

Broadwater Farm Residents' Association Response to Main Modifications
Consultation in Relation to SA62

1. We wish to amend:

'- the capacity of the existing community facilities to match any development, including existing shortfalls where they exist'

to ***'the need to preserve existing community facilities, while addressing any shortfalls where they exist'***

Reason: We believe that the preservation of existing community facilities was agreed at the Inspection hearing, whereas this modification implies existing facilities may be demolished if new facilities are promised. This fails to take into account the amount of community involvement and public expenditure (and hence long term obligations) in the creation of existing facilities. The need for clarity on this is further underlined by the tendency of developers to initially promise improved facilities in their new developments and then fail to keep these promises on ground of 'viability'. (see for example on the Heygate Estate: <https://southwarknotes.wordpress.com/tag/rip-off/page/2/>)

There is a further need for clarity if the policy is not to generate gross uncertainty and insecurity for the facilities in the area, undermining their overriding need to plan, manage and access funding for the future.

According to our contemporaneous note, the above was accepted by Matthew Pattison for the Council in discussion over concerns to protect existing facilities. Following our representations, the Inspector seemed to share our concerns and stated that "existing policies [re community infrastructure] are adequate and strong." She said that the SPD should "include recognition of the community and public investment" made in the area. She asked the Council to "look at it all against the [existing] policies." Mr Pattison explicitly replied: "We are not doing away with any of the existing infrastructure." This reassurance was taken as precluding the need for any further representation on this matter.

2. Re: the SPD principles set out, we wish to add some extra principles:

a. ADD: ***'Will include a range of options'***

Reason: Mr Patterson stated that "I think it [the SPD] would include a range of options and list of outcomes".

b. ADD: ***'Will be framed in an open way'***

Reason: The Inspector stated that the SPD "must be framed in an open way with no assumptions"

c. Plus AMEND the existing principle:

'the different and distinct characteristics of areas within the Allocation...'

to

'the different and distinct characteristics of areas within **and adjacent to** the Allocation **area**...'

Reason: This point was acknowledged by the Inspector to ensure that any SPD must take into account the context of what the Inspector called the "surrounding area", being 100% suburban to the east and south sides of the Allocation, 100% suburban/conservation area to the north side, and 100% MOL parkland to the west side.

3. Re the points relating to: 'Where new development is proposed:'

ADD: '**Existing residents affected by any development to be offered social rented housing in the new development with a secure, permanent tenancy**'

Reason: The Inspector explicitly stated that, in an SPD, "I would like to see [Existing] residents right to a secure home on any new estate".