

Representation	Officer Response
<p data-bbox="188 316 483 344"><a href="#">East Dulwich Area Vision</a></p> <p data-bbox="188 357 725 424">Organisation: Greendale Property Company NSPPSV71.2</p> <p data-bbox="188 466 1456 564">Together with Dulwich Leisure Centre, the vision for East Dulwich identifies DHFC as a focus for sports and leisure in East Dulwich, as well as an important visitor attraction with a valuable community function. This recognition is supported by Greendale.</p> <p data-bbox="188 606 1429 705">Greendale also supports the broad principles for development in East Dulwich (set out at para AV.07.2), specifically the requirement to provide as many homes as possible of all tenures (bullet point No. 2) and provide an improved stadium for DHFC (bullet point No. 8).</p> <p data-bbox="188 746 1438 845">However, although the vision is supported, the reality of the current situation (the existing dilapidated stadium, dated facilities and limited public access to the leisure facilities and through the site) is that this vision cannot be realised without significant investment and improvements to the site and area.</p>	<p data-bbox="1487 357 1576 386">Noted.</p>
<p data-bbox="188 965 792 1032">Organisation: Education and Skills Funding Agency NSPPSV55.9</p> <p data-bbox="188 1074 1397 1173">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 data-bbox="1487 965 1576 994">Noted.</p>
<p data-bbox="188 1220 551 1287">Organisation: Bankside Group NSPPSV141.1</p> <p data-bbox="188 1329 371 1358">1. Introduction</p> <p data-bbox="188 1364 1429 1431">1.1. We object to the Submission Version of the Southwark Local Plan, and would like to take part in the examination process.</p>	<p data-bbox="1487 1220 2063 1319">The suggested allocation of 56-61 Rye Hill Park as a site in the NSP, and the site's removal from the MOL, have been noted.</p> <p data-bbox="1487 1326 2063 1431">It should be acknowledged that all site allocations and area visions have gone through a rigorous process which is reflected in our sites</p>

1.2. These comments are made in respect of the Proposed submission version of the Southwark Local Plan (December 2017). Specifically, these representations relate to the current form of the Southwark Local Plan, and the failure of the document to designate the land at No 56-61 Rye Hill Park, Nunhead, SE15 5JN for residential development.

1.3. These comments should be read alongside previous comments made in relation to this site, dated 5th March 2015, 29th November 2016, 18th April 2017 and 6<sup>th</sup> July 2017 with reference 14/2288. These comments maintain our objection to the plans current form.

## 2. Update

2.1. As stated above, this site has been submitted to the Council for consideration as part of the emerging local plan on numerous occasions. We have however been surprised and very disappointed that despite the Council's claims that they have considered all sites submitted to them in the latest round of consultation, no evidence of any assessment of this site has been published to date.

2.2. Failure of the Council to consider this site results in the Plan being unsound, as it is neither positively prepared or justified – as the Council's decision to retain this site within the MOL does not reflect the evidence before it clearly demonstrating that it is not suitable. Our detailed assessment of why the site does not meet the requirements of its current designation as MOL or Open Space has been submitted to the Council already during previous consultation. It provided again for reference however at Appendix 1.

2.3. Since the previous submission, we were contacted by officers within the Council's planning department asking if we intended to further promote the site for potential allocation. If this was the case, we were advised that demonstrating public support for the sites allocation/use for residential development would strengthen its case for residential allocation.

2.4. Accordingly, a public exhibition was held near the site, promoting the site for a residential scheme of up to 16 apartments, all of which were to be affordable housing tenure. A copy of the consultation report documenting all feedback received is provided by Appendix 2 of this submission. General details of the proposed redevelopment are also provided by Appendix 3.

2.5. Prior to the exhibition invitations to the event were sent to 298 residential addresses, local ward Councillors, Southwark Council Officers and several local groups. A total of 13 people visited the exhibition, and 6 provided written feedback.

2.6. In the main, the attendees both accepted the principle of redeveloping the site, the proposed land use and the proposed form and arrangement of the buildings.

No objection was recorded, and many residents supported the benefits that the sites redevelopment had

methodology paper. Each version of the NSP has also been strengthened through input from statutory and other consultees, including feedback received from consultation held with the residents of Southwark, ensuring compliance with the NPPF & London Plan.

Due to its location, the site must remain as MOL. P56: Open Space states that development will not be permitted on Metropolitan Open Land (MOL) except in exceptional circumstances, of which the Council has found that the development of the 56-61 Rye Hill Park site would not meet. The maintenance and protection of MOL is of regional importance and guidelines regarding development surrounding MOL is set in the London Plan.

to offer.

2.7. The positive feedback received at the event demonstrates the local support for the sites redevelopment, and so emphasises the valuable opportunity the sites development for residential use offers – with no members of the public seeking the sites retention in its current use.

2.8. Furthermore, some residents also showed support for the sites opportunity to create of a permanent route through the site to Nunhead Reservoir, and with it access to its views across London as well as a link between Peckham Rye and Nunhead Cemetery.

3. Need to designate this site for residential development

3.1. The following section proceeds further detail on why the site does not fulfil its current policy designations as Metropolitan Open Land (MOL) or as Open Space.

This is also provided by Appendix 1.

3.2. We would in addition however highlight our disappointment that despite promoting this site on several occasions, it has still not been taken forward by the Council.

3.3. The only formal response to date has been provided in Annex 1 of the New Southwark Plan Methodology Paper published in 2017, simply stating that as the site was allocated as MOL, it was unlikely to come forward for development. The Local Plan process however is appropriate time for amendments to be made to such designations.

3.4. We have noted that as the plan has progressed several new allocations have been designated by the Council as it seeks to meet increasing housing demand. We note that notwithstanding the Methodology Papers guidance that sites generally above 0.25 hectares will be allocated, several have now been allocated which are smaller than 56-61 Rye Hill Lane – which is approximately 1400sqm. This includes NSP 49, NSP 59, NSP 61, NSP 62, NSP 63 and NSP 74.

3.5. It is therefore clear that the Council is reviewing its allocations, and adding many sites for allocations between each version of the plan. It however remains the case that this site is not allocated. This is despite the site not complying with the requirements of the MOL, nor its designation as Open Space.

3.6. Failing to allocate this site also misses the opportunity to enhance the Boroughs Green Chain and network, through providing a publicly accessible route from Rye Hill, northwards to the Nunhead Cemetery and potentially the reservoir. The site is private land, and it is not publically accessible. Through its allocation, it can be made publically accessible, and in doing so open up this new route. This will not only improve the accessibility of the area, but also the surrounding MOL land – enhancing its public benefit to all. Without the allocation of this, routes from the south are far more challenging and restricted.

3.7. It is therefore considered that the NSP is not justified, as realistic alternatives for development have been ignored. It ignores the Council's own evidence base, notably the Open Space Strategy 2013 which

advises that that the site is amongst the lowest scoring within the borough, without public access and below average quality. We remain of the view that this sustainable site, to provide much needed residential accommodation – as in infill development promote by the Nunhead Plan, has been unreasonably overlooked.

#### 4. Current Site Designation

4.1. The adopted Southwark Local Plan shows the land at No 56-61 Rye Hill Park to have the following designations;

- Metropolitan Open Land (MOL)
- Open Space 132 Water Works at Nunhead.

4.2. The site does not fulfil the criteria required for each designation, as defined by both National and Regional Planning Policy. It is therefore a wasted opportunity. Instead, the site should be utilised for residential development. Please see our previous submitted comments dated 29th November 2016 for further detail on this matter – which are provided as Appendix 1 for reference.

4.3. On the basis that the sites designation does not fulfil the requirements of MOL designation, it therefore does not comply with national guidance of policy provided by both the NPPF, and the London Plan. On this basis the Proposed submission version of the Southwark Local Plan is not justified, and therefore it is unsound.

#### 5. Land at No 56-61 Rye Hill Park.

5.1. Written representations were made on the 29th November 2016 which outlined why the site at 56-61 should be re-designated for residential development, and identified that the site does not fulfil the required criteria of a MOL or Open Space designation. Overall, it was concluded that the site would be better utilised for residential development which would help to increase the supply of homes in the borough.

5.2. The proposed submission Area Vision for Nunhead, provided within the proposed submission Local Plan, identifies that development in Nunhead should provide as many homes as possible while respecting the local character, improve walking and cycling routes and public transport, and improve the town centre.

5.3. The Area Vision also states that Nunhead has the potential to contribute towards meeting Southwark's housing need, but that most new homes would be built on infill sites.

5.4. No new development opportunity sites have been identified in Nunhead through the draft Area Vision and Strategic Allocations document which was out for consultation until 7th July 2017, and which we commented on in our

representations dated 18th April 2017.

5.5. The Nunhead Area Vision Map shows 56-61 Rye Hill Park as being on land identified as 'existing open spaces', which correlates with the designation under the current Local Plan.

5.6. The New Southwark Plan Submission Version presents changes to a number of the proposed strategic and development management policies outlined in the Preferred Options document (October 2015), and also proposes amendments to the Area Visions and Site Allocations.

5.7. Specifically, no amendments are proposed to the Nunhead Area Vision as presented in the December 2017 consultation document. No changes have been proposed to the MOL and Open Space designations affecting the site at 56-61 Rye Hill Park.

5.8. We would like to stress that we support the vision for Nunhead and note that it generally aligns with the London Plan and the Local Plan's goals for increasing housing supply. However, by allowing a section of underutilised and inaccessible MOL/Open Space (which abutted on three sides by residential development) to remain in situ, the draft Area Vision and Site Allocation Plan is not encouraging development in Nunhead to 'provide as many homes as possible'.

5.9. Our proposal for development on the site would involve 100% affordable housing with an offer of a Public Right of Way across the site to facilitate access to the reservoir behind. This will, subject to Thames Water cooperation, make the area more accessible to pedestrians, and provide a view across London from this point.

5.10. The Submission Version of the New Southwark Plan proposes alterations to Policy DM1 (Affordable Homes). The October 2015 document stated that where developments provide 10 or more homes a minimum of 35% of the dwellings must be affordable housing. A tenure split of 10.5% intermediate and 24.5% social rented housing would also be required. The proposed policy DM1 has changed lightly and now states that 35% affordable housing must be provided with a tenure split of 10% intermediate housing, and 25% social rented housing.

5.11. Policy DM1 states that there is a shortage of affordable homes in Southwark, and that the boroughs 'main priority' is to provide more affordable homes. The policy also states that the annual net affordable housing need is for 799 homes per year which equates to 48% of Southwark's total housing need. In addition, it is stated that 92% of households in Southwark require some form of affordable housing due to their income.

5.12. It is clear from Policy DM1 that providing more affordable housing is the main priority. The site at 56-61 Rye Hill Park is designated as MOL and Open Space, but is inaccessible to the public and unused. This site is suitable for affordable residential development. We assert that the designation and current use of this site is not in keeping with the aim of this key policy, and could be better utilised.

5.13. The document also proposes a new policy which was not included in the October 2015 preferred options consultation document. Policy SP7 (Social Regeneration) states that all development should contribute towards social regeneration by enhancing the health and wellbeing of existing residents. This is achieved through strengthening and supporting cohesive and empowered local communities, improving accessibility and encouraging people to travel actively, and increasing connectivity with greenspace.

5.14. The site at 56-61 Rye Hill Park is inaccessible to the public but is situated between residential properties and Nunhead Reservoir. Residential development of the site will utilise an unused section of land for affordable housing, and would include a public right of way for walking and cycling through the site to the reservoir behind.

Thus, increasing access to greenspace and creating new links for active travel through the area.

5.15. Furthermore, Policy 17 of the current Peckham and Nunhead Area Action Plan (2014) identifies that to meet the needs of the borough 700 affordable homes need to be provided.

5.16. Policy 3.11 of the London Plan (2016) also states that 17,000 more affordable homes per year are required.

5.17. Residential development on the site at 56-61 Rye Hill Park would therefore support the Submission Document of the Southwark Local Plan document, the London Plan vision, and the requirement identified in the Peckham and Nunhead Area Action Plan in terms of affordable housing requirement, and increasing connectivity through the borough.

## 6. Conclusion and Recommended Actions

6.1. We have highlighted that there is a very significant need for additional housing both within the Borough and across London, and the responsibility of the Council to make the most effective use of land and resources available in meeting the needs of its residents.

6.2. The sites current designation as MOL/Open Space severely limits its development potential, and possible contribution towards achieving Southwark and London's affordable housing requirement.

6.3. We therefore repeat our request that the site is removed from the MOL, no longer designated as Open Space, and instead allocated for housing as part of the Area Visions and Site Allocations for the New Southwark Plan.

6.4. The Southwark Plan in its current Submission form is unsound, and we therefore object to its current form.

Individual  
NSPPSV325.3

CONSIDERS THE NEW SOUTHWARK PLAN TO BE SOUND AND LEGALLY COMPLIANT

Noted.