

Representation	Officer Response
<p><b>Rotherhithe Area Vision</b></p> <p>Organisation: Education and Skills Funding Agency NSPPSV55.11</p>	<p>Noted.</p>
<p>8. The ESFA supports the continued inclusion of requirements for new or expanded schools in site allocations NSP04, NSP10 and NSP40 and supportive statements on provision of school places in area visions AV.05, AV.06, AV.07, AV.12 and AV.14.</p>	
<p>Organisation: Vital OKR NSPPSV205 Individuals NSPPSV91, NSPPSV128 and NSPPSV205</p> <p>Objection to failure to protect existing boatyard</p> <p>Objection 62. We object to the failure to protect the existing boatyard facility at allocated site CWAAP16. This is unsound in relation to the requirement of London Plan policy SI15.</p> <p>London Plan policy SI15 regarding water transport requires that existing boatyard sites should be protected and development proposals to increase their capacity or range of services should be supported. Alternative use of a boatyard site should only be accepted if the facilities of the site are reprovided at a site with equivalent or enhanced facilities. 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.</p> <p>NPPF para 157 requires that Local Plans should indicate land-use</p>	<p>CWAAP 16 forms part of the adopted Canada Water Area Action Plan which is a relevant and up to date development plan document for the site. The site allocation guidance states the required land uses are: Boatyard uses associated with marina including the construction, repair and storage of boats, yacht chandlery, and toilet and shower facilities; retail uses (Classes A1 and A3). In site specific guidance it also states: Development should not compromise the operation of the boatyard.</p>

designations on a proposals map; 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.

Organisation: Port of London Authority

NSPPS143.19

#### 5. Rotherhithe

It is noted in the area vision that the area is accessible by tube and rail from Canada Water and Surrey Docks stations with improved bus connections, walking and cycling routes, noting that accessibility for all modes of transport and congestion require improvement. The PLA consider that reference must also be given to the use of the River Thames as an alternative form of transportation in regards to any future development near to the riverside in this location. This should include reference to the Greenland Surrey Quays Pier which is within the boundary of this area vision.

The PLA support the reference in the area vision to the statement that developments should prioritise walking and cycling and improve public transport, including improved links to the river, boat services and docks, the completion of the Thames Path, and the proposed new river crossing to Canary Wharf. Regarding the proposed river crossing the PLA must be consulted on the detailed proposals when available.

In general, for all the area visions, and any developments at, or near to the River Thames, the PLA request that further consideration should be given to the promotion of the use of the River Thames, for both passengers and freight, within relevant area visions and more generally within the Local Plan. The PLA support the references made to maintaining and enhancing existing riverside facilities, but would request

Support noted.

Reference has been added to Policy P22 (River Thames) regarding the use of the River Thames as an alternative means of transport during construction.

to see further emphasis given to the promotion of new facilities as a result of future development as well.

Organisation: TfL City Planning  
NSPPSV181.32

The sixth bullet point could mention specifically the need for development to support expansion of cycle hire to the area

The Area Vision for Rotherhithe states development should prioritise walking and cycling and improve public transport. This includes supporting cycle hire into Rotherhithe.

Policy P52 (cycling) sets out that development must contribute towards the provision of cycle hire schemes and this may also include providing space within the development for the expansion of the cycle hire scheme.

Individual  
NSPPSV288.3

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

Do you consider that the New Southwark Plan is sound? - Soundness

No

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

Justified

Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not: **Consistent with national policy and the London Plan**

Individual  
NSPPSV288.6

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

The real Resident approved Master Plan 2005 should be implemented and not bypassed by these flawed procedures, there are many parts of the Resident approved Master Plan of 2005, which need to be implemented. Such as the Leisure Centre, the height of the buildings, the heritage boat industry of the South Dock Boat Yard which needs protection and which wasn't mentioned in the original Master Plan. The little industry we had in our area such as the printing press and the biscuit factory have all been closed down, industry in our area has been wiped out.

This work is mostly to do with the Leisure Centre project and which shouldn't be incorporated in to the development by British Land PLC if the specifications of the Resident approved Master Plan are not met by the British Land PLC proposed Leisure Centre for many reasons which are developed below, being the principal reason that it has been modified and no longer responds to the Resident approved Master Plan in a process without consultation.

Documentation available on request: This document refers to the "call to consultation" by Southwark Council regarding the Leisure Centre and which was a consultation in name only, copies of these documents can't be incorporated here (photocopies)

This documentation is relevant to show that there was no consultation at

The current CWAAP has superseded the resident approved masterplan, the CWAAP was subject to public consultation and an examination in public prior to adoption. The recently adopted CWAAP has considered the sites planning history. This would include the leisure centre that was granted permission in 2005 under application number 04/AP/2357, and the application at Surrey Quays Leisure Park (the initial outline planning permission 09/AP/1999 and application for reserved matters 15/AP/4099 granted in 2016). Development must meet current and future needs, and therefore as the context and needs of the area have changed, the strategic vision has altered accordingly to ensure new jobs and new homes are delivered in the area. To meet these needs, a number of amendments have been made to the original submission after three re-consultations. These include: reductions in height, alterations to design, promotion of car free development with the exception of disabled car parking provision, additional Environmental Statement Addendums and an increase in affordable housing. To meet these needs, priority has been awarded to the delivery of homes and employment, in line with city-wide and national policy agendas. The masterplan does deliver leisure floor space including a cinema and health and education facilities.

CWAAP 16 forms part of the adopted Canada Water Area Action Plan which is a relevant and up to date development plan document for the site. The site allocation guidance states the required land uses are: Boatyard uses associated with marina including the construction, repair and storage of boats, yacht chandlery, and toilet and shower facilities; retail uses (Classes A1 and A3). In site specific guidance it also states: Development should not compromise the operation of the boatyard.

British Land submitted a full application in May 2018 (18/AP/1431). This application was granted by planning committee on 20<sup>th</sup> November 2018 and subject to planning conditions and a legal agreement by 20<sup>th</sup> May 2019. This application proposes a sports hall and sports facilities.

In regards to the determination of Seven Islands closing Policy P44 (Community uses) sets out the requirement with regards to community facilities. Any

the beginning of 2016 regarding what went in to the proposed Leisure Centre . The proposed Leisure Centre no longer responds to the Resident approved Master Plan.. The reply to this question lacks integrity but I can't incorporate a copies of those documents here. Copies of these documents and illustrations of bulkheads are available on request from [REDACTED] and I hereby forgo any right to anonymity.

potential redevelopment would have to be assessed against this policy within the development plan.

Our community should have a reasonable expectation that it is going to get the facilities promised by Southwark Council, when in consultation in 2005 concluded in the Resident approved Master Plan for the development of our area and its facilities, among them the Leisure Centre.

Sadly, this is not the case in this present so called consultation which has important problems of integrity and is not observing any law except the will of the Developer British Land PLC being implemented by some former alleged property sector lobbyists\* with specific and identifiable procedures which do concern me specially regarding: integrity, abuse of authority, distorting or supressing information sometimes from other Public Bodies and using public authority to supress the public's availability of choices etc.

If what is prescribed by the Resident approved Master Plan ratified in 2016 by 300 petitioners is not to be executed, then nothing should be executed until such a time when what was prescribed can be implemented. The worst thing that can happen is that private companies should abuse their power and influence over people in authority who apply themselves in an arbitrary way, doing whatever they like with contracts concerning the resident's facilities in this Borough to the

resident's long term disadvantage.

The problem with this process, to be described and detailed further down, is that it is not a consultation but this process is a way around a Resident approved Master Plan and its original and legal consultation in order to comply with the requirements of the beneficiary and Developer. The way in which this has been achieved is by the Developer (mostly British Land PLC) with the assistance of this Administration\* of Southwark Council presenting their project and which is then forced through by the Southwark Council Administration\* using their powers of administration.

Those aspects in these Developer's projects which go against the Resident approved Master Plan are changed any way, and changes made obligatory by the Administration\* abusing its power in an arbitrary way, also supporting their efforts by making many statements which lack integrity when it is necessary to silence adverse opinions in meetings of consultation. What the Developer desires is no longer changeable by the public in "consultation", and in this way the undesirable projects will get approved by default when the consultation closes, turning this "second" Master Plan consultation in to a formality.

#### The Leisure Centre from Hell:

For instance, the Resident approved Master Plan prescribed a Leisure Centre with an aquatic centre with a similar swimming pool to the one which we have at the moment (Seven Islands 33 meters) but in 50 meters (same pool 17 meters longer), to be sited eventually where Decathlon is today. This was approved by the residents and the Council in 2005 and supported by a petition in 2016 with 300 signatures. Instead, the developer British Land PLC supported by this Administration\* of

Southwark Council, in a way which makes them hard to distinguish from British Land PLC Lobbyists\*/employees/ people under the Developer's control for whatever reason, presented and pushed vigorously what I will call with the descriptive name of the "Leisure Centre from Hell" project, totally prejudicial for environment lovers, sports people, cyclists, pedestrians, nearby residents, a green corridor which would have been completely destroyed, and above a tube line! Also incorporating only a "short course" 25 meter prefabricated "cheaper impossible to buy" swimming pool, with only 1.8 meters in depth to be supplied, of course, by the Developer. The site: less than five minute walk from the much better Seven Islands Leisure Centre. NOTHING of this project of the "Leisure Centre from Hell" was as prescribed by the Resident approved Master Plan! Seven Island Leisure Centre was left as by far the best facility, but we were going to "throw it away". NOTHING inside or around "this cheaper impossible", low quality facility was consulted but was just put in front of the residents by the Developer and was going to be approved, pushed through with no integrity and ruthlessly and this happened over at least three meetings and nobody wanted it, we were getting close to riot mode.

Such was the "new favoured" site, such was the "new favoured Leisure Centre": a "bolt on" Leisure Centre totally unsatisfactory and totally different to what the Resident's Master Plan recommended, nothing to do with the 300 signature petition of 2016. The only winner: British Land PLC, ALL our community a loser.

All the specifications approved by the Residents approved Master Plan were not available any more for the public to select, neither was it possible to keep the "today much better" Leisure Centre at Seven Islands, the "consultation" for the Leisure Centre was even separated from all other consultations. Even with all this unethical effort by the

Administration\* in order to approve the Developer's project, the opposition was overwhelming forcing the Administration\* of Southwark Council and the Developer to withdraw their "favoured Leisure Centre" after many unsuccessful attempts using "every trick in the book". Sadly this was only a partial withdrawal by the Developer of their project. Crucially the Administration\* are determined to "give" their Developer British Land PLC a contract for an ENTIRE and UNSATISFACTORY new Leisure Centre which unexplainably MUST BE within British Land PLC's development at any cost, and to replace our excellent swimming pool facility and Leisure Centre at Seven Islands with a very much inferior Leisure Centre to be supplied by the Developer. A contract which we do not need.

What is so wrong is that a contract for British Land PLC seems to "obligatory" for the Council Administration\*, nothing else is an option such as keeping the superior 33 meter long pool 3.8 m. deep swimming pool which we already have today and which, according to the Councillor for Regeneration\*, is too expensive to build (the same 33 meter pool in 50 meters is too expensive), and we are going to destroy it and replace with a cheap prefabricated piece of rubbish? This has to be one of the many problems of integrity for the Administration\* of Southwark Council to answer. Only interests not declared by the Councillors can explain what otherwise appears to be only irrational behaviour (\*).

Surely the best solution for our community, (if there are no ulterior motives) has to be for the superior Seven Islands site to be retained indefinitely until the Council has the resources to build a 50 meter pool and to comply with the Resident approved Master Plan. Seven Islands site which is 50 x 100 meters, it is the ideal site to keep as it is, allocated to leisure services use already, it can house the prescribed 50 meter swimming pool and in the meantime, we continue to use the better 33 meter swimming pool until there is the money to build a better one.

There is nothing in the Master Plan that says that the Council must "give"

the Developer a lucrative contract in phase 1! This can be completed whenever there are resources to complete it and should only be completed when the resources are available.

#### Heritage Industry Boat Yard at South Dock:

The problems of integrity with this “consultation” also extends to other parts of our area and covers many aspects of the Resident approved Master Plan, just like the Leisure Centre, our legacy treasured ship industry: The South Dock Boat Yard, which this Administration\* of Southwark Council wants to place above it a 28 floor tower creating all sorts of problems for the boat users, this is strongly opposed by residents and boat owners. Even though this project was “isolated” to deal with it on its own and to minimize the possibility of the Boat Yard’s defence; the Administration\* has found a determined opposition which all being well will succeed in implementing the will of the residents and boat owners and not the interests of the Developer avoiding so many floors of yet more luxury flats which will not benefit our community which would be impairing the interests of the boat owners and residents. (The Developer in this case seems not to be British Land PLC).

#### Height of the Buildings:

In the same way as above, the Resident approved Master Plan also specified that buildings should be of up to 8 floors high, this is now not an option either (to choose eight floors), the Administration\* will give us as many floors as British Land PLC wants to put. The choice of how many floors is a question which this time is not to be asked. Again the fact that the Developer is contradicting the Resident approved Master Plan, must be another problem for the integrity of this Administration\* of Southwark Council. At the end of the day these two associates try to cut the swimming pool in half (by a factor of 2) to the detriment of the residents and increase the height of the buildings by a factor of five also to the detriment of the residents.

Southwark Council's Administration\* and the Developer are finding this way to get round what was passed after being so hotly debated in 2005 and is enshrined in the Master Plan and ratified by a 300 signature petition. This shows contempt for such a legitimate consultation and this must be a problem of integrity for the Administration\* of Southwark Council and of course, for the Developer who is the only beneficiary of all this, our community is a loser.

**My Complaint:**

This is what I want to say: this "consultation" is flawed, this consultation is a way which the Developer British Land PLC has found to get round a valid Resident approved Master Plan and even backed by a 300 signature petition. Those driving the consultation are not distinguishable from lobbyist or direct employees of the Developer and have behaved in such a way, consistently across all consultations which I have observed, always putting to one side the Resident approved Master Plan whenever it conflicted with the interests and plans of the Developer. This could be explained to a point if the Councillors had declared their "pro Developer" interests, but this has been avoided / concealed.

Southwark Council's Administration\* has deployed its power in an arbitrary way to support the Developer without any integrity, as described underneath here in more detail. For all these irregularities in this consultation, this process needs to be put into supervision.

**This Work's Method:**

This work has a statement with what I want to say above, where in general, all the problems which I found are briefly exposed. Next are all the same problems with the arguments of the Administration\* of Southwark Council, many instances of abuse, problems of integrity etc. which I have found with more detail and how the Council Administration\* deployed its power to support of the Developer compromising anything the Administration saw fit to compromise.

In addition to this, it is important to note that the Administration\* of Southwark failed to express a “pro Developer” interest to those being consulted regarding their links to development and property firms which would have served for us to guard ourselves against these interests or simply to be able to explain unethical procedures which I have found. Published proof describing these links can be found in the Notes and references (\*) towards the end of this document.

In order to avoid my arguments being undermined with inaccuracies, the different arguments have been developed as completely and as self-contained as possible and which makes some repetition unavoidable. This becomes necessary because of the way in which the Councillor for Regeneration operates using his authority stamp out opinions adverse to the Developer’s projects, when all the arguments are present such possibility is pre-empted.

Argument: Integrity in the history of the Process of the “hard sell” of the British Land’s project by the Administration\* of Southwark Council:  
After our healthy debates in 2005, the first invitation to any description of a consultation came to me in a letter, reference MW-441/MJA (copy available at the end) dated January 21st 2016 to my address. The letter did not give us, the Council Tax Payers, an option of keeping Seven Islands Leisure Centre, nor of keeping the specifications of the Resident approved Master Plan’s prescribed Leisure Centre either and which were ratified latter by a 300 signature petition to Southwark. These approved previsions by the Resident approved Master Plan considered it convenient to move Seven Islands Leisure Centre only in certain conditions to another site in order to give the residents better and not worse facilities. However what the invitation which I received refers to, no longer met any of the previsions of the Resident approved Master Plan and all the changes which are sought are only for the benefit of the Developer British Land PLC.

Crucially the Councillor for Regeneration\* hid from the residents in his letter to us the residents, those features which we were going to lose. In other words, entire sports and facilities of unique importance in the entire Borough would be lost, we were going to lose a 33 meter long pool to swim in, with 3.8 meters of depth to be replaced by a prefabricated cheap “short course” 25 meter long pool only 1.8 meter deep for swimming practice only, entire sports would be lost, no diving, no scuba diving, no swimming at depth etc. We were told nothing about these problems in our “invitation to a consultation” which was terribly flawed for that reason, and also because of the people who produced the letter!, the author failed to declare a “pro Developer” interest (links to developers and property industry, this is examined in references (\*). During the process, the Councillor\* was conducting himself, at all times, as a veritable “sales person” as if on commission from the beneficiary, British Land PLC. as if he were somebody trying to sell a used car and was hiding all the problems of which he was perfectly aware, and which he was determined to conceal in order to get his sale and his reward.

The letter which was sent to me not only doesn’t mention all what we would lose with the cheap, shorter prefabricated “short course” swimming pool, the writer carefully leaves out that the site he is proposing means the destruction of a green corridor, that it is slap bang on top of residents houses, on top of a tube line, that it is to be built over a cycle and pedestrian path etc. I find it impossible to differentiate Councillor\* Mark Williams\* for Regeneration’s\* work from the work which I would expect from a normal employee of the British Land PLC company, which is the real only beneficiary of such a damaging contract for our community. This company is real “beneficiary” and the one which put this terrible project in front of us and it was up to the Administration\* of Southwark Council to get it approved using “any trick in the book”. There can be no other interpretation, and to make matters worse, no interest was declared in order to alert and protect the public, these “impossible to understand” situations.

This is the only invitation which most of us would have received and it says nothing about what the public needs to know, nor declaring family links or former job links of the Administration\* of Southwark Council to Developers or Property Associated Companies, to warn us residents who were being consulted, to put us on our guard. This should have been done, why wasn't it done? Its weight seems to be all important and the only thing which can explain the otherwise erratic behaviour of the Administration.

So anybody reading this letter which was sent to me (copy below), would very likely have given it the benefit of the doubt, they could have granted the letter the integrity which it doesn't have and for whatever reason: because of having to work, being a busy person, family, etc., the resident might not have bothered to find out what the Administration\* of Southwark Council was really proposing and what they were concealing from the residents.

In the "Consultation" itself there was supportive personnel of this project both from the beneficiary British Land PLC of course, and from their Southwark Council Administration\* associates.. This pattern has been what I have found at every "consultation", some people in latter consultations which I spoke to myself had no idea of the type of second rate swimming pool which they were going to receive on a "like it or lump it basis", the only debate has been which site involved with the "beneficiary" Developer was the Leisure Centre going to be built on! Also this invitation fails to mention that it is undermining all the provisions of the Resident approved Master Plan (latter ratified by a 300 signature petition). So that a busy normal resident may have felt pleased to remain invited but would rather stay out of the consultation because there are only good things to say of the catastrophe which the Developer wanted to inflict on our community for their own benefit with the assistance of their associates in the Council\*: Much less sports were going to be available to the residents in an inferior swimming pool.

A swimming pool defines the Leisure Centre, once the concrete has set, there is no instrument in the world which could give us all the length and depth of our much better 33 meter long 3.8 meter deep swimming pool. We can happily go the other way and simulate a second rate “short course pool” with our Imperial length pool or with an Olympic length swimming pool but the other way is impossible, and that piece of prefabricated rubbish is going to condemn our community to 40 or 50 years with such an inferior facility as is the case in Elephant and Castle. Of the people who got their letters, many were not aware of the real situation because they were invited in a way which lacked integrity, so from the start, this consultation has no integrity and from the start this process needs to be put under supervision.

I complained about this method of replacement of our 33 meter swimming pool but nothing was done about it (Southwark on line reference 571469 and several letters), so my complaint was ignored. I can see no other solution except the full implementation of the provisions of the Resident approved Master Plan, or to preserve our better facility in Seven Islands Leisure Centre which can house a 50 meter swimming pool until such a time when Southwark Council can afford the said implementation or when implementing the full Resident approved Master Plan doesn't conflict with the interests of the Developer.

It would be unethical to continue with this “way around” a valid and legal Master Plan using so many lies to protect the interests of the Developer. I must conclude that the circumstantial evidence is damning, it would be so naïve of me if I said that an experienced Councillor for Regeneration\* has made so many unintended mistakes in only one direction: against the Southwark residents, again and again, and never errs in favour of the residents.

It is also hard to understand if the “beneficiary” Developer were to be an

“innocent third party” then why would its terrible projects not come with warnings, that the Developer does not share the views of the Administration\* of Southwark Council nor does it recommend the work being presented as there are better options. The “beneficiary” of the contract, the Developer British Land PLC has a palpable common cause with the Administration\* of Southwark Council.

I will follow all this with many other arguments which came up in this process which was started by this letter and which tries to give the Developer British Land PLC a “way around” a valid Master Plan. This process tries to achieve an “approval by default” of what the Developer puts in front of the residents with the assistance of the Administration\* of Southwark Council who are not only to supply plenty of false information during the process when necessary, but also will use their authority to reject and make unavailable to the public, anything prescribed by the Resident approved Master Plan and which is to the Developer’s disadvantage.

Leisure Centre Swimming Pool definitions and problems:

Argument: The conflicting opinions of the Councillor for Regeneration:  
At present in the expressed opinion of the Councillor for Regeneration\* it would be too expensive to build a swimming pool like the one which we have now in 33 meters or in 50 meters as recommended by the Master Plan approved by the Residents, so it would be too expensive, yet Mr. Mark Williams\* is doing everything he can to destroy it and replace it with a far inferior prefabricated “short course” to be supplied by British Land PLC, granting British Land PLC an unnecessary contract for an entire Leisure Centre, as well.

Our community doesn’t need this, the moment the specification of the swimming pool was changed in an arbitrary way without consultation, we stopped needing a new Leisure Centre as well, we already have a better Leisure Centre than what we would get with this process that has

so many problems and without a declaration of interests of the Council Administration is hard to understand why this process is taking place at all: An easy example: Why “must” the new Leisure Centre not only is to be built against all the previsions of the Master Plan, but also must be built in phase 1! Unsatisfactory and right away!

It would be much wiser to keep the Seven Islands site with the 33 meter pool which can be reduced in length at will when required and is a much better swimming pool allowing many other sports, until such a time when the Council feels that it can implement the Master Plan’s 50 meter pool which could be easily sited on the Seven Islands site because of its dimensions of 50 x 100 meters. It doesn’t make sense to destroy a pool of such quality which is too expensive to build today. There is no need to implement an unsatisfactory Leisure Centre NOW. The residents don’t say that .. Sport England doesn’t say that.. who is saying that and WHY?

Argument: The conflicting opinions of the Developer:

For British Land PLC they accept that they wouldn’t be able to build a swimming pool as complete and with as many features as the present one at Seven Islands Leisure Centre, yet they are also intent on destroying the better and more expensive pool and replacing it with one which is inferior in every respect including price. The Developer is going to be the beneficiary of a large contract, they don’t need to declare an obvious interest.

The present swimming pool at Seven Islands is the best one in the Borough, it has features which no other swimming pool in the Borough has, and sports which can be practiced at Seven Islands Leisure Centre can’t be practiced anywhere else in the Borough because everywhere else in the Borough they have swimming pools like the one which they want to force on us. The worst site in the Borough could well be the latest swimming pool at Elephant and Castle where I found it impossible to swim butterfly style. Those responsible for Elephant and Castle swimming pool should answer for what they did.

Again the best solution is to keep the better 33 meter swimming pool and Seven Islands Leisure Centre site. Its 50 x 100 meter dimensions could easily take the prescribed 50 meter pool when the resources are available or the Developer's interests are not getting in the way.

Argument: The Administration\* of Southwark Council refused to debate the consequences of the changes imposed by the Administration\*/Developer:

Under the "Formality Only" consultation method of the Councillor for Regeneration Mr. Mark Williams\* neither British Land P.L.C. nor the current Administration\* of Southwark Council have ever consulted our community about the fundamental change of the swimming pool which was introduced by the Administration\*/Developer, just like that! Its consequences have not been a matter for consultation nor properly assessed by those consulted. A fundamental change to the requirements of the Resident approved Master Plan have not even been consulted nor evaluated. Is there a need to give British Land PLC a contract at all?

This change to the Resident approved Master Plan has to be another problem of integrity for the procedures of "consultation" controlled by the Developer British Land PLC through the Administration\* of Southwark Council and which tries to "give" the Developer a contract for an inferior Leisure Centre which our area doesn't appear to need. Such changes make a new Leisure Centre not only unnecessary but counterproductive.

Misrepresentations of Sport England and the Amateur Swimming Association statements, swimming regulations and recommendations: By the Council Administration\* and which it DOES NOT have the power to do.

Argument: The solution for a small group of users a very small amount of time is the simulation of a "short course" by means of a movable

bulkhead, this was concealed, never suggested nor debated by the Administration\* nor by the “experienced” when it suits them “Developer British Land PLC”.

Argument of Southwark Council Administration\* School children need a short course pool for “competitions” – Constantly used with no integrity.

Argument: Clear advantage of 33 meter swimming pools over 25 meter pools: More Public availability during school lessons: This was pointed out but concealed and ignored by the Council Administration\*.

Argument: The conclusions of the Resident approved Master Plan of 2005 were neither against Sport England regulations, nor breaking any regulations at all, they were effectively the most professional and the best possible for our community covering sports regulated by The Amateur Swimming Association, The Amateur Diving Association, Scuba diving bodies: BSAC and PADI (practiced today at Seven Islands but not possible if the Developer inflicts on us their cheaper impossible swimming pool)

Argument: To all intentions and purposes, our present superior 33 meter pool with a bulkhead at 25 meters is an approved “short course” for the Amateur Swimming Association! Preserving in this way all the other sports which are practiced or which can be practiced at Seven Islands Leisure Centre but which couldn’t be practiced in the swimming pool of the unnecessary Developer’s contract.

Before we go in to a “rare need” of school children, invoked by the Councillor for Regeneration\*, first I want to indicate how school lessons are really carried out at our Leisure Centre most of the days of the year. It is important to avoid the Councillor for Regeneration’s\* lack of integrity which leads us in to confusion and which might be cleared if he only declared his interests in order to understand why he is doing and saying erratic things.

In our case at Seven Islands, during normal school lessons, 25 meters are normally not used, nor do they have any importance (contrary to what the Administration\* of Southwark Council falsely declares in order to try and force the granting a contract which we don't need to their associates British Land PLC).

Most of the year the shallow end is cordoned off, leaving free a viable area for the general public to swim in, at the same time as the children are learning in the shallow end. So in the rest of the swimming pool other swimmers can swim as well because our swimming pool is extra long.

In a 25 meter swimming pool this would not be possible, the available distance for other swimmers would be too limited (15 meters) and so in this way a 25 meter pool limits the use and availability of the facility to the public dramatically, as happens on all other sites of Southwark Council (i.e. Elephant and Castle, the Borough's newest swimming pool, to a great degree, a waste of money because it is already too small and has just been built, if a consultancy was carried out the Borough should be seeking damages, if a consultancy was not requested or its results were ignored then it should consider disciplinary action against those responsible for short changing the public of Elephant and Castle, money very badly spent, the area is condemned for 40 years or more to that cheap rubbish).

Although 33 meter swimming pools, normally are no longer built in England today, there are identifiable advantages for keeping a 33 meter swimming pools over 25 meter pools during normal school lessons which this Southwark Council Administration\* refuses to acknowledge, namely the considerable increase in availability of the facility to the general public due to the large length of the swimming pool.

For this reason and all the other sports which would be lost to our

residents, it is so important to stick to the Resident approved Master Plan which was developed expertly and not by people associated to Developers. If can't implement the professionally developed Master Plan of 2005, then we must protect the assets which our community already has from their destruction for commercial or unexplained not declared personal\* reasons.

This important advantage feature was also concealed from the "consultation" process by the Councillor for Regeneration\*, completely distorting the use of the swimming pool and in so doing, making it yet a more considerable problem of integrity for the Councillor for Regeneration\* who hosted the consultation with the beneficiary of the unnecessary contract for the prejudicial project British Land PIC.

The Administration\* really "want" to give them a contract and there is no other way of looking at it. So important to look at everything, including the undeclared and concealed interests.

<https://www.youtube.com/watch?v=-CzOg6QVCLo>

(more photos and videos are available upon request, can't be posted / uploaded here)

Within the Resident approved Master Plan it prescribes a divisible, 50 meter swimming pool similar to the 33 meter swimming pool with 3.8 meters deep in existence today but in 50 meters (same pool, 17 meters longer), this would allow all the sports practiced today at Seven Islands with no problems ( Diving regulated by the Amateur Divers Association and Scuba diving regulated by BSAC and PADI), but in addition, it would be a centre for excellence where official swimming competitions of Olympic standard length could take place and which are desired by all normal swimmers ( As supported by the Amateur Swimming Association) not a mere limited, prefabricated "short course" 25 meter swimming pool which is the minimum accepted by the Amateur Swimming Association (it is not possible to go any lower / cheaper) and which the Developer is so keen to inflict on us.)

The conclusions of the Resident approved Master Plan of 2005 were neither against Sport England regulations, nor breaking any regulations at all, they were effectively

Individual

NSPPSV288.7

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

1 . There is a Resident approved Master Plan which should be observed, for the particular case of the Leisure Centre, the specifications set down were not casual, in order to incorporate the Leisure Centre in to the Master Plan of Canada Water it should have a site as good as the one it has now (Land of 50 x 100 meters approx) and a swimming pool at least of 33 meters 3.8 meters deep to allow the range of sports which can be practiced at Seven Islands which INCLUDE a short course of 25 meters which is perfectly compatible and feasible with 33 meter Imperial Pool.

2 . If the prescribed specifications of the Master Plan can't be met by British Land PLC or the Council of the London Borough of Southwark, then the best facility should be kept for our Community which would be Seven Islands Leisure Centre, which is practically in the new Town Centre so that there is no need to "give" British Land PLC a contract for an entire Leisure Centre when we already have a better one.

3 . When a developer or the Council decide that they are in a position to implement the Master Plan and its specifications for a Leisure Centre, the site at Seven Islands is perfectly capable to allow those important objectives for our community.

The current CWAAP has superseded the resident approved masterplan, the CWAAP was subject to public consultation and an examination in public prior to adoption. The recently adopted CWAAP has considered the sites planning history. This would include the leisure centre that was granted permission in 2005 under application number 04/AP/2357, and the application at Surrey Quays Leisure Park (the initial outline planning permission 09/AP/1999 and application for reserved matters 15/AP/4099 granted in 2016). The details of these applications do not have to be implemented. Development must meet current and future needs, and therefore as the context and needs of the area have changed, the strategic vision has altered accordingly to ensure new jobs and new homes are delivered in the area. To meet these needs, a number of amendments have been made to the original submission after three re-consultations. These include: reductions in height, alterations to design, promotion of car free development with the exception of disabled car parking provision, additional Environmental Statement Addendums and an increase in affordable housing. To meet these needs, priority has been awarded to the delivery of homes and employment, in line with city-wide and national policy agendas. The masterplan does deliver leisure floor space including a cinema and health and education facilities.

British Land submitted a full application in May 2018 (18/AP/1431). This application was granted by planning committee on 20<sup>th</sup> November 2018 and subject to planning conditions and a legal agreement by 20<sup>th</sup> May 2019. This application proposes a sports hall and sports facilities.

In regards to the determination of Seven Islands closing Policy P44 (Community uses) sets out the requirement with regards to community facilities. Any

4 . During a decade Seven Islands has been neglected and facilities taken away, a modest building program could now concentrate the money which was used on other Leisure Centres on to Seven Islands which would give us the best swimming pool of the entire Borough with all the other facilities cancelled or taken out re-instated.

5. There is no need to give an "easy job" to the Developer British Land PLC with would be profoundly detrimental to our community in addition to the expense.

6. There has been already a valid consultation regarding the Master Plan which should not be bypassed by a bogus consultation without integrity. If the Council or the Developer insist in a new consultation to alter the Master Plan and its specifications, the same must be carried out under supervision, and after the Councillors have declared their interests, the public must be supplied with ALL the details of what is going to happen and ALL the options. Letters without integrity calling to consultation must not reach the public as what happened at the beginning of 2016.

potential redevelopment would have to be assessed against this policy within the development plan.

We are in the process of updating our SCI which will give our residents more clarity on how we consult on planning applications, in addition to giving guidance on how residents can be more involved.

Individual  
NSPPSV290.3

Noted.

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**

Do you consider that the New Southwark Plan is sound? - Soundness

**No**

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

it is not:

**Justified**

Do you consider that the New Southwark Plan is unsound because it is not: - Do you consider that the New Southwark Plan is unsound because it is not: **Consistent with national policy and the London Plan**

Individual

NSPPSV290.6

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

The sub title of this "Southwark Plan" speaks of "keeping promises" and that is not the documented experience which I have regarding the application of the Southwark Plan to Canada Water - Rotherhithe. Keeping promises must be guaranteed by the Plan itself when it refers to resident involvement.

I have seen community involvement which has been easily altered behind closed doors, ignored or managed during secondary consultations.

If these integrity problems are not addressed in the plan, it is not clear what the plan seeks to achieve as it would appear to be going in two different directions, at least two different results.

Without clarity and integrity it not necessarily will mean that both solutions were the most appropriate strategy.

The NSP is a strategic plan for the Borough that sets out how we aim to fulfil our promises and achieve social regeneration.

Throughout the process of developing the New Southwark Plan a range of events have been used to consult on the plan. A number of these included face to face questionnaires, community workshops and presentations at Community Councils and Tenants Association. This online service can be accessed at local Southwark libraries. The NSP has also been prepared with consideration of an extensive evidence base to justify our approach.

Alongside the NSP we are in the process of updating our SCI which will give our residents more clarity on how we implement our planning decisions, in addition to giving guidance on how residents can be more involved.

It is not clear what will happen when other interests take precedence, if both differing solutions will be consistent with National Policy.

My experience is that without efforts to protect the integrity of this process it can result in near fraud situations (example agreements concerning Seven Islands Leisure Centre which seem to be partially withdrawn after the agreement had been reached).

There are no procedural guarantees for previously consulted matters. Agreed results can be changed behind closed doors or by managing and forcing a change using secondary consultations as a tool to give precedence to other interests. (example: concerning agreements reached over the building heights).

Individual

NSPPSV290.7

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

(There is no protection of the procedural integrity in this plan, this I have verified during its application to Rotherhithe/ Canada water, and for this reason it is not clear what it intends to achieve nor who it proposes to benefit so I propose that : )

1 Integrity of consultations: Should be preceded by a declaration of interests by those consulting and special care should be taken not to override public consultation in these areas of conflicts of interest without an express mandate from the electorate. Once the public

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We have updated our Statement of Community Involvement to reinforce how we consult with the community more effectively. It recognises the important role the community plays in shaping their built environment. We are committed to improving our customer service, responding to public queries in a timely and open manner from the start of the planning process. We are also committed to improving our digital tools to make planning easier to understand and to allow for more available information. These commitments are made in line with our principles of inclusion, and a process that is reflective and built on trust.

consultations have ended in agreements which satisfy legislation and valid plans, these choices should not be changed.

**2 Protecting the integrity of the consultation and public involvement:**

Once ALL the options have been identified and agreed to, by the consultants and consulted. The consultation should proceed to determine an agreed way forward consistent with legislation and relevant planned objectives. The approval of the planning application should depend on the integrity of the consultation. The consultation should not be managed by limiting the options.

**3 Advertising the consultations:** Should be very well advertised with banners in the areas or at the facilities to be affected with clear statement of ALL the changes which are sought and their consequences. This information should also be honest and complete in letters of invitation to the potential consultees so that they can better decide the adequate degree of their involvement. Approval of planning sought should be dependent on the integrity of the consultation.

**4 Protecting the consultations:** Care should be taken not to override consultations nor attempt to modify earlier public involvement “a la carte”, nor to split those being consulted in to small groups in order to wear them down, demanding more of their time, those consulted will have other activities and jobs, this must be respected.

**5 Changes to Consultations when strictly necessary :** If an earlier consultation needs to be revised, the starting point should not be arbitrary at the discretion of those deciding how and what can be consulted in order to force a result, all options must be on the table again for consultation. The consultation should start from the conclusions and agreements arrived at by the earlier public involvement. A second consultation should not be a tool to make arbitrary modifications to earlier consultations and agreements. Once agreements have been reached they should not be changeable behind closed doors

either. The public has given their time and this must be respected.

6 Right to ask for arbitration during consultations: Where arbitrary decisions are being made and it appears that consultations are being managed, the public should have a right to request that the consultation be put under supervision, especially if what is being done, is not supported by an express mandate from the electorate or is in an area of conflict of interests, or it is not clear if it benefits other parties to the detriment of the community.

Individual  
NSPPSV294.9

Noted.

Do you consider that the New Southwark Plan is sound? - Soundness  
**No**

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