

Representation	Officer Response
<b>Late Representations</b>	
<b>P71</b>	
<p data-bbox="188 381 833 448">Organisation: London Gypsies and Travellers NSPPSV167</p> <p data-bbox="188 491 645 523">London Gypsies and Travellers</p> <p data-bbox="188 566 1444 783">We welcome the new Policy P71 Homes for Travellers and Gypsies in the New Southwark Plan as an important step in recognising these communities and their accommodation needs. We wish to draw to the attention of the Planning Inspector our previous consultation responses on the NSP where we have raised similar concerns and made similar proposals to improve the Plan. We wish to attend the Examination in Public hearings on this issue.</p> <p data-bbox="188 826 1391 895">We consider that P71 fails the tests of soundness and requirements under the Public Sector Equality Duty on a number of grounds as summarised below.</p> <p data-bbox="188 900 672 932">1. Positively prepared and justified</p> <p data-bbox="188 975 1451 1447">The NSP is not positively prepared because the Council has not produced an assessment of the accommodation needs of Gypsies and Travellers, either as part of the SHMA or as a separate study. This has been a requirement in the PPTS since 2012 and has been raised as a key concern by LGT and other organisations ever since the early stages of consultation on this Plan. The best available evidence is the 2008 London Gypsy and Traveller Accommodation Needs Assessment which identifies a need of 17 additional pitches between 2007-2017. No new pitches have been provided in Southwark towards meeting this need. Therefore P71 is not based on robust and credible evidence. We do not believe that the approach taken in P71 that the accommodation needs of Gypsies and Travellers will be identified and planned for at a later date is sustainable and compliant with the Public Sector Equality Duty. The Equality Impact Assessment is very weak in relation to Gypsies and Travellers and fails to acknowledge the inequalities arising from the significant delay in gathering evidence and considering the needs of this</p>	<p data-bbox="1487 528 2065 815">Noted. The council has commissioned a needs assessment that will establish the requirements for traveller and gypsy accommodation. The needs assessment will assess the current need and potential future requirements – the methodology will be set out in the needs assessment document.</p> <p data-bbox="1487 863 2065 1080">We note that the Inspector’s Report to the Draft London Plan recommends that the Mayor should commit to instigating and leading a London-wide accommodation assessment for gypsies and travellers as soon as possible.</p> <p data-bbox="1487 1123 2065 1340">The Inspector’s Report also sets out that the definition set out in the Draft London Plan of gypsies and travellers is entirely different to the national definition. It concludes that the definition should be consistent with the national definition.</p> <p data-bbox="1487 1383 2065 1447">The policy has been amended to state ‘accommodation’ instead of ‘facilities’.</p>

protected group.

## 2. Effective

The accommodation needs of Gypsies and Travellers should be assessed and planned for alongside all other communities, not as part of a separate exercise. The NSP sets targets and allocates sites for the delivery of general needs housing and other uses. None of the other Area Action Plans make provision for Gypsy and Traveller accommodation, despite the issue being raised as part of the relevant consultations by LGT and other organisations.

This separate approach to considering Gypsy and Traveller accommodation needs is unlikely to be effective as demonstrated in many other London Boroughs which have not been able to identify a supply of land. Examples of good practice where site allocations for Gypsy and Traveller accommodation are made alongside those for housing and other uses include the Local Plans for Croydon and the London Legacy Development Corporation.

One of the key problems with a separate Gypsy and Traveller Plan approach is that all or most of the sites that would be available, suitable and deliverable are already allocated for other uses through the Local Plan and AAPs. This reinforces the unfair and discriminatory approach of leaving Gypsy and Traveller provision to sites that are undesirable or impossible to deliver and causing unnecessary delays through a further plan-making process.

We are concerned about the vague wording of P71 2 which states: 'Identifying new sites for additional facilities to meet the needs of travellers and gypsies'. It is not clear what the council means by 'facilities'. Instead, the policy should refer to new sites for additional accommodation.

Similarly, the wording in P71 that existing sites will be protected subject to need is of concern in the absence of criteria for assessing this. Given the multiple pressures to intensify development and viability concerns, P71 needs to make a much stronger

commitment to ensure the safeguarding of this type of accommodation.

### 3. Consistent with national policy and the London Plan

The NSP is not consistent with the National Planning Policy Framework, Planning Policy for Traveller Sites and current London Plan which make clear requirements that local authorities should carry out assessments of need, set pitch targets and identify a 5-year supply of land to meet the accommodation needs of Gypsies and Travellers.

The Draft London Plan which is currently under examination and therefore an important material consideration for the NSP introduces new requirements for local authorities such as using a more inclusive definition of Travellers for assessing need; carrying out an audit of existing sites to determine overcrowding, repair and refurbishment needs and capacity for additional pitches; actively planning to protect existing sites.

The Draft London Plan also requires local authorities that have not conducted an accommodation needs assessment to do so within 2 years of its adoption, or use the figure of need from the 2008 GTANA. For Southwark, this is 15 pitches. We would support the inclusion of this figure in P71 as an immediate target for new accommodation to avoid further delays in producing new evidence.

#### Proposed changes to make the Plan sound and compliant with Equality Duties

To address these concerns, we suggest a number of changes to P71

- Include the Draft London Plan Policy H16 B definition of Travellers
- Use the Draft London Plan Table 4.4A figure of need as a target for pitches to be delivered in the first five years of the NSP. This should be reviewed subject to the new Gypsy and Traveller accommodation needs assessment to be undertaken by the council
- Allocate sites to meet this figure of need in the NSP
- Include additional text in the policy about identifying a supply of land for years 6-15 of the Plan, in line with national policy
- Clarify the wording in the policy and supporting text as suggested above in section 2
- Indicate how the council will implement Draft London Plan Policy H16 E regarding site

audits	
Aylesbury Area Vision	
<p>Individual NSPPSV381</p> <p>This is a submission to SNP Aylesbury Area Vision, policy AV x1,2,3, on behalf of Walworth Greens. We would like to speak at the Examination in Public. Please kindly confirm receiving this email.</p> <p>We do not consider the New Southwark Plan: Aylesbury Area Vision neither legally compliant nor sound.</p> <p>It is not legally compliant as</p> <ol style="list-style-type: none"> <li>1. the suggested regeneration plans do not protect Burgess Park, which forms more than one-third of the area included in the proposed Aylesbury Area Vision Map, from the inappropriate development currently proposed, in accordance with Southwark Council's legal obligation. The proposed Aylesbury Area Vision doesn't mention their legal obligation to protect Burgess Park as Metropolitan Open Land.</li> <li>2. The Aylesbury Area Vision Map has been modified mid-way during the consultation cycle,</li> </ol> <p>Suggested improvement:</p> <p>The proposed Aylesbury Area Vision should recognise that Burgess Park is a major heritage asset, and protected Metropolitan Open Land. It should include a specific vision for the park and clearly formulate plans for its protection from the insensitive design of unproportionally high buildings to minimise overshadowing and loss of amenity, in line with the park's shape and further enhancements to children's play provision and sports facilities. It should include a continuation of green spaces into new Aylesbury development, which was removed from the original Aylesbury plan of 2010.</p>	<p>Noted. Point one, as Metropolitan Open Land, development surrounding Burgess Park will be guided by policy P56 (open space), so this does not need to be repeated as P56 is an overarching policy covering all open space in the borough.</p> <p>Point two, the Aylesbury map in the NSP was changed to reflect the existing Area Action Plan boundary to ensure the map was accurate and consistent with the Area Action Plan.</p> <p>Point three, any planning application for development near Burgess Park will be assessed against Policy P54 (protection of amenity). Any planning application for tall buildings will be assessed against all the relevant policies of the NSP, including Policy P16 (tall buildings).</p>

The Aylesbury Area Vision Map needs to remain identical to the original AAAP Boundary Plan.

The Aylesbury Area Vision is not sound, because it has not been positively prepared, it's unjustified and is not effective.

### SP2: Regeneration that works for All

Individual  
NSPPSV32

I would like to appear at the public examination of this version.

I understand an agreement between Southwark Council and Southwark Law Centre has permitted respondents to submit papers via email – hence my format).

Amendments version of the New Southwark Plan

It is my contention that the plan as amended is neither legal or sound.

One major reason for this is because a large part of the Plan is the section of proposals for what the council wishes to see on the various site allocations it has listed. In fact many of these so-called proposal sites have already been given full planning permission, including some extremely large sites. In some cases, work has started on site and the Inspector has not yet conducted his examination of the plan.

(If I am called to speak at the examination, I will have compiled and submitted a full list of the relevant sites).

Re SP2, amended now to 'Regeneration that works for all'

Though I welcome the amendment acknowledging that all residents should benefit from regeneration, I query the soundness of the amendment given that most of the policies in the Submission Version of the plan should also have been re-written to take full account

Noted. Point one, the purpose of a site allocation is to guide development and establish appropriate land uses. Consultation will have occurred on these specific planning applications individually.

Point two, please refer to Strategic Policy SP6 Cleaner, Greener, Safer for more specific planning guidance to ensure the protection of open space and biodiversity where possible.

Point three, each site allocation now refers to relevant open spaces which would be impacted by development within the site allocation. Open space designations have also been added to site allocation and area vision maps.

Point four, the Southwark Housing Strategy to 2043 aims to meet the needs of the older people through building

of the implications of the amendment. That has not happened and hence many groups and individuals affected by the Plan are not benefitting at all from regeneration in complete contravention of the Amendment.

For example, there are acknowledged deficiencies in council open space and also biodiversity sites in 'most regeneration areas'. This relates to Policies P56, P58 and P59. (See also the Council's 'Open Spaces Strategy' where nearly all the areas are deficient in Public Open Space – some very seriously deficient are also no regeneration areas under the Amended Plan). Surely the council, through its plan should have taken the opportunity to right this imbalance – if this latest amendment is to have meaning?

A further instance of un-soundness regarding these same policies on provision of open space and biodiversity is, for example, that Site Allocations for these same areas deficient in POS when referred to in the Submission Version often mention a duty on developers to 'provide open space ...' of a certain percentage of site area. ( e.g., Borough Bankside site allocations, p 97 Submission version). This is misleading and therefore unsound as designed, landscaped amenity land is meant to provide a setting for residents of the new build or customers of new retail/office areas and cannot ever be included in the council's total public open space portfolio and hence cannot be held to make up for current open space deficiencies endured by long term residents living in these areas. Further it is not made clear when the site allocations refer to the council's desire to achieve extra open space, that the rest of the site proposals will also result in an increase in population for that same area. Hence existing residents in regeneration areas will remain deficient in open space sites compared to the borough norm.

(If I am called to appear at the examination, I will have complied and submitted a full list of such Site Allocations).

Full details of the known area deficiencies in provision of open space for Southwark communities are laid out in the borough's Open Space Strategy and its Evidence Base documentation. (See Open Space Strategy, Evidence Base documents, p 50, Table 5.3, 'Open Space by Sub-area'). This makes it perfectly obvious that according to population, the sub-area, 'Bermondsey, Old Kent Road', is the most deficient in the entire borough in

lifetime homes, delivering extra care housing, exploring other specialist housing options for older people, and adapting properties to enable older residents and people with disabilities to live independently for as long as possible in their communities. As such, the NSP does not include a fixed target for specialist housing but the policy is clear that provision will be accepted where there is a demonstrated need.

public open space. When the Open Space Strategy was published in 2013 it was stated that in spite of this gross deficiency, there was little likelihood of any development land becoming available to alleviate the situation. Yet this is also now the area in the borough where a great deal of 'development land' has been released for the Old Kent Road Action Area site allocations. With the enormous projected increase in population that will result from the OKRAA proposed 20,000 plus new homes, no realistic attempt has been made to address what will become a much greater public open space deficiency for existing residents – proof surely that the ineffective Amendment leaves the New Southwark Plan unjustified and unsound.

Following on from this it can also be claimed that in allowing an already POS deficient area of the borough to become even more deficient, the New Southwark Plan is also inconsistent with the London Plan, p.305

' Policy G4 Local green and open space

The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.

Development Plans and Opportunity Area Frameworks should:

ensure that future green and open space needs are planned for in areas with the potential for substantial change.'

Another area where there are examples of the unsoundness and ineffectiveness of SP2, 'Regeneration that works for all' is in the policy area P5, Housing for Older People. Over recent years, residents in Southwark have lost almost all the extra-care and nursing home provision we once had in the borough. With the 65+ population expected to increase exponentially from now on and the projected increase in longevity referred to in the Evidence Base documents, there does not seem to be sufficient provision made in the Plan to cater for this. In the plan, Site Allocation proposals are prioritised as to whether they 'must', 'should' or 'may' be planned for the sites in question. With one exception, where the development site includes an almshouse demolition and rebuild, all the potential proposals for care housing have been given the lowest priority, ie., care home provision 'may' be considered for the sites. I suggest again that this is proof of the unsound and ineffective application of the amendment and hence, the New Southwark

Plan.