

Representation	Officer Response
<p data-bbox="181 312 560 347">NSP75 Rotherhithe Gasometer</p> <p data-bbox="181 352 481 421">QUOD on behalf of SGN NSPPSV160.2</p> <p data-bbox="181 464 1104 1422"> Site Allocation NSP75: Rotherhithe Gasometer  The site is allocated within the Proposed Changes to the Submitted New Southwark Plan under Site Allocation NSP75: Rotherhithe Gasometer. The Proposed Changes to the Submitted New Southwark Plan has re-introduced an indicative residential capacity for the site of 160 new homes. An extract of the allocation with tracked changes (purple text) is shown in Figure 1.  The New Southwark Plan Submission Version - Proposed Modifications for Examination (January 2020) did not include an indicative residential capacity for the site.  It is acknowledged that the re-introduction of a site capacity was at the request of the Inspectors' as outlined in the Main Initial Matters/Concerns letter dated 20 April 2020 (Paragraph 4.8) which required information on the proposed dwelling capacity and the timing of each site's anticipated delivery to be considered against the Council's housing trajectory.  A site capacity had previously been included within the New Southwark Plan – Preferred Option (2017) version which identified the site as being capable of accommodating 137 new homes. However, subsequent drafts agreed that it was acceptable to omit the indicative site capacity from the site allocation itself so as not to be overly restrictive.  It is noted that the Submitted New Southwark Plan has updated the site capacity for Allocation NSP75 from 137 to 160 residential units; increasing the residential floorspace from 11,420sqm GIA to 11,824sqm GIA, which has been informed by the updated Site Allocations Methodology Report (July 2020).  In principle, this increase in residential capacity is supported, however, we consider that the Proposed Changes to the Submitted New Southwark Plan </p>	<p data-bbox="1126 464 1411 499">Representation noted.</p> <p data-bbox="1126 536 2074 858"> The NSP was updated to include the indicative site capacities as required by the Inspectors. Alongside this, the Integrated Impact Assessment (IIA) was also updated to more clearly set out the Council's considerations of reasonable alternatives for planning for growth on each site allocation. This is set out in Appendix 12 of the IIA, and it now provides details Option C: Higher Option. All site allocation capacities considered during different iterations are also set out within this appendix. The final indicative site capacity assumptions are set out in Appendix 12, and are also provided within the Sites Allocations Methodology Report (July 2020). </p> <p data-bbox="1126 895 2074 1070"> The inclusion of an indicative residential capacity in the NSP site allocations does not affect the flexibility of the any site coming forward as the capacities stated are indicative and not intended to be prescriptive. The methodology of how the capacities on each site were calculated is set out in the updated Site Methodology Paper. </p>

do not fully align with the Inspectors' feedback at paragraph 4.7, which outlines an expectation that each site allocation should provide a minimum or ranges of housing that can be provided on each site.

Firstly, the inclusion of an 'indicative residential capacity' implies that this level of development is considered to be the optimum or broad quantum of development that the site can accommodate. We consider that defining the site capacity in this way continues to underestimate the potential for site allocation NSP75, which is located in a highly sustainable location (as demonstrated by its PTAL) and is contained within the Canada Water Opportunity Area. The emerging (ItP) London Plan (2019) requires sites within Opportunity Areas to make the best use of land and shall prioritise the development of sites that are well-connected by existing or planned public transport.

Secondly, the defined capacity does not allow for sufficient flexibility for prospective development proposals, which based on initial capacity studies indicate that the site could accommodate up to 200 units whilst still respecting the context of the surrounding area.

As outlined in previous representations to the New Southwark Plan, the continued exclusion of the indicative site capacity would be the preferred approach as its inclusion is too restrictive and does not allow for any flexibility in forthcoming proposals. However, its inclusion as currently drafted does not account for the recommendations of the Inspectors' who recommended the introduction of a minimum or a range in site capacity.

In consideration of the above, and also taking into account the complexity of this site and significant costs involved for remediating the site, the figure set at 160 homes should be the site's minimum capacity. The provision of a minimum capacity would also be consistent with the Inspector's comments and would continue to provide sufficient information for the purposes of forecasting housing delivery.

In view of the NPPF's test of soundness (paragraph 35), we consider the Proposed Changes to the Submitted New Southwark Plan Previous to be unjustified, inconsistent with national planning policy and not effective. Please refer to QUOD on behalf of SGN for image

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NSP76 St Olav's Business Park, Lower Road	
<p data-bbox="174 352 1126 424">South East London Clinical Commissioning Group NSPPSV453.7</p> <p data-bbox="174 464 1081 568">Surrey Quays/Canada Water must provide 2000 sqm health facility – this remains correct, even though a formal position has been reached whereby the developer contributes less than the whole of the value of this.</p>	<p data-bbox="1126 464 1413 496">Representation noted.</p>

Representation	Officer Response
<a href="#">NSP79 Croft Street Depot</a>	
<p data-bbox="188 528 835 595">DP9 on behalf of British Land Uplift Fund Partnership NSPPSV27</p> <p data-bbox="188 636 1115 1062">Whilst we agree with LBS's Consultation Report response that the Site is located in the Central Activities Zone which is a suitable location for employment growth, in light of the above policy wording, we consider that the existing reference to the re-provision of employment floorspace detailed in the Site Vision is too prescriptive and would undermine the principle policy intention of P29. In summary, we do not consider this a sound approach given that the Plan prescribes a punitive approach for sites allocated within the Plan which is contradictory to the proposed policy intention set out in draft Policy P29. This diversion from policy would establish a separate approach to allocated and windfall sites, whereby the latter would not be subject to prescriptive thresholds for delivery. We therefore urge the Council to remove this wording from the Site Allocation.</p>	<p data-bbox="1140 671 1411 699">Representation noted.</p> <p data-bbox="1140 743 2042 954">Policy P29 sets out that development in the site allocations must retain or increase the amount of employment floor space on site. The site allocation requires at least the amount of employment floor space currently on site or at least 50% of the development as employment floor space to meet the employment needs of the area. Evidence base demonstrating need can be found on the Examination page – <a href="#">Employment Land Review</a></p>

Representation	Officer Response
<a href="#">AV.15 Rotherhithe Area Vision</a>	
<a href="#">Paul Whittlesea</a>	

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 this policy is sound? - sound NO

Do you consider this policy is sound? - why not sound - Effective EFFECTIVE

Do you consider this policy is sound? - why not sound - Positively Prepared POSITIVELY PREPARED

"The huge development of Canada Water is already putting enormous strain on public services and transport. Canada Water tube station (in normal times) at rush hour is overcrowded. Already Lower Road and Jamaica Road are very congested despite changes at the Rotherhithe Tunnel roundabout. This means that current illegal breaches of air quality will only increase with extra residential and construction traffic. This has never been adequately explained in any meetings I have attended. This will be exacerbated by proposed developments at the Bermondsey Biscuit Factory and the massive Deptford Landings development in neighbouring Lewisham Borough.

There are references to a foot and cycle bridge between Rotherhithe and Canary Wharf. While this would be welcome, the London Mayor has said that this will not go ahead due to funding constraints. A local plan's proposals have to be deliverable and therefore resourced, so this is not a sound proposal now.

An example of public services that will be undermined is the plan that has been mooted to replace the Seven Islands swimming pool and leisure centre (not mentioned in the NSP) with another leisure centre nearby in the Canada Water development. This is not factoring in the expansion of housing in Rotherhithe and extra demand. We will need both facilities.

For such a large expansion of housing, there is no mention of space to be allocated for buildings for church or faith groups in this area. This is despite a

Noted.

Applications coming forward will be assessed against the policies in the plan, including those relating to reducing noise pollution and improving air quality. Traffic management plans are provided as an application comes forward for development.

The NSP is a strategic document with the Area Vision Map notes the Proposed Thames Crossing. If this is confirmed to be not happening by the GLA, reference of it will be removed in future versions of the plan.

In regards to the determination of Seven Islands closing Policy P44 (Community uses) sets out the requirement with regards to community facilities. Any potential redevelopment would have to be assessed against this policy within the development plan.

The plan does not need to allocate sites for places of worship in order to be sound. However, applications for places of worship will be considered if/when they come forward.

The Health Impact Assessment is based on the HUDU model and is prepared in alignment with the Healthy Urban Planning Checklist. This is not an exhaustive assessment but focuses on aspects of the health impact assessment highlighted in this model. Under Theme 4 of the HIA, policy P46 Community uses is referenced which includes facilities such as leisure.

