



## Comment

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<b>Event Name</b>	Lewisham Site Allocations DPD - Proposed Submission Version
<b>Comment by</b>	The Milton BVI Group ( Vic Hester)
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<b>Consultation Point</b>	Table 2.3 Mixed Use Employment Locations (MELs) ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### 1. Legal Compliance

**Do you consider the Site Allocations Proposed Submission Document is legally compliant?** No

### 2. Soundness

If you enter NO in response to this question, please also answer Question 3. Otherwise go to Question 4 to give reasons why you consider the document is not legally compliant or to Question 8 if you just wish to comment on an aspect of the document. Notes explaining 'soundness' are to be found in the supporting documents of the introductory consultation page .

**Do you consider the Site Allocations Document is Sound?** No

### **3. Reasons for Unsoundness**

**Please select below, the reason why you consider the Site Allocations Document is unsound.** The document is not consistent with national policy

### **4. Details of legal non-compliance or unsoundness**

**Please give details below as to why you consider the document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the document please also use this box to give your reasons.**

The Milton BVI Groups own Sun Wharf - a significant amount of the land covered by the MEL, Site SA10. Whilst the policies and objectives of the Core Strategy carry through for this allocation, there are 4 concerns raised by the owners of Sun Wharf. 1. The sites set out in Table 2.2 (mixed use housing sites) are for mixed uses which appear to be predominantly housing led. The sites set out in Table 2.3 (mixed use employment sites) are for mixed uses which are not predominantly employment led, but again are mainly housing led. The supporting texts, the Core Strategy and the Deptford Creekside Scoping Report indicate that the employment floorspace of the SA10 Site should be some 20% of the total built floorspace, leaving 80% to housing. This complies with previous discussions with the Council on employment to housing ratios. As such, the Tables 2.2 and 2.3 are not as clear as they could be; or rather, is there a need to have different tables? 2. The description of the site allocation could be clearer or more specific. The description in Site SA10, is in accordance with the Core Strategy; however, the opportunity could be taken in this DPD to be more specific. The Cockpit Arts building already provides uses associated with the creative industries. Would the description of SA10 "providing employment uses including creative industries, office and workshops" apply to all the individual sites that make up SA10, once they are built out, or should the description be amended to state that the creative industries uses are already provided in the Cockpit Arts building and should be retained as part of the SA10 allocation? In similar fashion, the previous UDP allocation for Site Ref 20A, which included Sun Wharf, referred to a range of development/uses including education/leisure (Laban Centre). The parenthesis made it clear where the education/leisure component of the allocation was to be located. 3. Linked to 2 above, the Masterplan should provide a comprehensive planning framework for SA10 but it should be clear that although the Masterplan would be comprehensive the development of the individual sites within the wider SA10 allocation need not come forward at the same time - and in fact they would not be expected to. 4. As the SA10 site is a key component of the Core Strategy's Regeneration & Growth Area (Spatial Strategy 1). There should be reference to the objective/support behind bringing forward the site as a priority over other considerations that might affect the viability and deliverability of the SA10 site - such as land contamination, flooding, 50% affordable housing provision, Lewisham's CIL and the London Mayor's CIL requirements. The DPD should be compliant with the new NPPF. The need for clarity is set out in paragraphs 153-4 of the NPPF.

### **5. Changes required to achieve legal compliance/soundness**

**Please set out below the change(s) you consider necessary to achieve legal compliance or soundness. YOU WILL NEED TO SAY WHY YOU CONSIDER THIS CHANGE WILL ACHIEVE LEGAL COMPLIANCE OR SOUNDNESS. It will be helpful to add your suggested revised wording of any text.**

The Draft DPD should be better aligned with the new NPPF. The need for clarity in the DPD is emphasised in the NPPF. The Council's Draft DPD should provide greater clarity and be more specific to enable a decision maker to be clear on what is required with the development of a specific site or number of sites within a wider allocation.

### **6. Participation in the Oral Examination**

**If your representation is seeking a change do you consider it necessary to participate in the oral part of the examination?** Yes

#### **7. Reasons for Participating in the Oral Examination**

**Please outline below your reasons for participating in the oral examination. You should note that the Inspector will determine the most appropriate procedure to adopt to hear those who indicate they wish to participate in the oral part of the examination.**

The development of Site SA10 is an important component of the Core Strategy's regeneration and growth agenda. Discussions have taken place with the Council for both Kent Wharf and Sun Wharf; however, these have faded mainly as a result of the economic downturn and the requirements/objectives of the Council and Creekside Charrette 2009. Attendance at the Hearing/oral examination would be important to ensure that the land owners' and developers' objectives could be heard by the Inspector.