

# **Trinity Newington Residents' Association**

Cole Street Falmouth Road Merrick Square Swan Street Trinity Street Trinity Church Square

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9 January 2003

Dear Mesdames,

## **The Southwark Plan (UDP) first draft consultation: Trinity Newington Residents' Association Response**

This response follows the format of your Part 1 and 2 document and the attached UDP Proposals Map dated November 2002. We will comment separately on relevant Supplementary Planning Guidance documents (most particularly the Bankside and The Borough Action Area and generally on Pack 1 and your Clean and Green and Housing sections SPGs).

TNRA is the residents' association for the Trinity Newington Estate, which includes most of the Trinity Church Square conservation area. The estate is owned by a single private landlord, the Corporation of Trinity House. It consists of 300 dwellings of various sizes, from bedsits to family houses let on several different types of tenancy: Rent Act protected tenancies, assured and assured shorthold tenancies, and long leaseholds. TNRA has existed since 1976 and currently 159 of the total 300 households are members. We responded to your Area 1 Plan consultation on 13 December 2001.

### **1.0 Overall Strategy**

1.1 ***Sustainable Development***: we agree with your objectives of sustainable development and note your three objectives: 1) sustainable development balancing "the needs of the environment, economy and society" 2) enabling participation 3) highest quality developments with infrastructure (*Plan 2.2.1*). We do not fully understand the sustainability appraisal, Sustainable Development Index or Sustainability Impact Assessment.

Appendix 3 (pp.70-73) does not explain the methodology and we should like to know how the various scores compare with other similar central areas (in say Copenhagen, Berlin, Paris, Dublin or Edinburgh or even Lambeth).

We strongly agree with the recommendations of CRISP and the Forum for the Future, reported on p.72, that more guidance must be given in the SPG Notes. This is important in achieving your objective of clarity, referred to in para 2.2.3.

1.2 ***External Influences***: you mention national influences and the (Mayor's) London Plan; we advise you also consider European Union influences and the possibility

of direct collaboration with other adjacent London Boroughs and the City of London. Incidentally have you investigated the EU Sixth Environmental Action Programme with a view to obtaining funding?

It would be helpful if references later in the document to external influences restated their origin. For example, on page 12, repeat that the draft Spatial Development Strategy and thus the Special Policy Areas, are part of the Mayor's London Plan.

1.3 **Local Influences:** no comment

1.4 **Key Diagram** (your section 5): this seems a strange title for a section of your document, we suggest you re-label it "Strategic Areas. The diagram on page 11 is not helpful. It would be clearer if some areas of the borough were labelled, as on the large Proposals Map. The diagram does not, as claimed on page 10, show how "these areas and programmes relate to.... major development areas in adjoining boroughs" – no other boroughs are shown.

1.4.1 Special Policy Areas and Opportunity Areas: the TNRA area is within the London South Central area (which is an example of the inter London Borough collaboration we refer to in 1.2 above), and close to the *Thames Special Policy Area* and also to the Elephant and Castle and to the London Bridge *Opportunity Areas*. We will therefore comment on the SPG documents for these two Opportunity areas. However, we wonder what opportunity there is for us to comment on and contribute to the Special Policy Areas: the *Plan* should clarify this in section 5.1?

1.4.2 Opportunity Areas: in 5.2 you slightly confusingly refer to the two opportunity areas which require special policies (the Elephant and Castle and London Bridge). Regarding the Elephant and Castle we have to record our disappointment at the failure of the redevelopment proposals of the last few years. Regarding London Bridge we advise you should also allow for the possibility of no change in respect of London Bridge station redevelopment proposals as well as redevelopment and also consider the possibility of much delayed implementation of Thameslink 2000 (whose very name is rather suggestive of delays in railway infrastructure improvements).

1.4.3 Action Areas: we will comment separately on the SPG for Bankside and (The) Borough: please could you maintain the full title of The Borough? Regarding the Old Kent Road (your section 5.4.1 iv ) we note concern at the car based retail developments along the Old Kent Road and share your wish that further development should reduce to the need to travel by private car. We advise you consider an active policy of creating a boulevard along the Old Kent Road with paving, provision for pedestrians, cycles and public transport given this is a major arterial approach to London. We also propose removal of the Old Kent Road flyover and substitution by a crossroads junction, this would release further sites for housing development Such thinking could (in conjunction with the GLA) be extended to improvements of all of Southwark's trunk roads.

1.4.4 Transport and Open Space: the Cross River Transit (Tram) Project (your section 5.5 ii) could similarly be a catalyst for urban improvement of the Walworth Road.

### 1.5 *Proposals Map:*

1.5.1 Floodable areas: in our letter of 13 December 2001 we advised that “there should be an active flood control policy, linked to active planning policies for the river and planning controls, that aim to increase river flood capacity.” We suggest you take this on board: remember the life of the Thames Barrier is limited. This should be linked to active policies to reduce and slow surface water runoff.

1.5.2 Borough Open Land: in respect of Borough Open Land we suggest that the Trinity Church Square garden be so designated and so benefit from the status accorded the Merrick Square Garden.

We also note that on your Proposals Map you only show the area of the old early 1980s riverside garden north of the Tate on Bankside and this should be extended south to the north face of the Tate Modern, and also to include the garden on the Sumner Street side.

The “green on the map grey on the ground” triangle of Borough Open Land at the junction of Borough High Street and Great Dover Street and Long Lane is of no use and is really a monument to 1960s highway engineering; it should be redeveloped as soon as possible along with reinstatement of the old churchyard around St Georges. This is another potential site for housing and offices.

1.5.3 Strategic Views: this is a very limited policy restricted to views of St Pauls. We suggest you develop a far wider ranging policy of valuing landmarks, skylines and prospects throughout the whole of Southwark, including views of and from Crystal Palace, views along the River Thames, or indeed the rather sublime view of the Swiss Re building (the Gherkin) from Jamaica Road. In short the present Views Policy is unambitious.

1.5.4 Protected Shopping Frontages: you only so identify the east side of Borough High street: please extend this designation to the west side as well. We also would argue that a much longer stretch of the Old Kent Road be so protected: remember this was a major street of gin palaces, boxing pubs and music halls and could be a major street for shopping and club and recreational value especially if there was a policy of making it a boulevard linked with our proposal to demolish the Old Kent Road flyover and redevelop this site: this would link with the Plan’s policy of promoting other than car based developments.

1.6 *The Southwark Plan Objectives:* these are admirable objectives and we have no other comment.

1.7 *Implementing the Plan:* no comment.

### 2.1 **Core Strategic Policies**

2.1.1 We suggest it is probably best if we address these policies in terms of your application of them in the Supplementary Planning Guidance documents. So in brief we welcome your commitment to small and medium enterprises and to mixed use (Objective 2), but make the note that you should also consider mixed residential and workshop or studio use.

In our earlier response we made specific comments about employment, education, homes, design and density, culture and leisure, health, waste and air pollution and green spaces.

2.1.2 However, your policy 3.11 on Biodiversity seems unduly negative and exclusive: i.e. stopping development and defining biodiversity as restricted to nature reserves. We advise you extend the policy and make it much more active, i.e the *Plan* should promote biodiversity, for example, new housing developments should have gardens not gated car parks, offices should have green roofs, school playgrounds should be places of delight and diversity, not seas of macadam, etc.

We also suggest you should consider development of biodiversity policy and protection of existing habitats, promote development of new ones and promote use of native species because they support more insect and therefore bird life. Planning for vegetation including street tree planting should also be used to improve air quality. You should have an active policy of providing allotment gardens (in short supply in Central London) and promote private gardens in new housing developments.

Your Appendix 6 *Habitats* is unsourced and therefore largely meaningless; is this based on London Ecology Unit or London Wildlife Trust surveys perhaps? The extensive and unsorted lists of vascular plants and of fauna (pp 78-82) are mystifying. Page 44 suggests this may be a list of species you wish to promote or protect, if so then you should say so and justify the list. However, we do advise that the convention in botanical Latin is to use lower case for species names.

2.1.3 Noise: the document makes no mention of noise policy, this may be worth considering in view of the GLA's interest in ambient noise: quiet is of especial value in large cities.

Thank you for giving us the opportunity to comment on the development of this UDP. We suggest that in future you provide a tabular response form primarily in order to ease the burden for yourselves of analysing these responses.

Yours sincerely,

Robert Holden  
for Trinity Newington Residents Association