

Representation	Officer Response
<p data-bbox="188 316 656 344">Crystal Palace and Gipsy Hill Area Vision</p> <p data-bbox="188 357 656 459">Organisation: The Kingswood Network NSPPSV36.1 NSPPSV36.2</p> <p data-bbox="188 501 533 529">This policy is not justified as:</p> <ul data-bbox="188 571 1451 673" style="list-style-type: none"> • The Area Visions fail to take account of submissions made by Kingswood Estate residents about the Dulwich Area Vision in November 2016 and there was insufficient consultation on the newly created Area Vision for Crystal Palace and Gipsy Hill. <p data-bbox="188 715 1451 817">(Pg 16 http://modern.gov.southwark.gov.uk/documents/s66133/Appendix%20B%20NSP%20Consultation%20report.pdf)</p> <p data-bbox="188 858 1451 992">This policy is not sound because it is not consistent with National Planning Policy Framework, through failure to comply with the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” so that Local Plans reflect a “collective vision”; which the Dulwich and Crystal Palace & Gipsy Hill Area Vision fail to do.</p> <ul data-bbox="188 1034 1451 1391" style="list-style-type: none"> • With regard to both area visions, (AV05 and AV06), it is incorrect that the neighbourhood characterised as Kingswood Estate is principally “Dulwich” (AV06), also demonstrated by the maps associated with those areas. Most people on the Kingswood Estate rely on cross border service provisions and other essential local amenities from other London Boroughs, and at Gipsy Hill. The Kingswood Estate shares characteristics with the Area Vision of Crystal Palace and Gipsy Hill (AV05) and as such, should be represented in both Area Visions. • In creating the new area vision for Crystal Palace and Gipsy Hill (AV05) insufficient regard has been made to consider the distinctive needs of the Kingswood Estate. Insufficient evidence base has been provided to justify defining Kingswood Estate to be principally part of “Dulwich” Area Vision. (AV06). 	<p data-bbox="1487 357 2056 459">The Area Vision for Crystal Palace and Gipsy Hill has been updated to reference Kingswood Estate.</p> <p data-bbox="1487 501 2056 849">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. Our online services are currently in the process of being renewed and improved.</p> <p data-bbox="1487 890 2056 1104">The vision for Dulwich acknowledges the suburban nature of Dulwich which includes the Kingswood Estate, we acknowledge that due to its location, it is necessary to also include the Kingswood Estate in the Crystal Palace and Gipsy Hill Area Vision.</p> <p data-bbox="1487 1145 2056 1321">Policy SP2 seeks to promote wellbeing and reduce inequalities so that people have better lives in stronger communities. The Development Management policies P12-P25 seek to deliver this in proposed development.</p> <p data-bbox="1487 1362 2056 1423">Tall buildings are covered under policy P16 (tall buildings), which is an overarching policy to be</p>

- The Kingswood Estate has some local proximity to West Dulwich and has a strong functional and local connection with Gipsy Hill and Lambeth services. E.g. the Lambeth provided Paxton Medical Heath Centre at Gipsy Hill is a core service provider. Gipsy Hill is the largest local parade of shops and local amenities. The Estate's only local bus services connect with Crystal Palace (Croydon/Lambeth/Bromley) and Sydenham (Lewisham). For many disabled people and older people living closest to West Dulwich shops on the Estate, the walk is too far, and there is no local bus service at their end of the Estate.

- There are no direct buses or transport links to most parts of "Dulwich" or into Southwark from the Kingswood Estate, so the evidence that the Kingswood Estate community mostly uses, or is served, by "Dulwich" providers appears unjustified. Local transport access better serves other local cross border shopping areas. It is wrong to imply that the community living in Kingswood Estate have their "local shopping centre in Dulwich Village".

- There is significant (and long term) lack of accessible railway station platform access for older people, and disabled people from the Kingwood Estate. Combined with its location at the furthest most fringe of Southwark to access core services, this means this neighbourhood area needs specific support from its long-term Area Vision.

- Kingswood is amongst the 10% most deprived neighbourhoods in the country for: Income, Income Affecting Children, Income Affecting older period (2011 census data) and is unusually isolated from other groups in Southwark, Lewisham and Lambeth by distance. As other parts of Southwark are now deemed "needier" due to increasing numbers of people with no recourse to public funds, some statutory services for this southern part of Southwark are provided less frequently, meaning the increasing likelihood of residents needing to travel north to access services.

- For "improvements to local services to meet local needs" the Area Vision for the Kingswood Estate neighbourhood fails to consider the significance of its cross-border situation. Long term planning in this area should call for better and improved cross border functions and collaborative working.

This policy is not positively prepared as, whilst some Area Visions of the policy are vague or unclear:

- Visions of local residents, as identified in the Consultation Report, have been ignored in producing the version now submitted by the Council;

implemented across the entire borough, and where appropriate area visions and site allocations set out where tall buildings can be located. These will be determined on a case by case basis, and any proposed development will need to comply with all other relevant policies in the plan.

The area visions are intended to be strategic visions which identify the character of the area, however, they do not go into extensive detail.

- Consequently, they do not reflect a distinctively different identity that is relevant to each individual area for which a Vision has been included;
- The significant policy change to P14 Tall Buildings, means tall buildings may now be permitted anywhere in the borough which infers that they could significantly change each and every Area Vision in terms of both numbers and locations, and with no definition of what a tall building is and not clarifying what “significantly taller than their surroundings” means.

This policy is not effective as it does not:

- Provide Visions for each area that are sufficiently clear and distinctive enough to enable measurement that can demonstrate delivery of each Vision.
- Provide Visions, & associated site allocations, that reflect where Tall Buildings are to be located, and at what height.
- Overall, the area visions do not reflect the distinctively different identity of the Kingswood Estate that is relevant to this individual area which an Area Vision seeks to address. These proposed policies are not effective for Kingswood Estate.

To make the policy sound, the NSP should:

1. Revisit the Area Visions in order to ensure that they reflect a “collective vision” and a complete and accurate picture of the local communities and where they associate themselves with. This should be done in “collaboration with neighbourhoods, local organisations and businesses”
2. Kingswood Estate needs to be additionally included in the Crystal Palace and Gipsy Hill Area Vision due to its cross- border requirements and proximity to Gipsy Hill for local service provision with Lambeth.
3. Due to the Kingswood Estate’s unique isolation, the distinctive character of the Estate, and the local needs of the estate, potentially a separate Area Vision could be raised for Kingswood Estate. This would

<p>give clear support for the Estate and its needs.</p> <p>4. With the resulting Area Visions, Site Allocations should be reviewed to ensure that they reflect the visions and identify things such as where tall buildings are appropriate and their indicative heights; including any proposals to increase the density of housing on existing social housing estates.</p>	
<p>Organisation: Education and Skills Funding Agency NSPPSV55.</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>Positive representation is acknowledged.</p>
<p>Individual NSPPSV60.1</p> <p>1. Overall, the area visions do not reflect the distinctively different identity of the Kingswood Estate that is relevant to this individual area for which a Visions seeks to address. These proposed policies are not effective for Kingswood Estate.</p> <p>2. With regard to both area visions, (AV05 and AV06), it is incorrect that the neighbourhood characterised by Kingswood Estate is principally “Dulwich” (AV06). For most people on the Kingswood Estate they rely on cross border service provisions and other essential local amenities from other London Boroughs, and at Gypsy Hill. The Kingswood Estate shares characteristics with the Area Vision of Crystal Palace and Gypsy Hill (AV05).</p> <p>3. In creating the new area vision for Crystal Palace and Gypsy Hill (AV05) insufficient regard has been made to consider the distinctive needs of the Kingswood Estate. Insufficient evidence base has been provided to justify defining Kingswood Estate to be principally part of “Dulwich” Area Vision.(AV06).</p> <p>4. Kingswood Estate has some local proximity to West Dulwich, and has a strong functional and local connection with Gypsy Hill and Lambeth services. E.g. the Lambeth provided Paxton Medical Heath Centre at Gypsy Hill is a core service provider. Gypsy Hill is the largest local parade of shops and local amenities is</p>	<p>The Area Vision for Crystal Palace and Gypsy Hill has been updated to reference Kingswood Estate.</p> <p>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. Our online services are currently in the process of being renewed and improved.</p> <p>The vision for Dulwich acknowledges the suburban nature of Dulwich which includes the</p>

at Gipsy Hill and it's only local bus services connect with Crystal Palace (Croydon/Lambeth/Bromley) and Sydenham (Lewisham). For many disabled, elderly or inform living closest to West Dulwich shops on the Estate, the walk is too far, and there is no local bus service at their end of the Estate.

5. There are no direct buses or transport links to most parts of "Dulwich" or into Southwark from the Kingswood Estate, so the evidence that the Kingswood Estate community mostly uses, or is served, by "Dulwich" providers appears unjustified. Local transport access better serves other local cross border shopping areas. It is wrong to imply that the community living in Kingswood Estate have their "local shopping centre in Dulwich Village".

6. For "improvements to local services to meet local needs" the Kingswood Estate Area Vision fails to consider the significance of Gipsy Hill and its cross border situation.

7. Kingswood is amongst the 10% most deprived neighbourhoods in the country for: Income, Income Affecting Children, Income Affecting older period (2011 census data). It is unusually isolated from other groups in Southwark, Lewisham and Lambeth by distance. The large estate has local needs are not being properly considered.

8. Looking at many essential or local services needs, like access to 24hour pharmacies provisions, combined with its distinctive high deprivation levels, the lack of transport access is a greater concern on Kingswood Estate than other parts of "Dulwich". The Kingswood Estate estate needs clear and separate planning consideration.

9. Presently there are very limited Southwark local medical and GP services in this south end of Southwark, near Gipsy Hill where I live by the Kingswood Estate. Progressively choices are being eroded due to cut back of GP practice boundaries, further reducing choice in health service provisions where I live. Greater long term demands for better and improved cross border functions and collaborative working is needed for the Kingswood Estate neighbourhood.

10. I attend regular Kingswood Estate network meetings. Evidence from its stakeholders include:

- Working cross borough - Some of the vulnerable parents' GP are based in Lambeth, so their health services would have to be via Lambeth and not Southwark
- Dulwich Wood / Kingswood is not the most overall neediest area in Southwark. In practice, the area won't get as frequent support due to funding cuts, placing greater pressure on local service providers.
- Some of health professionals will not cross borough so won't provide their services out of Dulwich Wood / Kingswood area.
- The Estate is one of the most economic disadvantaged (by deprivation level) area Southwark, that means reliance on local services and public transport it relatively greater on this Estate compared most other parts of Southwark or Dulwich.

Kingswood Estate, we acknowledge that due to its location, it is necessary to also include the Kingswood Estate in the Crystal Palace and Gipsy Hill Area Vision.

Policy SP2 seeks to promote wellbeing and reduce inequalities so that people have better lives in stronger communities. The Development Management policies P12-P25 seek to deliver this in proposed development.

The area visions are intended to be strategic visions which identify the character of the area, however, they do not go into extensive detail.

· There is significant (and long term) lack of accessible railway station platform access for the elderly, disabled and infirm for all those on the Kingwood Estate. Combined with its location at the furthest most fringe of Southwark to access core services, this means this neighbourhood area needs specific support from its long term Area Vision.

To make the policy sound, the NSP should

11. Revisit the Area Visions in order to ensure they reflect a “collective vision” in “collaboration with neighbourhoods, local organisations and businesses”.

12. Kingswood Estate needs to be additionally shown added to the Crystal Palace and Gipsy Hill area vision due to cross border requirements and proximity to Gipsy Hill for local service provision with Lambeth. Due to the Kingswood Estate’s unique isolation, distinctive character of the Estate, and the local needs of the estate, then potentially a separate Area Vision could be raised for Kingswood Estate. This would give clear support for the Estate and its needs.

Organisation: LB Lewisham
NSPPSV106.8

I set out below officer level comments from the London Borough of Lewisham:

In relation to the overall level of growth:

3 The Site Allocations proposed in this document have the potential to transform your borough and the individual site allocations and area visions in section 8 identify indicative capacities. The reasoning text for Policy SP1 Quality Affordable Homes (page 16– 17) acknowledges that a number of potential development sites will be allocated for housing and other land uses and that there are enough sites to build at least 2,736 new homes per year which would meet the London Plan target of 27,362 new homes between 2015 and 2025. However, it is difficult to understand the overall quantum of development being proposed. To aid understanding, the Plan would benefit from explicitly recognising the level of anticipated growth within an overarching policy that highlights the cumulative, indicative figures for the whole borough for residential, retail and employment uses and by including a key diagram at the start of your Plan; and by including an overview map showing the different areas at the start of section 8.

An infographic has been inserted into the policy which sets out our key figures for the borough.