

Representation	Officer Response
<p data-bbox="188 320 506 347">SP4 Strong Local Economy</p> <p data-bbox="188 360 338 421">Individual NSPPSV18.3</p> <p data-bbox="188 467 1066 528">Policy SP4 identifies a requirement for the delivery of 500 new affordable small business units within the Borough.</p> <p data-bbox="188 574 1106 675">The ability to accommodate these as part of a proposed development should be considered on a site-by-site basis and therefore be subject to the overall viability assessment for the scheme.</p> <p data-bbox="188 721 1106 821">Additional justification should be included at Policy SP4 to recognise that the delivery of new affordable business units should form part of a formal viability assessment.</p>	<p data-bbox="1140 467 1971 528">Policy P28 now includes a requirement for the provision of affordable workspace in developments of B class space over 500sqm.</p>
<p data-bbox="188 866 546 927">Organisation: Better Bankside NSPPSV22.4</p> <p data-bbox="188 973 1043 1034">Firstly, point number 3 of the Policy SP4 appears to have an incomplete sentence.</p> <p data-bbox="188 1080 1111 1361">Secondly, the proposed policy fails to recognise any of the Business Improvement Districts (BIDs) operating within Southwark, of which there are five. We believe this is a great shame as BIDs are playing an increasingly fundamental role in many of the public realm improvement schemes across the Borough. What's more, the security and cleaning services offered by BIDs (that are in addition to the Borough's services) help to create a more attractive, safer environment for businesses to work, helping to stimulate and grow the local economy.</p> <p data-bbox="188 1407 1025 1433">We believe it is essential that the Local Plan takes the role of BIDs into</p>	<p data-bbox="1140 973 1895 999">Noted. This will be amended and include reference to the BIDs.</p>

<p>consideration; often representing many of the needs of local businesses. We would therefore also welcome part of the policy to indicate how the Council and developers should engage and collaborate with BIDs to ensure the most appropriate design and development outcomes are achieved.</p>	
<p>Individual NSPPSV40.14</p> <p>This policy is not positively prepared because it fails to recognise the shortfall of provision across the borough of adequate spaces for street traders.</p> <p>This policy is not positively prepared because there is no provision for spaces for 'Community Kiosks' or 'Hole in the Walls'.</p> <p>Over the decades across the whole of London tens of thousands of street traders have been lost. Once the sign of busy and thriving local economies, the few that survive today face increasing and unjustified pressure, with the fear of losing their stalls and pitches through regeneration and development.</p> <p>The NSP needs to ensure these vital spaces are not lost or are got rid of and new spaces are found to ensure there is increased provision, so this type of activity is able to continue and safeguarded into the future. With fewer overheads than shops, these traders can keep the costs of their merchandise low and at reasonable enough prices for them to successfully serve the needs of the very large demographic of the hard pressed, low waged, urban poor members in our society, and in doing so make an important contribution in helping to strengthen the local economy.</p>	<p>Street traders and market stalls will be protected under Policy P38 - business relocation. Community kiosks and cash points are encouraged in town centre developments.</p>
<p>Individual NSPPSV56.3</p> <p>This strategic policy is not sound because it rests on some incorrect assumptions about the way town centres and High Streets work, the relationships between Social Regeneration and the local economy and living</p>	<p>Noted.</p>

<p>neighbourhoods, the role of industrial land in London’s economy, and the nature of work and jobs for a wide spectrum of skills and aptitudes.</p> <p>I have more detailed comments and explanations of this for a number of the policies P25 to P41 which I can expand on at the oral examination and contribute to the discussion. I will be able to make a more detailed comment in the further statement for the oral examination.</p>	
<p>Organisation: GLA NSPPSV66.3</p> <p>The Mayor welcomes the policy, which aims to deliver 500 new affordable small business units. This approach is in line with draft new London Plan Policy E2 Low-cost business space and Policy E3 Affordable workspace.</p>	<p>Support noted.</p>
<p>Organisation: Harkers Studio NSPPSV77.2</p> <p>In the last ten months, we have been running a campaign to save Harkers Studio (a purpose-built theatrical scenic studio) and to raise awareness of the loss of creative workspaces in Southwark. We appreciate that this site is rather small and doesn't match up to bigger developments near Elephant &amp; Castle. We also understand that Harkers Studio is a building that is very industry specific in this case a subsidiary to the theatre industry. However, if the consultation had included bodies such as the Walworth Society, in particular in the light of the fact that two amenity societies out of three had advised against the change of use, the understanding of the use of the building within its local economy would have been better understood and valued.</p> <p>It is worth noting that the area around Walworth has been home to a number of theatrical production making facilities over the last two centuries and we still find companies like Andy Kinghts and Stage Services within</p>	<p>Noted. Policy P38 is relevant to note in terms of protection for existing businesses.</p>

<p>walking distance from Harkers. However, these are small businesses who need support from a sound policy framework in order to carry on with their business (P26/P28) this including securing their workspaces and leases. In turn, will secure various employment opportunities for the growing population.</p>	
<p>Organisation: Historic England NSPPSV83.3</p> <p>We also welcome the reference to distinctive town centres in policy SP4, but would point out that some text appears to be missing from the end of clause 3.</p>	<p>Noted. This will be amended.</p>
<p>Individual NSPPSV86.9</p> <p>With the huge pressures on Council's to identify development sites that meet the huge reported need for more housing, especially affordable housing, the NSP includes a substantial number of prospective sites on what is currently deemed to be Industrial Land. This is inconsistent with National Planning Policy, and the opposite of the policies of The Mayor in his New London Plan which states that there should be no net loss of Industrial Land.</p> <p>That does not, of course, mean that such land could not be used more efficiently or effectively; but does mean that there must be careful consideration given to ensure that proposals properly reflect the sustainable economic needs of the borough and its residents alongside social needs.</p> <p>Work undertaken by local businesses has identified that the Council has not done this adequately, and so cannot make objective decisions on the best paths to follow. These include:</p> <ul style="list-style-type: none"> <li>• Failure to objectively assess and define the business and other development needs of Southwark;</li> </ul>	<p>Noted. Site allocations on currently designated industrial land are required to comply with design guidance for the effective mixing of industrial and residential uses.</p>

- Failure to carry out a review of land available for economic development, undertaken at the same time as, or combined with, the Strategic Housing Land Availability Assessment;
- Failure to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area;
- Failure to meet the business development needs of Southwark;
- Failure to ensure that the assessment of and strategies for housing, employment and other uses are integrated, and that full account has been taken of relevant market and economic signals;
- Failure to be aspirational but realistic, and to pay careful attention to viability and costs in plan-making and decision-taking; and define a plan that is deliverable.
- Failure to carry out early and meaningful engagement and collaboration with businesses during NSP preparation;
- Failure to effectively cooperate with neighbouring authorities to plan for issues with cross-boundary impacts.

These inadequacies would make the plan unsound; indicating that it has not been positively prepared, justified, nor will it be effective, nor is it consistent with national policy, as defined by the National Planning Policy Framework  
Suggested improvements:

This Policy is in need of urgent review in light of the lack of understanding and evidence that it needs to be based upon; and to reflect upon the Mayor's New London Plan and its requirement for no net loss of Industrial Land.

Consequent to this, the Site Allocations on Plan pages 94 to 336 need to be reviewed to ensure that Industrial Land and associated jobs are protected, especially as these jobs are most likely those employing existing local communities who would be disproportionately affected if those jobs were lost to the area.

Organisation: Vital OKR  
NSPPSV205  
individuals  
NSPPSV91, NSPPSV128

#### Objection 64

We object to failure to designate CEZ or CEZs in Southwark. Southwark have not followed guidance in the London Plan which is clearly of relevance to large areas of Bermondsey, Rotherhithe, Old Kent Road, Peckham, Walworth and Camberwell. In addition the London Plan OKR OA policy clearly signals the relevance of creative enterprise in that area, which implies that CAZ designation would be appropriate.

[London Plan Policy HC5](#) about supporting London's culture and creative industries encourages boroughs to work with the Mayor and relevant stakeholders to identify Creative Enterprise Zones in Local Plans: in areas that have emerging or existing clusters of creative industries; or in areas of identified demand and more deprived areas where there is evidence that the designation of a Creative Enterprise Zone will enhance the local economy and provide facilities and workspace for the creative industries. It then goes on to set out Local Plan policies that should be put in place for CAZs.

[London Plan para 7.5.12](#) and others explain that creative industries play an important role in London's economy and its cultural offer and as a sector, are growing at a faster rate than any other area of the economy. It is further stated that setting up a Creative Enterprise Zone can help boost the local economy of more deprived areas and support their regeneration, and that CEZs will support the provision of dedicated small industrial and creative workspaces and will seek to address issues of affordability and suitability of space for artists and creative businesses. It is indicated that Boroughs will be responsible for defining these areas in their Local Plans and developing policies to provide the workspace the industries need, and that

#### Objection 64

Southwark has proposed a CEZ for Camberwell and Peckham using the A202 between Peckham and Camberwell as the artery for the proposed zone. The proposal aimed to support Peckham's diverse, creative community and stimulate further organic growth in the creative industries in the Camberwell area. However, Southwark was unsuccessful in securing funding from the Greater London Authority (GLA) for the CEZ project. Southwark will continue to explore further opportunities to designate CEZ in the borough in accordance with the London Plan. Reference will be made in the NSP in relation to the CEZ.

CEZs should seek to protect, develop and deliver new spaces the creative industries need to produce, manufacture, design, rehearse and create cultural goods, as well as ancillary facilities where they can meet clients, network, share knowledge and showcase their work. This should include protecting existing workspace and encouraging new workspaces for the creative industries, ensuring that low-cost business space and affordable workspace is made available in accordance with Policy E2 Low-cost business space, Policy E3 Affordable workspace and Policy E8 Sector growth opportunities and clusters, and encouraging the temporary use of vacant buildings for creative uses.

[NPPF para 21](#) requires local planning authorities to support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Also to plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries, and set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period. Para 21 also instructs that investment in business should not be over-burdened by the combined requirements of planning policy expectations.

[NPPF para 157](#) states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation.

[NPPF para 154](#) states that Local Plans should set out clear policies on what will or will not be permitted and where.

[London Plan para 2.1.14](#) about the Old Kent Road OA requires that workspace for the existing creative industries should be protected and supported.

<p>Individual NSPPSV110.3</p> <p>2. New Southwark Plan Strategic priorities</p> <p>The strategic priorities are unsound because they are not effective. The dependencies between SP2 (Social regeneration to revitalise neighbourhoods) and SP4 (Strong local economy) are not brought out fully in the Plan. It is clear, in a neighbourhood such as Peckham, that enterprise is intimately linked to sense of community. However, SP5 does recognise the importance of SMEs and of helping start ups, through the High Street Challenge, which is to be encouraged. Economic diversification is essential if a community is to be more resilient; without stating those dependencies, SP2 is not effective.</p>	<p>We will amend SP2 to take into account the socio-economic, health, community and retail needs of the borough, which will provide cross-cutting themes of social regeneration across all the strategic policies</p>
<p>Individual NSPPSV120.3</p> <p>* SP4 LOCAL ECONOMY Albion Street 'quarter' and wider area links to the published, adopted Canada Water designated Town Center is hindered by horrific non permeability. The pending Phase 1 Canada Water Master Plan delivery is handicapped by a non sensible review of permeable access North of the site. This has breached existent, published Council policy. Elected Members have also contributed to increased community tensions by 'turning a blind eye' to some very, very questionable behavior from active community delegates. This hinders local economy in Rotherhithe and impacts greatly on the ongoing, divisive culture fostered by some Elected Members and community delegates in supporting economic growth or expansion in Rotherhithe.</p>	<p>Noted. Comments on specific planning applications can be registered via the online portal.</p>
<p>Individual NSPPSV148.5</p> <p>SP4 STRONG LOCAL ECONOMY</p>	<p>We have a comprehensive evidence base that supports the New Southwark</p>

<p>This strategic policy is unsound because</p> <ul style="list-style-type: none"> <li>• the Plan is not based on adequate, up-to-date and relevant evidence about the economic characteristics of the area;</li> <li>• there has been no review of land available for economic development which should be combined with or considered alongside the Strategic Housing Land Availability Assessment;</li> </ul> <p>This strategic policy says it aims to retain the industrial premises that London needs, but 37 site allocations propose redevelopment of industrial accommodation, with a potential loss of 89ha of industrial land. There seems to be a disconnect between policies and designations and the demands for space within the real economy. This does not meet the requirements of NPPF or of the draft new London Plan.</p>	<p>Plan which has been prepared by experienced economic consultants in collaboration with and on behalf of the council. This includes two comprehensive retail studies prepared by Lichfields. The selection of the eight high streets in the retail studies provided a representative and comprehensive sample of the diversity of population characteristics, retail style and retail offer. With regard to some of the smaller high streets, the council has surveyed all high streets in the borough and categorised them as primary or secondary shopping frontages. All of these parades are catalogued and mapped in the public domain. The industrial study and the employment land reviews (ELR) undertaken by GVA and CAG includes comprehensive analysis of 35 employment cluster areas across the borough. Furthermore the NSP site allocations for larger employment sites in the borough records the amount and use class of all uses present on the site and this is required to be reprovided on site where specified in policy, along with specified required use classes in site allocations. Our policies P26 and P38 (for reprovion or relocation of small businesses) require employment floorspace to be reprovided and specific businesses reprovided or relocated if a planning application is proposed for the site which requires a finer grain of analysis of the local economy prior to any changes being proposed to existing employment sites.</p>
<p>Individual NSPPSV151.2</p> <p>SP4 Riverside welcome the important that is identified of a strong local economy that provides opportunities for residents in industrial, commercial and service sectors.</p>	<p>Noted.</p>

Organisation: Southwark Studios  
NSPPSV170.2

The introduction of Creative Enterprise Zones presents another opportunity to use funding to encourage the creative industries to establish a new long-term home in areas of Southwark, particularly The Old Kent Road. I would highly recommend applying for the CEZ and Southwark Studios offers it's expertise to help form a bid. A CEZ could be through discretionary short-term rates relief, clustering through defining usage class of property (under the control of LB Southwark Planning department) or a strong advertising campaign directed at drawing in the creative industries.

Southwark has proposed a CEZ for Camberwell and Peckham using the A202 between Peckham and Camberwell as the artery for the proposed zone. The proposal aimed to support Peckham's diverse, creative community and stimulate further organic growth in the creative industries in the Camberwell area. However, Southwark was unsuccessful in securing funding from the Greater London Authority (GLA) for the CEZ project. Southwark will continue to explore further opportunities to designate CEZ in the borough in accordance with the London Plan. Reference will be made in the NSP in relation to the CEZ.

Organisation: Southwark Studios  
NSPPSV170.3

The new 'New Workspace Requirements Checklist' suggested within the OKRAAP should be placed within the New Southwark Plan:

- A named provider to be part of Section 106 agreements between the developer and LB Southwark
- Classifying the useage class of the space within planning applications to ensure long term use for the creative industries
- Specifying the "early stage at which developers are expected to work with the provider" with further explanation. What stage and How early?
- Inclusion of draft heads of terms for the creative industry within Section 106 agreement that include:
  - suitable length of lease that allows for return on investment
  - shell specification and fit out contribution from the developer
  - hours of operation suitable to the workspace sector
  - cost per square foot or sale price to the leaseholder at a percentage below market value that permits viability for the workspace provider (based on their business model)

This response will be considered under amended Policy P28.

Organisations: Studio Make Create and Space Studio  
NSPPSV175.6, NSPPSV169.05

We object to failure to designate Creative Enterprise Zone/s as encouraged by the London Plan

This inadequacy makes the plan unsound in relation to the London Plan.

Southwark has proposed a CEZ for Camberwell and Peckham using the A202 between Peckham and Camberwell as the artery for the proposed zone. The proposal aimed to support Peckham's diverse, creative community and stimulate further organic growth in the creative industries in the Camberwell area. However, Southwark was unsuccessful in securing funding from the Greater London Authority (GLA) for the CEZ project. Southwark will continue to explore further opportunities to designate CEZ in the borough in accordance with the London Plan. Reference will be made in the NSP in relation to the CEZ.

Organisation: Tesco Stores  
NSPPSV180.2

Policy SP4 of the New Southwark Plan sets out the Council's overarching objectives for achieving a strong economy for the borough. Key to achieving this ambition is the Council's objective of working with existing local businesses and residents to make Southwark a thriving place to do business, bringing more opportunities for local people.

Whilst our client welcomes the Council's ambition for strengthening the borough's economy, it is noted that Point 3 of Policy SP4, as currently worded, is incomplete.

In the context of the New Southwark Plan, and the wider objectives of Policy SP4, it is contended that Point 3 should incorporate reference to the role that residential uses can perform in securing a strong local community. Therefore our client suggests that Point 3 on Policy SP4 be amended as follows:

Ensuring the distinctive town and local centres will be places where shops, leisure, office and residential uses are promoted; and

Nonetheless, given the ambiguity presented by way of the existing incomplete wording of Point 3, our client reserves the right to provide

Noted. However this policy has particular reference to town centre and economy uses. Residential is not a main town centre use as defined by the NPPF and the priorities for new housing is explained within strategic policy 1. It is acknowledged residential has an important role to play in the economy and in town centres particularly to unlock mixed use development.

further comments on Policy SP4 at such time that the complete wording of Policy SP4 is made available.

Organisation: Vital OKR  
NSPPSV205.40

#### Objection 1.

We object to failure to objectively assess and define the business and other development needs of Southwark, and failure to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

We note, for example, that the Southwark High Street Survey 2015 concentrated on frontage retail, only considered 8 high streets within the confines of town centre boundaries, and the survey of people focused on shopping rather than the full range of activities, so the exercise was far from comprehensive. Likewise the only other broad review of high street settings was the Southwark Retail Study which concentrated on A class uses and commercial leisure, and only considered 14 designated town centres, thus ignoring around half of the borough's high streets. In a similar spirit the Southwark Industrial and Warehousing Land Study only took note of sites identified and recommended for protection as industrial land by the 2010 Employment Land Study, being the SPIL and LSIS, ignoring industrial and hybrid B class space, and indeed office / studio accommodation, in numerous non designated industrial sites, in high street settings and elsewhere scattered in predominantly residential areas. Most recently the Southwark Employment Land Review focused only on B class uses, disregarding a vast array of other employment generating uses, and it only considered the employment cluster areas highlighted in a 2009 study by URS, and relied on cursory reviews of areas, predominantly desk based, rather than systematic surveys. Thus the evidence base is woefully incomplete, sketchy and fractured.

#### Objection 1

We have a comprehensive evidence base that supports the New Southwark Plan which has been prepared by experienced economic consultants in collaboration with and on behalf of the council. This includes two comprehensive retail studies prepared by Lichfields. The selection of the eight high streets in the retail studies provided a representative and comprehensive sample of the diversity of population characteristics, retail style and retail offer. With regard to some of the smaller high streets, the council has surveyed all high streets in the borough and categorised them as primary or secondary shopping frontages. All of these parades are catalogued and mapped in the public domain. The industrial study and the employment land reviews (ELR) undertaken by GVA and CAG do not ignore non-designated industrial sites. The study includes a comprehensive analysis of 35 employment cluster areas across the borough. Furthermore the NSP site allocations for larger employment sites in the borough records the amount and use class of all uses present on the site and this is required to be reprovided on site where specified in policy, along with specified required use classes in site allocations. Our policies P26 and P38 (for reprovion or relocation of small businesses) require employment floorspace to be reprovided and specific businesses reprovided or relocated if a planning application is proposed for the site which requires a finer grain of analysis of the local economy prior to any changes being proposed to existing employment sites. The ELR does not ignore non-B class job growth it includes all sectors as identified through ONS and BRES data. The economy is constantly changing and it is important that planning policy and the evidence supporting it is kept up to date. Hence for our existing industrial areas

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

**NPPF para 17** requires that every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. It requires that plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;

**NPPF para 158** regarding using a proportionate evidence base requires that each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. The paragraph also requires local planning authorities to ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

**NPPF para 160**, under the heading Business, requires local planning authorities to have a clear understanding of business needs within the economic markets operating in and across their area.

**NPPF para 23** requires planning policies to meet needs for retail, leisure, office and other main town centre uses in full, un-compromised by limited site availability, and to ensure this local planning authorities should undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites.

including Old Kent Road and Parkhouse Street we have prepared more recent evidence through the OKR Workspace Demand Study which further updates the economical situation in Southwark and more specifically in the aforementioned areas and supports the council's approach to making effective use of land and mixing industrial and residential uses in new and innovative ways. This is in line with both Part 11 of the NPPF and the emerging guidance in the New London Plan on co-location.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91, NSPPSV128

## Objection 2.

We object to failure to meet the business and other development needs of Southwark. This failure is substantial and is likely to cause extensive damage to the existing economy and to constrict growth.

There appears to have been no attempt to assess current and future accommodation needs in a systematic and holistic way, there is no indication that evidence from work such as that undertaken by the GLA on industrial accommodation demand and supply, and on high streets, has been coherently considered alongside work carried out for Southwark, in order to achieve such an assessment, and no evidence has been offered of a proper mapping and quantum assessment to understand the scale of accommodation need in relation to what currently exists, nor to check against the potential consequences of the policies, map designations and allocations set out in the NSP. It is particularly troubling that many of the recommendations made in reports that are within the evidence base have been ignored without explanation, resulting in a dramatic increase in the loss of capacity for economic and civic activity that the NSP would allow.

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

[NPPF para 17](#), under the heading Core planning principles, states that one of the 12 core land-use planning principles is that planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Requiring that every effort should be made objectively to identify and then meet the housing, business and other development needs

## Objection 2

Our evidence base projects the amount of floorspace and jobs growth on a borough wide level. It can be difficult to quantify exact floorspace figures for different use classes across the whole borough. Nevertheless more specific business surveying in key areas of change, for example the OKR area, is underway to give a more accurate picture of the economy and quantum of floorspace in these areas. The employment clusters in the ELR also provide a spatial analysis of the economical functions of different parts of the borough. Furthermore the NSP site allocations for larger employment sites in the borough records the amount and use class of all uses present on the site and this is required to be reprovided on site where specified in policy, along with specified required use classes in site allocations. Our evidence base recommends the protection and support of employment floorspace and this is reflected in the requirements in our Policies, particularly P26 and the site allocations where we expect to see re-provision of floorspace at least and growth in some areas to generate jobs. Policy P38 also adds a further layer of protection for small and independent businesses and requires a business relocation strategy.

of an area, and respond positively to wider opportunities for growth. Requiring that plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;

**NPPF para 19** states that planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

**NPPF para 20** requires that to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.

**NPPF para 21** requires local planning authorities to support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Also to plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries, and set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period. Para 21 also instructs that investment in business should not be over-burdened by the combined requirements of planning policy expectations.

**NPPF para 152** requires local planning authorities to seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

**NPPF para 37** requires that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

**NPPF para 161** states that local planning authorities must use the evidence base referred to in para 160 to assess: the needs for land or floorspace for economic development (being development, including those within the B Use Classes, public and community uses and main town centre uses, but excluding housing development), including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development; the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs.

**NPPF para 6** states that the purpose of the planning system is to contribute to the achievement of sustainable development, including through an economic role, contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements.

**NPPF para 70** makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

**London Plan Policy GG5** regarding growing a good economy requires that those involved in planning and development should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

[NPPF para 23](#) requires planning policies to meet needs for retail, leisure, office and other main town centre uses in full, un-compromised by limited site availability, and to ensure this local planning authorities should undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites.

[London Plan para 6.2.1](#) emphasises that smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. Hence it is stated that to deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole, and that ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

[London Plan para 6.2.4](#) requires that where there there is demand for workspace or viable existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the intensification or reconfiguration of space. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to 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.

Organisation: Vital OKR  
NSPPSV205  
Individuals

**Objection 3.**

We object to failure to ensure that the assessment of, and strategies for housing, employment and other uses are integrated, and failure to take full account of relevant market and economic signals. There has been a failure also to achieve a balance of land uses so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

[NPPF para 70](#) makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

[NPPF para 154](#) states that Local Plans should set out clear policies on what will or will not be permitted and where.

[London Plan para 6.7.6](#) explains that collaborative working between the Mayor, boroughs and other stakeholders on Development Plan reviews, planning frameworks and masterplans provide useful mechanisms to co-ordinate these processes. This should ensure that the need to maintain sufficient capacity for industry to service London's economy and residents is considered alongside other planning objectives including delivery of strategic infrastructure, housing, social infrastructure and other uses.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91.82, NSPPSV128.82

**Objection 3**

The evidence base takes into account market and economic signals in projections of employment sector and jobs growth. The NSP includes a wide range of policies and specified land uses in its site allocations that encourage a variety of use classes that will benefit the immediate local community and help to reduce journey lengths by providing local jobs, shops and community facilities alongside housing.

**Objection 4.**

We object to failure to be aspirational but realistic, and to pay careful attention to viability and costs in plan-making and decision-taking, and define a plan that is deliverable.

There is no sign in the evidence base of any testing of viability of the huge quantity of development expected to include a mix of B class accommodation, office, hybrid business space, and industrial, with residential. This lack raises substantial deliverability concerns as the development types relied upon are relatively untested, indeed examples of them have to date not been delivered in Southwark.

NPPF para 154 states that Local Plans should be aspirational but realistic

NPPF para 173 regarding ensuring viability and deliverability, states that pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

**Objection 5.**

**Objection 4**

The NSP is supported by a borough scale viability assessment that tests a range of schemes including examples of mixed use development in Southwark. The recent planning applications approved in the Old Kent Road which include some of the largest scale industrial and residential mixed use developments are also submitted with detailed viability assessments which have been discussed in detail at planning committees regarding deliverability.

**Objection 5**

We object to failure to carry out early and meaningful engagement and collaboration with (amongst others) businesses during NSP preparation so that, as far as possible, the plan reflects a collective vision and a set of agreed priorities for the sustainable development of the area. Engagement with enterprise has been minimal such that it is not possible to claim that the NSP reflects a collective vision.

[NPPF para 160](#), under the heading Business, requires local planning authorities, in order to achieve a clear understanding of business needs within the economic markets operating in and across their area, to work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.

[NPPF para 155](#) requires early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. It suggests that a wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area.

[London Plan para 6.7.6](#) explains that collaborative working between the Mayor, boroughs and other stakeholders on Development Plan reviews, planning frameworks and masterplans provide useful mechanisms to co-ordinate these processes. This should ensure that the need to maintain sufficient capacity for industry to service London's economy and residents is considered alongside other planning objectives including delivery of strategic infrastructure, housing, social infrastructure and other uses.

The details of all consultation undertaken in the NSP is set out in the published Consultation Plans and Consultation Reports that have accompanied the various stages of consultation. We have consulted extensively on the NSP and participated in a number of workshops focused on the economy including participation from local BIDS and business groups. We are committed to continuing engagement with businesses and our policies, such as P38 (business relocation) and P28 (affordable workspace) require the needs of businesses to be considered at an early stage of scheme design.

Additionally, the council provides direct advice and guidance to employers considering creating an apprenticeship, including support in creating the vacancy, recruiting to the post and sourcing the right training provider. We also work specifically with the construction sector to promote the Southwark Apprenticeship Standard.

The Southwark Business Forum helps to align the Corporate Social Responsibility (CSR) activities of some of the major corporate entities based in or operating in the borough with the council's own priorities. The agenda is shaped by the businesses and discussions have focused on skills provision and careers advice. The forum has been crucial in helping to shape policy, engaging in dialogue on key issues such as Brexit, apprenticeships and skills.

Support for Business Improvement Districts in Southwark is ongoing and is a key conduit for business support and engagement. We established a BIDs network bringing together the five Southwark BIDs of Bermondsey Blue BID, Better Bankside, South Bank BID, Team London Bridge and We are Waterloo. Key areas for discussion have included employment, apprenticeships, business rates revaluation and business rates devolution.

Affordable small business space is being built into planning policy and the council holds an approved workspace provider list to encourage quality in

	<p>small business space development. In Camberwell and Peckham, the ongoing development of a Creative Enterprise Zone focuses on the protection and growth of affordable creative business space in the area.</p>
<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91 NSPPSV128</p> <p><b>Objection 6.</b></p> <p>We object to failure to effectively cooperate with neighbouring authorities to plan for issues with cross-boundary impacts, working together to meet development requirements which cannot wholly be met within Southwark, for instance because of a lack of physical capacity. There is no clear evidence of cooperation with other authorities to consider how to meet the accommodation needs of economic and civic activity.</p> <p><a href="#">NPPF para 157</a> requires that Local Plans should be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;</p> <p><a href="#">NPPF para 160</a>, under the heading Business, requires local planning authorities, in order to achieve a clear understanding of business needs within the economic markets operating in and across their area, to work together with regional and neighbouring authorities to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market.</p> <p><a href="#">NPPF para 178</a> makes clear that public bodies have a duty to cooperate on planning issues that cross administrative boundaries and that the Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.</p>	<p><b>Objection 6</b></p> <p>We are bound by a duty to cooperate as required by the NPPF and we regularly meet with our neighbouring boroughs in the wider South East London region. We have particularly collaborated with Lewisham on growth in the Old Kent Road and New Cross opportunity areas and promote the Bakerloo Line extension. This includes collaborative working on economic issues such as work at South Bermondsey diveunder on industrial intensification and business relocation opportunities across both boroughs. We will be submitting SOCG's with our neighbouring boroughs as part of the NSP examination which will outline this collaboration on a range of wider London issues.</p>

**NPPF para 179** requires that local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity

**NPPF para 181** requires that local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.

**Representation**

P25 Strategic Protected Industrial Land

**Officer Response**

Individual  
NSPPSV06.1

As someone who has run a business based in Southwark for over thirty years employing around forty staff, I would like to make the following comments regarding your New Southwark Plan.

It appears that many current industrial sites are not receiving protection and furthermore there is little or no attempt to integrate industry into mixed use areas. The bulk of my company, Flint Hire and Supply Ltd., was forced to move out of Southwark to nearby Deptford due to a lack of suitable industrial premises in the area. The final nail in the coffin was received when Southwark granted planning to convert our grade two listed scenery paint frame into flats. We now find our current landlords, Segro, are proposing doubling the rent on our current Deptford warehouse. This is possible due to the lack of supply of medium sized industrial units in the area. Furthermore Segro are now planning on selling the Deptford Trading Estate which without protection will no doubt end up as more unnecessary luxury housing. Flint Hire and Supply Ltd are currently considering total relocation of the company out of London partly due to a sheer lack of available industrial buildings (10,000 – 20,000 sq ft) and also because the few remaining ones are commanding prices only feasible for the likes of Amazon. If we move out of Inner London it will cause 40 staff to either relocate or undertake environmentally damaging journeys on a transport infrastructure that is already unable to cope. A local Zoopla search finds over 10,000 flats available within 3 miles of SE17 while you will struggle to find any decent industrial units. Jobs are needed to form a balanced society.

The plan needs to be revised to incorporate and protect industrial space so the area can provide a variety of jobs for local residents.

Individual  
NSPPSV15.1

A number of sites are protected as Strategic Protected Industrial Land and we have also introduced Locally Significant Industrial Land within the Old Kent Road area. Whilst some industrial sites will change to mixed use, as part of the Old Kent Road regeneration, we have policies in place to ensure business relocation opportunities on site or nearby are fully explored (Policy P38 - Business relocation). Policy P26 (office and business development) also requires replacement employment floorspace on sites within the CAZ, opportunity areas, town centres and certain site allocations. We have introduced the Old Kent Road Business Network (however all businesses are encouraged to sign up) where we will be providing a match making service between developers and businesses to ensure existing businesses are included in redevelopment plans across the area. This also extends beyond borough boundaries and we are exploring opportunities for intensification of industrial land with Lewisham.

Existing employment sites for redevelopment / change of use are assessed on a site by site basis. Article 4 Directions have also been introduced which restrict the change of use of from B1 (c) (light industrial) to C3 (dwellinghouse) of which there is a threat in the Borough. Article 4 Directions for changes of use from office use (Class B1a) to a dwellinghouse (Class C3) in the Central Activities Zone (CAZ) further protect employment land from permitted development rights.

I am writing to inform the council of my desire to make a representation on Policy 25 of the New Southwark Plan – Strategic protected industrial land. The policy as stated in the plan fails to require re-provision of industrial capacity through the process of redevelopment.

- This is contrary to the policy’s aims as set out in clause 2.1 – “Retain, grow and intensify industrial uses”
- This is contrary to the National Planning Policy Framework (March 2012), specifically paragraph 17 – planning should “proactively drive and support sustainable economic development”.

Without allowing for the re-provision of industrial capacity through the process of redevelopment, I fail to see how the above principles can be enacted. For these reasons, Policy 25 is neither:

- Positively prepared
- Consistent with National Policy

Failing to maintain the industrial capacity of land use in Southwark, the borough’s economy will undoubtedly suffer. It would be appropriate to require a review of how to effectively maintain industrial capacity in instances where development plans impact (Strategic protected) industrial land. To this end, I suggest the inclusion of the below clause:

2.4 Review the re-provision of industrial capacity / re-designation of industrial land in instances where development cannot satisfy clauses 2.1, 2.2, 2.3.

The language of “must” in clause 2 is insufficient to protect Southwark’s industrial capacity and properly conform to both the NPPF and the NSP’s own stated aim in clause 2.1

Organisation: Berkeley Homes (South East London)  
NSPPSV21.8

A number of sites are protected as Strategic Protected Industrial Land and we have also introduced Locally Significant Industrial Land within the Old Kent Road area where industrial space would need to be reprovided alongside other mixed uses. Whilst some industrial sites will change to mixed use, as part of the Old Kent Road regeneration, we have policies in place to ensure business relocation opportunities on site or nearby are fully explored (Policy P38 - Business relocation). Policy P26 (office and business development) also requires replacement employment floorspace on sites within the CAZ, opportunity areas, town centres and certain site allocations. The design guidance in the Old Kent Road AAP states how a range of new workspaces will be provided within mixed use development, to meet the 'Bow Tie' strategy in the AAP providing workspace 'from laptops to forklifts'. We are also exploring opportunities for intensification of industrial land with Lewisham.

Allocated sites require provision of employment floorspace where required - mixed use development is encouraged as recommended in the Employment Land Review (ELR) Part 1. The Employment Land Review recommends some existing sites that can be released for other uses excluding employment. The Industrial and Warehousing Land Study also assesses the potential for retaining employment on the existing employment sites and recommends releasing some of these.

Existing employment sites for redevelopment / change of use are assessed on a site by site basis.

Article 4 Directions have been imposed which restrict the change of use of from B1 (c) (light industrial) to C3 (dwellinghouse) of which there is a threat in the Borough. Article 4 Directions for changes of use from office use (Class B1a) to a dwellinghouse (Class C3) in the Central Activities Zone (CAZ) is also in place to further protect employment land.

We strongly support the consolidation of the Strategic Industrial Land (SIL) into more focussed areas as highlighted in the Policies Map of the NSP, where existing industrial capacity can be retained and intensified. This is in line with the objectives of the DLP Policy E5 which notes that SIL should be managed proactively through a plan-led process to sustain them as London's main reservoirs of industrial and logistical uses with capacity for uses that support the functioning of London's economy. Section B of Policy E5 in the DLP notes that Boroughs should, in their Development Plans, define the boundaries of SIL, having regard to the scope for intensification, Co-Location and Substitution as set out in Policy E7 of the DLP.

With regard to areas within NSP65 (and OKR 10 of the DOKR AAP) the de-designation of Malt Street and other land as SIL is strongly supported. This will result in a focus towards mixed use development and co-location of commercial and residential uses.

Individual  
NSPPSV40.15

This policy is not positively prepared, justified or effective because there is a failure to protect industrial land designations across Southwark.

There is insufficient protection of industrial land across Southwark and a failure to designate new sites This is inconsistent with the Mayors wishing and the London Plan which calls for no net loss of industrial land in London.

Noted. Mixed use development incorporating some light industrial uses in place of existing SIL in this area is required as part of the Old Kent Road AAP, NSP site allocations and OKR design guidance. We have also introduced some Locally Significant Industrial Sites (LSIS) to part of the NSP65 site allocation.

A number of sites are protected as Strategic Protected Industrial Land and we have also introduced Locally Significant Industrial Land within the Old Kent Road area where industrial space would need to be reprovided alongside other mixed uses. Whilst some industrial sites will change to mixed use, as part of the Old Kent Road regeneration, we have policies in place to ensure business relocation opportunities on site or nearby are fully explored (Policy P38 - Business relocation). Policy P26 (office and business development) also requires replacement employment floorspace on sites within the CAZ, opportunity areas, town centres and certain site allocations. The design guidance in the Old Kent Road AAP states how a range of new workspaces will be provided within mixed use development, to meet the 'Bow Tie' strategy in the AAP providing workspace 'from laptops to forklifts'. We are also exploring opportunities for intensification of industrial land with

	<p>Lewisham.</p> <p>Allocated sites require provision of employment floorspace where required - mixed use development is encouraged as recommended in the Employment Land Review (ELR) Part 1. The Employment Land Review recommends some existing sites that can be released for other uses excluding employment. The Industrial and Warehousing Land Study also assesses the potential for retaining employment on the existing employment sites and recommends releasing some of these.</p> <p>Existing employment sites for redevelopment / change of use are assessed on a site by site basis.</p> <p>Article 4 Directions have been imposed which restrict the change of use of from B1 (c) (light industrial) to C3 (dwellinghouse) of which there is a threat in the Borough. Article 4 Directions for changes of use from office use (Class B1a) to a dwellinghouse (Class C3) in the Central Activities Zone (CAZ) is also in place to further protect employment land.</p>
<p>Organisation: Elephant Amenity Network NSPPSV57.12</p> <p>This policy is unsound because it:-</p> <ul style="list-style-type: none"> <li>• Does not mention or justify the reduction of SPIL designations</li> <li>• Does not follow through in the site allocations, many of which remove protected industrial sites</li> <li>• Does not justify the abandonment of Locally Significant Industrial Sites policies and site designations</li> <li>• Ignores the evidence of need for industrial land in the Borough which would justify more industrial land designation</li> <li>• Does not confirm with policy in the draft new London Plan</li> </ul> <p>To make the plan sound, it must be based on an objective assessment of the</p>	<p>A number of sites are protected as Strategic Protected Industrial Land and we have also introduced Locally Significant Industrial Land within the Old Kent Road area where industrial space would need to be reprovided alongside other mixed uses. Whilst some industrial sites will change to mixed use, as part of the Old Kent Road regeneration, we have policies in place to ensure business relocation opportunities on site or nearby are fully explored (Policy P38 - Business relocation). Policy P26 (office and business development) also requires replacement employment floorspace on sites within the CAZ, opportunity areas, town centres and certain site allocations. The design guidance in the Old Kent Road AAP states how a range of new workspaces will be provided within mixed use development, to meet the 'Bow Tie' strategy in the AAP providing workspace 'from laptops to forklifts'. We are</p>

needs of businesses and build in ongoing engagement and collaboration with businesses.

also exploring opportunities for intensification of industrial land with Lewisham.

Allocated sites require provision of employment floorspace where required - mixed use development is encouraged as recommended in the Employment Land Review (ELR) Part 1. The Employment Land Review recommends some existing sites that can be released for other uses excluding employment. The Industrial and Warehousing Land Study also assesses the potential for retaining employment on the existing employment sites and recommends releasing some of these.

Existing employment sites for redevelopment / change of use are assessed on a site by site basis. Article 4 Directions have been imposed which restrict the change of use of from B1 (c) (light industrial) to C3 (dwellinghouse) of which there is a threat in the Borough. Article 4 Directions for changes of use from office use (Class B1a) to a dwellinghouse (Class C3) in the Central Activities Zone (CAZ) is also in place to further protect employment land.

Organisation: GLA  
NSPPSV66.7

There is a lack of clarity in the draft NSP as to how Southwark will retain its industrial capacity. The London Plan classifies Southwark as a limited transfer borough, with exceptional planned release related to the Old Kent Road opportunity area. In the draft London Plan, Southwark is categorised as a borough which should “retain capacity”.

The draft NSP designates 27.6Ha of industrial land as SIL; in 2015 there was a total of 82.9Ha (64.1Ha SIL, 18.8Ha LSIS) protected industrial land in 2015, according to our Aecom industrial land supply study. This represents a very significant planned loss of designated industrial land, which is an issue that has been raised in previous consultation responses and at meetings between Southwark and GLA officers.

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

From recent discussions with Southwark officers, it seems that Southwark is aware of the issue of generally higher value office uses displacing industry without proper policy in place. However, Policy P25 only protects the retained SIL, and Policy P26 doesn't differentiate between offices and other business development, with reference only made to B use class rather than specifying the different sub-classes.

Site allocations on existing industrial sites (both sites proposed to be released from SIL, and other non-designated industrial sites) similarly require development only to re-provide B Class uses, or explicitly state B1 (rather than including existing B1c/B2/B8 or SG industrial uses). Overall, then, the Plan as it stands doesn't adequately show how it will retain industrial capacity in Southwark, both on (adopted) designated SIL and LSIS and on non-designated industrial sites.

The draft OKR AAP provides some resolution towards this issue, setting out clear and detailed policies, site allocations and masterplans for the intensification and co-location of existing industrial sites. However, the draft OKR AAP is at the preferred options stage and is unlikely to be adopted for some time and therefore the draft NSP will need to provide at least some of the detail and policies contained within the draft AAP.

There are also concerns regarding the extent of release of SIL on some sites in the OKR area, which are detailed below in the comments on the draft OKR Area Vision.

It is recommended that the draft NSP sets out:

- a mechanism by which the industrial capacity of the borough will be protected, and
- clarify in relevant site allocations and policy that industrial capacity, which generally means floorspace, specifically B1c/B2/B8/SG industrial uses, should be retained or intensified.

Individual

With the huge pressures on Council's to identify development sites that meet the huge reported need for more housing, especially affordable housing, the NSP includes a substantial number of prospective sites on what is currently deemed to be Industrial Land. This is inconsistent with National Planning Policy, and the opposite of the policies of The Mayor in his New London Plan which states that there should be no net loss of Industrial Land.

That does not, of course, mean that such land could not be used more efficiently or effectively; but does mean that there must be careful consideration given to ensure that proposals properly reflect the sustainable economic needs of the borough and its residents alongside social needs.

Work undertaken by local businesses has identified that the Council has not done this adequately, and so cannot make objective decisions on the best paths to follow. These include:

- Failure to objectively assess and define the business and other development needs of Southwark;
- Failure to carry out a review of land available for economic development, undertaken at the same time as, or combined with, the Strategic Housing Land Availability Assessment;
- Failure to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area;
- Failure to meet the business development needs of Southwark;
- Failure to ensure that the assessment of and strategies for housing, employment and other uses are integrated, and that full account has been taken of relevant market and economic signals;
- Failure to be aspirational but realistic, and to pay careful attention to viability and costs in plan-making and decision-taking; and define a plan that is deliverable.
- Failure to carry out early and meaningful engagement and collaboration

A number of sites are protected as Strategic Protected Industrial Land and we have also introduced Locally Significant Industrial Land within the Old Kent Road area where industrial space would need to be reprovided alongside other mixed uses. Whilst some industrial sites will change to mixed use, as part of the Old Kent Road regeneration, we have policies in place to ensure business relocation opportunities on site or nearby are fully explored (Policy P38 - Business relocation). Policy P26 (office and business development) also requires replacement employment floorspace on sites within the CAZ, opportunity areas, town centres and certain site allocations. The design guidance in the Old Kent Road AAP states how a range of new workspaces will be provided within mixed use development, to meet the 'Bow Tie' strategy in the AAP providing workspace 'from laptops to forklifts'. We are also exploring opportunities for intensification of industrial land with Lewisham.

Allocated sites require provision of employment floorspace where required - mixed use development is encouraged as recommended in the Employment Land Review (ELR) Part 1. Of the 460,000 sq m of net additional office floorspace predicted to be required between 2014 and 2036, around 80% of this should be provided in the CAZ - Southwark ELR Part 1. The Employment Land Review recommends some existing sites that can be released for other uses excluding employment. The Industrial and Warehousing Land Study also assesses the potential for retaining employment on the existing employment sites and recommends releasing some of these. These studies, as well as viability evidence, form part of the evidence base where we have objectively assessed and defined the business and other development needs in Southwark, which is reflected in NSP policies (including affordable workspace) as well as Old Kent Road AAP policies and site allocations, which also clarify the uplift in the number of jobs expected in the Old Kent Road opportunity area. Further evidence is underway regarding workspace demand in the borough as well as full business survey of the industrial sites

with businesses during NSP preparation;

- Failure to effectively cooperate with neighbouring authorities to plan for issues with cross-boundary impacts.

These inadequacies would make the plan unsound; indicating that it has not been positively prepared, justified, nor will it be effective, nor is it consistent with national policy, as defined by the National Planning Policy Framework

Suggested improvements:

This Policy is in need of urgent review in light of the lack of understanding and evidence that it needs to be based upon; and to reflect upon the Mayor's New London Plan and its requirement for no net loss of Industrial Land.

Consequent to this, the Site Allocations on Plan pages 94 to 336 need to be reviewed to ensure that Industrial Land and associated jobs are protected, especially as these jobs are most likely those employing existing local communities who would be disproportionately affected if those jobs were lost to the area.

in Old Kent Road, updating our previous comprehensive survey completed in 2015. All our evidence base documents are available on our website.

Southwark Council, and the GLA, have, by exchange of letter have confirmed an agreed approach to the phased release of Strategic Industrial Land for mixed use development that would include a range of commercial uses including distribution and light industrial uses in the Old Kent Road Opportunity Area. These letters, and associated plans are available to view on our website. Existing employment sites for redevelopment / change of use are assessed on a site by site basis. Article 4 Directions have been imposed which restrict the change of use of from B1 (c) (light industrial) to C3 (dwellinghouse) of which there is a threat in the Borough. Article 4 Directions for changes of use from office use (Class B1a) to a dwellinghouse (Class C3) in the Central Activities Zone (CAZ) is also in place to further protect employment land.

The council has been engaging and consulting with businesses on industrial land particularly around the Old Kent Road for the last 5 years. We have reported all the engagement and events to date in our OKR Consultation Summary (January 2019) as well as our online interactive consultation map. We also regularly meet with neighbouring boroughs such as Lewisham to discuss cross-boundary issues and joint working, around the Old Kent Road industrial sites and the Bakerloo Line extension.

Organisation: Vital OKR  
 NSPPSV205  
 Individuals  
 NSPPSV91 NSPPSV128

Objection 7.

We object to the insufficient extent of industrial land designation across Southwark through SPIL and LSIS. We challenge the proposal to reduce such

Objection 7

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

protective designation by some 57ha (that would reduce the borough total from 85ha to 28ha, a dramatic 67% shrinkage) coupled with the failure to designate any new sites for industrial use through SPIL or LSIS designation, the failure to set out requirements for replacement industrial accommodation on allocated sites, and the failure to require, through other NSP policies, the retention or replacement of industrial accommodation on Non-Designated Industrial Sites.

While the P25 Reasons text correctly states that Southwark is an important location for industrial servicing to central London and accommodates a wide range of industrial businesses, the extent of industrial land designated for protection, in combination with site allocations and other NSP policies, fails to match this recognition of importance, would likely cause severe shortage of industrial accommodation and thus displacement and / or constriction of a significant part of the borough's economy.

We have reviewed and roughly mapped the extent of industrial land in the borough today, noting that it is predominantly occupied. We believe that it totals around 120ha.

Across the borough only 5 industrial sites are proposed as SPIL (all of which have the same designation in the current Southwark Local Plan). The NSP proposes to remove SPIL designation from 10 industrial sites, redesignating each of them for mixed-use development without any policy requirement that replacement B class space be industrial of similar quantum and type as existing, nor indeed requiring any replacement of industrial accommodation. There are also site allocations for a further 22 currently industrial sites, the majority of which are proposed for mixed-use redevelopment without any policy requirement that replacement B class space be industrial of similar quantum and type as existing, nor requiring any replacement of industrial accommodation. At least another 45 small undesignated industrial sites have no site allocations, and nothing in proposed NSP policy would prevent their redevelopment without any replacement industrial accommodation.

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.

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

The hectareage, roughly measured, adds up as follows:

1.

Proposed area of SPIL, substantially reduced from the extent designated in the current Southwark Local Plan, 2016 updated map, totalling just under **28ha**

2.

Current areas of SPIL and LSIS (as protected in the current Southwark Local Plan, 2016 updated map) that are included within NSP site allocations, with no requirement to replace industrial accommodation, totalling **57ha**

3.

No new areas of designated industrial land are proposed.

4.

Currently undesignated industrial areas that are included within NSP site allocations, with no requirement to replace industrial accommodation, totalling **21ha**

5.

Currently undesignated small industrial sites that have no NSP site allocation covering them, and there is no NSP policy requiring replacement of industrial should redevelopment be proposed, add up to **16ha**

Taking 120ha as the rough current land extent of industrial in the borough, the combination of a reduction to 28ha of SPIL, the lack of new designations, and the lack of policies clearly requiring retention or re-provision of industrial space on sites where it currently exists, if re-developed, a worst case scale of industrial accommodation loss that would be allowed by the NSP as submitted would be **92ha**, which is **77%** of the current borough total.

This dramatically conflicts with London Plan policy and disregards the requirements of the NPPF.

So, the NSP as proposed for submission affords no clear protection to around

94ha extent of industrial accommodation, 77% of the borough's total, and it neither requires re-provision through the process of redevelopment nor gives clear indication of the scale and geography of industrial intensification, co-location and substitution required in the borough.

Thus the NSP does not accord with the spirit of the draft London Plan Policy E4 para C that places Southwark in the 'retain capacity' category.

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

[London Plan Policy GG5](#) regarding growing a good economy requires that those involved in planning and development should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

[London Plan policy E4](#) requires that a sufficient supply of land and premises to meet current and future demands for industrial and related functions should be maintained. The policy requires that the retention and provision of industrial capacity across SIL, LSIS and Non-Designated Industrial Sites should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations. Southwark is in the 'Retain' category requiring that they should seek to intensify industrial floorspace capacity. Southwark is included in the Central Services Area, where particular recognition is given to the need to provide essential services to the CAZ and in particular sustainable 'last mile' distribution/logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions.

[London Plan para 6.4.1](#) explains that London depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. This includes

a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, vehicle maintenance and repair, building trades, construction, waste recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology) and an efficient storage and distribution system which can respond to business and consumer demands.

[London Plan para 6.4.4](#) outlines evidence that London faces industrial land shortage of several hundred hectares.

[NPPF para 157](#) requires that Local Plans should Indicate land-use designations on a proposals map.

[NPPF para 157](#) states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation.

[NPPF para 6](#) requires the planning system to contribute to the achievement of sustainable development, including through an economic role, contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements.

[London Plan para 6.5.2](#) requires that SIL be complemented by smaller-scale provision in LSIS and Non-Designated Industrial Sites including sustainable 'last mile' distribution close to central London.

[London Plan Policy E5](#) about Strategic Industrial Locations (SIL) requires boroughs to manage SILs proactively through a plan-led process to sustain them as London's main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London's economy, and to develop local policies to protect and intensify the function of SILs and enhance their

attractiveness and competitiveness, and explore opportunities to intensify and make more efficient use of land in SILs.

London Plan para 6.5.1 and 6.5.2 state that SILs are given strategic protection because they are critical to the effective functioning of London's economy, important in supporting strategic logistics operations serving the capital as well as providing relatively low-cost industrial space for SMEs.

London Plan para 6.5.3 requires that innovations to make more effective use of land in SILs should be explored in Local Plan reviews.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

#### Objection 8.

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

1. Railway viaduct and associated accommodation at NSP10 (Biscuit Factory and Campus)
2. Railway viaduct and associated accommodation between SPIL1 and NSP13
3. Railway viaduct and associated accommodation west of SP13, as far as Tower Bridge Road
4. Western part of NSP56 (Crimscott Street and Page's Walk)
5. Most of NSP66 (Marlborough Street and St James's Road)
6. Northern portion of NSP67 (Sandgate Street and Verney Road)
7. NSP69 (Hatcham Road and Penarth Street)

#### Objection 8

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 P26 also 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. This means we would encourage a range of workspaces to suit demand in different parts of the borough. We have specified that in current designated industrial sites (e.g. NSP23 or OKR sites) where industrial provision would be required.

8. Part of NSP70 (Ilderton Road)
9. Part of NSP65 (Land bounded by Glengall Road, Latona Roads and Old Kent Road)
10. Part of NSP23 (Burgess Business Park)
11. NSP28, 26, 27, 22 (Camberwell sites) and railway viaduct and associated accommodation from there northwards as far as Borough Road
12. Railway viaduct and associated accommodation either side and eastwards from Great Suffolk Street
13. NSP39 and adjoining part of NSP40 (East Dulwich sites)
14. Railway viaduct and associated accommodation between OKR and Queens Road Peckham
15. PNAAP2 (Print Village) and railway viaduct and associated accommodation running eastwards through Peckham and as far as Kirkwood Road
16. Remaining industrial accommodation north of Spa Road  
And 30 other small areas (not listed here, but a map can be provided) that are currently industrial and we have identified as suitable for designation, each being modest settings where the likely disruption to businesses and the potential reduction in capacity outweighs the modest scope for residential development, and where delivery of mixed schemes including replacement industrial space would be challenging or impossible.

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

[London Plan Policy 9.9.2](#) states that any waste site release should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput of the site proposed to be lost.

[London Plan para 9.8.8](#) requires that large-scale redevelopment opportunities and redevelopment proposals should incorporate waste management facilities within them. To meet this requirement references should be made to the requirement to retain and to incorporate in the site

allocation policies for sites including NSP67, NSP89, NSP68.

**NPPF para 6** requires the planning system to contribute to the achievement of sustainable development, including through an economic role, contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements.

**London Plan policy E4** requires that overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS, and that any release of industrial land should be facilitated through the processes of industrial intensification, co-location and substitution.

**London Plan para 6.5.2** requires that SIL be complemented by smaller-scale provision in LSIS and Non-Designated Industrial Sites including sustainable 'last mile' distribution close to central London.

**London Plan Policy E5** about Strategic Industrial Locations (SIL) requires boroughs to manage SILs proactively through a plan-led process to sustain them as London's main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London's economy, and to develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness, and explore opportunities to intensify and make more efficient use of land in SILs.

**London Plan para 6.5.1 and 6.5.2** state that SILs are given strategic protection because they are critical to the effective functioning of London's economy, important in supporting strategic logistics operations serving the capital as well as providing relatively low-cost industrial space for SMEs.

**London Plan para 6.5.3** requires that innovations to make more effective use

of land in SILs should be explored in Local Plan reviews.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

#### Objection 9.

We object to the failure to designate any new sites as protected industrial, even though this is clearly possible, and the lack of any explanation for this omission. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest the following areas, that are not currently industrial, for possible additional SPIL / LSIS designations.

1. Part of NSP65 (Land bounded by Glengall Road, Latona Roads and Old Kent Road)
2. Part of NSP81 (Decathlon Site etc) and / or NSP82 (Harmsworth Quays etc)
3. NSP79 (Rotherhithe Gasometer)
4. Part of Dog Kennel Hill Sainsbury's site

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

London Plan policy E4 requires that overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS, and that any release of industrial land should be facilitated through the processes of industrial intensification, co-location and substitution.

London Plan para 6.5.2 requires that SIL be complemented by smaller-scale provision in LSIS and Non-Designated Industrial Sites including sustainable 'last mile' distribution close to central London.

#### Objection 9

Site NSP65 now has LSIS included to the west of Ossory Road requiring industrial uses in mixed use. NSP81 and NSP82 are not currently industrial sites (they are retail uses) and they are 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 these sites where these are specified in particular site allocations or they fall within the requirements of re-provision as per P26. NSP82 in particular will be benefitting from a significant uplift in employment floorspace as well as jobs as part of the Canada Water masterplan application. NSP79 (Rotherhithe gasometer) is not designated for industrial. The London Plan states the principle of no net loss of floorspace capacity does not apply to sites used for utilities infrastructure which are no longer required (Para 6.4.5B). The Sainsbury's site in Dog Kennel Hill is a retail (A class) site and is not proposed for redevelopment within the NSP.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

#### 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.

NSP10 (Biscuit Factory and Campus) railway viaducts currently SPIL  
NSP57 (Mandela Way)  
NSP56 (Crimscott + Page's Walk)  
NSP66 (Marlborough Grove and St James's Road)  
NSP67 (Sandgate Street and Verney Road)  
NSP69 (Hatcham Road and Penarth Street)  
NSP70 (Ilderton Road)  
NSP68 (Devon Street and Sylvan Grove)  
NSP65 (Land bounded by Glengall Road, Latona Roads and Old Kent Road)  
NSP23 (Burgess Business Park)

[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

#### Objection 10

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

whole, and that ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

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

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

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128 NSPPSV205

#### Objection 11.

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.

NSP10 (Biscuit Factory and Campus) parts other than railway viaducts  
NSP11 (Tower Workshops)  
NSP13 (Old Jamaica Road Business Estate)  
NSP22 (Camberwell Station)  
NSP25 (Valmar Trading Estate)  
NSP26 (Camberwell Bus Garage)  
NSP27 (Abellio Bus Garage)  
NSP28 (Land Between Camberwell Station Road and Warner Road)  
NSP30 (49 Lomond Grove)  
NSP31 (99 Lomond Grove)  
NSP37 (Kwik Fit etc)  
NSP39 (Railway Rise)  
NSP41 (Goose Green Trading Estate)  
NSP43 (Bakerloo Line Sidings etc)  
NSP44 (63-85 Newington Causeway)  
NSP50 (Bath Trading Estate)  
NSP64 (Former Southern Railway Stables)

#### Objection 11

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.

NSP71 (Toys R Us Site)  
NSP73 (Kwikfit Garage)  
NSP74 (636 Old Kent Road)  
NSP77 (East of Rye Lane including railway arches)  
NSP82 (Harmsworth Quays etc)

[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 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: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

#### Objection 12.

We object to the failure to define any requirement for industrial accommodation within mixed-development on the following allocated sites where there is clear potential to incorporate such uses. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the allocation policies for each be revised to include requirements for a defined minimum quantum of industrial accommodation.

NSP40 (Dulwich Community Hospital)

#### Objection 12

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

NSP75 (Aylesham Centre etc)  
NSP32 (123 Grove Park)  
AAAP (Aylesbury Action Area) sites not already built  
NSP79 (Rotherhithe Gasometer)  
NSP12 (Chambers Wharf)  
NSP 44 (Newington Causeway)  
NSP42 (Newington Triangle)  
NSP82 (Harmsworth Quays etc)  
NSP81 (Decathlon Site etc)  
PNAAP19  
PNAAP16  
PNAAP9

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

[London Plan para 6.2.1](#) emphasises that smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. Hence it is stated that to deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole, and that ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

[London Plan para 6.2.4](#) requires that where there there is demand for workspace or viable existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the intensification or reconfiguration of space. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to accommodate replacement workspace and existing businesses on-site through intensification or reconfiguration. What constitutes a reasonable proximity should be determined on the

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.

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

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

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

#### Objection 13.

We object to failure to make site allocations for the following sites that could, if development came forward, offer potential to incorporate industrial accommodation as part of mixed development. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest

#### Objection 13

The Sainsbury's site in Dog Kennel Hill is a retail (A class) site and is not proposed for redevelopment within the NSP. The Tustin and Ledbury Estates are council housing estates where no industrial land is present.

that these sites be allocated, with policies for each that include requirements for a defined minimum quantum of industrial accommodation.

Sainsbury's site at Dog Kennel Hill  
Tustin Estate  
Ledbury Estate

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

Organisation: Vital OKR  
NSPPSV205  
Individual  
NSPPSV91.82, NSPPSV128.82

#### Objection 14.

We object to the failure to justify reduction of SPIL designated industrial land, and the deletion of all LSIS designations, and the lack of any evidence that compensatory capacity can realistically be provided through intensification.

The P25 Reasons para states that the proposed 27.6ha of SPIL present opportunities to grow and intensify industrial uses as well as accommodating specific types of industry that are unable to be accommodated within mixed use developments. This is all true, but the problem is that the 27.6ha area is clearly insufficient to accommodate the demand, even only from existing businesses in the area, a problem that is magnified because the SPIL areas suggested are not the best suited to intensification of accommodation as they are severely constrained by railway viaducts, utilities infrastructure and waste management facilities. There is scope for intensification in these areas, but only limited, and there is no realistic prospect of intensification in these areas being able to replace the capacity lost from areas removed from SIL and LSIS in order to achieve the London Plan nil nett loss requirement, nor to

#### Objection 14

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

adequately provide for the specific types of industry that are unable to be accommodated within mixed use developments.

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

London Plan Policy E5 about Strategic Industrial Locations (SIL) requires boroughs to manage SILs proactively through a plan-led process to sustain them as London's main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London's economy, and to develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness, and explore opportunities to intensify and make more efficient use of land in SILs.

London Plan para 6.5.1 and 6.5.2 state that SILs are given strategic protection because they are critical to the effective functioning of London's economy, important in supporting strategic logistics operations serving the capital as well as providing relatively low-cost industrial space for SMEs.

London Plan para 6.5.3 requires that innovations to make more effective use of land in SILs should be explored in Local Plan reviews.

London Plan para 6.2.1 emphasises that smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. Hence it is stated that to deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole, and that ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

London Plan para 6.2.4 requires that where there there is demand for workspace or viable existing business uses on site, development proposals

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.

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

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.

Organisation: Vital OKR  
NSPPSV205  
Individual  
NSPPSV91 NSPPSV128

#### Objection 15.

We object to failure to indicate the site of the Integrated Waste Management Facility as SPIL, even though the P25 Reasons para states that it is SPIL. This inconsistency should be corrected by including the relevant area as SPIL on the map.

The fact that there are other Waste Management Facilities in existing industrial areas, most notably in areas currently designated as SPIL, appears to have been disregarded when reviewing the boundaries of designated industrial.

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

Organisation: Vital OKR  
NSPPSV205  
Individuals

#### Objection 15

The IWMS is still proposed for SPIL designation and this is identified on the proposals map.

NSPPSV91 NSPPSV128

Objection 16.

We object to P25 point 3 and the part of the Reasons para that suggest the possibility of removing SPIL designation from the Integrated Waste Management Facility. There is no realistic prospect of the need for waste management facilities in Southwark dramatically reducing, and even if that was not the case that would not justify deletion from SPIL. The research and analysis that underpins the GLA nil nett loss policy, including the placing of Southwark in the Retain category, factored in predictions for accommodation requirement changes across all sectors of the industrial economy. It is the overall anticipated requirement that demands the nil nett loss policy, the likely occurrence of localised variation in demand from particular sectors having already been factored in.

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

Organisation: Vital OKR

NSPPSV205

Individuals

NSPPSV91 NSPPSV128

Objection 17.

We object to the abandonment of Locally Significant Industrial Sites policies and site designations, for which no justification has been given. As P25 is the only NSP policy about protection of industrial land for principally industrial use we have included here our objection to the lack of policies and associated map designations protecting LSIS, this being a change from the previous Southwark Local Plan. No coherent explanation has been offered as to why this aspect of policy has been deleted, and no assessment of the affect on capacity in relation to demand has been carried out. We

Objection 16

This is a reference to the long term potential of the site if waste facilities are accommodated elsewhere however there is no current plan for this.

Objection 17

We have now introduced 3 LSIS sites and the required uses and areas are mapped on the relevant site allocations.

suggest that in order to achieve soundness, as part of efforts to ensure sufficient industrial capacity, LSIS policies should be reintroduced, and there should be comprehensive designation of all identifiable industrial land in the borough as either SIL, LSIS or site allocation (with clear policy on requirements to retain and / or replace capacity).

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

[London Plan para 6.2.1](#) emphasises that smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. Hence it is stated that to deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole, and that ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

[London Plan para 6.2.4](#) requires that where there there is demand for workspace or viable existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the intensification or reconfiguration of space. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to 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.

Organisation: Vital OKR

NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

**Objection 18.**

We object to failure to identify and protect sufficient capacity for industry and logistics within or close to the CAZ to support the needs of businesses and activities within that area, as the London Plan requires. The NSP as proposed would allow a dramatic reduction in such capacity since it provides no protection for the industrial capacity within the CAZ areas of Southwark, it reduces the extent of protected industrial land close to the CAZ (all current Southwark SPIL and LSIS is within 3km of the CAZ), it sets no requirement for retention or replacement of industrial capacity on allocated sites where there currently industrial premises, nor does it require creation of any industrial in locations close to CAZ where it is not currently present.

[London Plan Policy SD4](#) regarding the Central Activities Zone (CAZ) states that sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation and other related service functions within or close to the CAZ and Northern Isle of Dogs to support the needs of businesses and activities within these areas.

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

**Objection 19.**

**Objection 18**

It is considered the sites identified for industrial including sites for intensification and mixed use are sufficiently close to the CAZ to continue serving central London.

**Objection 19**

We object to the failure to ensure that there will be no nett loss of industrial floorspace capacity within the OKR Opportunity Area and the lack of any demonstration that intensification of industrial accommodation can realistically be expected to provide space for businesses that would be displaced from areas where it is proposed to remove designation.

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

[London Plan para 2.1.14](#) about the Old Kent Road OA makes clear that the area contains the last remaining significant areas of Strategic Industrial Locations that lie in close proximity to the CAZ and the only SILs within Southwark. The policy requires Southwark to plan for no net loss of industrial floorspace capacity and to set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a wider range of commercial uses within designated town centres.

[London Plan para 2.1.14](#) about the Old Kent Road OA requires that workspace for the existing creative industries should be protected and supported.

[London Plan para 6.2.1](#) emphasises that smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. Hence it is stated that to deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole, and that ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

[London Plan para 6.2.4](#) requires that where there there is demand for

Regarding industrial floorspace in the OKR area this is addressed under Objections 7 and 14. Regarding relocation the council is committed to ensuring businesses can be reaccommodated in development schemes where feasible and viable for the business (see P38 and OKR Policy 6). We recognise it is not always possible to relocate on the same site, therefore we are actively working with businesses and developers to explore options for relocation within the opportunity area as schemes are phased.

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.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

#### Objection 20.

We object to failure to ensure that workspace for the existing creative industries in the OKR OA will be protected and supported, an objective that could best be achieved through industrial land designation in combination with clear retain or re-provide requirements for allocated sites, and careful use of conservation area designation and Article 4 Directions to control loss of accommodation through demolition and conversion. The two strongest clusters of creative enterprises in the OKR OA are the Verney, Ilderton and Hatcham industrial areas, and the Ossory, Glengall, Haymerle and Latona

#### Objection 20

We have introduced an Article 4 Direction to protect B1c space in these sites and across sites in the borough to prevent permitted development changes of use to residential. The OKR AAP and NSP policies are supportive of the rich clusters of creative enterprises in Southwark and these continue to grow and creative workspaces are being accommodated in development schemes, including a number of examples where creative businesses are being successfully expanded and relocated (e.g. Southwark Studios).

industrial areas. These areas are currently SIL, and we suggest that SIL designation should be retained (albeit a reduced extent compared with currently).

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

[London Plan para 2.1.14](#) about the Old Kent Road OA requires that workspace for the existing creative industries should be protected and supported.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

Objection 21.

We object to the titling of strategic protected industrial as SPIL because it causes needless confusion to title SIL as SPIL in Southwark. The plan should be amended so that all reference to SPIL becomes SIL (Strategic Industrial Land). The title LSIS should be utilised for areas that are not include in the scope of London Plan Table 6.3 that lists SILs, if the GLA insist on that, though the distinction seems academic as all is now of strategic significance due to scarcity and the strategic nil nett loss policy.

[London Plan Policy E6](#) requires that in their Development Plans, boroughs should define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps justified by evidence in local employment land reviews.

[London Plan Policy E7](#) makes clear that intensification of business uses in Use

Objection 21

It is not considered the name of the industrial land designation goes to the heart of the soundness of the plan. LSIS has been used for newly designated LSIS sites.

Classes B1c, B2 and B8 occupying all categories of industrial land should deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing. It is further required that when making revision of SIL boundaries to allow alternative development on some areas its should be ensured that the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements, and that the intensified industrial, storage and distribution uses can be completed and operational can be in advance of any residential component being occupied.

London Plan para 6.7.2 indicates that the majority of land in SILs should be retained and intensified for industrial-type functions and states that while there may be scope for selected parts of SILs or LSISs to be consolidated, this should be done through a carefully co-ordinated plan-led approach to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the transfer of some land for a mix of uses including residential.

Organisation: Southwark Studios  
NSPPSV170.1

Such a large area of redevelopment requires an identity (A2.3.1), something the creative industries can bring in abundance. There is a danger that developer-lead regeneration could lead to disjointed, soulless sites devoid of community or vitality, a problem that can be seen in other redeveloped areas and regularly commented on by existing locals and in the press.

Our wish is that Southwark's regeneration has a social identity with creativity at its heart.

The council are highly supportive of creative enterprises forming part of new development to ensure a rich and diverse cultural economy in regeneration. Our policies on business relocation (Policy P38) seek to retain existing businesses where possible., We have established the OKR Business Network and Creative OKR to further engage with creative businesses in this area, as well as further afield in Peckham, Elephant and Castle and Camberwell. We have established a new affordable workspace policy in the AAP which responds to workspace demand in the borough and have a number of

LB Southwark's own Study identifies SMEs "making up over 99% of business within Southwark" and that "managed workspace" and "flexible smaller units with space under 500sqm is required to meet demand". To this end securing suitable property in the long-term is the most important factor when aiming to establish a thriving community of creative industries, we offer the following suggestions that will help this become a reality:

- The New Southwark Plan has identified a number of development opportunity sites (NSP), most with a requirement to include B1 space as part of their "site vision" redevelopment plans. It is helpful to see numbers, including square meters of floorspace, that are attached to these individual sites however only one (NSP56) requires from it's redevelopment to "Provide a new arts hub.... At least 50% of any development floorspace must be provided as creative and cultural small business workspace". I would highly recommend expanding this percentage requirement to multiple NSP sites to include managed, affordable workspace. Providers could be chosen from LB Southwark's Approval Workspace Provider list. note: Tower Workshops (Maltby Street/NSP09) would be of particular suitability/interest to Southwark Studios.
- Southwark Studios on the former Rich Estate (NSP 56) can be used as a practical real-life, successful example of securing property in the long-term for an industry otherwise removed/asked to leave/gentrified from their home in the borough.
- A main concern for current local businesses we talk to is an influx of residential units will automatically make most areas unsuitable for their current useage (a 'Ministry of Sound' situation). We would like to suggest designating a suitable area for future light industrial use. Perhaps naming the land/railway arches near New Bermondsey Overground a 'Preferred Light Industrial Area'. This will help reduce fears from local businesses who feel there will be no future relocation opportunities.

creative/artists studio workspace providers on our Workspace Provider List. Policy P43: Leisure, arts and culture encourages new leisure, arts and cultural uses. Existing leisure, arts and cultural uses to be retained or reprovided in development, unless marketing evidence is provided.

New community facilities (Use Class D1, D2 and Sui Generis) and retention of community facilities is also encouraged within Policy P44: Community uses. This can include creative arts / art hub. This policy requires development to retain community facilities unless marketing evidence is provided. Site allocations are set out as per the recommendations set out in the ELR Part 1 which include allocations for Use Class B1 (light industrial).

Creative uses can still be provided in the other site allocations where use class D is set out within the site vision.

Creative uses and business uses are also encouraged within Policy P27: Railway arches which requires development within these to provide commercial activities including community facilities (D use classes) and sui generis. We have also designated the land around to railway arches in South Bermondsey to Strategic Protected Industrial Land (SPIL) and look to intensify the business uses in this area in collaboration with Lewisham Council.

Organisation: Studio Makecreate and Space Studios, and Individual

Regarding Strong, local economy policy P25: Strategic protected industrial land we object to:

The insufficient extent of industrial land designation across Southwark through SPIL and LSIS;

Failure to afford clear protection to around 94ha extent of industrial accommodation, 77% of the borough's total;

Failure to require re-provision of industrial capacity through the process of redevelopment;

Failure to give clear indication of the scale and geography of industrial intensification, co-location and substitution required in the borough;

Failure to designate 46 currently industrial sites as protected industrial, and the inclusion of many within site allocations that require no replacement of industrial capacity;

Failure to designate any new sites as protected industrial, even though this is clearly possible, and the lack of any explanation for this omission;

Failure to define requirements for industrial accommodation within mixed-development on 10 allocated sites that are currently SPIL or LSIS and 22 allocated sites that are currently Non-Designated industrial;

Failure to define any requirement for industrial accommodation within mixed-development on at least 13 allocated sites that are not currently industrial but where there is clear potential to incorporate such uses;

Failure to make site allocations for at least 3 sites that could, if development came forward, offer potential to incorporate industrial accommodation as part of mixed development;

Failure to justify reduction of SPIL designation, and the deletion of all LSIS designations, and the lack of any evidence that compensatory capacity can realistically be provided through intensification;

Failure to indicate the site of the Integrated Waste Management Facility as SPIL on the Policies Map, and indication of the possibility of removing SPIL designation from that facility.;

The council are highly supportive of creative enterprises forming part of new development to ensure a rich and diverse cultural economy in regeneration. Our policies on business relocation (Policy P38) seek to retain existing businesses where possible., We have established the OKR Business Network and Creative OKR to further engage with creative businesses in this area, as well as further afield in Peckham, Elephant and Castle and Camberwell. We have established a new affordable workspace policy in the AAP which responds to workspace demand in the borough and have a number of creative/artists studio workspace providers on our Workspace Provider List. Policy P43: Leisure, arts and culture encourages new leisure, arts and cultural uses. Existing leisure, arts and cultural uses to be retained or reprovided in development, unless marketing evidence is provided.

New community facilities (Use Class D1, D2 and Sui Generis) and retention of community facilities is also encouraged within Policy P44: Community uses. This can include creative arts / art hub. This policy requires development to retain community facilities unless marketing evidence is provided. Site allocations are set out as per the recommendations set out in the ELR Part 1 which include allocations for Use Class B1 (light industrial).

Creative uses can still be provided in the other site allocations where use class D is set out within the site vision.

Creative uses and business uses are also encouraged within Policy P27: Railway arches which requires development within these to provide commercial activities including community facilities (D use classes) and sui generis. We have also designated the land around to railway arches in South Bermondsey to Strategic Protected Industrial Land (SPIL) and look to intensify the business uses in this area in collaboration with Lewisham Council.

The abandonment of Locally Significant Industrial Sites policies and site designations, for which no justification has been given;  
Failure to identify and protect sufficient capacity for industry and logistics within or close to the CAZ to support the needs of businesses and activities within that area, as the London Plan requires;  
Failure to ensure that there will be no nett loss of industrial floorspace capacity within the OKR Opportunity Area;  
Failure to ensure that workspace for the existing creative industries in the OKR OA will be protected and supported;

These inadequacies make the plan unsound as it is not justified, would not be effective, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan.

Individual  
NSPPSV193.10

(many examples in Bermondsey) Point 2 fails to adequately define the range of accommodation that suits the full range of small and small branch business of relevance to Southwark (or to Areas Visions like AV10 for example); Reference to favouring horizontal mixed-use types over vertical mixed-use types is without justification, and reference is made only to residential as the use that might mix with B class uses. This is to the detriment of the potential of a thriving economy in the Bermondsey Area.

We welcome a number of different types of mixed-use development and in some cases uses other residential would be able to successfully mix with B classes.

Organisation: Travis Perkins PLC

NSPPSV194.1

there are the following problems: The insufficient extent of industrial land designation across Southwark through SPIL and LSIS; Failure to afford clear protection to around most of the borough's industrial accommodation; Failure to give clear indication of the scale and geography of industrial intensification, co-location and substitution required in the borough; Failure to designate any new sites as protected industrial, even though this is clearly possible, and the lack of any explanation for this omission;

A number of sites are protected as Strategic Protected Industrial Land (including new sites at Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate) and we have also introduced Locally Significant Industrial Land within the Old Kent Road area. Whilst some industrial sites will change to mixed use, as part of the Old Kent Road regeneration, we have policies in place to ensure business relocation opportunities on site or nearby are fully explored (Policy P38 - Business relocation). Policy P26 (office and business development) also requires replacement employment floorspace on sites within the CAZ, opportunity areas, town centres and certain site allocations. We have introduced the Old Kent Road Business Network (however all businesses are encouraged to sign up) where we will be providing a match making service between developers and businesses to ensure existing businesses are included in redevelopment plans across the area. This also extends beyond borough boundaries and we are exploring opportunities for intensification of industrial land with Lewisham.

Southwark Council, and the GLA, have, by exchange of letter have confirmed an agreed approach to the phased release of Strategic Industrial Land for mixed use development that would include a range of commercial uses including distribution and light industrial uses in the Old Kent Road Opportunity Area. These letters, and associated plans are available to view on our website.

Existing employment sites for redevelopment / change of use are assessed on a site by site basis. Article 4 Directions have also been introduced which restrict the change of use of from B1 (c) (light industrial) to C3 (dwellinghouse) of which there is a threat in the Borough. Article 4 Directions for changes of use from office use (Class B1a) to a dwellinghouse (Class C3) in the Central Activities Zone (CAZ) further protect employment land from permitted development rights.

Organisation: Twenty Twenty Glengall Limited and 180 Ilderton Road Limited

<p>NSPPSV196.1</p> <p>Our Clients consider both documents to be legally compliant with Section 20(5)(a) of the Planning and Compulsory Purchase Act 2004; and whilst it is considered that both documents are generally “sound” in planning terms, we wish to make comment in the spirit of ensuring that both Plans are as effective as possible in meeting Southwark’s burgeoning development needs.</p>	<p>Noted. Support</p>
<p>Individual NSPPSV217.6</p> <p>Strategic protected industrial land sets out that on strategic protected industrial land (SPIL) only industrial uses (B1b, B1c, B2, B8, sui generis industrial use classes) and uses ancillary to the industrial uses, will be permitted. On SPIL development must: retain, grow and intensify industrial uses including increasing the number of jobs; make use of railway arches for employment uses (B use classes); and seek to increase the number of jobs. We support this approach to SPIL land but note that planning applications within the Opportunity Areas on designated SPIL can further meet wider planning objectives in terms of delivering residential development, whilst not prejudicing the employment function of SPIL.</p>	<p>Noted. There are opportunities for intensification of SPIL for industrial uses. Other parts of the Old Kent Road opportunity area allow for mixed use development incorporating industrial or other employment uses as outlined on site allocations or design guidance in the Old Kent Road AAP.</p>
<p>Individual NSPPSV237.3</p> <p>The amount of land designated as SPIL within Southwark has been significantly reduced within the submission document, compared with the 2011 Core Strategy designation. An even greater amount of designated</p>	<p>A number of sites are protected as Strategic Protected Industrial Land (including new sites at Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate) and we have also introduced Locally Significant Industrial</p>

protection was lost in previous plans, including the removal of employment zones in areas such as the junction with Wyndham Road and Camberwell New Road.

The manufacturing sector as a whole is growing across the UK, so a policy which reduces SPIL protection is counterintuitive. The threat of SPIL redesignation has already led to trading businesses relocating from Southwark, resulting in a loss of local employment.

To make the policy sound, the NSP should identify the amount of industrial and manufacturing land in use in 1990, and use this as the baseline for the natural amount of land which should receive SPIL protection. Current SPIL designation levels should be protected and frozen at the current number of hectares.

“SPIL provides land suitable for general and light industrial uses, logistics, waste management and environmental industries, utilities, wholesale markets, transport functions and sui generis uses that are inappropriate in residential areas” suggests a conflict between proximity of any industrial and residential uses which is not evidence-based. It should be reworded to read:  
“SPIL provides land suitable for general and light industrial uses, logistics, waste management and environmental industries, utilities, wholesale markets, transport functions and sui generis uses whose viability would be threatened if exposed to the residential development market without a strategic zoning designation.”

Land within the Old Kent Road area. Whilst some industrial sites will change to mixed use, as part of the Old Kent Road regeneration, we have policies in place to ensure business relocation opportunities on site or nearby are fully explored (Policy P38 - Business relocation). Policy P26 (office and business development) also requires replacement employment floorspace on sites within the CAZ, opportunity areas, town centres and certain site allocations. We have introduced the Old Kent Road Business Network (however all businesses are encouraged to sign up) where we will be providing a match making service between developers and businesses to ensure existing businesses are included in redevelopment plans across the area. This also extends beyond borough boundaries and we are exploring opportunities for intensification of industrial land with Lewisham.

Southwark Council, and the GLA, have, by exchange of letter have confirmed an agreed approach to the phased release of Strategic Industrial Land for mixed use development that would include a range of commercial uses including distribution and light industrial uses in the Old Kent Road Opportunity Area. These letters, and associated plans are available to view on our website. Allocated sites require provision of employment floorspace where required - mixed use development is encouraged as recommended in the Employment Land Review (ELR) Part 1 study. Existing employment sites for redevelopment / change of use are assessed on a site by site basis.

Article 4 Directions have been imposed which restrict the change of use of from B1 (c) (light industrial) to C3 (dwellinghouse) of which there is a threat in the Borough, in order to protect this use class.

Smaller sites for protection outside of SPIL, CAZ, town centres and opportunity areas may be subject to specific requirements if they are designated site allocations. The ELR assesses the current economy of Southwark which considers the changing demands of businesses, to relate this back to 1990 as a baseline would be inappropriate as the economy has diversified and developed since. The suggested amendment to the NSP is

	<p>noted. The design guidance in the Old Kent Road AAP states how a range of new workspaces will be provided within mixed use development, to meet the 'Bow Tie' strategy in the AAP providing workspace 'from laptops to forklifts'.</p>
<p>Individual NSPPSV330.4</p> <p>We object to failure to objectively assess and define the business and other development needs of Southwark, and failure to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.</p> <p>We note, for example, that the Southwark High Street Survey 2015 concentrated on frontage retail, only considered 8 high streets within the confines of town centre boundaries, and the survey of people focused on shopping rather than the full range of activities, so the exercise was far from comprehensive. Likewise the only other broad review of high street settings was the Southwark Retail Study which concentrated on A class uses and commercial leisure, and only considered 14 designated town centres, thus ignoring around half of the borough's high streets. In a similar spirit the Southwark Industrial and Warehousing Land Study only took note of sites identified and recommended for protection as industrial land by the 2010 Employment Land Study, being the SPIL and LSIS, ignoring industrial and hybrid B class space, and indeed office / studio accommodation, in numerous non designated industrial sites, in high street settings and elsewhere scattered in predominantly residential areas. Most recently the Southwark Employment Land Review focused only on B class uses, disregarding a vast array of other employment generating uses, and it only considered the employment cluster areas highlighted in a 2009 study by URS, and relied on cursory reviews of areas, predominantly desk based, rather than systematic surveys. Thus the evidence base is woefully incomplete, sketchy and fractured.</p>	<p>We have a comprehensive evidence base that supports the New Southwark Plan which has been prepared by experienced economic consultants in collaboration with and on behalf of the council. This includes two comprehensive retail studies prepared by Lichfields. The selection of the eight high streets in the retail studies provided a representative and comprehensive sample of the diversity of population characteristics, retail style and retail offer. With regard to some of the smaller high streets, the council has surveyed all high streets in the borough and categorised them as primary or secondary shopping frontages. All of these parades are catalogued and mapped in the public domain. The industrial study and the employment land reviews (ELR) undertaken by GVA and CAG do not ignore non-designated industrial sites. The study includes a comprehensive analysis of 35 employment cluster areas across the borough. Furthermore the NSP site allocations for larger employment sites in the borough records the amount and use class of all uses present on the site and this is required to be reprovided on site where specified in policy, along with specified required use classes in site allocations. Our policies P26 and P38 (for reprovion or relocation of small businesses) require employment floorspace to be reprovided and specific businesses reprovided or relocated if a planning application is proposed for the site which requires a finer grain of analysis of the local economy prior to any changes being proposed to existing employment sites. The ELR does not ignore non-B class job growth it includes all sectors as identified through ONS and BRES data. The economy is constantly changing and it is important that planning policy and the evidence supporting it is kept up to date. Hence for our existing industrial areas including Old Kent Road and Parkhouse Street we have prepared more recent</p>

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

NPPF para 17 requires that every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. It requires that plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;

NPPF para 158 regarding using a proportionate evidence base requires that each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. The paragraph also requires local planning authorities to ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

NPPF para 160, under the heading Business, requires local planning authorities to have a clear understanding of business needs within the economic markets operating in and across their area.

NPPF para 23 requires planning policies to meet needs for retail, leisure, office and other main town centre uses in full, un-compromised by limited site availability, and to ensure this local planning authorities should undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites.

The insufficient extent of industrial land designation across Southwark through SPIL and LSIS;

Failure to afford clear protection to around 94ha extent of industrial accommodation, 77% of the borough's total;

Failure to require re-provision of industrial capacity through the process of

evidence through the OKR Workspace Demand Study which further updates the economical situation in Southwark and more specifically in the aforementioned areas and supports the council's approach to making effective use of land and mixing industrial and residential uses in new and innovative ways. This is in line with both Part 11 of the NPPF and the emerging guidance in the New London Plan on co-location.

The council are highly supportive of creative enterprises forming part of new development to ensure a rich and diverse cultural economy in regeneration. Our policies on business relocation (Policy P38) seek to retain existing businesses where possible., We have established the OKR Business Network and Creative OKR to further engage with creative businesses in this area, as well as further afield in Peckham, Elephant and Castle and Camberwell. We have established a new affordable workspace policy in the AAP which responds to workspace demand in the borough and have a number of creative/artists studio workspace providers on our Workspace Provider List. Policy P43: Leisure, arts and culture encourages new leisure, arts and cultural uses. Existing leisure, arts and cultural uses to be retained or reprovided in development, unless marketing evidence is provided.

New community facilities (Use Class D1, D2 and Sui Generis) and retention of community facilities is also encouraged within Policy P44: Community uses. This can include creative arts / art hub. This policy requires development to retain community facilities unless marketing evidence is provided. Site allocations are set out as per the recommendations set out in the ELR Part 1 which include allocations for Use Class B1 (light industrial).

Creative uses can still be provided in the other site allocations where use class D is set out within the site vision.

Creative uses and business uses are also encouraged within Policy P27: Railway arches which requires development within these to provide commercial activities including community facilities (D use classes) and sui

redevelopment;

Failure to give clear indication of the scale and geography of industrial intensification, co-location and substitution required in the borough;

Failure to designate 46 currently industrial sites as protected industrial, and the inclusion of many within site allocations that require no replacement of industrial capacity;

Failure to designate any new sites as protected industrial, even though this is clearly possible, and the lack of any explanation for this omission;

Failure to define requirements for industrial accommodation within mixed-development on 10 allocated sites that are currently SPIL or LSIS and 22 allocated sites that are currently Non-Designated industrial;

Failure to define any requirement for industrial accommodation within mixed-development on at least 13 allocated sites that are not currently industrial but where there is clear potential to incorporate such uses;

Failure to make site allocations for at least 3 sites that could, if development came forward, offer potential to incorporate industrial accommodation as part of mixed development;

Failure to justify reduction of SPIL designation, and the deletion of all LSIS designations, and the lack of any evidence that compensatory capacity can realistically be provided through intensification;

Failure to indicate the site of the Integrated Waste Management Facility as SPIL on the Policies Map, and indication of the possibility of removing SPIL designation from that facility.;

The abandonment of Locally Significant Industrial Sites policies and site designations, for which no justification has been given;

Failure to identify and protect sufficient capacity for industry and logistics within or close to the CAZ to support the needs of businesses and activities within that area, as the London Plan requires;

Failure to ensure that there will be no nett loss of industrial floorspace capacity within the OKR Opportunity Area;

Failure to ensure that workspace for the existing creative industries in the OKR OA will be protected and supported;

generis. We have also designated the land around to railway arches in South Bermondsey to Strategic Protected Industrial Land (SPIL) and look to intensify the business uses in this area in collaboration with Lewisham Council.

These inadequacies make the plan unsound as it is not justified, would not be effective, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan.

Representation	Officer Response
<p data-bbox="181 248 640 284">P26 Office and business development</p> <p data-bbox="181 288 602 360">Organisation: Trinity Village Estate NSPPSV195.1</p> <p data-bbox="181 400 1093 539">The Southwark New Local Plan Draft Policy P25 seeks to protect B Class and similar sui generis uses on Strategic Protected Industrial Land. This is consistent with the draft policies of the emerging London Plan and is supported by TP.</p> <p data-bbox="181 579 1093 794">Draft Policy 26 (Office and Business Development) replaces Draft Policy 24 (Office and Business Development), which was published in the Regulation 18 Version of the New Local Plan (June 2017). Draft policy 26 provides protection to B Class and employment generating sui generis uses in CAZ areas. Deleted draft policy 24 provided the same protection but covered all employment generating sites throughout the borough.</p> <p data-bbox="181 834 1115 1294">Neither of the emerging policies provide policy protection for non-designated industrial sites. The 2017 “Keep London Working” 1 report found that there was 6,976 hectares of land in industrial and related uses in London (in 2015) of which about 50 per cent was within SILs, a further 14 per cent was in LSIS designated by boroughs and the remaining 36 per cent was in Non-Designated Industrial Sites which are not designated in Local Plan policies maps. Draft London Plan Policy E4 provides protection for non-designated sites that contain industrial and related uses. The Southwark New Local Plan is not consistent with this policy, given that draft policies 25 and 26 only afford protection to employment generating sites within a SIL and the CAZ. The New Southwark Local Plan should provide the same policy protection to non-designated employment generating sites as those sites within the CAZ and SIL’s.</p> <p data-bbox="181 1334 322 1366">Policy Title</p>	<p data-bbox="1126 400 2078 719">Noted. Point one, the focus has shifted from regeneration areas to focus more specifically on retaining and increasing employment floorspace in key strategic locations. This shift mirrors the focus in the London Plan on promoting mixed use development in the CAZ and subsequent losses of office floorspace to residential through permitted development rights. These losses have meant the policy needed to be strengthened to focus more specially on protecting and increasing employment floorspace. Employment floorspace has been promoted in preferable locations: the Central Activities Zone, town centres and opportunity areas.</p> <p data-bbox="1126 759 2078 863">Point two, non-designated industrial sites are covered by Policy P26 regarding re-provision of employment (B class) uses where they are located in the opportunity areas, town centres or it is specified in a site allocation.</p> <p data-bbox="1126 903 2078 967">Point three, the title covers the land uses protected in this policy. Please see comments made for P25 for industrial sites, P28, P30 and P32 for retail.</p> <p data-bbox="1126 1007 2078 1150">Point four, P26 Office and business development seeks to protect B class use floorspace or sui generis employment generating uses in the Central Activities Zone, town centres, and opportunity areas and where specified in site allocations.</p>

With regard to the title of draft policy 26 the term ‘business development’ traditionally refers to light industrial / office uses in planning terms and is not coherent with the policy wording which refers to other employment uses, including B2/B8 uses as well as sui generis employment generating uses. The title of the policy should therefore be amended from “Policy 24 - Office and Business Development” to read:

“Policy DM24 (Employment Development)”

Amending the title to the above would make the policy more consistent with London Plan and NPPF.

#### Conclusion

The current business operations of Travis Perkins in Southwark are commercially successful. TP is seeking to ensure that its builders’ merchants (both existing and any future new branches) are protected through robust local planning policies. Draft policy 26 in its current form does not protect non designated industrial related functions. These suggested amends will protect employment and sui generis employment generating uses, not just on SIL and CAZ land but on all industrial related land throughout the borough.

We trust that the content of this letter is clear and we would be grateful if you would keep us informed of the progress of the New Southwark Plan. Should you have any questions or wish to discuss the future of this site, please do not hesitate to contact me.

Organisation: Helix International Group  
NSPPSV80.3

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

P26 Office and business development seeks to protect B class use floorspace or sui generis employment generating uses in the Central Activities Zone, town centres, and opportunity areas and where specified in site allocations. All site allocations currently illustrate the area of the site and include an audit

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.

of existing uses including their use class and estimated floorspace. Regarding the development of 328 St James' Road, the site allocation guidance is not overly prescriptive to ensure creative flexibility, further guidance can be found in the OKR AAP and associated evidence base. Planning applications must ensure that 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. Guidance on co-location of a range of uses including industrial is available for the Old Kent Road area where mixed use will be the most prominent typology, including light industrial and creative uses.

Organisation: Barkwest and Regent Group  
NSPPSV20.5

Point 2 states that "in exceptional circumstances, the loss of employment floorspace may be accepted in the Central Activities Zone, town centres, opportunity areas and where specified in site allocations where the retention or uplift in employment floorspace on the site is not feasible. This must be demonstrated through a marketing exercise for two years immediately prior to any planning application, for both its existing condition and as an opportunity for an improved employment use through redevelopment which shows there is no demand".

It will not be possible to rigorously market test all employment space for two years prior to a planning application as the application will often be run in parallel with the remaining periods of limited or declining occupation but where there is no appetite by a site owner to market the buildings in their existing condition which is often poor, out of date or semi derelict condition, and due to the need to make best use of a site for mixed use purposes. The policy should account for this by clarifying in the supporting text that site specific situations will be accounted for.

In assessing whether a loss of employment floor area may be justified quantitatively, consideration should also be given to the quality and type of

Noted. The 2 year marketing period is considered appropriate. There are low vacancy rates in Southwark and demand for a range of workspaces remains high, therefore it is not considered this policy requirement would result in the proliferation of vacant or underused units but act as an incentive for effective marketing to ensure the units are occupied by the demand our evidence shows.

Policy 26 stipulates in exceptional circumstances the loss of employment floorspace may be accepted in the CAZ, town centres and opportunity areas where this is not feasible and where the two year marketing period demonstrates there is no demand.

employment floor space that may be provided on-site as part of a mixed-use scheme. The supporting text states that in Opportunity Areas, mixed use neighbourhoods will incorporate new types of flexible business workspace across a range of sectors including light manufacturing, technology, science, creative and cultural industries and the digital economy. This is supported. On this basis, a reduction in the quantity of existing employment floorspace may be justified where proposals incorporate a greater proportion of flexible workspace for small and medium sized enterprises.

Likewise, there may be a reduction in the total employment floor area on a site by site basis, but this may be justified where the employment offer as part of a mixed-use scheme is more fit for purpose for modern occupiers and where it can be retrofitted for future uses as well as delivering higher job densities off smaller floorplates.

We believe that this approach will reward those able to provide a fine grain of genuinely mixed-use developments, which should be encouraged. The policy and / or supporting text should be amended accordingly.

Policy P26 should be amended to state that the loss of employment floorspace may be accepted where the retention or uplift on site is not feasible and where there is no demand, or where it can be demonstrated that the employment floorspace to be provided is designed flexibly to meet the current and future demands of small and medium sized businesses.

Organisation: Berkeley Homes (South East London)  
NSPPSV21.9

As noted in previous representations +. With a large proportion of the land within Area Action Plans and Opportunity Areas containing these uses the Council is harming the ability for the other strategic priorities for the Borough to be delivered (new housing, jobs and public realm). As noted in the NPPF Paragraph 20, to help achieve economic growth, LPAs should plan pro-

We expect development in the borough to grow the number of jobs, resources knowledge and innovation in a range of sectors. Therefore in order to satisfy the growing demand as highlighted within the ELR, Southwark needs to deliver significant growth of around 460,000sqm of new office space, which will be concentrated around the Central Activities Zone and

actively to meet the development needs of business and support an economy fit for the 21st century.

Greater emphasis should be placed on the number of jobs (employment density) and the type of employment floorspace being delivered rather than a crude quantitative assessment of floorspace. The emphasis should be on creating jobs, building businesses and opportunities and this can best be achieved through the delivery of a range of appropriately sized and flexible accommodation; principally workspace, co-working space, studio and SME type units. This delivers an efficient use of land which allows other uses and enhanced public realm to be provided within schemes. This demonstrates that it is not the amount of floorspace provided but what it comprises, and how it allows for the intensification of the number of jobs on site. The crude re-provision of gross internal floorspace could deter potential development as the demand for large areas of business uses in an area may be limited, however higher density employment uses can deliver the number of jobs needed to maintain a genuine mixed use character.

The re-provision of employment accommodation on a site should not take into account the amount of yard areas or hardstanding which exists on a site. These areas reflect the policies and standards of previous planning regimes which sought large areas of car parking, servicing and vehicle access and turning areas. In tune with Policy E7 of the DLP greater intensification of employment areas should avoid such inefficient areas and developers should not have to re-provide these in future development.

Organisation: Dulwich Estates  
NSPPSV52.6

Emerging policy P26 deals with offices and business development. The Estate supports the intention of policy to support office and business development in the CAZ, town centres and opportunity areas in particular, in recognition of

town centre locations. The ELR also specifies that up to the period of 2036 employment is forecast to increase employment by approximately 84,000 jobs, 26,000 of which has already occurred by 2026. In the Old Kent Road specifically we expect development to double the number of jobs in the area, alongside a range of low to high density workspaces to meet current demands. The re-provision of floorspace as an assessment is appropriate to secure this uplift in jobs and meaningful employment space to be provided.

We expect development in the borough to grow the number of jobs, resources knowledge and innovation in a range of sectors. Therefore in order to satisfy the growing demand as highlighted within the ELR, Southwark

their role as commercial hubs. The Estate is concerned however that the proposed two year marketing period required in order to justify a loss of office and business floorspace is unnecessarily restrictive and places an inequitable financial burden on charity landowners in particular, such as the Estate, whose beneficiaries rely upon income from the property portfolio and whose other adjoining tenants are impacted whilst the property remains vacant when a possible alternative user/occupier could be readily available to take on the premises.

The impact of this policy would be to enforce long term voids in the Estate's property portfolio, thereby directly impacting on the Estate's adjoining tenants.

We do not consider that this approach is in accordance with the NPPF and thus is unsound. Paragraph 51 of the NPPF recommends that Local Planning Authorities "should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate."

Evidence of continued unsuccessful marketing of vacant floorspace as required by policy should not comprise the sole indicator of a 'strong economic reason' why such a use should be retained; other marketing evidence could include achieved rental values (compared to nearby properties), the impact a vacant unit is having on adjoining retailers and their business and other periods of vacancy. It is a Core planning principle of the NPPF that "Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities". Additional forms of evidence would help to indicate whether the existing commercial floorspace is operating efficiently and as the most sustainable use of the land, and

needs to deliver significant growth of around 460,000sqm of new office space, which will be concentrated around the Central Activities Zone and town centre locations. The ELR also specifies that up to the period of 2036 employment is forecast to increase employment by approximately 84,000 jobs, 26,000 of which has already occurred by 2026. The 2 year marketing period is considered appropriate. There are low vacancy rates in Southwark and demand for a range of workspaces remains high, therefore it is not considered this policy requirement would result in the proliferation of vacant or underused units but act as an incentive for effective marketing to ensure the units are occupied by the demand our evidence shows. Policy 26 stipulates in exceptional circumstances the loss of employment floorspace may be accepted in the CAZ, town centres and opportunity areas where this is not feasible and where the two year marketing period demonstrates there is no demand. Policy P15 (efficient use of land) is supportive of meanwhile uses.

whether an alternative land use would be more beneficial to the immediate area and wider Borough targets.

Furthermore, we consider that additional wording to the policies that would widen the opportunities to release employment floorspace would enable other objectives of the Plan to be realised.

Whilst we acknowledge that the NPPF identifies the value in allocating sites and designating areas, this is in order to promote development and flexible use of land. We do not consider therefore that the strict protection of employment floorspace is in conformity with the principles and the policies within the Framework and is thus unsound.

The NPPF makes a number of references to ensuring flexibility. In describing the presumption of sustainable development, it recommends that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless (i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or (ii) specific policies in the Framework indicate development should be restricted. Paragraph 22 states, “Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for an 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.”

The impact of the proposed policy is therefore to restrict the future development of existing employment sites, thereby neglecting the presumption in favour of sustainable development and the Core planning principle which requires the planning system to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country

needs. We consider that this conflict with national policy should be remedied by the inclusion of policy wording which seeks to acknowledge the NPPF's requirement for flexibility and the avoidance of long term land allocations and subsequently outlines a process by which designations can be reviewed or circumstances under which the introduction of alternative land uses be considered which is not based solely upon continuous marketing of vacant floorspace.

A more constructive approach would be to allow 'meanwhile' uses whilst marketing is ongoing. This would allow the Estate to continue to generate an income, offer short term accommodation to occupiers who require premises without the obligations of lengthy and costly lease terms (this is likely to include start up and independent organisations), and ensure that the accommodation is in beneficial use, potentially providing vital local services and not impacting upon other adjoining occupiers.

Organisation: GLA  
NSPPSV66.8

There is a lack of clarity in the draft NSP as to how Southwark will retain its industrial capacity. The London Plan classifies Southwark as a limited transfer borough, with exceptional planned release related to the Old Kent Road opportunity area. In the draft London Plan, Southwark is categorised as a borough which should "retain capacity".

The draft NSP designates 27.6Ha of industrial land as SIL; in 2015 there was a total of 82.9Ha (64.1Ha SIL, 18.8Ha LSIS) protected industrial land in 2015,

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

according to our Aecom industrial land supply study. This represents a very significant planned loss of designated industrial land, which is an issue that has been raised in previous consultation responses and at meetings between Southwark and GLA officers.

From recent discussions with Southwark officers, it seems that Southwark is aware of the issue of generally higher value office uses displacing industry without proper policy in place. However, Policy P25 only protects the retained SIL, and Policy P26 doesn't differentiate between offices and other business development, with reference only made to B use class rather than specifying the different sub-classes.

Site allocations on existing industrial sites (both sites proposed to be released from SIL, and other non-designated industrial sites) similarly require development only to re-provide B Class uses, or explicitly state B1 (rather than including existing B1c/B2/B8 or SG industrial uses). Overall, then, the Plan as it stands doesn't adequately show how it will retain industrial capacity in Southwark, both on (adopted) designated SIL and LSIS and on non-designated industrial sites.

The draft OKR AAP provides some resolution towards this issue, setting out clear and detailed policies, site allocations and masterplans for the intensification and co-location of existing industrial sites. However, the draft OKR AAP is at the preferred options stage and is unlikely to be adopted for some time and therefore the draft NSP will need to provide at least some of the detail and policies contained within the draft AAP.

There are also concerns regarding the extent of release of SIL on some sites in the OKR area, which are detailed below in the comments on the draft OKR Area Vision.

It is recommended that the draft NSP sets out:

- a mechanism by which the industrial capacity of the borough will be protected, and

Other mixed use sites would need to conform to the design guidance in the Old Kent Road AAP which includes a variety of workspaces 'from laptops to forklifts'.

- clarify in relevant site allocations and policy that industrial capacity, which generally means floorspace, specifically B1c/B2/B8/SG industrial uses, should be retained or intensified.

Organisation: GPE (St Thomas Street)  
NSPPSV67.4

This policy requires sites in the CAZ, town centres and opportunity areas to increase the amount of employment floorspace on site. This is welcomed as an effective means of delivering the strategic objective of ensuring Southwark has a strong local economy.

However, the need to submit marketing strategy for the use and occupation of new employment floorspace does not appear to be justified, as there is an identified need to deliver around 460,000sqm of new office space to meet demand in Southwark.

The current wording of this policy is also unclear and would benefit from clarification to ensure it can be effectively applied. The condition should be reworded as follows:

“1. In the Central Activities Zone, town centres, ~~and~~ opportunity areas and ~~where specified~~ in site allocations identified for continued employment uses, development on existing employment sites 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~~ 2. On sites where it is appropriate, feasible and viable for housing to be incorporated into existing employment sites without compromising their employment use, ~~Promote~~ the successful integration of homes and employment space should be considered through ~~in~~ the physical layout of developments and approach to servicing. ~~in areas that will accommodate~~

Whilst there is a need to provide an additional 460,000sqm of additional floorspace within the borough, a marketing strategy is required to ensure it will meet the market demand and will be feasible on site. This is to ensure better quality of protection which is relevant to the site.

<p><del>mixed use development</del>. Housing can be incorporated into mixed use development alongside This will include a range of employment spaces including freight, logistics, light industry, co-working, maker spaces and offices; and</p> <p><del>1.3 Provide a marketing strategy for the use and occupation of the employment space to be delivered to demonstrate how it will meet current market demand; or</del></p> <p>23. In exceptional circumstances, the loss of employment floorspace may be accepted in the Central Activities Zone, town centres, opportunity areas and where specified in site allocations where the retention or uplift in employment floorspace on the site is not feasible. This must be demonstrated through a marketing exercise for two years immediately prior to any planning application, for both its existing condition and as an opportunity for an improved employment use through redevelopment which shows there is no demand.”</p>	
<p>Organisation: Peckham Society NSPPSV140.14</p> <p>NSP 65 PS believes existing level of retail should be retained REASONS To enable policy P26 to be met</p>	<p>The reprovision of retail (A class uses) is covered under policies P30 (town and local centres), P32 (protected shopping frontages) and P33 (shops outside of town centres and protected shopping frontages) as well as P29 (small shops).</p>
<p>Organisation: Space Studios NSPPSV169.03</p> <p>Small and independent businesses we object to: The restriction of P26 point 1 to CAZ, town centres, opportunity areas and where specified in site allocations; Failure to state that the retain or increase requirement defined in 1.1 will apply to accommodation type, not just to floorspace; The retain or increase requirement in P26 1.1 being only related to employment floorspace (GIA) on-site, hence excluding yards;</p>	<p>Southwark's strategy is to allow flexibility for smaller employment sites not within the designated areas set out P26, which is where the majority of employment sites are concentrated. Outside of these areas policies in individual site allocations may require specific uses depending on the nature of the site. With regard to the accommodation type, we require a marketing strategy for the site to ensure it is meeting current and future workspace demand. We would expect to see appropriate commercial servicing and yard</p>

<p>The wording of P26 point 2 that allows exceptions to the retain or increase policy without an off-site compensatory requirement;          Failure to specify in 67 site allocations the required response to P26, including lack of quantum and type requirements for development and failure to give facts about existing floorspace and use types.</p>	<p>space included in developments that require the successful operation of different types of workspaces. We can require payments in-lieu for the loss of employment spaces which is included in our Section 106 and CIL SPD. All site allocations specify existing floorspace and use classes on the site.</p>
<p>Organisation: Studio Makecreate          NSPPSV175.3</p> <p>Regarding Strong, local economy policy P26: Office and business development we object to:</p> <p>The restriction of P26 point 1 to CAZ, town centres, opportunity areas and where specified in site allocations;          Failure to state that the retain or increase requirement defined in 1.1 will apply to accommodation type, not just to floorspace;          The retain or increase requirement in P26 1.1 being only related to employment floorspace (GIA) on-site, hence excluding yards;          The wording of P26 point 2 that allows exceptions to the retain or increase policy without an off-site compensatory requirement;          Failure to specify in 67 site allocations the required response to P26, including lack of quantum and type requirements for development and failure to give facts about existing floorspace and use types.</p> <p>These inadequacies make the plan unsound as it is not justified, would not be effective, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan</p>	<p>Southwark's strategy is to allow flexibility for smaller employment sites not within the designated areas set out P26, which is ewhere the majority of employment sites are concentrated. Outside of these areas policies in individual site allocations may require specific uses depending on the nature of the site. With regard to the accommodation type, we require a marketing strategy for the site to ensure it is meeting current and future workspace demand. We would expect to see appropriate commercial servicing and yard space included in developments that require the successful operation of different types of workspaces. We can require payments in-lieu for the loss of employment spaces which is included in our Section 106 and CIL SPD. All site allocations specify existing floorspace and use classes on the site.</p>
<p>Organisation: Team London Bridge          NSPPSV179.3</p> <p>14. We strongly support the positive approach to accommodating a growing market for business uses in Policy P26. This is confirmed by our own analysis</p>	<p>The policies in the London Plan and the Mayor's CAZ SPG provide the regional context for development in the CAZ and this is further supported by</p>

<p>of demand in the London Bridge area. The London Bridge Plan seeks to ensure “London Bridge will become the retail core for the borough of Southwark and the commercial core for London. A strong local economy will be bolstered by a mix of commercial users, tourism and local spend. Retail opportunities will expand, incorporating both traditional high street occupiers with local, independent fare that diversifies the district and provides an improved overall offer throughout London Bridge.”</p> <p>15. We believe Policy P26 could be bolder in establishing the ambition for commercial growth. Achieving this growth will require careful balance to be struck with other competing uses and within the London Bridge area we believe a clear priority should be established for commercial office, retail and leisure uses over residential. This would also be consistent with Policy SD5 C of the New London Plan which states “Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in other core commercial areas of the CAZ.” These other areas include London Bridge.</p> <p>16. We believe a revised Policy P26 would be complemented by the New Southwark Plan making this approach clearer in its Area Vision for London Bridge.</p> <p>Recommendations</p> <ul style="list-style-type: none"> <li>• Affirm an emphasis on office, retail and cultural development over residential in London Bridge through the Area Vision</li> <li>• Explicitly recognise the need to prioritise office, retail and cultural development over residential in some parts of the Borough in a revised Policy P26</li> </ul>	<p>NSP Policy P26 on a local level. The vision for London Bridge includes a strong emphasis on the core functions of the CAZ, including global commerce and opportunities to strengthen cultural uses and retail.</p>
<p>Individual NSPPSV193.7</p> <p>The plan is not founded on robust and credible evidence bases / the sources of evidence are not convincing. There is not a clear cut audit trail of how and why the preferred approach was arrived at. Alternative options have not been properly explored.</p>	<p>The site allocations include an audit of existing uses including their use class and estimated floorspace. Policies in the strong local economy section seek to protect B class use floorspace where they are specified in site allocations, or located in the CAZ, opportunity areas and town centres. Policy P38 is also</p>

**Not Effective Not Positively Prepared Not Justified:**

Incapable of being monitored because the sites are not sufficiently well understood, leading to inevitable gaps/inconsistencies (not positively prepared) in terms of how the spaces and uses (informal / cultural / economic) and the local character of the sites (can) contribute to the environmental economic and social sustainability of their wider settings. Consequently the aims of the Area Visions are not achievable and along with the Site Allocations are not justified.

**Detail/ Proposed Changes.**

In addition to the aforementioned non-credible evidence base (the site analysis described in the methodology) there is no Local List policy in the NSP. In addition to these deficiencies there a severe gap in the evidence base that supports the Strong Local Economy policies. These deficiencies compound to constitute a severe failure in understanding the relationship between the functioning of the local economy and the role of the existing built fabric as it is currently occupied. There has been no study to link these subjects arising from the Impact Assessment. In terms of character alone the Characterisation Studies for Bermondsey are out of date. Despite this they have been used (erroneously) to mis-define the boundary of the OBF Neighbourhood Area. Neighbourhood plans (with polices like Site Briefs for example) are a tool which could inform or indeed replace the Site Allocation policies in some areas (deficient as they are in credible evidence / processes to support them): Local knowledge and understanding of use and (potential) cultural value of sites should be being drawn out and tied into the Area Visions.

Both within and aside from (emerging) NPs, an audit of the local economy (in each Area Vision for example) combined with a Local List initiative could go some way to addressing this severe deficiency in the NSP's effective understanding of its subject.

**Detail/ Proposed Changes.**

There is no actual evidence (work described as having been undertaken in

relevant in relation to business relocation and P28 seeks to secure affordable housing in larger developments. The strong local economy section of the plan is formulated on the basis of a strong evidence base which includes analysis of Southwark's economy as a whole including sectoral growth and job projections. A Local List policy has been developed and we are also looking into mapping cultural, arts and leisure uses in town centres. We already map retail as part of the protected shopping frontages.

the Site Allocations Methodology paper) of detailed/iterative site analysis in relation to site capacity and similarly no evidence of proper investigations having been made into the potential effects on character and local heritage. To this end the attached letter of (21st January) - which has not been answered - asks for examples of working processes equating to Para. 3.11 (site capacity) and 3.2 (character, non-designated assets etc.). It then asks for evidence of how 3 key parts of the Integrated Impact Assessment (Historic England Good Practice Advice Note on P81 and IIAs 11 and 12 have been applied to the site allocations when in combination with the consultation received to date they would surely call into question the way tall buildings are still dominating the policies. More evidence should be gathered / made clear on how these sites are to be sensitively and sustainably developed using appropriate methods (currently lacking). There is no reason to assume that the failure to undertake the processes outlined in the methodology background paper are limited to NSP52&53 and the requirement for new evidence (to then be properly consulted on) therefore implicates ALL the site allocation policies - not just those whose sites -like NSP53 - constitute incredibly valuable and sensitive local heritage contexts but also those where for example the local economic and cultural uses and values have not been sufficiently if at all understood.

Organisation: Travis Perkins PLC  
NSPPSV194.2

The Southwark New Local Plan Draft Policy P25 seeks to protect B Class and similar sui generis uses on Strategic Protected Industrial Land. This is consistent with the draft policies of the emerging London Plan and is supported by TP.

Draft Policy 26 (Office and Business Development) replaces Draft Policy 24 (Office and Business Development), which was published in the Regulation 18 Version of the New Local Plan (June 2017). Draft policy 26 provides

The majority of our employment land is located in the CAZ, town centres, SPIL and opportunity areas which covers much of the north and central parts of the borough and where employment floorspace is required to be reprovided in redevelopment proposals., as required by Policies P25 and P26. We have introduced new SPIL sites at Admiral Hyson Industrial Estate and Old Jamaica Road Industrial Estate and introduced 3 new LSIS sites in the Old Kent Road, which is reflected in the NSP site allocations.

protection to B Class and employment generating sui generis uses in CAZ areas. Deleted draft policy 24 provided the same protection but covered all employment generating sites throughout the borough.

Neither of the emerging policies provide policy protection for non-designated industrial sites. The 2017 “Keep London Working” 1 report found that there was 6,976 hectares of land in industrial and related uses in London (in 2015) of which about 50 per cent was within SILs, a further 14 per cent was in LSIS designated by boroughs and the remaining 36 per cent was in Non-Designated Industrial Sites which are not designated in Local Plan policies maps. Draft London Plan Policy E4 provides protection for non-designated sites that contain industrial and related uses. The Southwark New Local Plan is not consistent with this policy, given that draft policies 25 and 26 only afford protection to employment generating sites within a SIL and the CAZ. The New Southwark Local Plan should provide the same policy protection to non-designated employment generating sites as those sites within the CAZ and SIL’s.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

#### Objection 22.

We object to the restriction of P26 point 1 to CAZ, town centres, opportunity areas and where specified in site allocations. The policy can work well across Southwark with no location limits, and by making such an amendment NSP soundness will improve.

[London Plan Policy E1](#) regarding offices requires that existing viable office floorspace capacity in outer and inner London locations outside the CAZ and NIOD should be retained, and development proposals should take into account the need for lower cost and affordable workspace. It is emphasised

#### Objection 22

These areas cover a significant amount of the borough and is where employment sites and mixed development is considered to be able to thrive the most.

in para 6.1.5 that it is important to ensure that there is sufficient space to support the growth of new start-up companies and to accommodate SMEs, including lower-cost and affordable business space. Thus Development Plans and development proposals should support the provision of space suitable for SMEs in light of strategic and local assessments of demand and supply.

**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: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

#### Objection 23.

We object to the failure to state that the retain or increase requirement defined in 1.1 will apply to accommodation type, not just to floorspace. Without such a requirement there will be a significant loss of industrial, workshop, studio and workroom accommodation, since this is harder to

#### Objection 23

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

incorporate in mixed developments, it generally takes up more volume, and yet it commands lower rent / sale values, than office space. This drafting inadequacy would add to the failure of the NSP to plan for the diverse accommodation needs of the borough's economy, and hence magnify its unsoundness. We suggest that wording could be added to state that development must retain or re-provide a similar mix of accommodation type, paying particular regard to matters including goods access, plan simplicity, floor loading, ceiling heights, natural light, emission management.

[London Plan Policy GG5](#) regarding growing a good economy requires those involved in planning and development should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

[NPPF para 154](#) states that Local Plans should set out clear policies on what will or will not be permitted and where.

[NPPF para 6](#) requires the planning system to contribute to the achievement of sustainable development, including through an economic role, contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements.

[London Plan para 2.1.14](#) about the Old Kent Road OA requires that workspace for the existing creative industries should be protected and supported.

[London Plan Policy SD4](#) regarding the Central Activities Zone (CAZ) requires that the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the

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. We use guidance from the draft London Plan on co-location of a range of uses including industrial and have bespoke design guidance in areas such as the Old Kent Road where mixed use will be most prominent including light industrial and creative uses.

intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.

**London Plan Policy E1** regarding offices requires that existing viable office floorspace capacity in outer and inner London locations outside the CAZ and NIOD should be retained, and development proposals should take into account the need for lower cost and affordable workspace. It is emphasised in para 6.1.5 that it is important to ensure that there is sufficient space to support the growth of new start-up companies and to accommodate SMEs, including lower-cost and affordable business space. Thus Development Plans and development proposals should support the provision of space suitable for SMEs in light of strategic and local assessments of demand and supply.

**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.

**London Plan Policy E2** requires that development proposals for new B1 business floorspace greater than 2,500 sqm (gross external area) should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.

<p>Organisation: Vital OKR  NSPPSV205  Individuals  NSPPSV91 NSPPSV128</p> <p>Objection 24.</p> <p>We object to the retain or increase requirement in P26 1.1 being only related to employment floorspace (GIA) on-site. This would cause a reduction in the provision of industrial accommodation as it does not include operational yard space. The wording should be amended to include operational yard space within the definition of floorspace, not limited to GIA.</p> <p><a href="#">NPPF para 14</a> requires Local Plans to meet objectively assessed needs.</p>	<p>Objection 24</p> <p>Yard space will be considered in relation to individuals sites and whether appropriate yard space and servicing appropriate to the business can be accommodated in mixed use and making more effective use of the site.</p>
<p>Organisation: Vital OKR  NSPPSV205  Individuals  NSPPSV91 NSPPSV128</p> <p>Objection 25.</p> <p>We object to the wording of P26 point 2 because it allows exceptions to the retain or increase policy without an off-site compensatory requirement. An off-site requirement in such exceptional circumstances is required by the London Plan, and it is essential in order to ensure that the NSP meets its</p>	<p>Objection 25</p> <p>Off-site compensatory payments where employment reprovision cannot be provided on site is featured in our Section 106 SPD. We will bring this into the policy wording as suggested.</p>

requirement to plan for the future accommodation needs the economy.

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

London Plan Policy SD4 regarding the Central Activities Zone (CAZ) requires that the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.

London Plan policy SD5 regarding offices, other strategic functions and residential developments in the CAZ requires that offices and other CAZ strategic functions are to be given greater weight relative to new residential development in the London Bridge, Borough and Bankside opportunity area. The policy states that mixed-use office/residential proposals are supported in principle in those areas, where there is an equivalent or net increase in office floorspace, however residential development proposals should not lead to a loss of office floorspace in any part the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices and/or alternative provision is made for the provision of net additional office space near the development (including through swaps and credits, about which it is stated that local approaches to mixed-use development of offices with housing should take into account the potential to use land use swaps, credits and off-site contributions to sustain strategically-important clusters of commercial activities such as those in parts of the commercial core of the CAZ.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

Objection 26.

Objection 26

We object to narrowness in the wording of the P26 Reasons para and suggest The final 2 sentences be refined to read something like this: In our central London site allocations we are requiring an uplift in employment space to help meet this growing demand and provide for the particular industrial needs of the CAZ. In our opportunity areas, town centres and major site allocations, mixed use neighbourhoods and mixed-use developments will incorporate new types of flexible business workspace accommodating manufacturing, logistics, servicing, technology, science, creative and cultural industries and the digital economy, helping to boost the number of jobs in the borough and enhance economic diversity.

[London Plan para 6.2.1](#) emphasises that smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. Hence it is stated that to deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole, and that ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

[London Plan para 6.2.4](#) requires that where there there is demand for workspace or viable existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the intensification or reconfiguration of space. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to 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

Noted. The reasons wording will be reviewed.

to existing businesses is minimised.

**London Plan Policy E1** regarding offices requires that existing viable office floorspace capacity in outer and inner London locations outside the CAZ and NIOD should be retained, and development proposals should take into account the need for lower cost and affordable workspace. It is emphasised in para 6.1.5 that it is important to ensure that there is sufficient space to support the growth of new start-up companies and to accommodate SMEs, including lower-cost and affordable business space. Thus Development Plans and development proposals should support the provision of space suitable for SMEs in light of strategic and local assessments of demand and supply.

**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.

**London Plan Policy E2** requires that development proposals for new B1 business floorspace greater than 2,500 sqm (gross external area) should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

Objection 27.

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

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

Objection 21 applies to the site allocations on the following 24 sites, on which the current main use is office (or hybrid B class use), 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.

- NSP01
- NSP02
- NSP03
- NSP05
- NSP07
- NSP08
- NSP09

Objection 27

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

NSP14  
NSP15  
NSP16  
NSP17  
NSP18  
NSP20  
NSP21  
NSP44  
NSP45  
NSP46  
NSP49  
NSP52  
NSP53  
NSP54  
NSP11 (Tower Workshops)  
NSP80 (St Olav's Business Park)

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

NSP10 (Biscuit factory)  
NSP57 (Mandela Way)  
NSP56 (Crimscott + C&B)  
NSP66 (St James's etc)  
NSP67 (Verney etc)  
NSP89 (Hatcham)  
NSP70 (Ilderton Road)  
NSP68 (Devon and Sylvan)  
NSP65 (Asda etc)  
NSP23 (Parkhouse)  
NSP13 (Old Jamaica Road Business Estate)

NSP22 Camberwell station)  
NSP25 (Valmar)  
NSP26 (Camberwell Bus Garage)  
NSP27 (Abellio garage)  
NSP28 (Camberwell station rd / Warner rd)  
NSP30 (Lomond Grove laundry)  
NSP31 (Edmundson)  
NSP37 (Kwik Fit etc)  
NSP39 (Railway Rise)  
NSP41 (Goose Green)  
NSP43 (Bakerloo depot)  
NSP44 (Newington Causeway)  
NSP50 (Bath Trading Estate)  
NSP64 (stables)  
NSP71 (Toys are us)  
NSP73 (Kwik Fit)  
NSP74 (Blackfen)  
NSP77 (East of Rye Ln)  
NSP82 (Harsworth Quays etc)  
NSP40 (Townley Road)  
NSP75 (Peckham, Aylesham Centre etc)  
NSP32 (Grove Park)  
AAAP (Aylesbury Action Area) sites not already built  
NSP79 (Gas holder site)  
NSP12 (Riverside Rotherhithe)  
NSP 48  
NSP42 (sites south of Borough Road)  
NSP82  
NSP81 (Canada Water main sites)  
PNAAP19 (Ex sausage)  
PNAAP16  
PNAAP9 (north of Peckham Road)

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

[London Plan Policy GG5](#) regarding growing a good economy requires those involved in planning and development should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

[NPPF para 154](#) states that Local Plans should set out clear policies on what will or will not be permitted and where.

[London Plan Policy SD4](#) regarding the Central Activities Zone (CAZ) requires that the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.

[London Plan policy SD5](#) regarding offices, other strategic functions and residential developments in the CAZ requires that offices and other CAZ strategic functions are to be given greater weight relative to new residential development in the London Bridge, Borough and Bankside opportunity area. The policy states that mixed-use office/residential proposals are supported in principle in those areas, where there is an equivalent or net increase in office floorspace, however residential development proposals should not lead to a loss of office floorspace in any part the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices and/or alternative provision is made for the provision of net additional office space near the development (including through swaps and credits, about which it is stated that local approaches to mixed-use development of offices with housing should take into account the potential to use land use swaps, credits and off-site contributions to sustain strategically-important clusters of commercial activities such as those in parts of the commercial core of the CAZ.

[London Plan Policy E1](#) regarding offices requires that existing viable office

floorspace capacity in outer and inner London locations outside the CAZ and NIOD should be retained, and development proposals should take into account the need for lower cost and affordable workspace. It is emphasised in para 6.1.5 that it is important to ensure that there is sufficient space to support the growth of new start-up companies and to accommodate SMEs, including lower-cost and affordable business space. Thus Development Plans and development proposals should support the provision of space suitable for SMEs in light of strategic and local assessments of demand and supply.

**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.

**London Plan Policy E2** requires that development proposals for new B1 business floorspace greater than 2,500 sqm (gross external area) should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.

**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.

Organisation: John Lyon's Charity  
NSPPSV214.5

Policy P26 'Office and business development' requires development to retain or re-provide existing employment floorspace in town centres, opportunity areas and Central Activities Zones. The Charity supports the wording of the policy text, however the Charity has concerns regarding criterion 2 of the policy.

Policy 26, criterion 2, states that uses for sites that do not involve job creation or retention/increase will require marketing evidence to justify the redevelopment of the site. The supporting text states that the marketing evidence to justify the redevelopment of the site and that this is required to

The 2 year marketing period is considered appropriate. There are low vacancy rates in Southwark and demand for a range of workspaces remains high, therefore it is not considered this policy requirement would result in the proliferation of vacant or underused units but act as an incentive for effective marketing to ensure the units are occupied by the demand our evidence shows.

Policy 26 stipulates in exceptional circumstances the loss of employment floorspace may be accepted in the CAZ, town centres and opportunity areas where this is not feasible and where the two year marketing period

<p>be undertaken for two years. We do not consider that the marketing timescales appropriate for sites related to industry to be appropriate for town centre uses that must be flexible to market demand. In this respect this requirement would effectively remove a site from the economic market for two years whilst the appropriate evidence is gathered to demonstrate that the redevelopment of the site is justified.</p>	<p>demonstrates there is no demand.</p>
<p>Organisation: Ilderton Road LLP NSPPSV217.7</p> <p>Office and business development states that in the Central Activities Zone, town centres, and opportunity areas and where specified in site allocations development must: retain or increase the amount of employment floorspace (GIA) on-site (B class use or sui generis employment generating uses); and promote the successful integration of homes and employment space in physical layout and servicing in areas that will accommodate mixed use development.</p> <p>We support this approach to office and business development and note that the planning application is compliant with this draft policy delivering an intensification of employment floorspace for an open B1 use.</p>	<p>Noted.</p>
<p>Individual NSPPSV237.4</p> <p>Storage &amp; access areas should also receive the same level of protection as employment floorspace, because they are part of the same ecosystem that enables that quantity of floorspace to be viable.</p> <p>If they do not, as in the NSP Submission document, it will tend to discriminate against small independent businesses which do not have separate warehousing and logistics, and will favour chains which integrate with a wider distribution and warehousing network. This will have the effect of discriminating against local entrepreneurs. In Southwark's large inner-city areas, BAME communities rely disproportionately on local commerce as a route out of local poverty, so this potentially discriminates against them, and</p>	<p>Storage and distribution uses fall under 'B class uses' and are therefore considered under Policy P26.</p> <p>Annex 3 of the NSP contains further guidance on marketing statement requirements.</p>

is therefore unsound.

P2 : Not positively prepared.

“Marketing exercise” is not specific enough. Marketing evidence to support the conversion of shops to residential has been accepted even where sporadic and only in professional journals, unlikely to reach many potentially interested local entrepreneurs. It could be made sound by rewording to: “through a marketing exercise for two years and by being entered on a publicly-searchable website database maintained by Southwark Council, immediately prior to any planning application, for both its existing condition and as an opportunity for an improved employment use through redevelopment which shows there is no demand.

1. The restriction of P26 point 1 to CAZ, town centres, opportunity areas and where specified in site allocations;
2. Failure to state that the 'retain or increase' requirement defined in 1.1 will apply to accommodation type, not just to floorspace;
3. The 'retain or increase' requirement in P26 1.1 being only related to employment floorspace (GIA) on-site, hence excluding yards;
4. The wording of P26 point 2 that allows exceptions to the 'retain or increase' policy without an off-site compensatory requirement;
5. Failure to specify in 67 site allocations the required response to P26, including lack of quantum and type requirements for development and failure to give facts about existing floorspace and use types.

These inadequacies make the plan unsound as it is not justified, would not be effective, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan.

Southwark's strategy is to allow flexibility for smaller employment sites not within the designated areas set out P26, which is where the majority of employment sites are concentrated. Outside of these areas policies in individual site allocations may require specific uses depending on the nature of the site. With regard to the accommodation type, we require a marketing strategy for the site to ensure it is meeting current and future workspace demand. We would expect to see appropriate commercial servicing and yard space included in developments that require the successful operation of different types of workspaces. We can require payments in-lieu for the loss of employment spaces which is included in our Section 106 and CIL SPD. All site allocations specify existing floorspace and use classes on the site.

Representation	Officer Response
<p data-bbox="188 253 423 280">P27 Railway Arches</p> <p data-bbox="188 296 546 360">Organisation: Better Bankside NSPPSV22.6</p> <p data-bbox="188 403 1061 612">Policy 27 identifies the opportunities presented by Southwark’s historic railway arches and we advocate reinstating the railway arches for commercial and community uses. Whilst Better Bankside are encouraged that the policy supports the delivery of the Low Line as a ‘walking route’, Policy 27 should also recognise the economic potential offered by the unlocking of the Low Line, as referred to in Policy 49.</p>	<p data-bbox="1140 403 2063 576">Noted. Proposals which affect railway arches and/or the Low Line will be subjected to criteria within policy 27 and 49. The reasons mention the economic potential of the Low Line, by being suited to small businesses and being interesting places for shops, cultural. creative and community uses and restaurants.</p>
<p data-bbox="188 659 405 722">Organisation: GLA NSPPSV66.9</p> <p data-bbox="188 766 1066 866">The Mayor supports this policy, particularly as it can provide low-cost and business space in line with draft London Plan Policy E2 Low-cost business space</p>	<p data-bbox="1140 766 1223 793">Noted.</p>
<p data-bbox="188 914 468 1050">Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91 NSPPSV128</p> <p data-bbox="188 1093 349 1120">Objection 28.</p> <p data-bbox="188 1165 1106 1372">We object to P27 point 1 that allows other than industrial uses in railway arches generally. Such a policy, if allowed to apply across over 800 arches, could be expected to result in extensive loss of industrial accommodation, as other uses that can pay higher rents take the space. This would further the unsoundness of the plan as it would magnify industrial accommodation shortage, contributing to a potential 92ha loss of capacity across the</p>	<p data-bbox="1140 1093 1294 1120">Objection 28</p> <p data-bbox="1140 1165 2063 1372">Our ELR recognises the important role for the railway arches provide in the borough in ensuring this stock can provide for more jobs and workplaces through intensification and refurbishment. It does not specify use classes for railway arches generally. However, it does look at some individual arches and encourages mixed use development for these. Southwark has over 800 railway arches and a mix of uses is appropriate particularly to encourage the</p>

<p>borough, 77% of the current total, one of the results of Southwark’s failure to make every effort to objectively identify and then meet the business needs of the area. This policy should be reviewed together with reconsideration of town centre policy, industrial land policy, office and business development policy, associated map designations, site allocation requirements, and more, with a view to better matching the supply of business and other non-residential accommodation with current and future demand. Either this policy should be revised to restrict A class uses and community facilities in railway arches, or the suggestions that follow in our Objection 23 should be applied.</p> <p>NPPF para 14 requires Local Plans to meet objectively assessed needs.</p> <p>NPPF para 154 states that Local Plans should set out clear policies on what will or will not be permitted and where.</p> <p>London Plan Policy GG5 regarding growing a good economy requires those involved in planning and development should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.</p>	<p>opening up of walking routes through the Low Line proposals. The NSP seeks to encourage use of the arches to encourage culture and character which can be achieved through a number of uses.</p>
<p>Organisation: Vital OKR  NSPPSV205  Individuals  NSPPSV91 NSPPSV128</p> <p>Objection 29.</p> <p>We object to failure to designate most areas of railway arch accommodation as SPIL and LSIS. We suggest that most railway viaduct spaces currently in industrial use be designated as SPIL or LSIS and that P27 apply only to areas outside those designations. In most of those areas inclusion in town centre</p>	<p>Objection 29</p> <p>Some railway arches are designated as SPIL e.g. at South Bermondsey which is already adopted industrial land. If railway arches are currently in employment use and are located in the areas specified in Policy 26, this would ensure the reprovision of employment (B class) uses which is</p>

<p>designations will be appropriate and should be taken forward as part of a fuller review of those designations. If this was taken forward then our Objection 22 could be disregarded.</p> <p><a href="#">NPPF para 154</a> states that Local Plans should set out clear policies on what will or will not be permitted and where.</p> <p><a href="#">London Plan Policy GG5</a> regarding growing a good economy requires those involved in planning and development should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.</p>	<p>consistent with Policy 27. Other uses may be introduced where appropriate and in line with other policies to support the Low Line policy.</p>
<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91 NSPPSV128</p> <p>Objection 30.</p> <p>We object to the limited scope of P27 point 1. The must not impede principle should be extended to include the general functioning and satisfactory servicing of activities in arches and premises premises nearby.</p>	<p>Objection 30</p> <p>Noted.</p>
<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91 NSPPSV128</p> <p>Objection 31.</p> <p>We object to the failure to define the scope of P27 on the Policies Map.</p>	<p>Objection 31</p> <p>The policies map will be updated to include railway arch and Low Line routes.</p>

<p>Without this there is significant scope for ambiguity and challenge.</p>	
<p>Organisation: Studio Makecreate and Individual NSPPSV175.4 and NSPPSV323.3</p> <p>Regarding Strong, local economy policy P27: Railway arches we object to:</p> <p>Point 1 that allows other than industrial uses in railway arches generally;  Failure to designate most areas of railway arch accommodation as SPIL and LSIS;  Failure to define the scope of P27 on the Policies Map.</p> <p>These inadequacies make the plan unsound as it is not justified, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan.</p>	<p>Point 1 - Our ELR recognises the important role for the railway arches provide in the borough in ensuring this stock can provide for more jobs and workplaces through intensification and refurbishment. It does not specify use classes for railway arches generally. However, it does look at some individual arches and encourages mixed use development for these. Southwark has over 800 railway arches and a mix of uses is appropriate particularly to encourage the opening up of walking routes through the Low Line proposals. The NSP seeks to encourage use of the arches to encourage culture and character which can be achieved through a number of uses.</p> <p>Point 2 - Some railway arches are designated as SPIL e.g. at South Bermondsey which is already adopted industrial land. If railway arches are currently in employment use and are located in the areas specified in Policy 26, this would ensure the re-provision of employment (B class) uses which is consistent with Policy 27. Other uses may be introduced where appropriate and in line with other policies to support the Low Line policy.</p> <p>Point 3 - The policies map has now been updated to include railway arch and Low Line routes.</p>
<p>Organisation: Team London Bridge NSPPSV179.4</p> <p>The London Bridge Plan identifies the Low Line as both an economic and public realm opportunity. The public realm opportunities are well recognised by the submitted Local Plan, including Policy P49 protecting Low Line routes</p>	<p>Noted. Proposals which affect railway arches and/or the Low Line will be subjected to criteria within policy 27 and 49. The reasons mention the economic potential of the Low Line, by being suited to small businesses and</p>

<p>and inclusion in relevant Area Visions. The emphasis is on its role as a “public realm corridor” and “walking route”. We believe this underplays the economic potential of the Low Line, especially as a location for affordable retail and business units of the kind supported by Policies P28 and P29. We believe this could be achieved by a strengthening of Policy P27 on Railway Arches to recognise this role.</p> <p>Recommendations</p> <ul style="list-style-type: none"> <li>• Expand Policy P27 explicitly to support the Low Line as an economic as well as public realm opportunity, including the need to protect existing small retail and business uses and maximise the future supply of new opportunities for small retail and business spaces</li> <li>• Recognise the economic as well as public realm opportunities of the Low Line where relevant in Area Visions</li> </ul>	<p>being interesting places for shops, cultural, creative and community uses and restaurants.</p>
<p>Individual NSPPSV193.8</p> <p>P27 Fails to designate most areas of railway arch accommodation as SPIL and LSIS; The scope of P27 is not defined on the Policies Map.</p>	<p>Some railway arches are designated as SPIL e.g. at South Bermondsey which is already adopted industrial land. If railway arches are currently in employment use and are located in the areas specified in Policy 26, this would ensure the reprovision of employment (B class) uses which is consistent with Policy 27. Other uses may be introduced where appropriate and in line with other policies to support the Low Line policy. The policies map has now been updated to include railway arch and Low Line routes.</p>

Representation	Officer Response
<p data-bbox="188 253 405 285"><b>P29 Small Shops</b></p> <p data-bbox="188 296 573 360">Organisation: Aviva and Galliard NSPPSV18.9</p> <p data-bbox="188 403 1099 467">Policy P29 requires that developments proposing 2,500 sq.m GIA or more of retail space provide at least 10% of this space as small shops.</p> <p data-bbox="188 510 1115 611">It is not clear as to whether this requirement applies to all development sites within the Borough or is specific to those sites located within the town centre boundary only.</p> <p data-bbox="188 654 1081 791">The small shops requirement is too restrictive on the redevelopment of significant sites within the Old Kent Road Opportunity Area where it would not be appropriate to deliver a unit measuring less than 80 sq. m in floorspace.</p> <p data-bbox="188 834 1104 935">Aviva and Galliard object to the inclusion of wording at Policy P29 part 3 and request that this be deleted or amended to exclude sites within the Old Kent Road Opportunity Area.</p>	<p data-bbox="1140 403 2063 719">The requirement for small shops in developments over 2,500sqm GIA or over in retail space is applicable to all development sites and not just sites located within the town centre boundary. Any site located outside a town centre proposing over 2,500sqm of retail uses would be subject to a sequential assessment. Old Kent Road is proposed to be designated as two district town centres and will bring forward a variety of uses in line with the AAP and opportunity area framework. It is considered appropriate to ensure larger sites on the Old Kent Road deliver a range of large and small retail spaces to meet demand.</p>
<p data-bbox="188 983 663 1046">Organisation Bankside Residents Forum NSPPSV19.19</p> <p data-bbox="188 1090 1070 1153">Without a robust Retail Capacity Study, this policy is both not justified nor positively prepared.</p>	<p data-bbox="1140 1090 2063 1265">The NSP is supported by a robust Retail Capacity Study which is published as part of the evidence base. This includes a borough wide study in 2015 and an Old Kent Road and borough update in 2018. The study contains borough projections and a number of recommendations which are incorporated into policy in the New Southwark Plan.</p>

Organisation: Dulwich Estates  
NSPPSV52.9

Emerging Policy P29 requires small shops to be retained in town centres, except where there is no demand for continued use.

The Estate recognises the value of small shops, with the character of Herne Hill, Park Hall Road, Dulwich Village and smaller parades all benefitting from a range of unit sizes and types of occupier which contribute to their character and overall vitality.

The Estate is concerned however that this policy is not effective by failing to define what constitutes a small shop (notwithstanding our earlier concerns that it is not possible to simply quantify a small and / or independent business) nor how a lack of demand can be demonstrated. In the absence of a formal assessment criteria (and not necessarily relying solely on marketing, as we have described in respect of business floorspace), this introduces a high degree of planning risk and constrains effective and commercial management of retail uses.

The NPPF requires planning policies to be positive and to set out policies for the management and growth over the plan period. As currently drafted, this policy does not allow landowners to effectively manage their retail portfolios. The policy should be revised to define 'small shops', and to set out how a lack of demand is to be demonstrated.

Organisation: Elephant Amenity Network  
NSPPSV57.13

The policy is unsound, because it sets too high a threshold for the provision of at least 10% small shops. In keeping with other policies in the Plan, the threshold should be 1,000 sqm

To make the policy sound, it also needs to include measures to help

The definition of 'small shop' is provided within the Fact Box accompanying the policy. To clarify this is 80sqm gross. This is defined within the Roger Tym and Partners Small Shops Study for the GLA in 2010.

The policy seeks to ensure the retention of small shops if they are displaced in schemes of any size. The threshold is considered appropriate for encouraging a range of small shops to be delivered in larger scheme proposals. Medium/small size supermarkets are around 1,000sqm and therefore 10% of the space as small shops may not be able to be configured

<p>strengthen the retail offer of small and independent businesses.</p>	<p>in the design and layout of smaller schemes. Small and Independent businesses are considered within policy 28 of the NSP.</p>
<p>Organisation: Greenpruce GP NSPPSV72.9</p> <p>Old Kent Road is identified as a Major Town Centre and it is anticipated that any future redevelopment of this Site will include a significant quantum of retail floorspace, not least the replacement of the existing retail baseline. Regard will need to be had to the scale and format of the proposed retail and there is still a clear role and need for larger format retailers, including the Tesco superstore, which currently occupies the Site. Larger retail units will ultimately be provided alongside smaller units.</p> <p>The requirement of the draft wording of Policy P29 that requires developments of over 2,500 sqm to provide at least 10% of this space as small shops is too prescriptive and potentially not appropriate, or deliverable in instances such as this Site where the reality of the total quantum of retail floorspace proposed - due to its large-scale format- is such that the provision of 10% of this space as small-format retailing could potentially be onerous. It is proposed that this 10% requirement should be omitted from this policy and that instead the requirement for the delivery of small shops should be appropriate and proportionate to the nature of the Site's position and function within the surrounding town centre.</p> <p>If the 10% threshold is to remain a requirement of this policy then clarification should be made that this threshold only applies to net additional retail floorspace compared with the existing baseline and mix of retail units.</p>	<p>Old Kent Road is proposed to be designated as two district town centres and will bring forward a variety of uses in line with the AAP and opportunity area framework. It is considered appropriate to ensure larger sites on the Old Kent Road deliver a range of large and small retail spaces to meet demand. The threshold is gross floorspace in new development proposals. The re-provision of supermarkets and large floorplate stores alongside small shops is also a consideration for sites in the Old Kent Road to ensure a range of retail units sizes is accommodated.</p>

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

**Objection 36.**

We object to restriction of policy application to town centres, without justification. The wording of point 1 should be altered to commence: Throughout the borough, small shops...

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

[NPPF para 70](#) makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

**Objection 36**

Small shops outside town centres would fall within the scope of Policy P33 so there is no need to repeat this.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

**Objection 37.**

We object to failure to preclude residential use when it has been demonstrated there is no demand for continued shop use.

**Objection 37**

Regarding alternative uses of shops where there is no demand this is also covered by Policy P30 (retaining A class uses in town centres), Policy P32

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

NPPF para 70 makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

(protecting A1 shop use in protected shopping frontages) and Policy P33 (shops outside of town centres) so there is no need to repeat this in terms of use class. This policy relates to the size of shops to be retained, to ensure there are a range of smaller units to help smaller retail businesses thrive.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

**Objection 38.**

We object to failure to adequately define the scope of a shop, such as the policy requires to be retained or re-provided. We suggest that the 80sqm floorspace should apply to the sales area only, and the scope requiring retention or re-provision should also include associated amenity, storage and yard / access space.

NPPF para 70 makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

**Objection 38**

The definition of 'small shop' is provided within the Fact Box accompanying the policy. To clarify this is 80sqm gross. This is defined within the Roger Tym and Partners Small Shops Study for the GLA in 2010.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

Objection 39.

We object to the failure to define the scope of P29 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies. Without this there is significant scope for ambiguity and challenge.

NPPF para 157 states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation.

NPPF para 157 requires that Local Plans should Indicate land-use designations on a proposals map.

NPPF para 70 makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

Individual  
NSPPSV110.9

Strong local economies  
Policy P29 (Small shops) is unsound because it is not effective. The policy notes that 'where occupiers of small shops are at risk of displacement from a development there should be full consideration of the feasibility of providing

Objection 39

The policies map identifies town centre boundaries and protected shopping frontages along with an address schedule (Annex to the NSP) which cover primary and secondary shopping parades inside and outside of town centres across the borough.

This is a Borough-wide policy whereas AV.13 is specific to Peckham. This area vision clearly states a requirement for "large and small shops".

<p>affordable and suitable space for the existing occupiers in the new development'. Yet later in the document, the Peckham Area Vision emphasises the provision of space for larger retail outlets, not small shops. The policy is therefore not effective.</p>	
<p>Organisation: Studio Makecreate and Individuals NSPPSV175.7, NSPPSV323.5 and NSPPSV330.6</p> <p>Regarding Strong, local economy policy P29: Small shops we object to:</p> <p>Restriction of policy application to town centres, without justification; Failure to preclude residential use when it has been demonstrated there is no demand for continued shop use; Failure to adequately define the scope of a shop, such as the policy requires to be retained or re-provided. Failure to define the scope of P29 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies.</p> <p>These inadequacies make the plan unsound as it is not justified, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan.</p>	<p>Point 1 - Small shops outside town centres would fall within the scope of Policy P33 so there is no need to repeat this.</p> <p>Point 2 - Regarding alternative uses of shops where there is no demand this is also covered by Policy (retaining A class uses in town centres), Policy P32 (protecting A1 shop use in protected shopping frontages) and Policy P33 (shops outside of town centres) so there is no need to repeat this in terms of use class. This policy relates to the size of shops to be retained, to ensure there are a range of smaller units to help smaller retail businesses thrive.</p> <p>Point 3 - The definition of 'small shop' is provided within the Fact Box accompanying the policy. To clarify this is 80sqm gross. This is defined within the Roger Tym and Partners Small Shops Study for the GLA in 2010.</p>
<p>Organisation: Tesco Stores Ltd NSPPSV180.4</p> <p>Policy 29 of the New Southwark Plan supports the retention of small shops. Policy 29 states that 'developments proposing 2,500sq.m or more GIA of retail space shall provide at least 10% of this space as small shops'. Whilst our client supports the objectives of Policy 29 in principle, and acknowledges that this policy reflects the new London Plan, it is contended that it is not clear whether the requirements of Policy 29 would apply where proposals seek the replacement of existing retail floorspace. Our client therefore requests that further clarification is provided in this regard.</p>	<p>The policy is 2,500sqm gross floorspace in new development proposals. The re-provision of supermarkets and large floorplate stores alongside small shops is also a consideration to ensure a range of retail units sizes is accommodated.</p>

Organisation: Tiger Development Ltd  
NSPPSV191.6

This draft policy should have explicit regard to the wider existing context of any proposal in respect of what an appropriate balance of small units would be. It may not always be appropriate for a development to provide or retain small shops – particularly where a significant number (including vacant units) exist in a designated town centre area.

In some instances such as the ASC, it is important to the vitality and viability of Peckham that redevelopment provides for larger units that meet modern retailer requirements, which will complement the smaller independent retailers that exist around ASC. If the Council is unwilling to amend draft Policy P29, then we propose that Site Allocation NSP75 is explicit in stating that Policy P29 should not apply. This would allow the proposals greater flexibility in securing retailers throughout the planning application process in the context of a challenging commercial (retail) property market. NSP75's Site Vision currently sets out that:

“Redevelopment of the site must:

Diversify and complement the existing retail offer in the town centre, with new opportunities for a range of shop sizes, including suitable space to attract a variety of retailers to Peckham;”

We would wish this flexibility to be retained in the NSP rather than needing to conform also with the more generic / restrictive draft Policy P29.

NSP75 sets out a range of shop sizes is required, therefore this policy is still relevant to ensure some small shops are provided within any redevelopment of the shopping centre providing 2,500sqm GIA or more.

Individual  
NSPPSV237.5

“In town centres, small shops should be retained except where it can be demonstrated there is no demand for continued use.” This approach will lead to small shops being routinely converted to flats outside town centres, since the C3 use commands a higher value. This will lead to the same effect as noted in the above comment on P26 Office and business development /1.1. It could be made sound by rewording to: “In designated centres and integrated shopping parades, small shops should be retained except where it

Point 1 - The NSP contains an Annex 3 on a guide to marketing statements which sets out the requirements to demonstrate no demand. This is rigorously assessed in the planning application process.

Point 2 - The definition of a small shop has now been amended to exclude storage from the definition of 80sqm in floorspace

can be demonstrated there is no demand for continued use and a local study has been conducted to determine whether any local council policy, such as parking, is unfairly disadvantaging these shops by comparison to other businesses in the Borough.”

Part 2 Not Consistent with National Planning Policy : A policy which provided only floorspace with no supporting access/storage tends to favour larger chain businesses with warehouses to support logistics from off the premises, and disadvantages smaller independent businesses. It could be made sound by replacing “floorspace” with:  
“all commercial space, including floorspace, access and storage space.”

Part 3: , Not Consistent with National Planning Policy

“at least 10% of space with small shops”. This is too imprecise and will lead to food and drink providers, potentially even including franchisees of larger chains defining themselves as small shops. It will tend to discourage specialist service and retail providers who contribute to the character of the area, so is not consistent with the London Plan and is therefore unsound. It could be made sound by rewording to: "at least 10% of space with independent businesses whose main business is not food and drink, and which have no other commercial premises.”

Point 3 - It is considered limiting the uses of small shops to exclude food and beverage uses would be too onerous. The policy intends to encourage a variety of small businesses in smaller retail units. Policy is governed by the use classes order which cannot differentiate between types of businesses. The second part of the policy seeks to ensure the delivery of affordable retail space for small businesses who may be displaced.

Representation	Officer Response
<p data-bbox="188 252 517 280">P30 Town and local centres</p> <p data-bbox="188 293 573 360">Organisation: Aviva and Galliard NSPPSV18.10</p> <p data-bbox="188 402 1081 504">Policy P30 requires large schemes for town centre uses that are over 1,000 sq. m or more provide public toilets, public drinking fountains and public seating.</p> <p data-bbox="188 545 1111 612">The Old Kent Road is defined as a Major Town Centre within Table 9 to Policy P30.</p> <p data-bbox="188 654 1104 794">This requirement is too restrictive and not appropriate for all sites to be developed for town centre uses along the Old Kent Road. The threshold is also considered to be too low for the requirement to provide public facilities (2,500 sq. m or above is considered more appropriate).</p> <p data-bbox="188 836 1111 976">Flexibility should be incorporated within the Policy that states public facilities should be provided in commercial schemes that exceed the minimum threshold and are in 'appropriate locations' or those with an identified deficiency of public or private facilities.</p>	<p data-bbox="1140 402 2051 647">We have set a local threshold of 1,000sqm to provide public toilets, drinking fountains and seating because developments over this size are likely to contribute significantly to the town centre environment and these facilities are currently lacking. The inclusion of these facilities will ensure our town centres continue to be accessible for all and will also benefit the shops provided because they will be providing an additional service to customers and ensuring they spend time in the town centre.</p>
<p data-bbox="188 1053 665 1120">Organisation Bankside Residents Forum NSPPSV19.20</p> <p data-bbox="188 1161 1072 1228">Without a robust Retail Capacity Study, this policy is both not justified nor positively prepared.</p>	<p data-bbox="1140 1161 2051 1228">A Retail Study by Lichfields has been prepared which has informed the town centre policy within the NSP.</p> <p data-bbox="1140 1270 2022 1337">Policy P30 seeks to protect Town Centres and provide town centre uses in accordance with the NPPF and London Plan.</p>

Organisation: Berkeley Homes (South East London)  
NSPPSV21.10

We support the identification of the Old Kent Road Major Town Centre. To reflect this, it would be helpful to also show this on the Policy Map.

This is illustrated on the Policies Map. Following the consultation process the Old Kent Road has now been redefined as a two District town centres and is categorised as Old Kent Road North and Old Kent Road South

Organisation: Better Bankside  
NSPPSV22.7

Policy P30 designates Bankside and The Borough as a District Town Centre within the Town Centre Hierarchy. According to the definitions set out within the New London Plan, Major Town Centres “generally contain over 50,000 sqm of retail, leisure and service floorspace” and “may also have significant employment, leisure service and cultural functions”.

We consider this designation to describe Bankside and The Borough more accurately than the District Town Centre criteria. The indicative uses within Bankside and the Borough are as follows:

- Retail: 31,586 sq.m
- Hotels: c.30,000 sq. m

The information above clearly illustrates that within Bankside and the Borough, there is approximately over 60,000 sq.m of combined retail and hotel space. This is above the criteria for District Town Centres that typically “contain 10,000 – 50,000 sqm of retail, leisure and service floorspace”.

The evidence base informing Policy P30 is comprised in part by the Southwark Retail Study. This document was written in 2015 and already omits several major developments with either full or outline planning consents. This part of the evidence base therefore requires updating, without which, the NSP cannot be perceived as using proportionate evidence that is “adequate, up-to-date and relevant” in accordance with Paragraph 158 of the NPPF.

The Retail Study highlights that Bankside and the Borough have a combined retail floorspace total of 25,268 sq.m, but this is predominantly food and beverage use. The retail and leisure facilities are also dispersed, with a series of separate clusters. Collectively, the different areas serve local residents (particularly Borough High Street), employees, tourists/entertainment visitors and commuters passing through the transport hub (London Bridge Station). As such, these are considered to be a District Town Centre. This is also consistent with the London Plan designation. The area benefits from being in the CAZ and an opportunity area.

In line with national policy, the Plan will be reviewed in regular intervals and any updates made accordingly.

Furthermore, the Major Town Centre description is more closely aligned with other aspects of the Plan relating to Bankside and The Borough area. Indeed, the NSP's Area Vision recognises Bankside and The Borough as being "at the heart of the commercial and cultural life of the capital".

The emerging Local Plan represents the strategic framework for the fifteen-year period up to 2033 and beyond. Paragraph 152 of the NPPF states that Local Plans should "... take account of longer-term requirements and be kept up to date".

Given the rapid increase in office and retail uses in Bankside and the Borough over the course of the existing Local Plan and Core Strategy, the NSP should reflect the area's role as a Centre over the emerging Plan's lifetime and the likelihood that this trend is likely to continue, reinforcing the area's suitability as a Major Town Centre.

This is especially true when considering the area's designation as an Opportunity Area. The Employment Land Study also forecasts growth of 460,000 sq.m of B1 additional office space to occur within the Borough, up to 2036. It recommends that 80% of this office space ought to be located within the Central Activities Zone encompassing the entire Bankside and the Borough area and is indicative of the neighbourhoods' expected economic growth.

In this instance, we find the NSP to be unjustified. Paragraph 182 of National Planning Policy Framework stipulates that in order to be considered justified, Local Plans should be the "most appropriate strategy". We feel that the inappropriate designation of Bankside and the Borough within the Town Hierarchy constitutes a deviation from this National Policy and on that basis renders the Plan unsound.

We suggest that designating the area as a "Major Town Centre" would be more appropriate in light of the above.

Individual  
NSPPSV56.12

These policies are not sound because they do not give appropriate guidance to ensure that a town centre has adequate car parking spaces for its viable functioning.

We have the experience in Peckham town centre that planning policies are aiming to reduce the amount of car parking space in individual developments to the detriment of the town centre's need overall for car parking space both for commercial and shoppers/visitors' uses.

Proposed changes to make the NSP sound:

The policy should require an assessment of the impact of a development on the town centre's overall car parking needs and ensure that individual planning decisions do not reduce the required car parking space and its appropriate allocation within the town centre.

P52 sets out car parking requirements in town centres.

Organisation: Elephant Amenity Network  
NSPPSV57.14

This policy is unsound for the following reasons:

We oppose the deletion of East Street as a local centre. East Street is much valued and the significant regeneration that is coming forward should not be based on the loss of its local identity.

We disagree with the elevation of 'Old Kent Rd' to a 'Major Town Centre' which implies the loss of its existing character as a ribbon development. It ignores the high street structure, missing out on the mix of retail with industrial and other workspaces that support a healthy local economy.

East Street is partially included in the Elephant and Castle/Walworth Road town centre and much of it is a protected shopping frontage. Following consultation Old Kent Road has been reallocated to two district town centres, (Old Kent Road North and Old Kent Road South), from major town centre allocation. The public toilets are expected to be free and this will be amended.

We support the provision of public toilets, but the policy is unsound as it does not include any criteria nor does it require that toilets should be free. This is not in conformity with draft new London Plan Policy S6.

Organisation: GLA  
NSPPSV66.10

The issue of non-conformity for some proposed town centre designations has been raised previously, in the letter dated 13 September 2017, in various email exchanges and at meetings between GLA officers and Southwark offices. Specifically, the proposed designations for Canada Water and Old Kent Road as Major Town Centres and Herne Hill as a District Centre.

The current town centre network is set out Table A2.1 in Annex Two of the London Plan which classifies town centres according to their existing role and function taking into account various criteria. London Plan policy 2.15 requires boroughs to co-ordinate the development of London's network of town centres in the context of Map 2.6 and Annex 2 of the London Plan.

The draft new London Plan has updated the town centre network (see Table A1.1 in Annex 1 Town Centre Network), using evidence from the London Town Centre Health Check 2018 and Experian's Consumer Expenditure and Comparison Goods Floorspace Need in London, 2017.

The proposed changes to the town centre network regarding Southwark includes:

- Elephant and Castle/Walworth Road reclassified from District to Major Centre
- Canada Water – future potential Major Centre and a night-time economy area of Local importance (NT3)
- Bankside and The Borough (previous Borough High Street) - night-time economy area of International importance
- London Bridge – night-time economy area of Regional/Sub-regional importance

Old Kent Road is part of an Opportunity Area as designated in the London Plan and as such was designated as a Major Town Centre given the development planned for the area. Following consultation and meetings with the GLA, Southwark has come to the agreement that the Old Kent Road should be classified as two separate town centres, 'Old Kent Road North' and 'Old Kent Road South', both centres have now been classified as two District Town Centres, which follows the approach in the London Plan.

Changes to classification of the Old Kent Road are being carried out in the near future through the NSP and OKR AAP.

- Old Kent Road/East Street – future potential District centre
- Old Kent Road/Peckham Park Road – future potential District centre

#### Canada Water

The draft new London Plan classifies Canada Water as a District with potential to become a Major centre, and GLA officers are confident that Canada Water is progressing towards becoming a Major centre. Given local knowledge and evidence, and the different timescales of the draft NSP and the new London Plan, we do not consider the classification of Canada Water as a Major centre to be a conformity issue.

#### Old Kent Road

The draft NSP identifies Old Kent Road (OKR) as a single Major centre, whereas it is not classified as any type of town centre in the adopted London Plan and the draft new London Plan identifies two areas along the OKR as having potential to become two District centres. The draft London Plan classification reflects the Southwark Retail Study 2015 which identifies the potential to create a local centre at the northern and a local or town centre towards the southern end of OKR.

The Mayor strongly supports Southwark's placemaking ambitions for the OKR area and the vision to reinvigorate the thoroughfare to become a thriving high street. While it is acknowledged that the draft NSP town centre boundary has been modified, the size, scale and extent of the single Major town centre that is proposed is currently not supported for the reasons set out below. However, the Mayor would support the identification of two potential future District town centres with tight boundaries, informed by demand and capacity assessments. Town centre development should be concentrated along the OKR, with a focus for each town centre to help create a sense of place.

While it is recognised that there is significant retail floorspace along the OKR, this is predominantly large format retail stores. There are also smaller retail

and other commercial uses along the OKR, however these tend to be focussed towards the north-west end of OKR, with smaller parades, retail parks and stand-alone units toward the south-east.

The size and mix of retail stores and the range of other town centre uses indicate that the OKR does not currently function as a town centre. For example, the predominance of large format retail stores relies on customers travelling by car which is more in line with an out-of-centre retail park. The London Plan requires Local Plans to set out a clear strategy for how potential centres can address the need for a broader mix of store sizes and a range of retail and services in line with Policy 2.15 Town centres and taking note of paragraphs 2.70 following.

A Major town centre of the proposed size, that extends for over 3km and extends outwards on both sides of the OKR would be a matter of concern for the following reasons:

- It could have significant impacts on the retail and other commercial vitality of nearby centres such as The Blue, Peckham, Elephant & Castle, New Cross Gate and Lewisham
- It could give rise to an over-extended, diluted centre without a proper focus of commercial uses around (existing and planned) transport hubs
- It might not see demand for the quantity of retail proposed
- It could lead to inappropriate development of edge-of-centre commercial uses in surrounding areas that are predominantly residential.

The designation of Major centres must only be undertaken through the London Plan as set out in London Plan paragraph 2.74. Compelling evidence, particularly regarding the impact on other centres, as well as demand and capacity assessments would be needed to support a town centre of the proposed size of OKR and the Mayor would be interested to see any further evidence to support Southwark's proposal. At present, the proposed designation of the OKR as a Major centre is considered to be a conformity issue. However, as development comes forward over time, the OKR

<p>designation will be reviewed in future iterations of both the Local Plan and the London Plan.</p> <p>The Mayor recommends that the draft NSP follows the approach in the London Plan, designating two potential future District centres, with distinct and smaller town centre boundaries around potential BLE stations. Although the Mayor recognises Southwark’s ambition to create a rejuvenated high street along Old Kent Road, the type, location, form and scale of commercial development must be carefully considered in order for Old Kent Road to support London’s network of town centres as a whole.</p>	
<p>Organisation: Historic England NSPPSV83.10</p> <p>We note clause 1 in policy P30 relating to the appropriate scale and nature of new development in town and local centres. We would point out that a number of these centres are designated as conservation areas. As with our comments above on the evidence base for the Plan, we would suggest that this is referenced in the supporting text and that applicants/promoters are directed to the relevant conservation area appraisal/management plan in developing schemes.</p>	<p>For proposals that relate to areas of conservation or heritage value, policies P16-P18 will apply.</p>
<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91 NSPPSV128</p> <p>Objection 40.</p> <p>We object to the failure to recognise and inclusively designate a significant proportion of the borough’s existing high street settings as town centres, and thus to protect them from development that could reduce non-residential capacity. We also object to the inappropriate inclusion of several predominantly residential areas within town centre boundaries.</p>	<p>Objection 40</p> <p>With regard to some of the smaller high streets, the council has surveyed all high streets in the borough and categorised them as primary or secondary shopping frontages. All of these parades are catalogued and mapped in the public domain with policies that apply to them (see P32). Not all parades are part of town centres. The NPPF (para 85) states that planning policies</p>

Outside the CAZ only around 60% of the borough's high street settings are proposed for designation as Town Centres and thus potentially afforded appropriate protection and policy clarity.

Within the CAZ high street setting areas on New Kent Road and the south-east section of Borough High Street and outside Town Centre designation.

The inclusion of substantial areas of stable predominantly residential fabric in the Walworth Town Centre boundary and the Elephant & Castle Town Centre boundary undermines the clarity of Town Centre policy and seems not to align with its purpose.

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

NPPF para 157 requires that Local Plans should Indicate land-use designations on a proposals map.

NPPF para 157 states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation.

NPPF para 6 requires the planning system to contribute to the achievement of sustainable development, including through an economic role, contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements.

NPPF para 70 makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly

recognise that residential development often plays an important role in ensuring the vitality of centres. It is considered existing residential communities also add to this vibrancy in the heart of some of the town centres and this is reflected in the boundaries.

where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

[London Plan Policy GG5](#) regarding growing a good economy requires those involved in planning and development should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

[NPPF para 23](#) requires planning policies to meet needs for retail, leisure, office and other main town centre uses in full, un-compromised by limited site availability, and to ensure this local planning authorities should undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites.

[NPPF para 23](#) requires Local Plans to define a network and hierarchy of town centres that is resilient to anticipated future economic changes, and to define the extent of town centres and set policies that make clear which uses will be permitted in such locations. Planning authorities are also required to allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres.

[London Plan policy SD7](#) regarding the town centre network makes clear that identified deficiencies in the London town centre network can be addressed by promoting centres to function at a higher level in the network, designating new centres or reassessing town centre boundaries.

[London Plan para 2.7.1](#) emphasises that London's town centre network is a vital element of London's economy and is crucial for meeting the needs of

<p>Londoners and those who work in and visit London.</p> <p><a href="#">London Plan policy SD8</a> regarding town centres requires Development Plans to define the detailed boundary of town centres in policy maps including the overall extent of the town centre (taking into consideration associated high streets which have particular economic or social value) along with specific policy-related designations such as primary shopping areas, primary and secondary frontages in light of demand/capacity assessments for town centre uses and housing</p> <p><a href="#">London Plan para 2.9.4</a> states that in many town centres in London, there is particular pressure on commercial floorspace to be converted to residential use. In order to ensure the vitality and vibrancy of town centres it is important that they contain an appropriate mix and quantity of office and other commercial floorspace.</p>	
<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91 NSPPSV128</p> <p><b>Objection 41.</b></p> <p>We object to failure to assess the quantum of future need for high street setting accommodation across Southwark, in relation to existing quantum, and to designate and define the extent of town centres accordingly, with the aim of meeting future need as well as current by designating areas that have the potential to strengthen or emerge as high street settings.</p> <p><a href="#">NPPF para 14</a> requires Local Plans to meet objectively assessed needs.</p> <p><a href="#">NPPF para 6</a> requires those involved with the planning system to contribute</p>	<p><b>Objection 41</b></p> <p>Quantums of retail form part of our evidence base in the town centres (see the retail studies by Lichfields). Site allocations also include the existing quantum of retail on retail sites and policies and guidance state where this should be reprovided. The retail policies in the plan are strong to protect existing retail uses (e.g. P32).</p>

to the achievement of sustainable development, including through an economic role, contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements.

**London Plan Policy GG5** regarding growing a good economy requires those involved in planning and development should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

**NPPF para 23** requires planning policies to meet needs for retail, leisure, office and other main town centre uses in full, un-compromised by limited site availability, and to ensure this local planning authorities should undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites.

**NPPF para 23** requires Local Plans to define a network and hierarchy of town centres that is resilient to anticipated future economic changes, and to define the extent of town centres and set policies that make clear which uses will be permitted in such locations. Planning authorities are also required to allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres.

**London Plan policy SD7** regarding the town centre network makes clear that identified deficiencies in the London town centre network can be addressed by promoting centres to function at a higher level in the network, designating new centres or reassessing town centre boundaries.

**London Plan policy SD8** regarding town centres requires Development Plans to define the detailed boundary of town centres in policy maps including the overall extent of the town centre (taking into consideration associated high

streets which have particular economic or social value) along with specific policy-related designations such as primary shopping areas, primary and secondary frontages in light of demand/capacity assessments for town centre uses and housing

[London Plan para 2.9.4](#) states that in many town centres in London, there is particular pressure on commercial floorspace to be converted to residential use. In order to ensure the vitality and vibrancy of town centres it is important that they contain an appropriate mix and quantity of office and other commercial floorspace.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

**Objection 42.**

We object to failure to designate District Town Centres at Old Kent Road West and Old Kent Road East as recommended by the GLA. We suggest that designation of two (most likely adjoining) District Town Centre extents should include current high street setting extents as well as additional areas that anticipate future needs in the area.

[NPPF para 14](#) requires Local Plans to meet *objectively assessed needs*

[London Plan para 2.1.15](#) about the Old Kent Road OA states that any new town centres should be designated close to the potential new Tube stations and should be of an appropriate scale, taking into account capacity and the impact on nearby centres.

**Objection 42**

We have confirmed the Old Kent Road will now be two district centres and this will be updated in the submission version of the NSP.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

#### Objection 43.

We object to failure to inclusively designate Local Town Centre extents and we suggest fresh designation of the following:

New Kent Road  
Southwark Park Road (west)  
Jamaica Road  
Lower Road / Plough Way  
Rotherhithe New Road  
East Street (east of Flint Street)  
Southampton Way  
Peckham Road  
Queens Road Peckham  
Evelina Road (north)  
Forest Hill Road / Peckham Rye  
Lordship Lane / The Plough  
Lordship Lane (south)  
Park Hall Road / Croxted Road  
Bellenden Road  
Camberwell Road  
Grange Road

[NPPF para 14](#) requires Local Plans to meet *objectively assessed needs*

#### Objection 43

Following the guidance in the London Plan, local centres typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, mostly for convenience goods and other services. They may include a small supermarket (typically up to around 500 sq.m), sub-post office, pharmacy, laundrette and other useful local services. Some of the areas mentioned are classified as secondary shopping frontages and typically do not contain the services usually ascribed to a local centre designation. It is considered P32 offers strong protection of A1 uses in these parades alongside P33 for shops outside protected shopping frontages or town centres.

- New Kent Road is designated as part of the extents of both the Old Kent Road Major Town Centre and the Elephant and Castle Major Town Centre. This designation will appropriately reflect the future growth anticipated in these town centres, and their hierarchy within Southwark's town centre network.
- Southwark Park Road is designated as a primary protected shopping frontage (SF5), it is also designated within the extents of the Blue Local Town Centre.
- Jamaica Road is designated as a secondary shopping frontage (SF18).
- Lower Road/Plough Way is within the extents of the Canada Water Major Town Centre, a section of this road is also designated as a secondary shopping frontage (SF22).
- The parade of shops on Rotherhithe New Road is not captured within any Local Town Centre extents, nor is it designated as a protected shopping frontage. However, A1 shops would be protected by P33 in

the NSP.

- The parade of shops, 211-239 East Street, is not captured within any Local Town Centre extents, nor is it designated as a protected shopping frontage. This parade of shops will be designated as protected shopping frontage to afford better protection to the A1 uses. This frontage has 62% of units in A1 use.
- The parade of shops on Southampton Way is not captured within any Local Town Centre extents, nor is it designated as a protected shopping frontage. Southampton Way is a varied street with significant residential and light industrial uses. This parade of shops will be designated as protected shopping frontage to afford better protection to the A1 uses. This frontage has 59% of units in A1 use.
- Peckham road has a few shops, but significant residential and D1 use (Camberwell College of Arts, South London Gallery). It should not form part of the extents of either Camberwell District Town Centre or Peckham Major Town Centre.
- The parade of shops on Queens Road Peckham is designated as a secondary shopping frontage (SF31).
- The parade of shops to the north of Evelina Road does not form an essential part of the Nunhead Local Town Centre.
- Forest Hill Road is designated as a secondary shopping frontage (SF46 and SF47). The parade of shops on Peckham Rye is within the extents of the Peckham Major Town Centre, this parade of shops is designated as secondary shopping frontage.
- The parade of shops on Lordship Lane, adjacent to Plough Lane, whilst not designated within a local town centre it is a secondary shopping frontage (SF47).
- The southern end of Lordship Lane is designated as a secondary shopping frontage (SF48).
- Park Hall Road and Croxted Road are designated as a secondary shopping frontage (SF49).
- Whilst Bellenden is in the environs of Peckham Major Town Centre, it is designated as a secondary shopping frontage (SF32).

	<ul style="list-style-type: none"> <li>- The extents of Camberwell Road intersect with both the Elephant and Castle Major Town Centre and the Camberwell District Town Centre, the road also includes, secondary shopping frontage (SF23). Two parades of shops will be designated as protected shopping frontage to afford better protection to the A1 uses. The proposed protected frontage 108-181 Camberwell Road has 46% units in A1 use. The second proposed protected frontage 201-227 Camberwell Road has 64% of units in A1 use.</li> <li>- The southern side of Grange Road is designated within the Old Kent Road Major Town Centre. The western end of Grange Road is included within the Tower Bridge Road Local Town Centre.</li> </ul>
<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91 NSPPSV128</p> <p>Objection 44.</p> <p>We object to failure to inclusively designate Neighbourhood Centre extents and suggest designation of at least 12 Neighbourhoods Centres, being all other settings that include designated protected frontage.</p> <p><a href="#">NPPF para 14</a> requires Local Plans to meet <i>objectively assessed needs</i></p>	<p>Objection 44</p> <p>Our approach has been to designate local centres and protected shopping frontages which we consider to be an effective policy tool is safeguarding smaller parades.</p>
<p>Organisation: Vital OKR NSPPSV205</p>	

Objection 45.

We object to failure to designate additional appropriate areas as additions to at least 3 of the designated Town Centres, as follow:

Borough High Street east side at south end;  
Tower Bridge Road, south end;  
Lordship Lane to incorporate Grove Vale area and to extend further south along Lordship Lane;  
And other additions are likely to be appropriate and should be identified through a careful audit of uses across the borough.

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

[NPPF para 154](#) states that Local Plans should set out clear policies on what will or will not be permitted and where.

[NPPF para 70](#) makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

[NPPF para 23](#) requires Local Plans to define a network and hierarchy of town centres that is resilient to anticipated future economic changes, and to define the extent of town centres and set policies that make clear which uses will be permitted in such locations.

Objection 45

With respect to the areas suggested for new town centres:

- The parade of shops to the southern end of Borough High Street is a small selection of shops with minimal A1 uses apart from a pharmacy and sandwich shop. As this parade of shops is a considerable distance away from the main section of Borough High street, it's inclusion within the District Town Centre would be overly prescriptive.
- The southern end of Tower Bridge Road forms part of the Tower Bridge Road Local Town Centre. The parade of shops is also designated as a secondary shopping frontage – also forms part of secondary shopping frontage (SF21). The council regularly reviews the town centre extents and will assess whether the southern boundary should be extended.
- The Lordship Lane District Town Centre does not include Grove Vale, however Grove Vale is a secondary shopping frontage (SF35). The roundabout between the two roads forms a natural boundary between the Lordship Lane District Town Centre and Grove Vale.

London Plan Policy SD6 regarding town centres requires that London's varied town centres and their vitality and viability be promoted and enhanced as: strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development.

London Plan para 2.9.4 states that in many town centres in London, there is particular pressure on commercial floorspace to be converted to residential use. In order to ensure the vitality and vibrancy of town centres it is important that they contain an appropriate mix and quantity of office and other commercial floorspace.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

**Objection 46.**

We object to failure to clearly define the scope of uses that are to be permitted and encouraged in town centres. We suggest that in addition to main town centre uses as defined in the NPPF, the list of uses that will be permitted and encouraged should include light industrial (including in workshops, workrooms and studios), smaller scale logistics, health care, community and education uses, all of which have a significant presence in Southwark's town centres and should be encouraged to flourish as those settings evolve.

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

NPPF para 154 states that Local Plans should set out clear policies on what

**Objection 46**

These uses are encouraged in other policies for example P26 regarding a range of employment uses in town centres. The reasons for Policy P30 will be reviewed.

will or will not be permitted and where.

**NPPF para 70** makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

**NPPF para 23** requires Local Plans to define a network and hierarchy of town centres that is resilient to anticipated future economic changes, and to define the extent of town centres and set policies that make clear which uses will be permitted in such locations.

**London Plan Policy SD6** regarding town centres requires that London's varied town centres and their vitality and viability be promoted and enhanced as: strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development.

**London Plan para 2.9.4** states that in many town centres in London, there is particular pressure on commercial floorspace to be converted to residential use. In order to ensure the vitality and vibrancy of town centres it is important that they contain an appropriate mix and quantity of office and other commercial floorspace.

Organisation: Vital OKR  
NSPPSV205

**Objection 47.**

We object to failure to define key design parameters for development within town centres, including prohibition of ground floor residential and the setting of a minimum ceiling height for ground floor accommodation.

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

[NPPF para 154](#) states that Local Plans should set out clear policies on what will or will not be permitted and where.

[NPPF para 70](#) makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

[London Plan Policy SD6](#) regarding town centres requires that London's varied town centres and their vitality and viability be promoted and enhanced as: strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development.

[London Plan para 2.9.4](#) states that in many town centres in London, there is particular pressure on commercial floorspace to be converted to residential use. In order to ensure the vitality and vibrancy of town centres it is important that they contain an appropriate mix and quantity of office and

**Objection 47**

It is not considered ground floor residential is always inappropriate particularly in housing only schemes in edge of centre locations. However in shopping parades and employment sites, policies exist to prevent change of use to residential and a mix of uses in new developments are required as per Policies P26, P30 and P32. It is considered minimum ceiling heights would depend on the business using the space so it may be onerous for the policy to set a limit.

other commercial floorspace.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

**Objection 48.**

We object to failure to require retention or re-provision of market uses, and their enhancement.

[NPPF para 14](#) requires Local Plans to meet objectively assessed needs.

[NPPF para 157](#) states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation.

[NPPF para 70](#) makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

[London Plan para 2.9.4](#) states that in many town centres in London, there is particular pressure on commercial floorspace to be converted to residential use. In order to ensure the vitality and vibrancy of town centres it is important that they contain an appropriate mix and quantity of office and other commercial floorspace.

**Objection 48**

The Southwark Markets and Street Trading Strategy acknowledges that markets operate in the context of the overall retail offer of the Borough and contribute economically, socially and culturally to Southwark. The Strategy is also set in the context of the Southwark Sustainable Communities Strategy (Southwark 2016) and the Council's Corporate Plan (2009-2011) and demonstrates how markets and street trading will contribute to delivering the key objectives and priorities of the Council and its partners. Southwark Council is currently in the process of updating this strategy. The relocation of small and independent businesses is addressed in P38, small and businesses include markets operated both within and outside the designated town centres.

Individual  
NSPPSV110.10

Policy P30 (Town and local centres) is unsound because it is not effective. The policy notes that 'Southwark's town centres are the central meeting places for residents... it is important to ensure that we maintain our town centres as lively and interesting places... each town centre has a unique identity that helps create a sense of place'. But later in the document the Peckham Area Vision ignores this aspiration, meaning there are internal conflicts in the Plan. The policy is therefore not effective.

The Peckham Area Vision encourages a lively place and a central meeting place for residents through the provision of an improved town centre - providing a range of daytime and night time activities (See AV.13.1).

Organisation: Studiomaecreate and Individual  
NSPPSV175.8 and NSPPSV323.6

Regarding Strong, local economy policy P30: Town and local centres we object to:

Failure to recognise and inclusively designate a significant proportion of existing high street settings as town centres, and thus to protect them from development that could reduce non-residential capacity;  
Failure to assess the quantum of future need for high street setting accommodation across Southwark, in relation to existing quantum, and to designate and define the extent of town centres accordingly;  
Failure to designate District Town Centres at Old Kent Road West and Old Kent Road East as recommended by the GLA;  
Failure to inclusively designate Local Town Centre extents (we suggest designation of an additional 17 Local Town Centres);  
Failure to inclusively designate Neighbourhood Centre extents (we suggest designation of at least 12 Neighbourhoods Centres, being all other settings that have designated protected frontage);  
Failure to designate additional appropriate areas as additions to at least 3 of the designated Town Centres;

1. Designations are as per recommendations in the Retail Study. The NSP has been prepared to ensure the retail capacity can be achieved for the Borough. Other shopping areas are protected as protected shopping frontages and policy P32 applies which has sufficient safeguards for local facilities.
2. Assessment of future need has been determined through the Retail Study, the policy, site allocations and town centre boundaries as per the proposals map have been prepared accordingly.
3. The recommendation made by the GLA has now been incorporated into the plan, Old Kent Road has now been identified in the plan as a two District town centres, noted within the plan as Old Kent Road North and Old Kent Road South.
- 4-6. These are protected through other retail policies. E.g. P29 and P33. Following the guidance in the London Plan, local centres typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, mostly for convenience goods and other services. They may include a small supermarket (typically up to around 500 sq.m), sub-post office, pharmacy, laundrette and other useful local services. Smaller areas identified are not suitable for local town centre

<p>Failure to clearly define the scope of uses that are to be permitted and encouraged in town centres;  Failure to define key design parameters for town centre development, including prohibition of ground floor residential and the setting of a minimum ground floor ceiling height;  Failure to require retention or re-provision of market uses, and their enhancement.</p> <p>These inadequacies make the plan unsound as it is not justified, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan.</p>	<p>designation but are categorised as protected shopping frontages with relevant policies e.g. P32 which denote their significance to serving the local community.</p> <p>7. P32: Protected Shopping Frontage sets out the extent of other uses that can be provided in the PSF. Types of uses encouraged are set out in P30 and the supporting text.</p> <p>8. This would result in the Plan being too prescriptive and not flexible in accordance with the NPPF. These are captured through other policy (P12) and supporting text in the Plan.</p> <p>9. Market uses would be considered as a small business and Policy P38 (business relocation would apply).</p>
<p>Organisation: Team London Bridge  NSPPSV179.2</p> <p>7. We welcome the changed designation of London Bridge as a “District Town Centre” rather than a “Local Centre” in Policy P30 of the submitted Plan. This begins to recognise its significant role as a retail, commercial and cultural hub.</p> <p>8. Nevertheless, we do not consider the “District Town Centre” classification to be soundly based. The town centre hierarchy states Major Town Centres “generally contain over 50,000 sqm of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions.” For District Town Centres it states “typically they contain 10,000 – 50,000 sqm of retail, leisure and service floorspace.”</p> <p>9. The breakdown of uses in London Bridge (which includes new retail in London Bridge station and 1 Tower Bridge developments) is as follows:</p> <ul style="list-style-type: none"> <li>• Office: 464,000 sq m</li> <li>• Retail (including food &amp; drink): 39,520 sq m</li> <li>• Hotels: 27,940 sq m</li> </ul> <p>10. Even on the basis of its retail and hotel function alone London Bridge has over 67,000 sq m of floorspace. This does not include its hugely important</p>	<p>The Retail Study recommended two options for the designation of London Bridge, either to designate it as a CAZ frontage at the existing retail parades, however, it was advised that this would not fully reflect the dynamism of the area or change which is occurring. The other option is to maintain the existing approach which provides greater flexibility to enable change and establishment of new retail uses in appropriate locations.</p> <p>There was no recommendation to designate it as a 'Major Town Centre'. This is consistent with the London Plan.</p>

office and civic function (including the headquarters of both London's Government and Southwark Council, King's College London and Guy's hospital).

11. Furthermore, we do not agree that Elephant and Castle/Walworth Road, Old Kent Road, Canada Water and Peckham are the centres with "most potential for growth". London Bridge is also an area with significant potential, including to the growing night time economy and it is one of the few locations where further growth can be supported without significant amenity issues.

12. Our assessment of the New London Plan's classification of International, National, Major and District Town Centres would also match London Bridge to a Major Town Centre role with over 50,000 sq m of retail, leisure and service floorspace.

13. We welcome London Bridge's inclusion in the Central Activities Zone but this does not obviate the need for it to be designated appropriately in the Town Centre hierarchy.

Recommendation

- Designate London Bridge as a Major Town Centre because of the area of retail, leisure and service floorspace and the wider office and civic functions it provides

Organisation: Tesco Stores  
NSPPSV180.5

Policy 30 supports new developments for a range of town centre uses, including markets, community, civic and cultural uses.

Whilst our client supports the commitment of the Council to preserve the vitality and viability of town centres, it is noted that previous iterations of the New Southwark Plan identified residential as an appropriate town centre use, as well as acknowledging the important role that residential uses perform in town centres. Previous representations made by our client to the New

The justification within this policy highlights that new homes will also help make Southwark's town centres more vibrant and independent, this is considerate of the NPPF.

Southwark Plan supported the Council's acknowledgement of the role that residential development performs in ensuring the vibrancy and vitality of town centres.

Furthermore, the NPPF clearly recognises that 'residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites'. It is therefore strongly contended that Policy 30 of the New Southwark Plan as currently worded is inconsistent with the objectives of the NPPF.

Our Client therefore proposes that Policy 30 is amended to say 'development of town centre uses including markets, community, civic, cultural and residential uses will be permitted in town centres and local centres where'.

Organisation: Tiger Development Ltd  
NSPPSV191.7

Town Centre developments often include residential uses, or are located within close proximity to existing residential accommodation, and by their very nature the commercial elements of such schemes will have a level of impact on residential amenity. The wording of Sub-section 3 should therefore be further defined to restrict those proposals that may cause significant harm to the amenities of surrounding occupiers. At present it would appear to restrict any harm to residential amenity.

Sub-section 4 should provide further definition of what uses are considered to offer "activity" at ground floor in the policy's justification text. This "activity" can often be created through the positioning of residential entrances for example, and should not be restricted to shop window displays (for example) alone. Equally, defining areas of "high footfall" is challenging and therefore references to defined Primary and Secondary Frontage is a more effective way of drafting this policy.

Individual  
NSPPSV237.6

These need to be considered on a case by case basis, therefore we have not specified the types of development or uses that cause harm. The 'active use' should also be determined on a case by case basis on whether it is appropriate in the town or local centre therefore it not considered to be appropriate to be prescriptive. Active frontage is defined in Annex 6.

It is not appropriate to set out primary or secondary shopping frontage instead of high footfall as there may be other instance where uses provide a high footfall which is not in the primary or secondary shopping frontage.

No new local centres have been created in the middle of the borough, where BAME communities rely disproportionately on local business opportunities, and which has experienced a significant and consistent loss of local commercial space since the 1980s. Additionally, by failing to designate local centres where the NPPF has encouraged it, local authorities deprive themselves of optionality, because the steer is towards conversion of non-residential space to residential, wherever there is no protective planning designation. Local centres which are protected from the threat of residential development can act as employment hubs, hubs for recycling, bike hire, municipal information dispensation, social, educational and community interaction. The National Planning Policy Framework states that local planning authorities should plan positively

Therefore, the policy is unsound. It could be made sound as follows:

The shopping area on Camberwell New Road between Comber Grove and John Ruskin Street, and surrounding schools and warehousing” should be classified as an additional new local centre in the plan. The local area has a strong tradition of employment, specialist and independent retail, serving both locals and visitors. The area is set to increase in residential density significantly in coming years, and contains key interchanges for active travel movement along Wyndham Road and Camberwell New Road, between major town centres and parks. Currently, the oldest shopping parade on Camberwell New Road (225-253) has no protection whatsoever, not even being designated as a secondary shopping frontage despite being an integrated shopping parade which has been in existence since the 1820s, appearing on the first map of Camberwell New Road. This clearly demonstrates that the area’s designation needs have not been properly considered. If this Local Centre designation for Camberwell New Road is not created, local amenities are under threat of not being planned for at high level (in terms of transport access and active travel for schools) and may cease to exist, depriving locals and visitors of goods, services & employment. This has already begun to occur, and there are several examples of shop

The proposed suggestion to the policy is noted. We have recently conducted a Shopping Frontage Survey which identified extensions to existing protected shopping frontages including Camberwell New Road (SF52) Please refer to the 2015 Retail Study and updated 2018 Retail Study which defines areas which are suited to growth. Our policies have been drafted with the Equalities Duty in mind, for further information please refer to the Equalities Impact Assessment.

conversions to residential in the area which were rubber-stamped despite Equality Act citations, lack of marketing and even trading tenants. The centres designations are fluid, as is shown by the promotion of Herne Hill from local centre to District Centre, in the NSP Submission document.

Paragraph 2 Not positively prepared: Our aim is to expand shopping space in our town centres particularly at Elephant and Castle including Walworth Road, Canada Water, Old Kent Road and Peckham which have the most potential for growth.” No evidence is provided to show why or how some areas are more suited to growth, and what kind of growth. This is important, due to the pattern of trading businesses which have had to make way for conversion to residential in some parts of the Borough.

Paragraph 2 Not positively prepared: “... which will reduce the amount of trips people need to make to reach their local services and jobs.” No evidence is provided to show that a more highly centralised town centre strategy with fewer outerlying shops will increase access, rather than reduce it by making those goods and services further away from most people, through centralisation.

Factbox: Not positively prepared: The Town Centre Hierarchy Factbox oversimplifies the potential role of different levels of the hierarchy, including that areas may transition between the categories, as with Herne Hill. The suggestion that comparison goods are unlikely to be found below major centre level is likely to disadvantage independents in this sector, who are less likely to be able to compete for major town centre rents. An example would be Duraty Electricals, which formerly had a shop in Camberwell. The effect of the policy summary is that the main retail goods and services opportunities for BAME entrepreneurs in areas like Camberwell will be mainly food and drink based, which limits social mobility opportunities. This effect is contrary to the Equality Act, and therefore unsound.

To make the summary sound, the wording should be:

<p>“ District centres: District centres provide goods and services for more local communities and accessible by public transport, walking and cycling. Typically they contain 10,000 – 50,000 sqm of retail, leisure and service floorspace. Local centres: Local centres help guarantee provision to a local catchment, accessible by walking and cycling and include local parades and small clusters of shops. Their local provision may include a small supermarket (typically up to around 500 sqm), sub-post office, pharmacy, laundrette and other useful local services. Some local centres located on busy main roads are also valuable and convenient shopping destinations for those regularly travelling through, and as such are an ideal location for independent specialist goods and service provision from local or new-entry independent merchants who may not be able to afford town centre rents.</p>	
<p>Individual NSPPSV288.2</p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant No</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Justified</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Consistent with national policy and the London Plan</p> <p>No further comment applied.</p>	<p>Your comments have been noted.</p>
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>

P31: Development outside of town centres	
<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91 NSPPSV128</p> <p>Objection 49.</p> <p>We object to failure to define the phrase town centre uses as this policy applies to them. We suggest that the phrase should be main town centre uses and this should be referenced to the NPPF.</p>	<p>Objection 49</p> <p>Noted. This will be changed.</p>
<p>Organisation: Tesco Stores NSPPSV180.6</p> <p>Policy 31 of the New Southwark Plan requires town and local centres to be the main focus for new developments, and therefore seeks to ensure that development outside of the town centre will not harm the vitality and viability of town centres. Our client wholly supports this objective. Policy P31 states that ‘development providing town centre uses outside town and local centres must comply with a sequential test. Large development proposals, over 1,000sq.m (gross), will require an impact assessment’.</p> <p>It is noted that this is a significant deviation from the adopted London Plan, new London Plan and crucially the NPPF, which all require only those retail, leisure and office developments greater than 2,500sqm in edge-of-centre developments to be accompanied by a detailed impact assessment. It is therefore strongly argued that Policy 31 is inconsistent with the NPPF, adopted London Plan, and new London Plan. Our client therefore contends that Policy P31 should be amended as follows: ‘large development proposals, <u>over 2,500 sqm (gross)</u>, will require an impact assessment’.</p>	<p>The NPPF states that unless there is no locally set threshold, then the default threshold should be 2500sqm. The Retail Study recommends a reduced threshold of 1,000sqm gross for the impact assessment as a blanket threshold set out in the NPPF gross is not appropriate in Southwark as development smaller than 2,500sqm gross could have a significant adverse impact on smaller centres. The plan does therefore not deviate from national policy.</p>
Representation	Officer Response

<p><b>P32 Protected shopping frontage</b></p> <p>Organisation: Bankside Residents Forum NSPPSV19.21</p> <p>Without a robust Retail Capacity Study, this policy is both not justified nor positively prepared.</p>	<p>A Retail Study has been prepared which sets out recommendations for the policy which informs the New Southwark Plan.</p>
<p>Organisation: Dulwich Estates NSPPSV52.10</p> <p>Emerging Policy P32 seeks to retain a quantum of Class A1 uses within protected shopping frontages and sets out the circumstances under which a loss of Class A1 use may be justified. This includes a requirement to market the property for Class A1 use for a minimum period of two years.</p> <p>As per our representations in respect of marketing business floorspace, the Estate is very concerned that this policy would result in damaging voids and cause harm to the overall vitality, viability and performance of designated and non-designated retail areas and the other business' adjoining especially in such times where retail is struggling to compete with online trading.</p> <p>The imposition of a two year marketing period would result in a vacant retail unit which does not generate any income for the Estate (thus reducing awards to its beneficiaries), nor does it provide any public benefit that an alternative use may secure. In retail contexts in particular, a vacant unit can have a knock on effect of reducing the appeal and success of the overall parade or area. Retailers are typically drawn to vibrant and successful centres, alongside competing occupiers of a similar quality that can attract significant footfall. Conversely, vacant units can indicate a struggling local retail market and are therefore less appealing to incoming retail occupiers. In turn, footfall reduces which makes retail conditions for existing or remaining occupiers more challenging, and potentially unsustainable. The decline of the</p>	<p>The inclusion of a marketing clause of two years is consistent with other marketing policies in the plan. It is not the intention of the council to encourage vacant units; it is our experience that Southwark shops have very low vacancy rates particularly in town centres, which is evidenced in our Retail Study (8.4% which is lower than the national average). It is important to maintain A1 uses because they offer services to the community. Marketing for one year may encourage shops to be left vacant for this time period until a change of use can be established. Marketing for two years would discourage this from happening and for the marketing strategy for be effective in finding an alternative A1 occupier, which continues to be in demand in Southwark.</p>

centre is inevitable.

We would instead recommend that the loss of Class A1 floorspace is not determined solely on marketing evidence, but instead is assessed by taking into account local and wider market conditions, and the economic and public benefits to introducing alternative uses, for example Class D1 uses that can serve the general public in an as important way as conventional retail uses.

As with business floorspace, a more constructive approach would be to allow 'meanwhile' uses whilst marketing is ongoing. This would allow the Estate to continue to generate an income, offer short term accommodation to occupiers who require premises without the obligations of lengthy and costly lease terms (this is likely to include start up and independent organisations), and ensure that the accommodation is in beneficial use, potentially providing vital local services. It would also avoid the risks of vacancies to the overall health of a designated or nondesignated retail area as we describe above.

Organisation: The Wardens and Commonality of the Fishmongers of the City of London  
NSPPSV208.2

Policy 32 seeks to retain the existing retail uses and prevent them from being changed to other uses which would erode the quality and variety of the main shopping parades. The policy seeks to ensure a nuanced approach to protecting retail with different levels required on different shopping streets rather than a flat target across Southwark. Considering the above, it is considered that Draft Policy 32 is generally sound in accordance with paragraph 182.

Individual  
NSPPSV237.7

Support noted.

Table 10 /Primary Shopping Frontages:

The percentage for Camberwell is too low at 60%, and takes no account of whether a shop is an outlier or part of an integrated shopping parade, whose conversion would negatively impact on the collective offer of that local shopping parade. There is no explanation of how the percentages were arrived at or impact assessments of the effects of lowering to that percentage. Therefore the policy is unresearched or untransparent.

Table 10 /Secondary Shopping Frontages:

The percentage for secondary shopping frontages is too low at 50%, so unsound for the same reasons as given above for Camberwell primary shopping frontages. Nos. 225-253 Camberwell New Road should at least be included in the list of Secondary Shopping Frontages, as they are older, more architecturally impressive, have more floorspace and access and contain a stronger trading offer, than those protected up until no. 223 (William Hill). Ideally they should form the lynchpin for a local centre designation, and a protected shopping frontage list which does not include these shops is inconsistent.

The percentage thresholds are based on existing levels of A1 in the shopping parade, which we are continuing to safeguard and encourage growth.

Individual  
NSPPSV327.6

P 32 page 60 - Protection of A1 Shops doesnt state if this is by floor area or number of shops. Doesnt say if 60% is less than is current so we cannot gauge if you will allow there to be less A1 under this proposal  
Page 70 - Hot food outlets - 5% of total numbr of units ... what is it currently in Camberwell?

Point 1 of the policy stipulates that the proportion of A1 relates to units rather than floorspace. Any planning application should calculate the proportion of retail units or hot food takeaways to ensure this is accurate at the time of the planning application and ensure the policies relating to these can be complied with. The Retail Study sets out the proportion of retail units at that time (2015).

**Representation**

**Officer Response**

P33 Shops outside protected shopping frontages	
<p>Organisation: Aviva and Galliard NSPPSV18.11</p> <p>Policy P33 states that development should not result in the loss of shops outside Protected Frontages, Town and Local Centres.</p> <p>The Policy should include sufficient flexibility to allow for the loss of retail floorspace outside defined centres where this accords with the Council's aspirations for the reimagining of the Old Kent Road as set out within the emerging AAP. This reimagining includes works to re-establish the a strong high street and reconfigure floorspace from 'warehouse' format premises to more traditional, high street style premises.</p> <p>Flexibility should be incorporated into the Policy to ensure development can be supported where it accords with the aspiration of the OKRAAP and other documents that comprise the development plan.</p>	<p>Noted. Our policies have been prepared in line with the NPPF which recommends a flexible approach when drafting planning policies. Shops located outside of protected shopping frontages benefit from no protection other than this policy. The protection of shops in these locations are essential as they provide convenience retail and other local services to meet the day-to-day needs of residents.</p>
<p>Organisation: Bankside Residents Forum NSPPSV19.22</p> <p>Without a robust Retail Capacity Study, this policy is both not justified nor positively prepared.</p>	<p>A Retail Study has been prepared which sets out recommendations for the policy which informs the New Southwark Plan.</p>
<p>Organisation: Vital OKR NSPPSV205.26 Individuals NSPPSV128.68 and NSPPSV91.68</p> <p>Objection 50.</p> <p>We object to the failure to define the scope of P33 on the Policies Map, by</p>	<p>Objection 50</p> <p>It is not considered there is scope for ambiguity due to the use classes order</p>

outlining each of the shops and associated accommodation to which this applies. Without this there is significant scope for ambiguity and challenge , and thus the policy will be weakened

NPPF para 157 states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation.

NPPF para 157 requires that Local Plans should Indicate land-use designations on a proposals map;

NPPF para 70 makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

and lawful uses of sites therefore it will be clear when this policy applies.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

Objection 51.

We object to weakness and unclarity in this policy and suggest; That shops be clearly defined for the purpose of this policy, and should include not just the sales area but also associated amenity, storage and yard / access space; An alternative to satisfying point 2 should be replacement provision in the nearby area, in an appropriate and viable location.

Objection 51

The policy will define shops as A1 use. The policy is intended to safeguard the A1 use outside of protected shopping frontages, town and local centres. The policy will define shops as A1 use. The policy is intended to safeguard the A1 use.

NPPF para 70 makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.

Organisation: Vital OKR  
NSPPSV205  
Individuals  
NSPPSV91 NSPPSV128

Objection 52.

We object to failure to include any reference to expectation for new development. We suggest addition of a point stating that development of new shops that are below the sequential test threshold, outside of town centres, where it is clear that they will meet a need, are likely to be viable, and will not disproportionately compromise residential amenity, will be supported.

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

Organisation: Studio Makecreate and Individual  
NSPPSV175.9 and NSPPSV323.7

Objection 52

Noted. This will be reviewed.

Regarding Strong, local economy policy P33: Shops outside protected shopping frontages, town and local centres we object to:

Failure to define the scope of P33 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies;  
Weakness and unclarity in the policy, and failure to include any reference to expectation for new development.

These inadequacies make the plan unsound as it is not justified, nor is it consistent with national policy, each in the ways required by the NPPF.

It is considered to be too prescriptive to map all of these shops on the policies map and reduces the flexibility of the policy, the current map highlights protected shopping frontages, town and local centres. Expectation of new development, if relating to an allocated site, would be set out within the Area Vision and more specifically within the site allocation section of the New Southwark Plan. For sites which are not allocated within the plan the expectation would relate to their most recent lawful use and this would be considered in any planning application that came forward.

Organisation: Tesco Stores  
NSPPSV180.7

Policy P33 of the New Southwark Plan seeks to resist the loss of shops outside Protected Shopping Frontages, Town and Local Centres. Indeed, Policy P33 resists any loss of shops unless evidence is provided that demonstrates that there is no demand for retail uses through a marketing exercise of two years.

Our client believes that the requirement to provide two years marketing evidence is a disproportionate length of time. Instead it is strongly contested that a reduced period of marketing adequately demonstrates demand for retail units. Indeed it is our client's extensive experience that retail units are seldom let after the initial 3-6 months marketing. Our client therefore proposes that the supporting text for Policy P33 is adjusted to read reflect this experience as follows; *'this must be demonstrated through a marketing exercise for 3-6 months immediately prior to any application'*.

It is our professional view that the above would avoid retail units remaining vacant for a prolonged period with no realistic chance of becoming occupied.

The inclusion of a marketing clause of two years is consistent with other marketing policies in the plan. It is not the intention of the council to encourage vacant units; it is our experience that Southwark shops have very low vacancy rates, which is evidenced in our Retail Study (8.4% which is lower than the national average). It is important to maintain A1 uses because they offer services to the community. Marketing for one year may encourage shops to be left vacant for this time period until a change of use can be established. Marketing for two years would discourage this from happening and for the marketing strategy for be effective in finding an alternative A1 occupier, which continues to be in demand in Southwark. The policy is intended to safeguard the A1 use class so that a continued service is provided for local residents.

In addition, Policy P33 states that ‘development must not result in the loss of shops outside Protected Shopping Frontages, Town and Local Centres’. Whilst our client supports the objective to resist the loss of shops within the borough, including those outside existing Protected Shopping Frontages, Town and Local Centres, our client requests further clarification as to the definition of ‘shops’. In particular we seek further clarification as to whether ‘shops’ refers to retail units or to retail floorspace.

Furthermore, by way of a rigid restriction on the loss of either ‘shops’ or retail floorspace’ it is contended that Policy P33 will restrict opportunities for improvements to retail provision within the borough. In particular it is contended that ensuring the quality of retail provision outside of protected shopping frontages, town or local centres would be better achieved through the adoption of a qualitative approach rather than a strictly quantitative approach as current adopted within Policy P33. It is therefore our clients view that Policy 33 should be amended as follows:

*‘development must not result in the material loss of retail provision outside Protected Shopping Frontages, Town and Local Centres’.*

It is contended that this approach will ensure the objectives of the policy are met whilst providing sufficient flexibility so as not to restrict opportunities for improvements to existing retail provision, including those that are part of wider redevelopment / regeneration proposals.

Individual  
NSPPSV237.8

“...marketing exercise for two years, immediately prior to any planning application, for both its existing condition and as an opportunity for an improved shop;”  
It is possible for a property owner to advertise in a professional or esoteric journal which might not be seen by potential local entrepreneurs. This has

The inclusion of a marketing clause of two years is consistent with other marketing policies in the plan. It is not the intention of the council to encourage vacant units; it is our experience that Southwark shops have very low vacancy rates particularly in town centres, which is evidenced in our Retail Study (8.4% which is lower than the national average). It is important

tended to happen in Camberwell, where there are examples of sporadic marketing with minimal attempts to let, and even offers being refused in the months prior to planning application. Therefore the policy is unsound, inconsistent with the London Plan's advocacy for social mobility and vibrant small business. It could be made sound as follows:

Properties should be published for invited offers through the Council website for at least six months prior to application, to ensure small businesses local to the borough and seeking to expand are able to search this register for opportunities to expand.

“Evidence is provided that there are alternative A Use Class shops within a 400 metre walking distance.” This test could only be failed by a shop which stood by itself, which is a rare situation. The test is therefore irrelevant, because any shop in or near an integrated shopping parade will always pass it. It is not evidence based, because there is no requirement to test commercial demand based on footfall or to assess need based on residential density. Additionally, there is no requirement to assess area-wide custom including shopping at drive-in supermarkets. This means it is possible for an increase in drive-in supermarket shopping to be taking place at the same time at local, walkable shops are converted, without investigating whether local planning policy is a factor in these shops' perceived commercial viability. The NPPF and London Plan encourage a reduction in car-based shopping, which these local shops have a role in reducing. Yet this policy, and existing practice, is to convert these outerlying shops to flats and take no action on drive-in supermarkets. Therefore the policy is in contradiction with the London Plan and is unsound. It could be made sound by the introduction of a requirement to assess local need and visitor footfall, and a recent analysis by the Council to ensure the effect of local policies (such as parking) does not constrict local commercial opportunities relative to other areas in the borough.

Smaller outerlying shops which fall in local centres or completely outside

to maintain A1 uses because they offer services to the community. Marketing for one year may encourage shops to be left vacant for this time period until a change of use can be established. Marketing for two years would discourage this from happening and for the marketing strategy for be effective in finding an alternative A1 occupier, which continues to be in demand in Southwark. We have also included a marketing strategy in Annex 1 of the plan which provides good practice guidance and the expectations for how marketing should be carried out. We rigorously review marketing strategies submitted with applications to ensure they are effective. With regard to the 400m threshold, this is an additional requirement on top of the evidence of no market demand, so that the policy is sufficiently robust to prevent changes of use without appropriate marketing and there being a range of facilities nearby.

designations are a vital opportunity for local BAME entrepreneurs to find a route out of poverty for themselves and their families. A policy which effectively discriminates against them is inconsistent with the Equality Act. Additionally, independents can develop better quality and specialist services which benefit locals, by attracting passing visitor custom to supplement the same shops which provision to locals. A key part of how to attract passing visitor custom lies in part of the offer being specialist, such as comparison goods, making it more likely that a passer-by will stop.

For this reason, the following paragraph is insufficient, because it implies that the role of smaller outerlying shops cannot extend beyond providing services only to locals:

“Outside town centres, local centres and protected shopping frontages, local shops and other local services should be safeguarded and supported to meet the day-to-day needs of residents. They can provide a convenient service to help to make people feel part of a community and do their shopping with minimal travel.”

As explained above, this approach is likely to constrict the quality of services available to locals, as well as the affordable commercial opportunities for deprived communities which both lie outside town centres yet can access passing custom on busy routes. Therefore, the policy contradicts the local economy growth & social mobility advocacy of the London Plan. It could be made sound by adding that outerlying shops and local centres can act to capture already-passing custom in a way beneficial to local opportunity and goods & services, therefore should receive planning designation protection and visitor infrastructure planning, irrespective of their position in or outside the centre hierarchy.

## Representation

P34 Shop fronts

## Officer Response

Organisation: British Sign and Graphics Association  
NSPPSV28.1

These representations are submitted on behalf of the British Sign and Graphics Association in response to Policies P34 and P40 and supporting text of the above draft Local Plan.

The BSGA represents 65% of the sales of sign age throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended).

We commented on the "Issues" draft of this plan and are glad to see that the policies and text have been substantially revised to take account of our representations. We have carefully considered the proposed policies within this Submission draft of the New Local Plan and are content that they mostly accord with national planning policy and guidance.

However, Policy P40 contains criteria 5 concerning "healthy behaviours". The Regulations do not permit control to be exercised over the content of any advertisement unless required in the interests of amenity or public safety. Criteria 5 and the final sentence of the supporting Reasons seek to influence the content of the actual advertisement; and this proposed additional control is not justified by the interests of amenity or public safety. As provided in Regulation 3(4) of the 2007 Regulations:

"Unless it appears to the local planning authority to be required in the interests of amenity or public safety, an express consent for the display of advertisements shall not contain any limitation or restriction relating to the subject matter, content or design of what is to be displayed."

Policy P40 criteria 5 and the final sentence of the supporting Reasons must

Support noted. Point 5 of Policy 40 has been removed following consultation responses received.

<p>therefore be deleted to accord with the law.</p>	
<p>Organisation: Peckham Society NSPPSV140.9</p> <p>PS believes the policy on shop fronts to be unsound for two reasons  1 there is no published evidence, despite a wealth of archival material  2 the first shops, say 26-28 Rye Lane, were probably stalls in front of houses  3 the Rye Lane Conservation Area appraisal values the vitality of the open shop fronts</p>	<p>A Retail Study has been prepared which sets out recommendations for the policy which informs the New Southwark Plan. Please note that should a proposal site be located within a conservation area, be a listed building or affect the setting of a heritage asset it will be assessed based on the area specific conservation area appraisal.</p>
<p>Organisation: Tesco Stores NSPPSV180.8</p> <p>Policy P34 of the New Southwark Plan sets out the Council’s policy for shop fronts and shop front signage. It highlights a set of criteria for shop fronts ensuring ‘the proportion, scale, style, detailing, colour and materials make a positive contribution to the building and its context’, including the need to utilise internal security grills and security solutions. In addition Policy P34 states that proposals must retain existing shop fronts in conservation areas, as well as shop windows if the proposals are part of a change of use within town centres.</p> <p>Whilst our client supports the Council’s objectives of improving design and appearance of town centres within the borough, it is contended that Policy P34 of the New Southwark Plan is over prescriptive and therefore not consistent with the paragraph 60 of the NPPF which states:</p> <p><i>Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.</i></p>	<p>This policy does not aim to impose a particular architectural style, instead states that a positive contribution should be made to the building and its context, and on this basis is not considered to be restrictive. Design within the borough is important and it is considered to be essential to retain original and well maintained shopfronts.</p>

Individual  
NSPPSV327.9

The plan should offer up the ability for the council to fine owners who do not maintain shop fronts or buildings above.  
Camberwell Church Street needs a policy where shop owners by the bus stop cannot place goods on the pavements.

Buildings and areas of land which are kept untidy can be subject to enforcement action dependent on the circumstances, should you find an area of land to be kept untidy it is advised that this is reported to the Planning Enforcement team.

**Representation**

P35 Betting shops, pawnbrokers and payday loan shops

**Officer Response**

Section 19 of the Planning and Compulsory Purchase Act 2004 requires that development plan documents or any other local development document must have regard to national policy documents and guidance as in the NPPF. For reasons set out below, this draft document is plainly contrary to the NPPF.

Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) regulations prescribes that that local plans must contain a reasoned justification of the policies. As set out in the NPPG (Paragraph 014. Reference ID: 12-014- 20140306) “appropriate and proportionate evidence is essential for producing a sound Local Plan” and “evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan”. Paragraph 182 of the NPPF states that a local planning authority should submit a plan for examination which it considers is sound – namely that it is: positively prepared; justified; effective; and consistent with national policy. It is considered that the Plan is not justified, as it is not founded on a robust and credible evidence base, particularly in relation to betting shops. The Council will also be aware that as a regulator they must comply with the Regulators’ Code (April 2014), laid down in parliament in accordance with section 23 of the Legislative and Regulatory Reform Act 2006. The Code seeks to promote proportionate, consistent and targeted regulatory activity through the development of transparent and effective dialogue and understanding between regulators and those they regulate to reduce regulatory burdens on businesses.

Our representation letter focuses on Policy P35. As per our initial representations to the Preferred Option Consultation in October 2015, we look at what the policy and reason states and then we turn to our objection. It is disappointing that our initial comments have not been considered in the preparation of the Proposed Submission Version.

There are genuine planning issues on the health, amenity and the continued protection of shopping frontages throughout the borough which justify considering the merits of proposals for these uses. Therefore, the council considers the policy is justified because of the need to exercise more control over planning for betting shops and pay day loan shops in the interests of the proper planning of the borough’s town centres. Of particular concern is the fact that:

Clusters of betting shops and pay day loan shops have become established in the protected shopping frontages over the last 8-9 years (identified through survey data).

The most significant clusters of betting shops in the borough is along Walworth Road, Camberwell/Denmark Hill and Rye Lane. This has coincided with reported anti social behaviour and crime in these locations which has been associated with betting shops. This is considered to be detrimental to the character of the high street and local amenity and also importantly how people are now perceiving the shopping experience in these town centres.

The most significant clusters of pay day loan shops are also along Walworth Road, Camberwell/Denmark Hill and Rye Lane;

There is potential for existing betting shop and pay day loan shop clusters in the borough to intensify or new ones to be formed (including in shopping frontages outside of the town centres) if the permitted development rights continue to be available for change of use.

The London Plan sets out the LDF's role to manage clusters of uses having regard to their positive and negative impacts on the objectives, policies and priorities including a centre’s role in promoting health and well-being which

Policy P35: Betting Shops, pawnbrokers and pay day loan shops

The policy states that development of betting shops, payday loan shops and pawnbrokers in protected shopping frontages must (1) Not exceed more than 5% of the total number of units within the protected shopping frontages; and (2) Be at least 10 premises away from other premises of the same use.

Within the 'Reasons' section it is stated that the policy has been formulated based on the fact that "concern has been raised by the community about the number and the resulting impact of the clustering of these shops on the diversity of shopping frontages and the choice available". It is also noted that too many in one area can lead to "a negative impact on the vitality and viability of the town centre, discourage investors from locating there and affect the quality of life of those living nearby". The Plan notes that this can result in the perception that the centre's retail offer is "weak" and that the centre is in "decline".

#### Objection Response

Prior to turning to the specific objection comments, it is important to note that Policy P35 makes it clear that all uses listed in the policy (notably betting shops, pawnbrokers and pay day loan shops) must be considered together (i.e. not just individual uses), and their potential cumulative impact assessed in cases (1) and (2).

We do not consider it is appropriate to group betting shops, payday loan companies and pawnbrokers together as each offers an entirely different service to their respective customers.

These uses are all typical town centre uses and collectively they will no doubt amount to a notable proportion of uses within centres already (prior to the policy being adopted). As a result of their varied functions, their potential

this policy seeks to achieve giving the concern of the proliferation of betting shops, pawnbrokers and payday loan shops in the borough. This policy does not restrict the uses altogether, but seeks to ensure there is not an over-concentration of these uses in one place. This is consistent with the report prepared to Planning Committee in relation to the Article 4 Direction before these uses were re-classified from A2 to sui generis nationally in recognition of the issues of concentration and impacts on the local community.

impacts (positive, not just negative impacts) on a centre will also vary. Many centres across the country and in Southwark are healthy, despite having a high number of these uses.

We strongly suggest that the Council revisits this proposed approach. It is pertinent to note that Camden Council indeed separated these uses following consultation on their Proposed Local Plan. The Local Plan has since been adopted with these uses dealt with individually.

There is a real danger that adopting such an approach will effectively put a moratorium on such new uses in centres and potentially encourage new operators and uses out of centres. Clearly such an approach is inappropriate and would fly in the face of the town centres first policy as set out in the NPPF which seeks to encourage town centre shops and services to locate within centres, rather than out of centre.

We are also concerned that the document will conflict with paragraph 23 of the NPPF which states that policies should be positive and promote competitive town centres. Bullet point 4 of this paragraph states that LPAs should “promote competitive town centres that provide customer choice and a diverse retail offer and which reflect individuality of town centres”. Clearly the document is likely to have a serious impact on particular industries and healthy competition between different operators by preventing new operators from locating within a particular centre.

Again, regard needs to be had to the very real impact that the document is likely to have on a number of different industries and the clear conflict that would arise with the NPPF.

#### Over-concentration / Clustering of the shops

We consider, in line with the London Plan SPG on Town Centres 2014, that the starting point for Local Plan policy making is whether there is an existing over concentration or cluster of uses (including betting shops) which has

reached saturation levels where positive impacts are outweighed by negative impacts.

The Council originally produced an evidence base for the policy which comprised documents that formed part of the Borough's Article 4 Directions in 2013, the 'Understanding perceptions of Southwark Town Centres' survey (2014), and the Retail Study produced by NLP (2015).

Within the information there was a document of maps entitled 'Article 4 Directions: Protected Frontages Maps of Betting Shops and Pay Day Loan Shops 2006-2013 produced in March 2014. Although the document provides an overview of the location of betting shops within the borough over time (between 2006 to 2013), it does not show on an appropriately scaled map where these existing betting shops lie within each centre, how many there are and therefore whether there is an existing over concentration or cluster of uses that has reached a saturation level. In addition, the purpose of the map appears to be to show an over-concentration of betting shop, pay day loan and pawnbroker uses combined to show a clustering of all uses within the protected shopping frontages of the borough. This document has since been removed from the online evidence base.

Firstly, and as discussed, these uses are all typical town centre uses and collectively they will no doubt amount to a notable proportion of uses within centres already (prior to the policy being adopted). Secondly, it is important to note that Southwark has 75 betting shops in the borough which is a far lower figure than many other London Boroughs and constitutes just 2.3% of retail units in betting shops use. Thirdly, from the map and other evidence base information available it is impossible to establish whether saturation levels have been reached resulting in harm to the centres when assessed in line with the 8 criteria of London Plan policy 4.8.

No new local evidence has been produced that would identify saturation levels and the point where harm outweighs the benefits of betting shops. It is therefore unclear how the figures in part (1) and (2) of the policy have

been derived at. There is no indication in the evidence base documents that these particular figures are appropriate and no explanation as to how, based on the evidence, the figures have been chosen. For example, when taking part (1) of the policy, there is no explanation as to why it has been concluded that 5% (or above) of a protected shopping frontage comprising betting shops, payday loan shops and pawnbrokers or that the number of betting shops, pawnbrokers or payday loan shops would result in:

- An impact of clustering of these shops;
- A negative impact on vitality and viability of any given centre;
- Discouraging investors from locating in the centre;
- Affect on the quality of life of those living there; and
- A centre that is weak and in decline.

One of the newly referenced evidence base documents, 'Responding to the cumulative impact of betting shops' (July 2013) was produced solely for the purpose of licensing authorities and has been misused for the purpose of evidence to planning policy. The document clearly states that the resource "is intended to provide a framework for licensing authorities to assess and consider the merits of introducing a cumulative impact policy statement (CIPS) for betting shops within the existing licensing and planning regulatory framework, and in particular, within local gambling licensing policies".

As such, it is abundantly clear that there is no basis for the figures specified in part (1) and (2) of the policy included in Policy P35. The policy should provide clear information and supporting evidence on why the above thresholds have been chosen.

We wish to draw attention to a recent Paddy Power appeal decision (ref: APP/U5930/A/14/2229533) at 620 High Road, Leytonstone which was allowed on 22 April 2015. The decision was made after betting shops became SG uses. The proposals would result in 6 betting shops in the centre, meaning betting shops would account for just 3.5% of the overall centre, a figure which the Inspector considered to be "a low figure when compared with a

comparison of other non-A1 uses in the centre”.

There was an existing betting shop within the same parade as the application site (4 units along) and an existing betting shop opposite the application site on the other side of the road. The Inspector concluded that:

“I do not consider that an additional betting office within the immediate area would result in a significant alteration to this balance, or result in a clustering effect that would be detrimental to the retail attraction of the immediate area or wider centre”.

The Inspector later stated:

“As I found within the previous section, the proposal would not result in any significant clustering concerns”.

The Inspectors comments are relevant in this instance. Firstly, the Inspector considered that betting shop uses comprising 3.5% would be appropriate (this is just 1.5% under the 5% threshold and does not comprise pay day shops or pawnbrokers).

Secondly, the Inspector considered that betting shops in more than 1 in 10 premises would be appropriate.

We therefore consider that the document should provide further information on why the thresholds in parts (1) and (2) of the policy are appropriate.

At present, in this regard, the draft policy is not sound as it would not be ‘effective’, has not been ‘justified’ and is not ‘consistent with national policy’.

Negative impact on vitality and viability of a town centre

The NPPF recognises the role of the planning system in supporting the vitality of town centres and promoting healthy communities. Paragraph 23 of the NPPF is clear when it states that local planning authorities (LPAs) should recognise town centres as the heart of their communities and pursue policies

to support their viability and vitality. In this regard, LPAs should set out policies that make clear which uses will be permitted in such locations, and promote competitive town centres that provide a diverse retail offer which reflects the individuality of a town centre.

Under this heading, the following impacts listed as reasons for the formation of Policy P35 will be considered:

- Discouraging investors from locating in centres;
- Affecting the quality of life for those living nearby; and
- Centre's retail offer is weak and in decline

As noted, the Council's original evidence base comprises the documents that formed part of the Borough's Article 4 Directions in 2013 (no removed from the evidence base), the 'Understanding perceptions of Southwark Town Centres' survey (2014) and the Retail Study produced by NLP (2015).

It would appear that the impacts relating to vitality and viability of the centres are based mainly on the 2014 survey which in our view is flawed and extremely negative towards betting shop use.

The document includes a 'questionnaire' that was used to ascertain the 'perceptions' of the public in Southwark's five town centres (it is important to re-iterate that these are 'perceptions' rather than fact). The questionnaire asks 22 questions of which 6 questions are based on betting shops and pay day loan shops (interestingly no other town centre uses are mentioned). Most of the questions are closed questions and one question (question 16) asks the respondent to say how far they agree with a number of mainly negative statements the Council have provided that relate to betting shops such as:

- People are less likely to visit this town centre because of them;
- They provide a meeting place for local people;
- They reduce the diversity of shops in this town centre;

- They make this town centre less attractive;
- They provide a valuable service for local people;
- They attract anti-social behaviour;
- They can affect people's health quality of life or well-being;
- They attract the wrong type of people.

Non-surprisingly, the survey suggests within the 'perception' section that the majority of respondents agreed with the negative statements above in all cases (highlighted in bold).

In addition, there is a question (number 11) that asks what the respondent most 'dislikes' about the town centre. This question is on the same page as all of the betting shop questions and is followed by the question 'how often do you visit betting shops'.

Non-surprisingly, in three of the centres, 'betting shops' are listed as a major 'dislike'.

It is our view that this survey cannot be used as a legitimate and robust evidence base document as it has not been 'positively prepared'. The questions asked are negative towards betting shops from the outset and therefore the data collected is in turn negative towards betting shop use. In addition, the data is based on perceptions rather than reality and therefore is not robust.

Discouraging investors from locating in centres

One of the 'reasons' for policy states that the threshold figures should be put in place in protected shopping frontages to avoid clustering of the uses to ensure that investors are not discouraged from locating in centres. There is no robust evidence that the Council have provided that demonstrates this point. It is based purely on the 'perceptions' of the Council's survey (which we discussed above).

Taking this into consideration, there is no reason why an investor would be

discouraged from locating within a particular centre due to other main town uses such as betting shops being present within that centre. It is considered therefore that this statement should be removed from the 'reason' section of the policy as it is not 'justified'.

Affecting the quality of life for those living nearby

One of the 'reasons' for policy states that the threshold figures should be put in place in protected shopping frontages to avoid clustering of the uses to ensure that there is no impact on the quality of life of those living nearby. Similar to above, there is no robust evidence to suggest that this is the case. This point is based purely on the survey information obtained which is based on perception and not reality.

The only evidence that the Council have in relation to the survey material are a number of statements made in the Council's Article 4 committee report in relation to anti-social behaviour. Within the report it is noted that reports from police raise concern over the number of betting shops and activity surrounding them. However, none of this evidence is provided and within the report it is openly admitted that:

"There is not an established direct link between the number and clustering of betting shops to incidence of anti-social behaviour and crime in the borough" (paragraph 92).

Although it has been raised by MPs, it is a common misconception that the clustering of betting shops in or close to deprived communities can have a detrimental effect on the diversity and character of high streets. Firstly, it should be noted that betting shops do not deliberately target deprived areas. Betting shop operators are predominantly concerned with areas with high populations. There are therefore also betting shops in affluent areas (such as High Street Kensington).

One of the council's referenced documents, Ben Cave Associates Ltd (2014) states that:

"Although many of these situational characteristics (e.g. concentration, clustering or proximity of venues) are thought to influence vulnerable gamblers, there has been very little empirical research into these factors and more research is needed before any definitive conclusions can be made. The scientific literature therefore falls short of supporting particular densities or exclusion/saturation distances for betting shops in the area." (paragraph 6.2.54)

Secondly, it is important to note that gambling is one of the most heavily regulated activities in the country which has resulted in a socially responsible industry. Betting shops are governed by the three gambling objectives. Betting shop operators wishing to open a new betting shop must demonstrate that their operation will:

1. Prevent gambling from being a source of crime and disorder, being associated with crime or disorder, or being used to support crime;
2. Ensure that gambling is conducted in a fair and open way; and
3. Protect children and other vulnerable people from being harmed or exploited by gambling.

As such, when applying for their gaming licence, betting shop operators must provide information and evidence demonstrating that they have appropriate training and management procedures/policies in place to show that they will comply with these objectives, including the protection of children and other vulnerable people, something that betting shop operators take very seriously. This of course includes being members of various schemes. For example, Paddy Power was a founding member of the Senet Group, an independent body set up to promote responsible gambling standards. They are also certified by Gamcare, as are the majority of the major betting shop operators.

Failure to demonstrate compliance with the objectives means that a license will not be granted, and of course, if at any time a betting shop operator is found not to be complying with the objectives in the future, their licence can be reviewed and ultimately revoked. Where the licensing authority has any concerns about a new operation when considering a licence application, they are perfectly entitled to impose conditions on a licence to ensure that additional measures/policies/procedures are put in place.

There is no evidence to suggest that a betting shop use would affect the quality of life of those living nearby a new betting shop use. The Council recognise that there is no direct link between the cluster of betting shops and crime and anti-social behaviour. It is considered therefore that reference to this statement should be removed from the 'reason' section to Policy P35 as it is not 'justified'.

It is noted that the Draft Haringey Development Management DPD made reference to a link between health outcomes and betting shops. During the Examination in Public, the Inspector made it clear that they did not accept that there was sufficient evidence to link betting shops with poor health outcomes. The claim was removed from the text (Modification 97) as part of the Main and Minor Modifications.

Contribution to a centre's retail offer that is 'weak' and a centre that is in 'decline' One of the 'reasons' for policy states that the threshold figures should be put in place in protected shopping frontages to avoid clustering of the uses to ensure that there is not a perception that an area is performing 'weak' in terms of its retail offer or is in 'decline' generally.

Again, there is no evidence to suggest that this statement is accurate. The Council should note that contrary to this statement, in terms of footfall, it has become generally accepted that betting shops, and in particular, Paddy Power betting shops, generate high levels of footfall. Survey work

undertaken between 2011 and 2014 by an independent survey company (ESA Retail) has demonstrated that across centres of varying size Paddy Power shops generate high visitation rates. The results show that Paddy Power shops often attract higher visitation rates than many A1 shops of a similar size, and that in some instances they attract new customers to a centre.

It is considered therefore that reference to this statement should be removed from the 'reason' section to Policy P35 as it is not 'justified'.

#### Conclusion

In our view policy P35 and its 'reasons' are not 'justified', 'positively prepared' or 'consistent with national policy'. The policy and reasons are not founded on a robust and credible evidence base. Furthermore, the policy and subtext is not consistent with national policy or with the London Plan. The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG. The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.

We have no issue with the fact that the Council will want to scrutinise new betting shop applications and ensure that they will not lead to any clusters or concentrations which would lead to negative impacts, however, to assert unnecessary thresholds as a starting point for all new applications in protected shopping frontages that are not based on a robust and credible evidence base is wholly unsubstantiated and does not allow officers/members to make objective decisions.

Indeed, many of the centres will have exceeded the thresholds outlined in

the policy already, and if the decision-makers are told that there is already an issue with betting shop use within the borough, many will naturally conclude that an additional betting shop in an area would result in an area being at high risk of adverse impacts and there will be a tendency to conclude that the application should be refused. This is clearly unacceptable, particularly given that there is not specific robust and credible evidence to back up the document's presumptions in this regard.

It would appear from the wording included within the Southwark's Economic Wellbeing Strategy 2017-22 that there is general attitude to prevent new betting shops, regardless of the local circumstances or identified impact on a particular centre. "At the same time, we will continue to oppose through planning policy any increase in the number and clustering of business types that extract money from the local economy, such as payday lenders and betting shops"

We conclude that the policy should be re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops whilst also removing the unnecessary grouping of a variety of uses which are not intertwined. We would be grateful if you would take the above comments on board in the preparation of the plan and request that you keep us informed on further progress and consultations.

## Representation

P37 Pubs

Organisation: GLA

## Officer Response

<p>NSPPSV66.11</p> <p>The Mayor welcomes the inclusion of a pub protection policy which is in line with draft London Plan Policy HC7 Protecting public houses.</p>	<p>Noted.</p>
<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91 NSPPSV128</p> <p>Objection 53.</p> <p>We object to the failure to define the scope of P37 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies. Without this there is significant scope for ambiguity and challenge, and thus the policy will be weakened.</p> <p><a href="#">NPPF para 157</a> states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation.</p> <p><a href="#">NPPF para 157</a> requires that Local Plans should Indicate land-use designations on a proposals map.</p> <p><a href="#">NPPF para 70</a> makes clear that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs, and should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and be retained for the benefit of the community.</p>	<p>Objection 53</p> <p>All pubs are mapped due to the Article 4 Direction which applies to them and this is a planning constraint which is available spatially.</p>
<p>Organisation: Southwark Friends of the Earth NSPPSV165.4</p>	

<p>P37 -Pubs:-</p> <ul style="list-style-type: none"> <li>• We entirely disagree with your statement that ' ... development proposals resulting in the loss of a pub will only be permitted where is no market demand for pub use .. !'.</li> <li>• We absolutely support this statement. We most strongly believe that there should be an 'automatic change of use' policy and an end to automatic demolition to any of buildings of beauty and great architectural merit.</li> <li>• The Council has sadly favoured and allowed automatic demolition of some of our architecturally beautiful pubs, e.g. The Clipper and The Ship York in Rotherhithe and others.</li> </ul> <p>The buildings mentioned here are sadly a handful of those already consigned to the history books. It is not recommended to erase history, we have a very diverse and interesting history in this old borough and the Council should be proud and not erasing our wonderful history.</p>	<p>Noted. However, we need to provide a policy framework for pubs to be considered where for change of use or redevelopment is proposed. A strict marketing process has been put in place for this.</p> <p>There is an Article 4 Direction to ensure a number of traditional public houses in the borough cannot be demolished, altered or a change of use carried out without planning permission. This will allow a fair assessment of any planning application for public houses subject of the Article 4.</p>
<p>Organisation: Studio Makecreate and Individual NSPPSV175.10 and NSPPSV323.8</p> <p>Regarding Strong, local economy policy P37: Pubs we object to failure to define the scope of P37 on the Policies Map, by outlining each of the shops and associated accommodation to which this applies.</p> <p>This inadequacy makes the plan unsound as it is not justified, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan.</p>	<p>All pubs are mapped due to the Article 4 Direction which applies to them and this is a planning constraint which is available spatially.</p>
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p>P38 Business Relocation</p>	
<p>Organisation: U and I Group PLC</p>	

NSPPSV197.1

We believe that the Plan's approach to dealing with existing tenants in Policy P38 ("Business Relocation") is too rigid and ignores the commercial realities of many developers who may not legally be required or entitled to deal with existing tenants. It should instead be satisfactory for developers to demonstrate that they have done everything within their rights or abilities to support the relocation and/or reincorporation of existing tenants and occupiers. The policy as drafted has the potential to hinder development from coming forward. Whilst we support the Council's ambition to replace all existing employment floorspace within schemes, a degree of flexibility should be applied where it is justified to do so. For example, an element of employment space could be given over to provide for other important needs (i.e. community or infrastructure requirements); full re-provision should not be sought where this is demonstrably unviable; and in some circumstances a smaller quantity of greater quality accommodation can support equal or greater job numbers. We request that the Council acknowledge these considerations when determining applications. In addition to the above, we would request that the Council update the annual housing target so that it corresponds with the figure in the draft New London Plan of 2,554 new dwellings per annum.

Following the receipt of the Inspector's Report on the Mayors of London on the Draft London Plan in October 2019, our 10 year housing target has been reduced to 23,550 homes over ten years (2019/20-2028/29) which includes 6,010 homes on small sites over ten years. In line with the new London Plan the annualised average housing target has been removed.

Organisation: Barkwest and Regent Group  
NSPPSV20.7

There may be instances of small businesses choosing to relocate as part of their individual consolidation plans or business needs, rather than being displaced by development. This policy should not apply in these situations, and therefore there should be no need for a business relocation strategy where evidence is provided that the business is relocating by its own accord.

Point 4 (iv) sets out that 'where existing businesses are proposed to be relocated the strategy should include: statements from existing businesses should they wish to cease trading rather than relocate'.

A strategy still needs to be provided to set out why the business is relocating / why they aren't being re-provided in the redevelopment.

All developments will be assessed on a site by site basis to ensure an assessment which is bespoke to the site.

Organisation: Berkeley Homes (South East London)  
NSPPSV21.11

As per the previous representations on the Preferred Option for the NSP, the requirement to provide a relocation strategy to the Council where small or independent businesses are displaced is considered onerous. It is long held tenet that the planning system is not there to protect individual commercial interests and it is not clear from the policy what the role of the Council would be in the process and how it could seek to protect individual commercial interests.

As per our previous comments it would be helpful if the Council could clarify what constitutes a small or independent business and how the strategies should be delivered.

The imposition of this requirement on developers would be significant and detrimental to the delivery of wider objectives. It is not clear from the Policy what timescales are applicable to the relocation and what requirements there are on the small businesses to accept what is offered. This will slow the development process and could lead to stalled or abandoned schemes where individual occupiers have onerous or complex relocation requirements.

It is considered that rather than seek to try and obligate developers and builders to assist relocation of existing businesses; encouragement should be given to working with Council operated initiatives to seek to support opportunities for new and existing businesses to flourish. Furthermore there should be greater encouragement for developers to deliver a range of employment opportunities in schemes within the Borough and especially in Opportunity Areas.

Organisation: Biz Space  
NSPPSV23.3

See Fact box for the definition of small business and independent business. Comments noted, however there is a risk that smaller businesses will be displaced or lost within the borough as a result of redevelopment, therefore a business relocation strategies are required by Policy P38.

BizSpace is one of the UK's leading providers of flexible employment accommodation and manages a portfolio of approximately 100 sites throughout England and Scotland, comprising a mixture of business centres, industrial estates and business parks. BizSpace's business model is based on supporting small and start-up businesses, by providing office, industrial and warehousing facilities on a flexible basis. It also employs approximately 180 in-house staff, based in various locations across the country. BizSpace is an experienced asset management company, continually reviewing its portfolio and seeking to maximise value, through on-going improvement and investment within existing sites, acquisitions of new opportunities and disposals of those sites which, for a variety of reasons, are failing to meet the BizSpace model.

In principle, therefore, BizSpace welcomes the Council's clear commitment to ensuring this type of flexible employment floorspace is provided within the borough, and its recognition of the important role that flexible employment space for small and start-up businesses provides. This is very much the foundation of the BizSpace model.

However, BizSpace nonetheless objects to the terms of the Council's employment policy P38: Business relocation. As proposed, this represents an extremely onerous policy for landowners such as BizSpace, working within wider opportunities and constraints, particularly in operating and managing a large portfolio of properties around the country. The requirement of Policy P38 extends above and beyond normal planning policy considerations in relation to loss of employment floorspace, and places an undue burden on landowners seeking to secure the viable long-term use of land and buildings and/or their disposal. It should not be the duty of a landowner to demonstrate how consideration has been given to facilitate the alternative provision of floorspace to tenants once the landlord has served a 'notice to quit' to any remaining tenants within a property. In any event, there are provisions within the Landlord Tenant Act relating to the provision of

Comments noted, however there is a risk that smaller businesses will be displaced or lost within the borough as a result of redevelopment, therefore a business relocation strategies are required by Policy P38.

alternative accommodation and this should not be duplicated through planning policy requirements.

Planning policy should be concerned with only seeking evidence to demonstrate whether or not an employment use of land and /or buildings remains viable (usually through a marketing campaign for a specified period) and thus whether a more efficient use can be achieved. By implication, this would suggest that where there is a case for alternative use of employment land, there would be difficulties in attracting / retaining tenants. As such, there should be no additional requirement beyond this standard policy approach to provide a business relocation strategy for any remaining tenants. Policy P38 should be deleted.

Organisation Capital Industry  
NSPPSV30.6

The policy states that where existing or independent businesses or small shops are displaced by development a business relocation strategy, setting out viable relocation options and written in consultation with affected businesses, must be provided. The policy goes on to list information which must be included in business relocation strategies. This expands to include specific business requirements including servicing, fit out and lease terms, and temporary relocation arrangements, where existing businesses are accommodated in new development schemes. Relocation strategies are required to include extensive information including identification of alternative premises in Southwark or in adjacent boroughs and collaboration with other landowners to establish whether suitable workspace for existing businesses could be accommodated in different phases of the development

Comments noted. In relation to the temporary relocation and potential for businesses to have to move twice, this is noted and accepted that in some cases it would be feasible or viable for businesses to be relocated twice. However it does depend on the nature of the business, as some business models such as creative workspace or artists studios can lend themselves well to meanwhile uses. Hence it is considered appropriate to still consider temporary relocation where it is feasible. It is noted the developer will not be responsible for the long term viability of the business it is proposing to relocate, but rather offer the opportunity of new space to be provided to an existing business on the site or offer assistance in terms of relocation. If the business can be accommodated on site, the policy ensures that the fit-out, rental terms and length of lease is suitable for the business to continue

programme.

Our client recognises that small businesses may require additional support to relocate or to mitigate risks to the business where they are affected by redevelopment. However, we consider that the requirements of Policy 38 are overtly onerous and place a significant burden on the applicant (who may not be the landowner), which goes beyond the control under the planning system. In particular, Old Kent Road is designated as an Opportunity Area where growth in the number of jobs and housing is to be delivered through regeneration of the area, which includes a large number of industrial estates.

Whilst our client as the landowner of the industrial units will seek to ensure that existing small businesses are retained wherever feasible and viable to do so, it is considered that the list of information required in the business relocation strategy is onerous and beyond the control of the planning system that the applicant is expected to bear the full responsibility and commercial risks of small businesses.

As mentioned above, from our client's experience, relocation to a temporary accommodation would result in small businesses relocating twice in a short period of time, this is unlikely to be acceptable to many tenants, particularly as any short term lease would be at a premium rent. There are a number of factors outside of the landowner/applicant's control and the policy disregards the process it would take to facilitate a tenant's occupation.

Ultimately, the requirements of the policy which put the entire responsibility of the existing tenants' relocation (both temporality and permanently) onto the applicant (which could either be a developer or a landowner) would place a significant and unreasonable burden on the applicant. This is a significant policy burden which would threaten the development viability, which is contrary to the NPPF paragraph 173.

We therefore object to this policy and consider that it should be amended as follows:

operating. This also has a benefit to the developer, in that the space can be designed and immediately occupied by a local business without the need to let.

*1. Where existing small or independent businesses or small shops are displaced by development a business relocation strategy, written in consultation with affected businesses, must be provided. The business relocation strategy must set out ~~viable~~-potential relocation options.*

*2. All business relocation strategies must include:*

*i. Existing levels of non-residential floorspace (GIA) separated by use class, including vacant units and yards; and*

*ii. Schedule of existing businesses operating on the site including business sector, estimated number of employees and lease terms; and*

*iii. Proposed levels of non-residential floorspace (GIA); and*

*iv. Details of engagement with existing businesses on-site regarding re-provision of premises or relocation options; and*

*v. Details of engagement with the council and workspace providers to secure occupiers for new employment space.*

~~*3 Where existing businesses are accommodated in new development schemes the strategy should include:*~~

~~*i. Specific business requirements including servicing, fit out and lease terms; and*~~

~~*ii. Temporary relocation arrangements or scheme phasing to allow the continuation of the business during construction. Temporary relocation should be contained on-site or as close to the original site as possible.*~~

~~*4 Where existing businesses are proposed to be relocated the strategy should include:*~~

~~*i. Reasons why existing businesses cannot be located on-site;*~~

~~*ii. Details of relocation options explored with individual businesses and the assistance that will be provided. Evidence should be given that the relocation option is suitable for the viable continuation of the business;*~~

~~*iii. Identification of potential alternative premises in in Southwark. Where no suitable sites exist, sites should be identified in adjacent boroughs;*~~

~~*iv. Statements from existing businesses should they wish to cease trading rather than relocate;*~~

~~*v. Collaboration with other landowners to establish whether suitable*~~

<p><del>workspace for existing businesses could be accommodated in different phases of the development programmes.</del></p>	
<p>Organisation: Elephant Amenity Network NSPPSV57.15</p> <p>We support a relocation strategy for small businesses and small shops, but for this policy to be sound it needs to include the following:</p> <ul style="list-style-type: none"> <li>• The importance of market traders who should also be protected</li> <li>• The need for specialist advice and support</li> <li>• The necessity of a relocation package that includes removal expenses and legal fees</li> <li>• The importance of maintaining the existing site as an attractive trading environment</li> <li>• Collaboration with existing traders associations and not limiting collaboration to Council forums.</li> </ul>	<p>Support noted. 1. Market traders will be included in the definition of a small or independent business or shop and will therefore benefit from this policy. 2 and 3. Agreed, this is covered in point 4ii where evidence is required of assistance and that the relocation option is suitable for the viable continuation of the business. 4. Agreed, this is covered by other policies in the strong local economy section, particularly P26 on workspace demand and sectors. Point 5. This will be added to Point 2v.</p>
<p>Organisation: Vital OKR NSPPSV205.30 Individuals NSPPSV91.72, NSPPSV128.72</p> <p>Objection 54.</p> <p>We object to lack of clarity in this policy and suggest a series of amendments to increase its effectiveness:</p> <p>Reference to <i>small or independent businesses</i> should be replaced with <i>small or small branch</i> (small businesses are independent, and small branch businesses have similar challenges and are also a vital part of the Southwark economy);</p> <p>In point 1 <i>are displaced</i> should be replaced by <i>may be displaced</i>;</p>	<p>Objection 54.</p> <p>We have included a definition of small and independent businesses which included small branch businesses operating on no more than 3 sites. This is in a fact box accompanying the policies.</p> <p>Point 1 – Agreed, this will be amended.</p> <p>Point 2i – ‘levels’ will be replaced by ‘amount’ to accurately reflect quantum – yards are already referred to, characteristics is included by referring to the use class and the business sectors which is required under 2ii.</p> <p>Point 2ii – It would be useful information to have about the businesses that</p>

Point 2i. should be redrafted to read Existing quantum and characterises of non-residential floorspace (GLA and operational yards), separated by use class, including vacant units and yards;

Point 2ii. should be redrafted to read Schedule of existing businesses operating on the site, and businesses that have recently departed, including description, business sector, nature of the space occupied, number of employees, and occupancy stuff / lease terms;

Point 2iii. should be redrafted to read Proposed levels of non-residential floorspace (GIA and yards), plus details of key characteristics;

Point v. should be redrafted to read Details of engagement with the council and workspace provider5s, agents, businesses and business associations, to secure occupiers for new employment space;

Point 3i. should be amended to read ...fit out and ownership or lease terms;

Point 3ii. should have added at its end ...,and should be avoided when businesses are of a type for whom multiple moves are not realistic;

Point 4ii. should have added at its end ...,this evidence should include statements from existing businesses;

Point 4iii. should be amended to read ...no suitable premises exist, suitable premises should be identified in adjacent boroughs.

With these suggested amendments the text would be as follows:

1.

Where existing small or small branch businesses or small shops may be displaced by development a business relocation strategy, written in consultation with affected businesses, must be provided. The business relocation strategy must set out viable relocation options.

2.

All business relocation strategies must include:

i.

Existing quantum and accommodation characteristics of non-residential floorspace (GIA and operational yards), listed by use class, including vacant

have recently departed, however as the purpose of this policy is related to business relocation on the site this may be an onerous requirement as it would not meet the objectives of the policy to provide relocation. However it is something that gets asks of developers by officers when considering site redevelopment that includes vacant units and can be included in reports if relevant.

Point 2iii. Noted – will add yards, use class, business sectors to be consistent with the above points on existing

Point 2v – Agreed – this will be amended

Point 3i – Agreed, this will be amended.

Point 3ii – Noted difficulties arising from some businesses unable to relocate twice. This point can be clarified in the reasons.

Point 4ii – Agreed, this will be amended.

Point 4iii – Agreed, this will be amended.

units and yards; and

ii.

Schedule of existing businesses operating on the site, and businesses that have recently departed, including description, business sector, nature of the space occupied, number of employees, and occupancy status / lease terms; and

iii.

Proposed levels of non-residential floorspace (GIA and operational yards), plus details of key characteristics; and

iv.

Details of engagement with existing businesses on-site regarding re-provision of premises or relocation options; and

v.

Details of engagement with the council and workspace providers, agents, businesses and business associations, to secure occupiers for new employment space.

3.

Where existing businesses are accommodated in new development schemes the strategy should include:

i.

Specific business requirements including servicing, fit out and ownership or lease terms; and

ii.

Temporary relocation arrangements or scheme phasing to allow the continuation of the business during construction. Temporary relocation should be contained on-site or as close to the original site as possible, and should be avoided when businesses are of a type for whom multiple moves are not realistic.

4.

Where existing businesses are proposed to be relocated the strategy should include:

- i. Reasons why existing businesses cannot be located on-site;
- ii. Details of relocation options explored with individual businesses and the assistance that has been and will be provided. Evidence should be given that the relocation option is suitable for the viable continuation of the business, this evidence should include statements from existing businesses;
- iii. Identification of alternative premises in Southwark. Where no suitable premises exist, suitable and available premises should be identified in adjacent boroughs;
- iv. Statements from existing businesses should they wish to cease trading rather than relocate;
- v. Collaboration with other property owners and developers to establish whether suitable workspace for existing businesses could be accommodated in different phases of the development programmes.

#### Reasons

Small and small branch businesses and small shops are a vital part of the prosperous local economy in Southwark and are made up of a wide range of innovative and inspiring enterprises, helping to boost local employment and the distinctive character of local neighbourhoods. Regeneration should help to increase the provision of small business space, particularly in new mixed use neighbourhoods. However it is important to ensure that any existing businesses are carefully considered in redevelopment schemes, either to be re- provided where phasing allows, or to be relocated in Southwark to ensure the borough retains its local talent and commercial creativity.

Small businesses are more vulnerable than larger companies and multiples and are unlikely to have the corporate resources available to seek specialist

advice on relocation and mitigate the risks to the business. This places a disproportionate burden on small enterprises and may affect the overall viability of their business. Therefore it is appropriate that additional support is given to small businesses that may be affected by redevelopment.

Organisation: Six Bridges Estate  
NSPPSV163.10

Policy P38: Business Relocation  
This policy states that:

1. Where existing small or independent businesses or small shops are displaced by development a business relocation strategy, written in consultation with affected businesses, must be provided. The business relocation strategy must set out viable relocation options.
2. All business relocation strategies must include:
  - i. Existing levels of non-residential floorspace (GIA) separated by use class, including vacant units and yards; and
  - ii. Schedule of existing businesses operating on the site including business sector, estimated number of employees and lease terms; and

Comments noted, however there is a risk that smaller businesses will be displaced or lost within the borough as a result of redevelopment, therefore a business relocation strategies are required by Policy P38.

- iii. Proposed levels of non-residential floorspace (GIA); and
- iv. Details of engagement with existing businesses on-site regarding re-provision of premises or relocation options; and
- v. Details of engagement with the council and workspace providers to secure occupiers for new employment space.

3 Where existing businesses are accommodated in new development schemes the strategy should include:

- i. Specific business requirements including servicing, fit out and lease terms; and
- ii. Temporary relocation arrangements or scheme phasing to allow the continuation of the business during construction. Temporary relocation should be contained on-site or as close to the original site as possible.

4 Where existing businesses are proposed to be relocated the strategy should include:

- i. Reasons why existing businesses cannot be located on-site;
- ii. Details of relocation options explored with individual businesses and the assistance that will be provided. Evidence should be given that the relocation option is suitable for the viable continuation of the business;
- iii. Identification of alternative premises in in Southwark. Where no suitable sites exist, sites should be identified in adjacent boroughs;
- iv. Statements from existing businesses should they wish to cease trading rather than relocate;
- v. Collaboration with other landowners to establish whether suitable workspace for existing businesses could be accommodated in different phases of the development programmes.

Policy P38 sets out detailed and onerous requirements with regards to business relocation strategies that apply where small or independent businesses are displaced by development.

As set out above, Royal London is supportive of the principle of supporting small and independent businesses and will work collaboratively with its

tenants where plans for redevelopment are identified. It is considered that the detailed requirements of the policy go beyond the role of the planning system which is related to Use Class rather than being tied to specific businesses. Other policies are already in place which protect B class or employment generating Sui Generis use (e.g. Policy P26: Office and business development and the guidance within the Old Kent Road Area Action Plan). In order for the Local Plan to be effective, deliverable and consistent with national policy it must be flexible to respond to market signals. There will commercial sensitivities surrounding the information requested which it is not appropriate to play out through the planning system. Separate controls on relocation, etc, are provided through the landlord and tenant system and will always have been subject to separate commercial negotiation. The requirements of this policy have the potential to discourage allocated sites coming forward for redevelopment and the delivery of wider strategic planning objectives of the NSP. As noted throughout these representations, the redevelopment of sites such as the Six Bridges Estate are already complex to deliver with complicated phasing, viability and design considerations. Overly onerous additional requirements should therefore be avoided for such site.

In order to for the NSP to be effective and deliverable, and consistent with national policy it is requested that Policy P38 is removed. If it must remain in some form, we request that the policy should be applied flexibility with the scale of requirements to be considered on a site by site basis and that the level of prescription in the policy is reduced.

#### Conclusion

Royal London is strongly supportive of the principle of the removal of the site from it's Strategic Industrial Land designation and the comprehensive mixed-use redevelopment of the site under Allocation NS 66 and in line with the

<p>Draft Old Kent Road Area Action Plan.</p> <p>As set out through these representations, sites such as 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 and the strategic planning objectives of the NSP and the Area Action Plan can be delivered. Balance and flexibility is critical given a number of competing objectives in order to avoid inadvertently impeding delivery, particularly given this site is likely to come forward in the longer term.</p>	
<p>Organisation: Space Studios, Individual qnd Studio Makecreate NSPPSV169.06, NSPPSV323.9 and NSPPSV175.11</p> <p>Regarding Strong, local economy policy P38: Business relocation we object to lack of clarity in this policy and would welcome amendments to increase its likely effectiveness</p>	<p>Noted. The policy will be reviewed.</p>
<p>Organisation: Twenty Twenty Glengall Limited NSPPSV175.11 and NSPPSV323.9</p> <p>Regarding Strong, local economy policy P38: Business relocation we object to lack of clarity in this policy and would welcome amendments to increase its likely effectiveness</p>	<p>Noted. The policy will be reviewed.</p>

<p>This inadequacy makes the plan unsound as it is not justified, nor is it consistent with national policy, each in the ways required by the NPPF. These failures also make the plan unsound in relation to the London Plan.</p>	
<p>Organisation: Twenty Twenty Glengall Limited and 180 Ilderton Road Limited NSPPSV196.5</p> <p>We believe that the Plan’s approach to dealing with existing tenants in Policy P38 (“Business Relocation”) is too rigid and ignores the commercial realities of many developers who may not legally be required or entitled to deal with existing tenants. It should instead be satisfactory for developers to demonstrate that they have done everything within their rights or abilities to support the relocation and/or reincorporation of existing tenants and occupiers. The policy as drafted has the potential to hinder development from coming forward.</p> <p>Whilst we support the Council’s ambition to replace all existing employment floorspace within schemes, a degree of flexibility should be applied where it is justified to do so. For example, an element of employment space could be given over to provide for other important needs (i.e. community or infrastructure requirements); full re-provision should not be sought where this is demonstrably unviable; and in some circumstances a smaller quantity of greater quality accommodation can support equal or greater job numbers. We request that the Council acknowledge these considerations when determining applications. In addition to the above, we would request that the Council update the annual housing target so that it corresponds with the figure in the draft New London Plan of 2,554 new dwellings per annum.</p>	<p>Comments noted, however there is a risk that smaller businesses will be displaced or lost within the borough as a result of redevelopment, therefore a business relocation strategies are required by Policy P38.</p>
<p>Organisation: John Lyon’s Charity NSPPSV214.6</p> <p>Policy 38 seeks the submission of a Relocation Strategy in the circumstances where an existing business or business operating at a site could be retained</p>	<p>Support noted and the need for bespoke requirements for each business agreed. The suggested changes for including servicing, size and type of units,</p>

as part of the development scheme and that the loss of that business from that site is deemed to be acceptable through meeting the other requirements of the policy.

The policy seeks to ensure that any existing businesses are carefully considered in redevelopment schemes, either to be re-provided where phasing allows, or to be relocated in Southwark to ensure the borough retains its commercial creativity. The Charity supports the requirement for a relocation strategy for the existing use once options to accommodate existing business within the site has been explored first however it is considered that the policy needs to recognise that as each scheme will have different circumstances, the actual approach to any specific relocation strategy would need to be discussed with the LPA before its submission.

The following sets out the constructive suggestions as to specific modifications that could be made to ensure the soundness of Policy 38. It is suggested that the following amendments should be made: -

2 Where existing businesses are accommodated in new development schemes the strategy should include:

- i. Specific business requirements including **servicing (e.g access for deliveries and pick up, utilities requirements and sizing, size and type of premises required, fit out and lease terms;** and
- ii. Temporary relocation arrangements or scheme phasing to allow the continuation of the business during construction. Temporary relocation should be contained on-site or as close to the original site as possible.

4 Where existing businesses are proposed to be relocated the strategy should include:

- i. Reasons why existing businesses cannot be located on-site;
- ii. Details of relocation options explored with individual businesses and the assistance that will be provided. Evidence should be given that the relocation option is suitable for the viable continuation of the business - **this could**

market locational need, access to clients and South London/Greater London relocation options will be noted in the policy or reasons to support the clarity of the policy.

include information such as locational needs and preferences; access to existing markets and clients;

iii. Identification of alternative premises in in Southwark. Where no suitable sites exist, sites should be identified in adjacent boroughs or if no options available then identification within South London and then Greater London as a whole;

iv. Statements from existing businesses should they wish to cease trading rather than relocate;

v. Collaboration with other landowners to establish whether suitable workspace for existing businesses could be accommodated in different phases of the development programmes.

Organisation: 313-349 Ilderton Road LLP  
NSPPSV217.8

Business relocation sets out that where existing small or independent businesses or small shops are displaced by development a business relocation strategy, written in consultation with affected businesses, must be provided. The business relocation strategy must set out viable relocation options.

We do not support this policy as is not positively prepared nor justified, and inconsistent with national planning policy. The policy is not in compliance with NPPF paragraph 173 which seeks to ensure deliverability of development schemes as the draft policy, as it is currently worded, requires unnecessary information to be supplied at early development stages which will difficult to secure. The term 'displacement' should also be defined accordingly as otherwise existing tenants that are seeking to grow / meet altered business needs may be curtailed by the punitive element of the draft policy.

Comments noted, however there is a risk that smaller businesses will be displaced or lost within the borough as a result of redevelopment, therefore a business relocation strategies are required by Policy P38.

Representation	Officer Response
<p data-bbox="188 880 663 911">P39 Access to Employment and training</p> <p data-bbox="188 922 546 986">Organisation: Dulwich Estates NSPPSV52.8</p> <p data-bbox="188 1031 1077 1129">Policy P39 requires development that results in a loss of employment floorspace to provide a financial contribution towards training and jobs for local people.</p> <p data-bbox="188 1174 1099 1377">This policy is not justified on the basis that coupled with other emerging policies that seek to impose minimum marketing periods, it is perverse to require a financial contribution when there is a loss of employment floorspace if it has been successfully demonstrated that there is no demand for that floorspace for an employment use. By that point, the site no longer has any value in terms of employment and training and therefore there is no</p>	<p data-bbox="1140 1031 2007 1166">The policy is consistent with the requirements of our Section 106 and CIL SPD. It is considered that where employment floorspace is lost, a contribution should be made to support job creation elsewhere in the borough.</p>

<p>harm to be mitigated (the point of planning obligations) arising from its loss.</p> <p>The imposition of unnecessary financial burdens would only serve to reduce overall scheme viability, and likely harm the delivery of other public benefits such as affordable housing, workspace, community facilities and public realm improvements associated with a development.</p> <p>Instead, obligations should be sought from proposed developments where opportunities to support local employment and training are evident, and in line with the NPPF as to when obligations should be sought.</p>	
<p>Individual NSPPSV151.14</p> <p>Whilst the policy is headed ‘access to employment and training’ the policy wording should be amended to ensure that the requirements for training and jobs for local people applies to employment schemes. Make it clear the policy relates to employment schemes.</p>	<p>The policy is relevant for residential and non-residential use development over the size thresholds stated.</p>
<p><b>Representation</b></p>	<p><b>Officer Response</b></p>
<p><a href="#">P40 Outdoors and advertisements and signage</a></p>	
<p>Organisation: British Sign and Graphics Association NSPPSV28.2</p> <p>These representations are submitted on behalf of the British Sign and Graphics Association in response to Policies P34 and P40 and supporting text of the above draft Local Plan.</p> <p>The BSGA represents 65% of the sales of sign age throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended).</p>	<p>Noted. This will be amended.</p>

We commented on the "Issues" draft of this plan and are glad to see that the policies and text have been substantially revised to take account of our representations. We have carefully considered the proposed policies within this Submission draft of the New Local Plan and are content that they mostly accord with national planning policy and guidance.

However, Policy P40 contains criteria 5 concerning "healthy behaviours". The Regulations do not permit control to be exercised over the content of any advertisement unless required in the interests of amenity or public safety. Criteria 5 and the final sentence of the supporting Reasons seek to influence the content of the actual advertisement; and this proposed additional control is not justified by the interests of amenity or public safety. As provided in Regulation 3(4) of the 2007 Regulations:

"Unless it appears to the local planning authority to be required in the interests of amenity or public safety, an express consent for the display of advertisements shall not contain any limitation or restriction relating to the subject matter, content or design of what is to be displayed."

Policy P40 criteria 5 and the final sentence of the supporting Reasons must therefore be deleted to accord with the law.

Organisation: Tesco Stores  
NSPPSV180.9

Policy P40 of the New Southwark Plan sets out the Council's policy for outdoor advertisements and signage. It highlights a set of criteria for shop fronts ensuring their 'size, scale, type and illumination are unobtrusive, taking into account site context and local context' and not compromising safety, security, highway sightlines, or TPOS.

Whilst our client supports the objectives of Policy P40 of the New Southwark Plan is over prescriptive and therefore not consistent with the paragraph 60

This policy does not aim to impose a particular architectural style, instead states that a positive contribution should be made to the building and its context, and on this basis is not considered to be restrictive. Design within the borough is important and it is considered to be essential to ensure outdoor signage is appropriate.

of the NPPF which states:

*Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.*