that provisions need to

be made to ensure existing employment uses retain the ability to function efficiently.

We note that the proposed NSP13 states that residential uses may be provided as part of redevelopment of the site. The successful integration of existing employment space with residential uses requires considered design and management to ensure that the existing employment functions can continue to operate efficiently and viably, and would not be comprised by the introduction of residential uses.

#### Examination in Public

On behalf of our client we request that we attend and speak at the oral section of the Examination in Public. We would be grateful if you can provide written acknowledgment of receipt of these representations, and if you could keep us updated on the anticipated date for the Examination in Public, and on the progress of the New Southwark Plan.

We look forward to future opportunities to engage with you - if you have any queries or would like to discuss anything further, please do contact

Organisation: Thames Water Utilities Ltd  
NSPPSV184.79

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

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.

discuss the water infrastructure needs relating to the Local Plan.

Due to the complexities of wastewater 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 wastewater infrastructure. 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 Southwark Council to discuss the wastewater infrastructure needs relating to the Local Plan.

Organisation: Scotia Gas Networks  
NSPPSV225.1

#### Old Kent Road Gas Holder Site

The site contains three gasholders known as nos. 10, 12 & 13 and is located in a mixed use location with good public transport connections (PTAL rating of 3). In June 2017, gasholder no. 13 was Grade II listed. A site boundary plan of SGN's land ownership can be found at Document 1.

The site is within the Old Kent Road Opportunity Area, and is strategic both in terms of its proximity to the aspired location for the new station for the extension to the Bakerloo Line which SGN fully supports, but also in terms of its location with regards to adjacent development that is coming forward and the extent of its Hazardous Substances Consent (HSC).

The extent of the HSC is set out in Figure 1 below. Within these consultation zones, depending on the distance from the hazardous installation, certain types of development will not be acceptable to the Health and Safety Executive by virtue of its risk profile (e.g. new residential development would not typically be acceptable within the inner consultation zone and would be

Noted. This site falls within the Old Kent Road Opportunity Area and further details regarding development of this area will be provided in the OKR AAP. Part of the gasworks site is retained as SPIL where there are utilities functions. Part of the site is appropriate for mixed use redevelopment and forms part of the Old Kent Road Frontage. In the OKR AAP it is allocated as a public open space around gasholder 13.

limited within the middle zone).

Positively, the HSC can be revoked once SGN are certain that there are no longer operational requirements for the site (including green energy initiatives) and where they have clarity that an alternative use is acceptable in a form and function which viably funds decommissioning and remediation works, requirements established by the adopted London Plan. By virtue of releasing the constraints of the Hazardous Substances Consent, substantial benefits to the wider area can be realised including new homes, economic, environmental and community benefits, place making and extensive public realm improvements.

Adopted London Plan (March 2016) and New Draft London Plan (March 2018) SGN has worked extensively with the Mayor of London to ensure that the policy framework established by the London Plan encourages development of their sites in a positive and proactive manner.

The adopted London Plan (March 2016) reflects these discussions and explicitly recognises at policy 5.22 (Hazardous Substances and Installations) that land use allocations across hazardous installation sites such as gasholder sites must take into account the need to “incentivise” and “fund” decommissioning. This means planning for land use allocations that are viable and higher value.

The Mayor has published a draft new London Plan which was out for consultation from the 1st December to the 2nd March 2018. The Draft Plan provides the strategic framework for land use planning in Greater London for the period 2019-2041 and is a material consideration. The New Southwark Plan will need to be in general conformity with the London Plan and the draft. Currently it is not.

Surplus utility sites are one of six strategic sources of housing supply which will enable the Mayor to double his completion rates. The Strategic Housing

Land Availability Assessment (SHLAA) which forms part of the evidence base for the draft London Plan, relies upon them for its 10 year housing target and they are distinguished from other categories of sites such as industrial sites planned for release under draft London Policies E4, E5, E6 and E7. Paragraph 6.4.5 of draft Policy E4 excludes surplus utility sites from the “no net loss of floorspace” test.

The draft Plan recognises the opportunities that exist for “innovations” within Strategic Infrastructure Land (SIL) to make more effective use of land in SILs. Boroughs should take into account the potential to rationalise SILs. In particular land that is not in industrial and related uses “or” land that contains “surplus utilities sites” should be considered for release (paragraph 6.5.3):-

“Innovations to make more effective use of land in SILs are encouraged and should be explored in Local Plan reviews and Opportunity Area Planning Frameworks. This includes collaborative working with other planning authorities in the relevant property market areas including authorities in the Wider South East (see also Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function). This should take into account the potential to rationalise areas of SIL that are currently in non-industrial and related uses or contain transport or utilities uses which are surplus to requirements.”

The adopted National Planning Policy Framework (NPPF), published in March 2012, provides further support to the London Plan policies and its draft. It seeks to avoid an unhealthy role over of employment land allocations and recognises the clear need for viable developments to come forward to avoid stymieing brownfield development sites.

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In particular, Paragraph 22 states that:

“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used

<p>for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”</p> <p>It would therefore seem perverse to include a surplus utility site within a SIL contrary to London Plan Policy 5.22, draft London plan paragraph 6.5.3 and NPPF paragraph 22. As the draft Plan makes these important distinctions so should the New Southwark Plan and its proposal map.</p>	
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p>NSP71: 760 and 812 Old Kent Road (Toyrus store)</p>	
<p>Individual NSPPSV40.40</p> <p>The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p>Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p>Organisation: Elephant Amenity Network NSPPSV57.33</p> <p>The following sites have industrial accommodation as an existing use, but this is not included in the site allocation. For the Plan to be sound, these sites should include a defined minimum amount of industrial accommodation. Where these sites include Strategic Protected Industrial Land and Locally Significant Industrial Sites, this use should be retained.</p>	<p>Representation noted. These sites are not currently designated as strategic industrial sites in Southwark. We have designated further parcels of industrial land at Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate, which covers some of the railway viaducts in Bermondsey. The other sites suggested are all sites proposed for redevelopment in the NSP therefore expected to deliver housing to help meet the future housing needs of the borough. Nevertheless mixed use would be expected on the majority of these sites where these are specified in particular site allocations or they fall within the requirements of re-provision as per P26. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites. Development must comply with guidance in the Old Kent Road AAP.</p>

Organisation: Vital OKR

NSPPSV205

Individuals

NSPPSV91.31 and NSPPSV128.31

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 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.

Representation noted. There is currently 83ha of protected industrial land in Southwark (64ha is strategic and 19ha is local). We are proposing to retain 32ha of SPIL in Southwark (strategic) which includes the designation of 2 new sites for SPIL which were previously undesignated (Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate). These sites are suitable for industrial uses only (Policy P25) including potential for intensification at the South Bermondsey diveunder site. In addition and following agreement with the GLA on our industrial strategy, we have designated 20ha of LSIS at Mandela Way, Ossory Road and Hatcham Road. The NSP site allocations have been amended and these sites will accommodate mixed use including a requirement for industrial uses as part of that mix, in accordance with New London Plan draft policy. In total we will retain 52ha of industrial land either as SPIL or LSIS in Southwark. The majority of the boroughs industrial land is situated in the Old Kent Road which is also designated as an opportunity area in the London Plan and will deliver significant change and benefits to the area including the Bakerloo Line extension. As such we have agreed the release of sites in the Old Kent Road from SPIL with the GLA to accommodate growth as part of mixed use development. Whilst the industrial land designation will no longer apply, our policies require full reprovion of employment (B class) floorspace on all of these sites and will follow the economy strategy in the Old Kent Road AAP requiring a wide range of employment uses including industrial. Planning applications approved in the OKR are providing B1c (light industrial uses) in mixed use developments. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites.

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 reprovion of employment (B class) uses where sites are located in opportunity areas, town centres or it is specified in a site allocation. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites. Development must comply with

<p>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 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 <b>before the commencement of new development.</b></p>	<p>guidance in the Old Kent Road AAP.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.13</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>Due to the complexities of wastewater networks the level of information</p>	<p>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.</p>

<p>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 wastewater infrastructure. 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 Southwark Council to discuss the wastewater infrastructure needs relating to the Local Plan.</p>	
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p><a href="#">NSP72: 840 Old Kent Road (Aldi store)</a></p>	
<p>Individual NSPPSV40.41</p> <p>The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p>Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.14</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>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.</p>

<p>Due to the complexities of wastewater 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 wastewater infrastructure. 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 Southwark Council to discuss the wastewater infrastructure needs relating to the Local Plan.</p>	
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p>NSP73: 684-698 Old Kent Road (Kwikfit garage)</p>	
<p>Individual NSPPSV40.42</p> <p>The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p>Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p>Organisation: Elephant Amenity Network NSPPSV57.34</p> <p>The following sites have industrial accommodation as an existing use, but this is not included in the site allocation. For the Plan to be sound, these sites should include a defined minimum amount of industrial accommodation. Where these sites include Strategic Protected Industrial Land and Locally Significant Industrial Sites, this use should be retained.</p>	<p>Representation noted. These sites are not currently designated as strategic industrial sites in Southwark. We have designated further parcels of industrial land at Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate, which covers some of the railway viaducts in Bermondsey. The other sites suggested are all sites proposed for redevelopment in the NSP therefore expected to deliver housing to help meet the future housing needs of the borough. Nevertheless mixed use would be expected on the majority of these sites where these are specified in particular site allocations or they fall within the requirements of re-provision as per P26. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites. Development must comply with guidance in the Old Kent Road AAP.</p>

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91.32 and NSPPSV128.32

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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

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regard to the impact on business supply chains and access to labour supply. Relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.

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

Organisation: Thames Water Utilities Ltd  
NSPPSV184.15

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

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.

<p>discuss the water infrastructure needs relating to the Local Plan.</p> <p>Due to the complexities of wastewater 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 wastewater infrastructure. 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 Southwark Council to discuss the wastewater infrastructure needs relating to the Local Plan.</p>	
Representation	Officer Response
<p><a href="#">NSP74: 636 Old Kent Road</a></p> <p>Individual NSPPSV40.43</p> <p>The proposals for redevelopment of the following sites are not justified because the views of the local residents have not been fully considered and taken into account. I can expand on this at the oral examination.</p>	<p>Representation noted. The site allocations have been carefully considered and consulted upon. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF &amp; London Plan.</p>
<p>Organisation: Elephant Amenity Network NSPPSV57.35</p> <p>The following sites have industrial accommodation as an existing use, but this is not included in the site allocation. For the Plan to be sound, these sites should include a defined minimum amount of industrial accommodation. Where these sites include Strategic Protected Industrial Land and Locally Significant Industrial Sites, this use should be retained.</p>	<p>Representation noted.. These sites are not currently designated as strategic industrial sites in Southwark. We have designated further parcels of industrial land at Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate, which covers some of the railway viaducts in Bermondsey. The other sites suggested are all sites proposed for redevelopment in the NSP therefore expected to deliver housing to help meet the future housing needs of the borough. Nevertheless mixed use would be expected on the majority of these sites where these are specified in particular site allocations or they fall within the requirements of re-provision as per P26. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites. Development must comply with guidance in the Old Kent Road</p>

<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91.33 and NSPPSV128.33</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</p>	<p>AAP.</p> <p>Representation noted. There is currently 83ha of protected industrial land in Southwark (64ha is strategic and 19ha is local). We are proposing to retain 32ha of SPIL in Southwark (strategic) which includes the designation of 2 new sites for SPIL which were previously undesignated (Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate). These sites are suitable for industrial uses only (Policy P25) including potential for intensification at the South Bermondsey diveunder site. In addition and following agreement with the GLA on our industrial strategy, we have designated 20ha of LSIS at Mandela Way, Ossory Road and Hatcham Road. The NSP site allocations have been amended and these sites will accommodate mixed use including a requirement for industrial uses as part of that mix, in accordance with New London Plan draft policy. In total we will retain 52ha of industrial land either as SPIL or LSIS in Southwark. The majority of the boroughs industrial land is situated in the Old Kent Road which is also designated as an opportunity area in the London Plan and will deliver significant change and benefits to the area including the Bakerloo Line extension. As such we have agreed the release of sites in the Old Kent Road from SPIL with the GLA to accommodate growth as part of mixed use development. Whilst the industrial land designation will no longer apply, our policies require full reprovision of employment (B class) floorspace on all of these sites and will follow the economy strategy in the Old Kent Road AAP requiring a wide range of employment uses including industrial. Planning applications approved in the OKR are providing B1c (light industrial uses) in mixed use developments. Policy P25: Strategic and protected industrial land sets out more specific requirements for SPIL sites.</p>
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Organisation: Thames Water Utilities Ltd  
NSPPSV184.80

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

Noted. Notwithstanding the above, applicants will still be notified to consult with Thames Water.