

Cabinet

Tuesday 22 March 2011

4.00 pm

Town Hall, Peckham Road, London SE5 8UB

Supplemental Agenda No.3

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Date: 18 March 2011

REVITALISE



April 2011

Core strategy











Foreword

Councillor Fiona Colley Cabinet Member for Regeneration and Corporate Strategy

Southwark is a truly remarkable place. It has welcomed new development and has used the power of its position in central London to attract investment wisely to improve the lives of the people who live and work here. At the same time, we have retained a very strong sense of our history and identity. To continue to succeed, we need a clear statement of the direction in which we are headed. The local development framework gives us the tools to do this.

In planning the future of the borough we need now, more than ever, to be clear not only about what changes we want to see, but how we are going to achieve them. One of our highest priorities is to provide more and better new houses and flats for people to make their home in Southwark. We have achieved great successes in areas like Bermondsey Spa which won the Mayor's 'Best New Place to Live' award and the Evening Standard's 'Best New Regeneration Project' in 2010. We are pushing ahead with even more ambitious plans to transform the Elephant and Castle and the Aylesbury Estate.

We are using area action plans to deal with some of the large and varied challenges around the borough. We have already adopted an area action plan for the Aylesbury area, are soon to adopt one for Canada Water and are working with the people of Peckham and Nunhead on a plan that achieves the full potential of those areas. We are also working with the communities in Bankside, Borough, London

Bridge, Camberwell and Dulwich to produce strategies that will guide development in and improve those areas.

This Core Strategy gives all of these plans their overall sense of direction. It explains the borough's vision for change and improvement for the next 15 years until 2026. It sets demanding standards and targets so that all development contributes to improvements to job opportunities, reduction in CO2 emissions, protection of other natural resources, stronger communities, protection of our environment, historic places and buildings, better homes and much more.

Preparation of the Core Strategy has involved a very wide range of people from all over this richly diverse borough. I am confident that it will prove hugely valuable in our aim to make regeneration work for the people of Southwark.

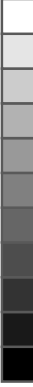
Councillor Fiona Colley



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Section 1: Introduction

The core strategy

- 1.1 The core strategy is a planning document that sets out how Southwark will change up to 2026 to be the type of place set out in our sustainable community strategy (Southwark 2016).
- 1.2 The core strategy affects everyone living in, working in and visiting Southwark. We set out the kind of place we want Southwark to be in the future and our approach to many important issues including:
 - What different places in the borough, such as Elephant and Castle, Bankside, London Bridge, Peckham, Canada Water and Aylesbury will be like in the future.
 - How much affordable and private housing we require in different areas.
 - How much family housing we require in different areas.
 - Where we should build new shops, schools, health centres, community centres and leisure facilities.
 - Where we protect employment areas and create new jobs.
 - Where we protect open spaces.
 - How we will improve opportunities for walking, cycling, public and river transport and reduce the need to drive.
 - How we will make sure new development is environmentally friendly.
 - How we will facilitate delivery, regeneration and improvements.
- 1.3 The core strategy is one of the most important documents in a set of planning documents called the local development framework. The core strategy sets out our long term vision, spatial strategy

and strategic policies with an implementation plan up until 2026 to deliver sustainable development. This includes targets for development from 2009 until 2026 unless specified otherwise. This spatial planning is a process where we consult on all of the important aspects that are needed to create successful places. As well as setting out what the places should look like and how to create them we also set out a plan for us to deliver this through proactive partnerships within Southwark and London. This demonstrates our approach to development and planning across the whole of Southwark and sets out the framework for policies we will use to make decisions on planning applications.

- 1.4 All of the planning documents in the local development framework need to be consistent with the core strategy. They may provide more detail to policies and change areas or add designations to the proposals map. The planning policies and guidance includes area action plans for Peckham and Nunhead, Canada Water, Old Kent Road and Aylesbury. Also development plan documents for development management and housing, along with supplementary planning documents for Bankside, Borough and London Bridge, Camberwell, Dulwich, Tower Bridge Business Complex, planning obligations/section 106, Aylesbury public realm, sustainability, housing and transport.
- 1.5 Some of the Southwark Plan will be replaced by the core strategy. The changes are set out in table 4 of appendix B. Eventually all of the Southwark Plan will be replaced by policies and guidance in the local development framework. The local development framework is illustrated in figure 1. This figure and appendices A & B will be updated as documents change.



1.6 The timetable for this will be updated in our local development scheme at

www.southwark.gov.uk/lds

Other important documents you need to know about

National and regional documents

1.7 The core strategy links to many other national and regional documents and must not go against national and regional policies. The London Plan together with the local development framework is our development plan. The development plan is used to make decisions on planning applications.

1.8 Figure 1 shows the inter-relationship between scale and the local development framework. Appendices A and B provide further information on how the local development framework and policies from the Southwark Plan relate to national and regional policies including the London Plan. These appendices will be updated as policies change. You can also find more information at

www.southwark.gov.uk/ldf

Supporting documents for the core strategy

1.9 Our supporting documents provide background information. These are our:

- Background papers (the evidence base): These reports provide more information on the core strategy, and set out all of the research, evidence and statistics we have collected to help prepare the core strategy. This includes why we chose the preferred options and strategic policies rather than the alternatives in the issues and options paper.
- Sustainability appraisal: This tests policies to make sure they have positive social, environmental and economic impacts.
- Equalities impact assessment: This examines how the core strategy meets the needs of the whole community and makes sure that the core strategy does not disadvantage anyone in the community.
- Consultation plan and strategy: These explain how and when we consulted the community in preparing the core strategy.
- Consultation report and officer responses: This summarises consultation on all the stages of the core strategy. The officer responses set out all the representations we received and how we have taken the comments into consideration.
- Appropriate assessment: This has been carried out under the EU Habitats Directive assessing the impact of the publication/ submission version on EU Protected wildlife habitats.

The supporting documents are available at

www.southwark.gov.uk/corestrategy

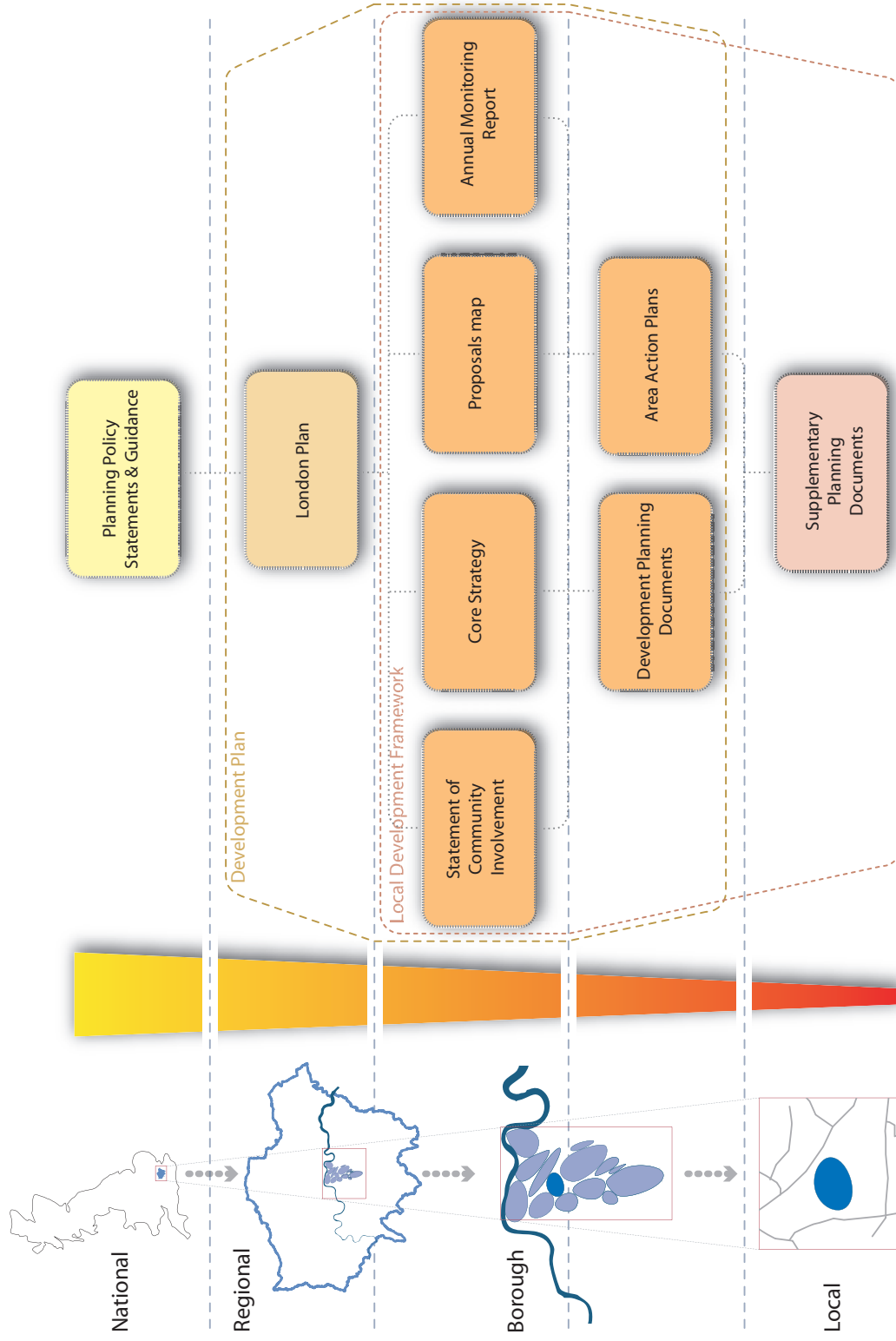
The full evidence base is available at

www.southwark.gov.uk/ldf/evidence





Figure 1: The inter-relationships between spatial scale and the local development framework



Note: this will be updated through the annual monitoring report





Finding the objectives, policies, maps and appendices

- Section 2 sets out how Southwark is today with the key challenges and opportunities.
- Section 3 sets out our visions, themes, objectives and strategy for Southwark and our strategic target policy for development.
- Section 4 sets out our visions and strategies for our unique areas and our strategic target policy for development in areas.
- Section 5 contains strategic policies for the borough with reasons why these are our policies.
- Sections 6 and 7 provide information on how we will implement, deliver and monitor the core strategy.
- There are a number of maps. These include the key diagram, which shows the main strategic areas of activity in Southwark. Also maps which show our requirements for affordable and private housing and also family housing across the whole borough.
- The proposals map adopted with the Southwark Plan in July 2007 will remain largely unchanged. The proposals map will be updated as it changes. The up to date version can be found at

www.southwark.gov.uk/proposalsmap

- There are a number of environmental targets. These may be updated and will be found at

www.southwark.gov.uk/corestrategy



Section 2: Southwark Today

Southwark today

2.1 Although Southwark is described as an inner city borough it really covers a range of areas. The borough includes areas of leafy suburbia, fashionable riverside flats, Victorian terraces, modern offices, open spaces and conservation areas. We have a very diverse, constantly changing population and a workforce that is growing rapidly. This means that consultation and partnership working are important to help us understand people's needs so that we can plan successful places and services. We will update this section where facts and figures change to keep it up to date.

Our diverse communities

2.2 The total population of Southwark is 274,000. This has risen by well over 50,000 since 1981. New residents are mainly workers in their 20s and 30s with household size getting smaller. Over 51% of residents are women. In 2001, around 10% of households were headed by lone parents, one of the highest levels in the country. Around 38% of residents are single persons, less than the average for inner London but well above the 30% national figure. Southwark's population is projected to increase by 12% by 2029 based on data from the Office of National Statistics and by 39% based on figures from the Greater London Authority. This means that the population is likely to grow between 1,300 and 4,000 additional people each year.

2.3 Only 28% of households include residents under 16. The under 16s make up around 20% of all residents in the borough, similar to the national average and very different to the ageing profile of the 1970s. In contrast, the percentage of residents who are over 65 has fallen from 14% to under 10% since 1991 compared

with over 65s representing 16% of the population nationally.

2.4 From the 1990s, African communities, now estimated at around 16% of residents, overtook the Caribbean group as the largest black minority and ethnic (BME) group in Southwark. This now stands at around 7%. Southwark has the largest African population of any local authority in Britain. African residents are mainly from Nigeria and other parts of West Africa. The South Asian and Chinese groups together make up around 7% of the population compared to 11% in inner London.

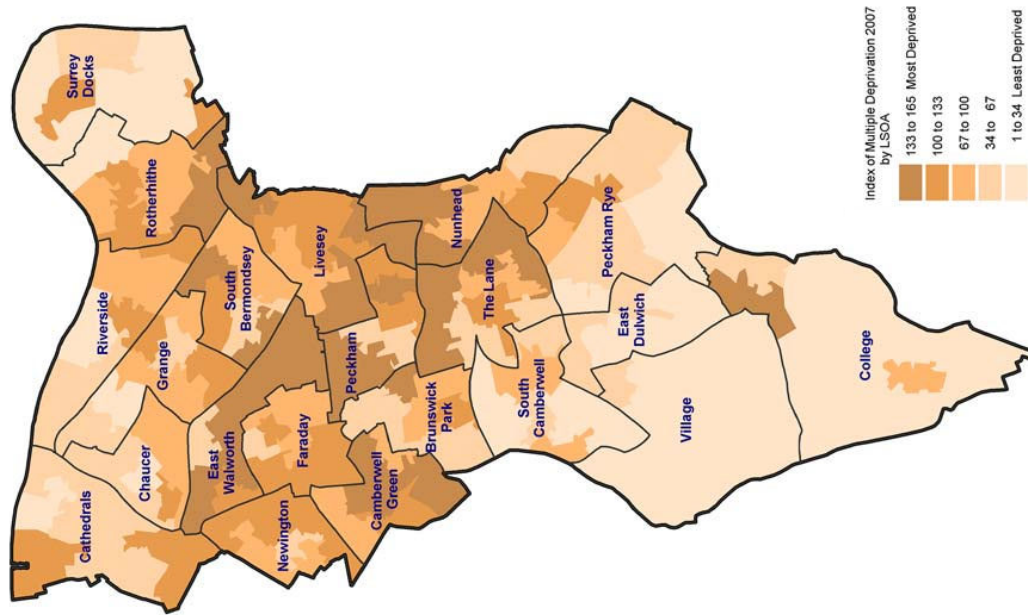
Inequalities within Southwark

2.5 Positive figures, changing definitions and demographic trends have led to Southwark moving down the league table of poverty. However the government estimates the borough is still in 26th position nationally out of 354 councils for the extent of deprivation. We have nearly three times the level of statutorily homeless households as England overall and almost double the number of adults dependent on a means-tested benefit.

2.6 The level of wealth is relatively high in areas such as Herne Hill, Dulwich, London Bridge and Bankside. However, there are high levels of poverty in areas such as Peckham, Elephant and Castle and Aylesbury. Within this, in 2007, East Walworth was ranked as the most deprived ward in Southwark, slipping from the 5th most deprived ward in Southwark in 2004. As a result, Livesey moved from being the most deprived ward in 2004 to the 2nd most deprived ward in 2007. Figures 2 and 3 show the index of multiple deprivation and the 10% most deprived areas.



Figure 2: Index of multiple deprivation 2007



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2.7 The Southwark Housing Requirements Study found that 53,500 (20%) of people living in Southwark said they had health problems. 25% of households contained at least one member with a health problem. 18,030 people had long term illness, disability or infirmity. 690 were wheelchair users and 4,460 had other walking or mobility difficulties. 4,470 had difficulties due to old age or frailty. In 2008 there were an estimated 38,412 households living in unsuitable housing with a need to move with high levels of overcrowding. Across London as a whole an estimated 560,000 households are living in unsuitable accommodation.

2.8 There are a high number of areas throughout Southwark with children in families with income deprivation. They are concentrated in the centre and towards the north with Rotherhithe being the highest at 72%. The only wards where this is not an issue are Village, Peckham Rye, Chaucer and East Dulwich.

Moving in and out of Southwark

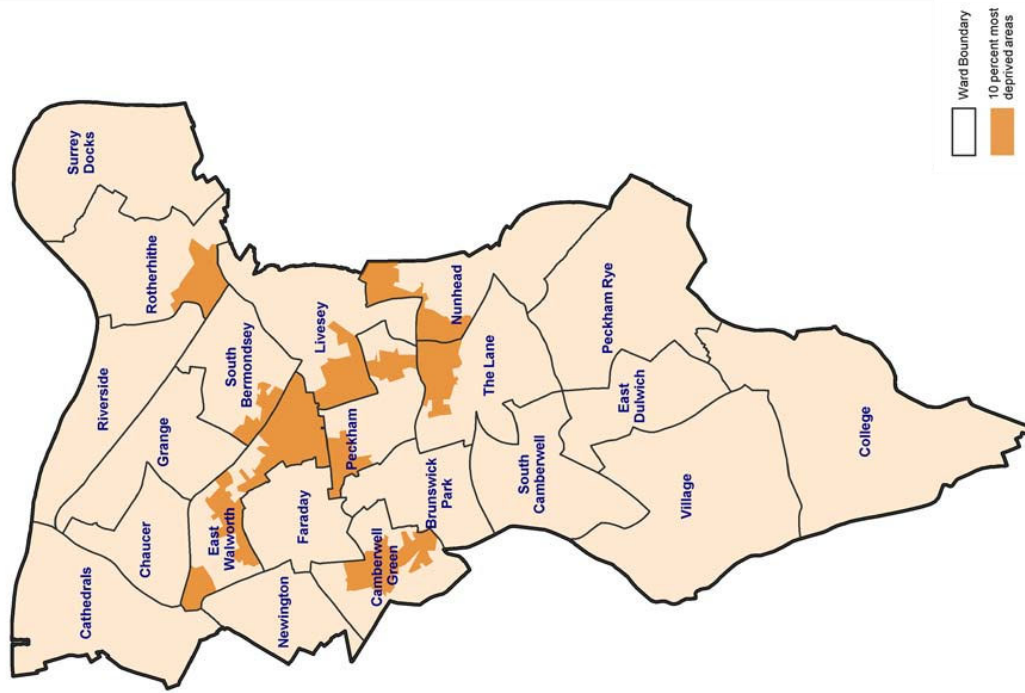
2.9 In general, Southwark residents tend to be on the move. In 2001, 2% of residents had newly arrived from abroad in the previous 12 months and an additional 8% from elsewhere in Britain.

2.10 The population grows by "natural increase", with over 3 local births for every death each year. Net growth per annum is 3000, but this is partly offset by net migration since many families and older residents move out of the area. Also younger single people and students move in and they use these homes on a short term basis.





Figure 3: Index of multiple deprivation 2007 showing the 10% most deprived areas



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Affordable living

2.11 Southwark has a higher amount of social housing than any other London borough. The total amount of social housing (council rented plus other registered providers) fell from its peak at nearly 70% in the 1970s to 53% in 2001. Currently 44% of homes are social housing, which is nearly three times the national average. In 2001, 31% of homes were owner occupied. This is still well below the Inner London 40% average and the 70% national figure. Private renting has risen from very little to 15% of all households. These changes reflect both 'right to buy' purchases and the construction of many private housing schemes since the 1980s.

Health and well being

2.12 The Standardised Mortality ratio is well above the national average at 108 (where 100 represents the national average), reflecting widespread deprivation. There are a high number of unpaid carers (18,500) who live in the borough. However, overall health may be improving. From 2001 to 2006 alone, life expectancy in Southwark rose by 3 years (men) and 2 years (women) to 77 and 82 years respectively.

2.13 The major health problems in Southwark are heart disease and stroke, cancer, diabetes, mental health problems and obesity leading to other diseases. These health conditions are influenced by wide range of determinants, such as demography, location, socio-economic status, access to services, housing conditions and the quality of the built and natural environment.

2.14 The areas with the highest levels of health and disability deprivation are the East Walworth, Nunhead, South Bermondsey





and Rotherhithe wards. Areas with low levels of deprivation occur in the south of the borough, in parts of the Riverside, Surrey Docks and Chaucer wards in the north. Figure 4 shows this.

- 2.15 Cardiovascular disease (CVD) accounts for nearly a third of all deaths in Southwark and over a quarter of premature deaths under 75 years of age. Compared to England, Southwark has a lower estimated proportion of adults who binge drink and adults who are obese, but a higher estimated proportion who smoke.
- 2.16 A significant issue in Southwark is the high level of teenage pregnancy. Southwark has a rate of 75 per 1000 compared to a national rate of 41 per 1000 in 2006/7. A major risk factor for long term health of local children is the continuing trend of obesity. Over a quarter (26%) of Year 6 children in the borough are obese, one of the highest rates in the country.

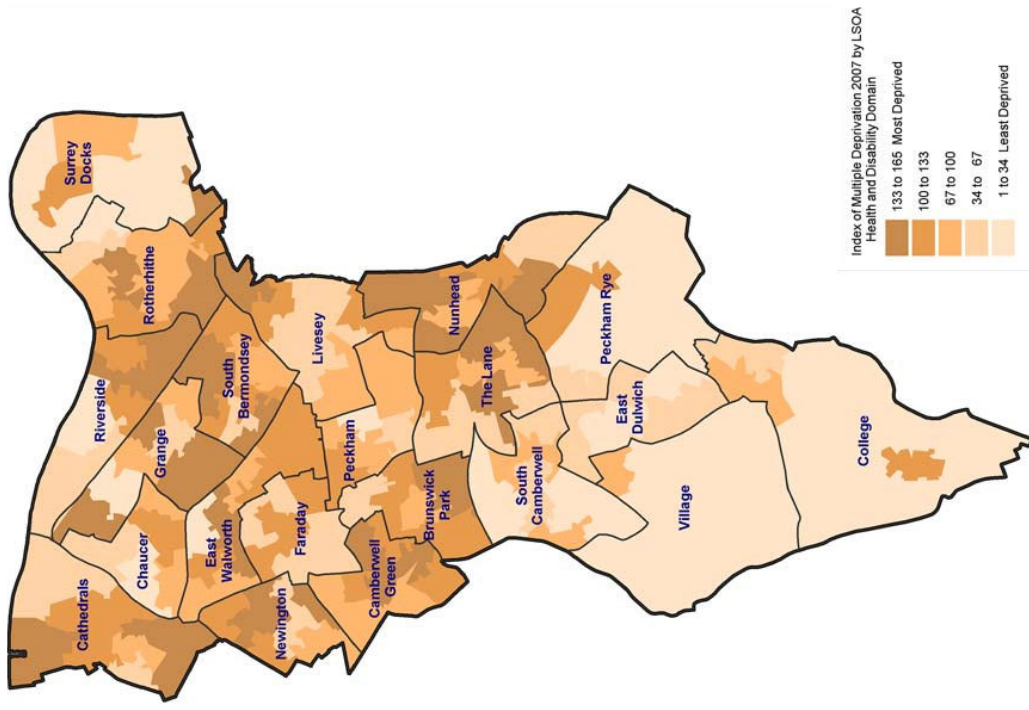
Learning

- 2.17 Over a third (35%) of working age residents in 2001 had higher education qualifications, which is nearly double the national norm. However the proportion of those with no qualifications (24%) was above the London average. In 2001 Southwark was home to 18,800 full-time students. This is almost double the national average, and the third highest in London.

National economy

- 2.18 The UK is currently experiencing the effects of the global economic crisis which is limiting the country's economic growth and is expected to continue for the next two to three years.

Figure 4: Index of multiple deprivation 2007 showing the health and disability deprivation



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2.19 The northern part of the borough which forms part of the Central Activities Zone would have been affected by the on-going recession. However the concentration of business services as opposed to financial services in this area of the borough may offer some degree of resilience.

2.20 The impact of the recession on Southwark can be measured in job losses. After four years of substantial reductions in the benefit claimant count, 2008 saw significant increases in the number of Job Seeker Allowance claims delete. An increase of 16% was experienced between May 2008 and January 2009.

2.21 Forecasters have suggested that London's employment growth will eventually resume its upward trend in the medium term. We will need to ensure that conditions for growth and recovery are in place to help future growth to happen.

2.22 Our regeneration programmes, at Bankside, Borough and London Bridge, Elephant and Castle, Canada Water and Aylesbury will help to significantly improve the quality of the physical environment. This will help create the conditions necessary to stimulate investment, invigorate the local economy and promote sustainable long-term regeneration.

Employment

2.23 Southwark has more jobs than it has workers so more employees commute into the borough than those that leave Southwark for work.

2.24 In 2008 the average gross weekly earnings for Southwark residents was £577.30 which is approximately £3.50 lower than

the London average of £580 and £98 higher than the rest of Great Britain. This has increased by £115 since 2002, an increase of 25%, compared with lower increases of 21% in London and 22% nationally.

2.25 In 2007, 72% (195,700) of residents in Southwark were of working age. This is higher than the London and Great Britain averages which are 67% and 63% respectively. Of these approximately 150,200 were working which is lower than the London and national average. A higher proportion of males are working when compared to females. In 2001, around 12% of residents were managers or senior professionals. This is 50% above the national figure but less than in inner London.

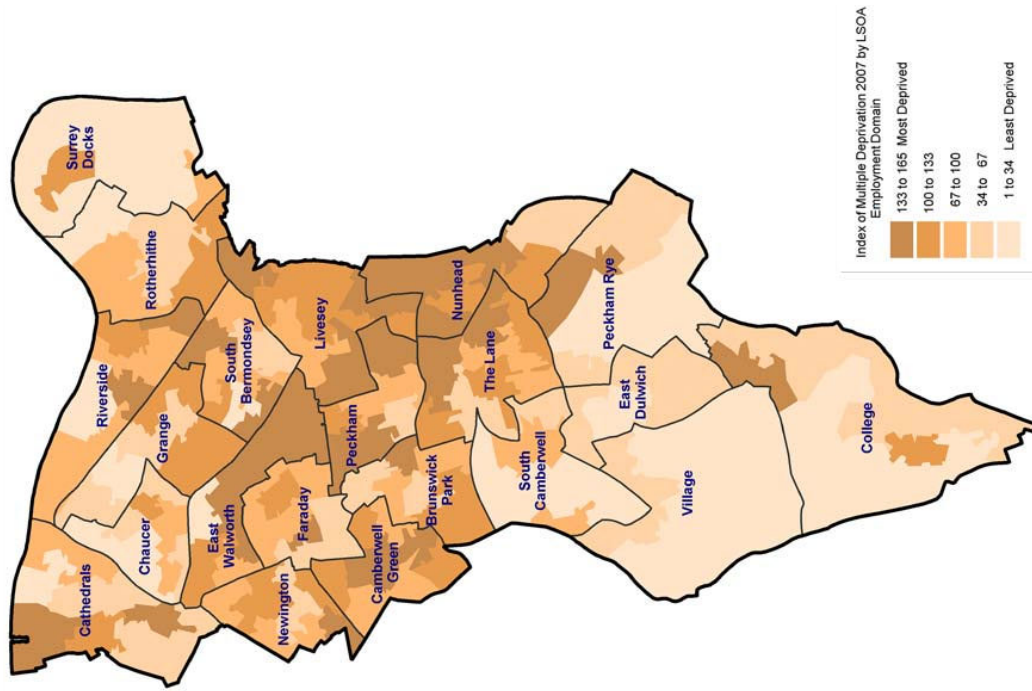
2.26 The 2007-2008 annual population survey stated that unemployment, at 8%, (claimant count) remains nearly double the national average, and a joint 7th highest in London. However, this is historically the lowest rate of unemployment for the borough and has decreased from a peak rate of 20% in 1997. A few years ago it was the 4th highest. The improvement may reflect more professional employees joining the local population as well as the success of policies which deal with the welfare of different groups of people in the borough.

Enterprise

2.27 The biggest concentration of business services is in the Central Activities Zone. These include major financial services, publishers and legal firms. Education and health are major employers in the borough, along with the council and the Greater London Authority. Southwark's business base comprises of around 12,800 businesses. In 2007, there were a total of 165,800



Figure 5: Index of multiple deprivation 2007 showing the employment deprivation



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employees in Southwark, making the borough the 7th largest economy in London. In 2007, there were a total of 165,800 employees in Southwark, making the borough the 7th largest economy in London. The second most dominant industry sector is distribution, hotels and restaurants at 22%, compared to 24% in London. The business services sector has driven the expansion of the business base in Southwark since 1998. It has also been responsible for the majority of jobs growth over the last decade. Since 1998 the sector has contributed 31,500 new jobs to the borough's economy, a growth rate of 102%.

2.28 The growth in the number of jobs in Southwark has increased greatly between 2003 and 2007 and has been concentrated in Cathedrals (+9,200 jobs or +18%), and Riverside (+7,200 jobs or +39%), wards within the Central Activity Zone. The New Business Registration rate (measured as per 10,000 population) was 96 in 2007 and ranks 11th out of the London boroughs. In 2007, the proportion of small businesses (less than 50 employees) showing growth stood at 13%, Southwark ranks 6th place against the London boroughs and has outperformed London as a whole. 96% of businesses in Southwark are micro or small businesses employing less than 50 people. 3% of businesses employ between 50 and 199 employees. There are 114 large or corporate sized companies in Southwark employing more than 200 people. This is equivalent to 1% of all companies in the borough. Despite this small figure, they provide 72,316 jobs which is 52% of the employment.

Green spaces

2.29 The growing population increasingly values access to high quality green spaces nearby. About 20% of Southwark is made up of





open spaces that are protected by the planning system. These are various sizes and include parks, sports grounds, nature reserves, allotments and woodlands. Increasing appreciation of the heritage of the built environment means that 22% of the borough is covered by conservation areas.

Leisure

2.30 There are a number of leisure centres in Southwark including Camberwell, Dulwich, Elephant & Castle, Geraldine Mary Harmsworth Sports facility, Peckham Pulse, Seven Islands, Southwark Park Sports Centre and Surrey Docks Watersports Centre. All of Southwark's leisure centres and the Southwark Park Athletics Stadium are run by Fusion Leisure Trust.

2.31 Burgess Park tennis centre is Southwark's newest tennis centre offering seven professionally surfaced courts, a practice wall and floodlighting.

2.32 The Herne Hill velodrome is located in the east of the borough and is one of the oldest cycling track venues in the world built in 1891. It hosted the track cycle racing events in the 1908 and 1948 Summer Olympics. The grandstand originally dates from 1891 and still remains on the site. In the centre of the track is a football pitch and the velodrome was the home of Crystal Palace F.C. from 1914 until 1918.

Getting around

2.33 The 2001 census showed that 29% of people's journeys were made by car, 35% were made by public transport and 36% by

bicycle and walking. Other surveys show that over three quarters of the population who have a job travel to work by public transport, walking and cycling.

2.34 Currently 12% of Southwark residents walk to work, which is similar to other inner London boroughs. However there is also a vast working population that lives outside the borough but travel to Southwark for employment.

2.35 According to the London area transport survey 1991 and 2001 Household surveys the number of cycle trips made by Southwark residents increased by 27% between 1991 and 2001 compared to a London-wide average of approximately 3%.

2.36 There are 11 railway stations in Southwark providing services between Central London and the South East. There are two areas (Burgess Park area from Camberwell to Bermondsey, and between Peckham RyePark and Dulwich Park) that are not close to a station, making it difficult for people living and working in these areas to use them. London Bridge station is one of 18 railway stations managed by Network Rail and is a major transport terminus and interchange for south London. It serves over 54 million people a year.

2.37 The underground network is concentrated in the north where there are nine underground stations including London Bridge, Borough, Elephant and Castle, Kennington, Surrey Quays, Rotherhithe, Southwark, Bermondsey and Canada Water. These are on four different lines including the Northern, Bakerloo, Jubilee and East London lines.





2.38 There are a number of bridges and tunnels for trains, the tube, road traffic and pedestrians across or under the river. There are also 6 piers for ferries, and private boats, which are owned and run by London River Services, the Port of London Authority, and businesses.

2.39 Key roads in Southwark are managed by Transport for London and all other roads are managed by the council. Some major routes such as the Old Kent Road are used by a large number of people travelling through to other parts of London and the South East of England.

2.40 The roads with the largest amount of traffic are in the north including Kennington Lane, Elephant and Castle, New Kent Road and Tower Bridge Road, Jamaica Road, the Rotherhithe Tunnel, Blackfriars Road and London Bridge. The Mayor's congestion charging scheme (CCS) has affected where people drive but the amount of traffic on the edge of the congestion charge zone has remained the same as before the congestion zone was introduced.

2.41 Car ownership levels in Southwark have traditionally been low with 48% of households owning a car in 2001. However, the national trend is that growth will be the highest for those areas with a current low base level. Vehicle emissions are the cause of 50% of air pollution and estimated to cause 24,000 deaths per year in the UK.

Climate change

2.42 Energy use in buildings is responsible for 85% of the direct carbon dioxide emissions in Southwark. Since 1996, we have

helped to increase the energy efficiency of the existing housing stock in the borough by approximately 5%.

2.43 Southwark's carbon dioxide emissions are slightly lower than the UK average with 6.7 tonnes per year of carbon dioxide emissions, compared with 9.7. 2.4 tonnes per year are domestic emissions, compared with 2.7 as a UK average.

2.44 Within Southwark, solar energy and bio-fuels were the most popular choices of renewable energy infrastructure chosen in 2007/08 with at least 40 pieces of technology installed on buildings.

Waste

2.45 In 2007/08 there was a slight increase in the total amount of waste collected. The percentage of total waste recycled and composted has continued to increase. The amount used to generate electricity has fallen this year but is the second highest figure achieved so far. Last year was an exception as 7,620 tonnes of waste was sent to an incinerator in Kent to help test the facility. The amount of waste disposed of in landfill has continued to meet our landfill targets.

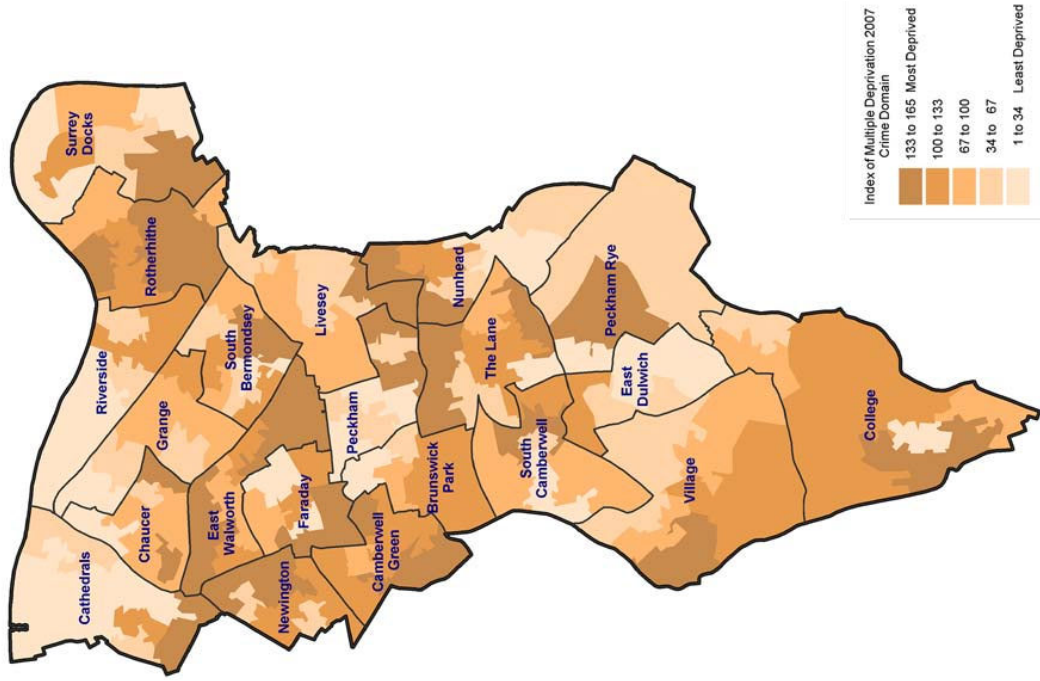
Crime

2.46 The pattern of crime distribution (for burglary, theft, criminal damage and violence) in Southwark has a different pattern of distribution to other index of deprivation. Figure 6 shows this. Whilst some of the most deprived areas of the borough do not have the highest levels of crime, some areas in the centre of the borough experience both high income deprivation and crime deprivation.



2.47 Over a third of Southwark falls within the 10% most deprived in terms of crime nationally with over half of Southwark in the 20% most deprived in England. Between 2004 and 2007, nearly a third 29% of areas in the borough had a decrease in the number of crimes. However 22% of areas elsewhere in the borough had an increase in the number of crimes. Crime rates in Peckham, Riverside, Rotherhithe, East Dulwich and Limesey wards had no areas that saw an increase in crime between 2004 and 2007.

Figure 6: Index of multiple deprivation 2007 showing crime deprivation



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Improving our places through Southwark 2016 and the core strategy

2.48 We work closely with our local strategic partnership, Southwark Alliance. Southwark Alliance has prepared our sustainable community strategy called Southwark 2016. The strategy sets out what people want Southwark to be like and what needs to be done to get there. Southwark Alliance is a forum of opinion, reflecting the diversity of the lives of the people in the borough. It brings together the Council and other statutory organisations, with voluntary, business, faith and community sector organisations.

2.49 Southwark 2016 sets out a vision for the borough alongside objectives and priorities for how the vision will be achieved. Southwark 2016's objectives and priorities form the basis of our core strategy objectives. The core strategy translates these objectives into a physical reality that will be implemented by setting out our spatial framework of how we will design, build and plan Southwark.

Challenges and opportunities

2.50 We have set out the main challenges and opportunities that we tackle in the core strategy to achieve our vision of improving our places for our diverse population between 2009 and 2026. This is based on what people have told us during consultation and partnership working along with our research. These are to:

- Achieve sustainable development by balancing environmental, social and economic needs to ensure a good quality of life for people now and in the long term.
- Continue to reflect our diverse cultures positively in places.
- Reduce the inequalities between people and communities through creating successful places.
- Build more housing and meet the needs of our diverse population. This includes how we can provide family housing, housing for first-time buyers, social rented housing, intermediate housing and different types of housing such as flats and houses.
- Balance the need for more housing with other demands on the land such as for community facilities, employment and protection of open spaces.
- Continue to develop and strengthen our economy to provide successful town centres, jobs and places for businesses to thrive. Southwark has huge differences between the wealthy and the more deprived areas despite being one of the largest economies in England.
- Provide space for new small businesses and creative industries and encourage innovative industries to move to Southwark.
- Invest in children through improvements to schools, youth





provision, play spaces, links to jobs and provision of good quality homes.

- Minimise our impact on the environment and adapt to climate change by better managing energy use, waste, water use, flood risk and controlling pollution.
- Help tackle the major health issues and inequalities in Southwark, such as obesity and mental health by addressing the environmental, social and economic factors that can influence health.
- Conserve and enhance heritage assets and wider historic environment and make sure open spaces are cared for and used.
- Make sure the design of developments is carefully thought through to contribute to successful places for people.
- Continue to improve the accessibility of Southwark, including safeguarding land for possible new public and river transport and improving walking and cycling routes.
- Ensure the core strategy is deliverable and sustainable by taking into account the capacity of planned and existing infrastructure.
- Consult and work in partnership effectively.
- Protect the suburban character of Rotherhithe and the south of the borough.
- Work with Lambeth, Lewisham, Tower Hamlets, Bromley, Westminster, City and Croydon to make sure our growth and opportunity areas complement each other.
- Work with Lambeth, Westminster, the City and Kensington and Chelsea in the Central Activities Zone to improve the north west of Southwark as a part of central London.



Working with our neighbouring boroughs

- 2.51 Southwark shares a boundary with or is very close to seven other London boroughs; Bromley, City, Croydon, Lambeth, Lewisham, Tower Hamlets and Westminster. We work closely with our neighbours to make sure that our policies take into account the changes other boroughs are making through their planning documents. We will continue to work with our neighbouring boroughs including producing joint evidence document such as our Strategic Housing Market Assessment and our Strategic Flood Risk Assessment. Figure 7 shows where Southwark is within London and the neighbouring boroughs we work closely with.
- 2.52 At the time of producing our core strategy, the key cross-boundary issues with our neighbours are set out below. We will update this information through the annual monitoring report.

Bromley

- 2.53 Beckenham and Penge local town centres are the closest to Southwark. The focus on Penge is to protect the surrounding open spaces. Our vision for Dulwich shares this aspiration and we will work together to make sure we continue to protect the open spaces in the south of our borough.

City

- 2.54 The business cluster known as 'the City' extends out of the City's administrative boundaries into the surrounding boroughs, including Southwark. This is often known as the city fringe and is an important area for financial and business growth. This covers much of Southwark's share of the Central Activities Zone, where we are encouraging more employment growth. As we produce





our Bankside, Borough and London Bridge supplementary planning document we will continue to make sure we work closely with the City.

Croydon

2.55 The southern end of Southwark is very close to part of Croydon. Croydon Metropolitan Centre is designated as an opportunity area in the London Plan. We will continue to make sure that our strategies for the south of the borough are aligned with Croydon's to continue to protect the area's open spaces and suburban character.

Lambeth

2.56 We share a large boundary with Lambeth. The London Plan designates both Waterloo and Vauxhall as opportunity areas, both of which are close to our boundary. We have inputted into Lambeth's Waterloo and Vauxhall supplementary planning documents and are continuing to work together to make sure our planning documents compliment each others'. This will enable us to work together to improve housing, jobs, business and tourism opportunities in both boroughs whilst protecting the rich history and environment.

2.57 We are working closely with Lambeth to produce our Bankside, Borough and London Bridge supplementary planning document to make sure that new businesses, shops, housing and cultural facilities benefit local residents as well as raise the profile of both Southwark and Lambeth. We will continue to work closely together on the production of supplementary planning

documents covering Herne Hill and Camberwell to strengthen the shopping and other services.

Lewisham

2.58 The London Plan designates both Lewisham-Catford-New Cross and Depford Creek/Greenwich Riverside as opportunity areas. These are both close to our boundaries and we will continue to work closely together, especially in the development of the Canada Water and Peckham and Nunhead area action plans, to make sure that the planned growth in these areas complements our planned growth.

Tower Hamlets

2.59 Canary Wharf is the only major town centre within Tower Hamlets, and is just across the river from Canada Water. Canary Wharf and the Tower of London area will see an increase in the provision of jobs. We will work together, particularly in the development of the Canada Water area action plan to make sure that our strategies for growth complement each other.

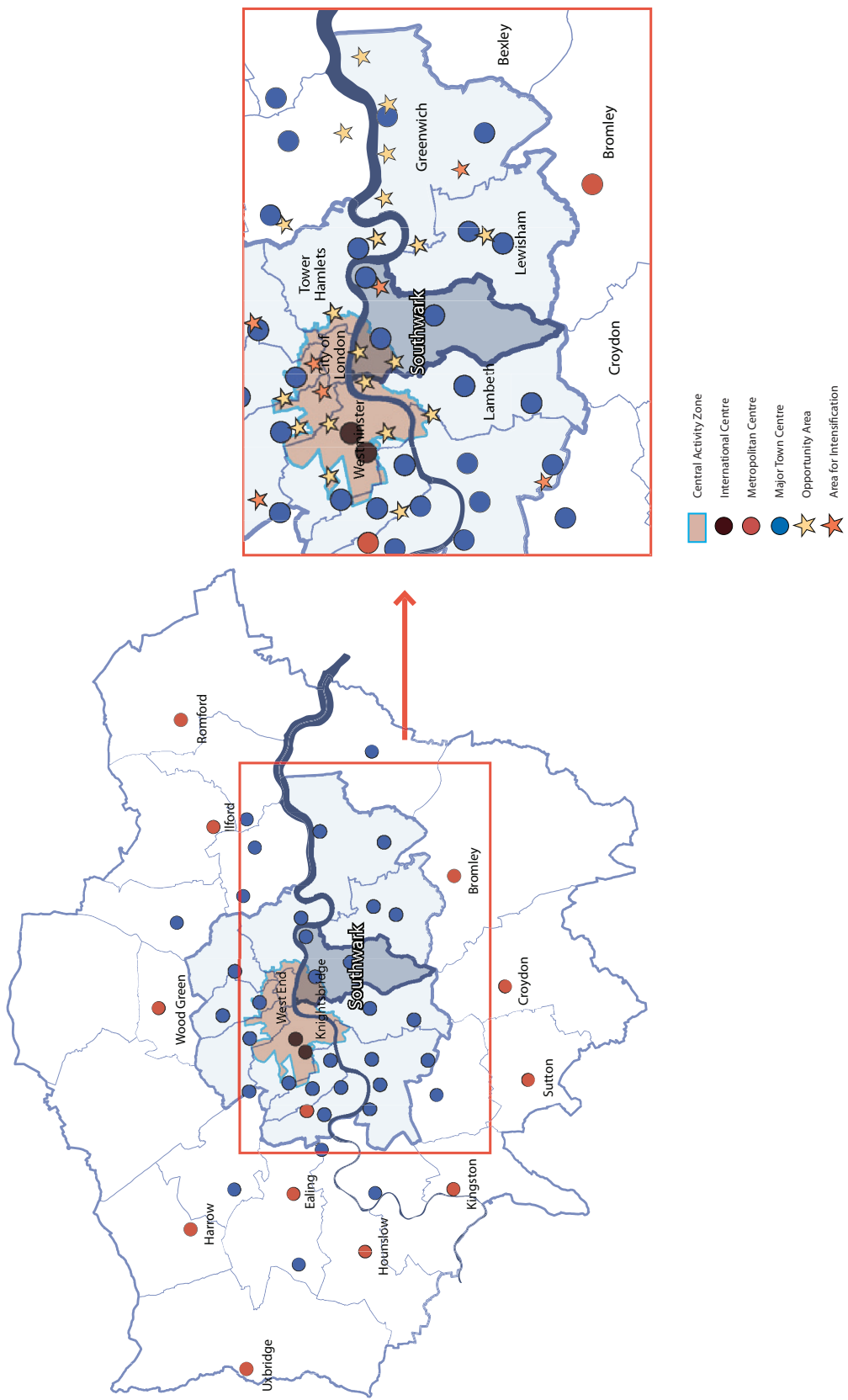
Westminster

2.60 The London Plan identifies two opportunity areas for growth of businesses and homes within Westminster's share of the Central Activities Zone at Victoria and Tottenham Court Road. There is also lots of non-residential development along the northern end of Vauxhall Bridge Road. We work closely with all the boroughs that form the Central Activities Zone to make sure our policies complement.



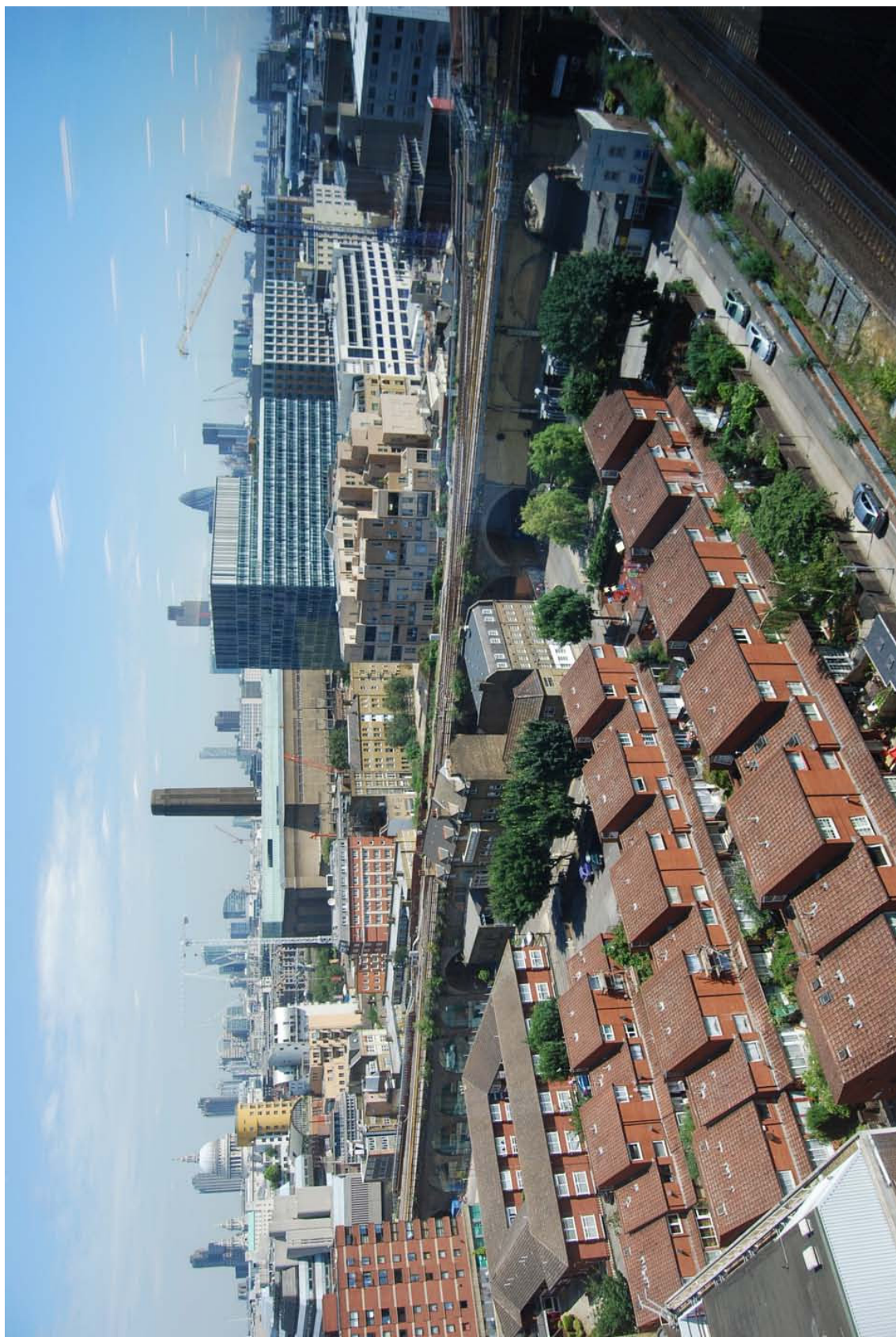


Figure 7: Southwark within London and our neighbouring boroughs





CORE STRATEGY



Section 3: Our Strategy for Southwark

Southwark vision - Improving our places (what are we trying to achieve)

Southwark vision

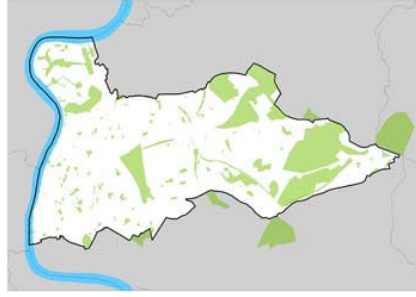
3.1 We will make sure that Southwark improves as a place where local facilities, the transport network and infrastructure is supporting the fast pace of change in growth areas such as Bankside, Borough and London Bridge, Elephant and Castle, Canada Water, Peckham and Nunhead and Aylesbury, where we are increasing homes by around 10% from 123,945 to 148,398, office space by around 30% from 1,255,000sqm to 1,674,885sqm and people working by around 15 % from 165,800 to 190,800 between 2009 and 2026.

3.2 We will make sure that this regeneration is as sustainable as possible by setting high environmental and design standards along with protecting and improving a network of open space and heritage throughout the borough.

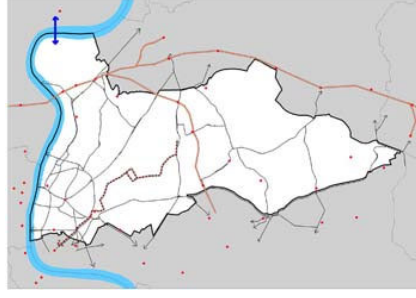
3.3 Set beside the River Thames, Southwark is made up of a diverse group of places with distinct identities where people who live, learn, work and have fun here can benefit from the vibrancy of our cultures and communities. We have set out unique visions to show the successful places that we want them to be.

Figure 8: The layers that form our key diagram

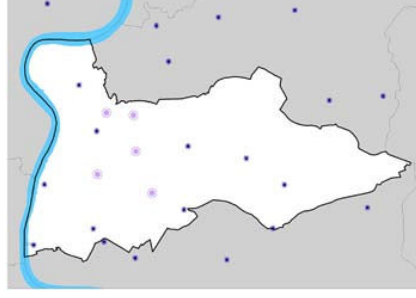
Protected open space



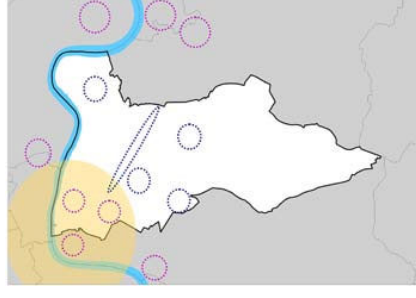
Key links and proposed public transport extensions



Industrial locations, town and local centres

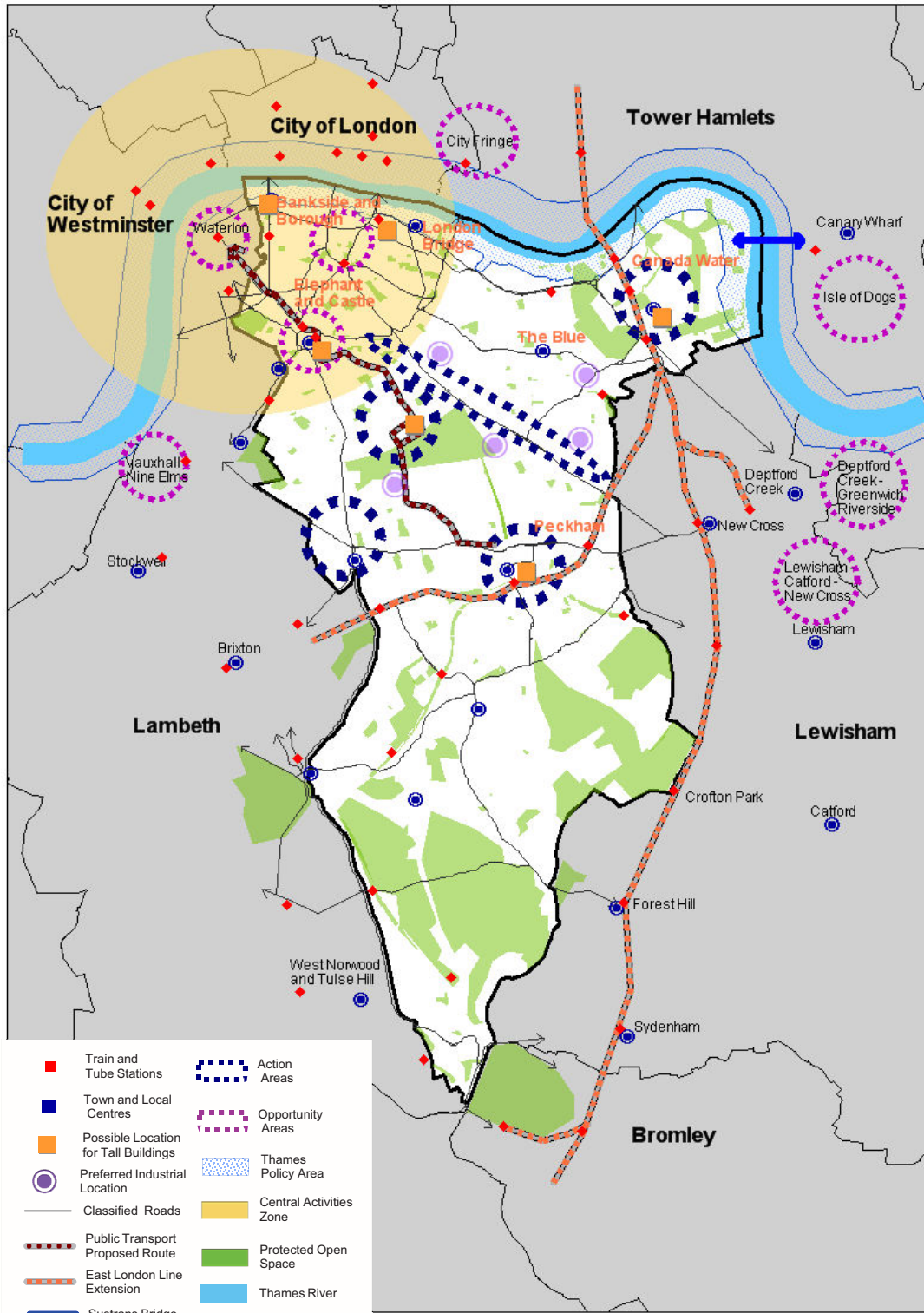


Central Activity Zone, opportunity and action areas



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Figure 9: Key diagram



Our themes and objectives

(How we will achieve our vision to improve our places)

We will achieve our vision for Southwark by working towards the core strategy themes set out below.

- Theme 1: Improving individual life chances.
- Theme 2: Making the borough a better place for people.
- Theme 3: Delivering quality public services.
- Theme 4: Making sure positive change happens.
- Theme 5: Developing in growth areas.

3.4 The themes pull together the strategic objectives. They are based on the objectives and priorities in the sustainable community strategy (Southwark 2016). Together they are designed to ensure integration with our other corporate plans and strategies. We have tested them all using our sustainability appraisal to make sure that they are working together to create sustainable places where decision making takes into account all of the themes. In this section we set out our strategy for achieving our vision, themes and objectives. We set out the strategic target planning policies that will help us meet these objectives. We start each policy by setting out which of the objectives it is intended to help us achieve. We also list all of the policies that are relevant for each objective in this section.

Theme 1: Improving individual life chances

Strategic Objective 1A. Create employment and link local people to jobs

3.5 Southwark will be a prosperous borough providing a wide range of employment opportunities that facilitate regeneration. The Central Activities Zone will contain a mix of tourism, cultural and creative industries, finance and office jobs. Local centres will provide retail, services and local employment whilst preferred industrial locations provide places for small businesses and industry. Southwark will be without concentrations of poverty and with good opportunities because there is good access to jobs and residents will have the training and skills needed by businesses. The policies related to this theme are STP 1, STP 2, SP 1, SP 3, SP 10 and SP 14.

Strategic Objective 1B. Achieve educational potential

3.6 Southwark schools, universities, pre-schools and colleges will be places where children and young people can achieve and gain the knowledge and skills to get a job. Southwark will be a place that creates positive futures by building, redeveloping and improving educational facilities with good access for everyone. Improving Southwark will help to attract good teachers to work in the borough. The policies related to this theme are STP 1, STP 2, SP 1, SP 4, SP 8, SP 10 and SP 14.

Strategic Objective 1C. Be healthy and active

3.7 Southwark's community will be healthy and active. By delivering sustainable growth people will have access to good health, education, sports, leisure and community facilities. Access to



open spaces and nature, opportunities for active travel and access to fresh, healthy food will encourage healthy lifestyles. Good quality affordable and family homes will help improve living conditions. The negative impacts of development on health will be addressed and developments will be well designed and able to cope with climate change. The policies related to this theme are STP 1, STP 2, SP 1, SP 2, SP 3, SP 4, SP 5, SP 7, SP 11, SP 12, SP 13 and SP 14.

Strategic Objective 1D. Culture, creativity and diversity

3.8 Southwark will be a prosperous borough providing a wide range of activities and facilities for the diverse community. Successful creative industries will thrive particularly in the strategic cultural areas. There will be a wide range of arts and cultural facilities for Southwark's multicultural and very diverse community. The policies related to this theme are STP1, STP2, SP1, SP2, SP3, SP4, SP5, SP7, SP11, SP12, SP13 and SP14.

Strategic Objective 1E. Be safe

3.9 Southwark will be a safe place for people to live, visit and work. The policies related to this theme are STP 1, STP 2, SP 1, SP 4, SP 12 and SP 14.

Theme 2: Making the borough a better place for people

Strategic Objective 2A. Create mixed communities

3.10 People will choose to live in Southwark because we will have a mixture of different types of housing, jobs, shops, schools,

community facilities, health centres, libraries, religious centres and leisure facilities needed by a diverse community. The policies related to this theme are STP 1, STP 2, SP 1, SP 2, SP 3, SP 5, SP 6, SP 7, SP 8, SP 9 and SP 14.

Strategic Objective 2B. Promote sustainable use of resources

3.11 Southwark will be a green and environmentally sustainable borough. New developments will be built to high environmental standards to reduce the impact on the environment and adapt to climate change, focussing on flood risk, waste management, biodiversity and water quality. New housing and businesses will be located near to community facilities, shops, offices and leisure facilities. This encourages walking, cycling and public transport and reduces the need to travel. The policies related to this theme are STP 1, STP 2, SP 1, SP 2, SP 11, SP12, SP 13 and SP 14.

Strategic Objective 2C. Provide more and better homes

3.12 The whole of the borough will offer more housing of a range of different types to meet the needs of the community. All the housing will be built to a high quality of design. There will be a choice of housing types including more family housing, housing for students and more affordable housing. The policies related to this theme are STP 1, STP 2, SP 1, SP 5, SP 6, SP 7, SP 8, SP 9, SP 12, SP13 and SP 14.

Strategic Objective 2D. Create a vibrant economy

3.13 Southwark will be a successful and profitable place. The town centres will offer a range of shops and services, along with offices, tourism and cultural facilities. The Central Activities Zone, opportunity areas and action areas will have lots of different activities as well as housing. The policies related to this theme



are STP 1, STP 2, SP 1, SP 3, SP 4, SP 8, SP 10 and SP 14.

Strategic Objective 2E. A liveable public realm

- 3.14 It will be easy to get to and around places on foot and by bike with excellent public transport links, including water transport. The policies related to this theme are STP 1, STP 2, SP 1, SP 2, SP 11 and SP 14.

Strategic Objective 2F. Conserve and protect historic and natural places

- 3.15 Southwark's heritage assets and wider historic environment will be conserved and enhanced. Open spaces and biodiversity will be protected, made more accessible and improved. The policies related to this theme are STP 1, STP 2 SP 1, SP 11, SP 12 and SP 14.

Theme 3: Delivering quality public services

Strategic Objective 3A. Accessible, customer focused, efficient and modern public services

- 3.16 Public services will be effective and easily accessible by all members of the community. The policies related to this theme are STP 1, STP 2, SP 1, SP 3, SP 4 and SP 14.

Theme 4: Making sure positive change happens

Strategic Objective 4A. Provide enough funding for regeneration to positively transform the image of Southwark.

- 3.17 We will work with landowners, local stakeholders and developers to achieve regeneration, continuing to make Southwark a place

that people aspire to be in and want to invest in. We will have a clear and flexible plan to make sure the right investment decisions are made and that regeneration happens on time. The policies related to this theme are STP 1, STP 2, SP 1, SP 6 and SP 14.

Strategic Objective 4B Making sure that we consult effectively

- 3.18 We will work with local communities, organisations, community groups, developers, businesses and land owners to make sure that we consult effectively on planning policies and development management decisions. We will make sure that we provide people with the opportunity to participate meaningfully in the preparation of local development framework documents as set out in our statement of community involvement. The policies related to this theme are STP 1, STP 2, SP 1 and SP 14.

Theme 5 Planning for development in growth areas

Objective 5A Developing in growth areas

- 3.19 We have a growth areas approach to achieving the vision to improve places prioritising development in the:
- Central Activities Zone.
 - Elephant and Castle opportunity area.
 - Bankside, Borough and London Bridge opportunity area.
 - Peckham and Nunhead action area.
 - Canada Water action area.
 - Aylesbury action area.
 - Camberwell action area.
 - Old Kent Road action area.



The policies related to this theme are STP 1, STP 2, SP 1, SP 2 and SP 5.

Our spatial strategy to improve Southwark through sustainable development

3.20 Our spatial strategy is to improve Southwark through sustainable development. We are doing this by tackling our challenges and maximising our opportunities using spatial planning. We set out our plan for achieving this in our core strategy. This includes our vision for the future development of Southwark between 2009 and 2026. We set out how we will achieve this through our themes, strategic objectives, strategic target policies, strategic policies, delivery programmes and monitoring. We provide our strategic approach to achieving this below.



Planning sustainably

3.21 We want Southwark to be a sustainable place where people want to live. Southwark has a very diverse population with lots of different needs. Our population is growing and there is pressure on the limited amount of land we have to provide the homes, business space and community facilities that places need. We need the right balance between different land uses. This includes considering the needs of the community in which the development occurs. Factors include helping people into jobs, providing local services, and protecting the character of areas. As well as how the development helps achieve objectives that are important to all of Southwark and even the world, such as climate change, population growth and managing waste. How we design and plan our places has a huge impact on people's quality of life. Understanding how places work is very important when setting out our strategy and delivery to make sure that we are making places rather than just developing buildings.

Development also places pressure on the environment and the resources current and future generations rely on for a good quality of life. We need to make sure that we do not use more resources than we have or use them faster than they can be replaced as this will mean future generations will have a lower quality of life. It will also damage the environment.

3.22 We will continue to work with our local communities and all of Southwark's partners through Southwark Alliance and link to the vision and objectives set out in the community strategy Southwark 2016. It is important to make sure that we understand all the wider issues and services and the physical, social and green infrastructure needed to build successful communities.

Delivering sustainable changes

- 3.23 We have set out a delivery programme to make sure that we have a comprehensive and ongoing set of actions that link through our core strategy to ensure that change takes place. The detail is set out in table 1 in section 6. This can be summarised as:
- Setting out a strategy for implementation of each policy and each area.
 - Linking the core strategy to our council-wide evidence based strategies for issues such as housing, open space and enterprise and areas such as Aylesbury and Canada Water.
 - Setting out detailed guidance, allocations of sites, delivery,



targets and monitoring through development plan documents on housing and development management.

- Setting out area visions, guidance, allocations of sites, delivery, targets and monitoring through development plan documents in area action plans for Canada Water, Aylesbury, Peckham and Nunhead and Old Kent road.
- Setting out further guidance in supplementary planning documents for Aylesbury, Dulwich, Bankside, Borough and London Bridge, Camberwell and Tower Bridge Business Complex.
- Making planning decisions on sustainable development through development management.
- Bringing our own land forward for development.
- Setting out the infrastructure required and how this will be developed.
- Providing a clear, needs based borough-wide approach to planning obligations (section 106) based on the impact of development, implemented through a tariff, or (where appropriate) the community infrastructure levy or equivalent.
- Improving our policy and decision making.





Strategic Targets Policy 1 - Achieving growth

How we will achieve our vision to improve our places:

- SO 1A: Create employment and link local people to jobs
- SO 1B: Achieve educational potential
- SO 1C: Be healthy and active
- SO 1D: Culture, creativity and diversity
- SO 1E: Be safe
- SO 2A: Create mixed communities
- SO 2B: Promote sustainable use of resources
- SO 2C: Provide more and better homes
- SO 2D: Create a vibrant economy
- SO 2F: Conserve and protect historic and natural places
- SO 3A: Accessible, customer focused, efficient and modern public services
- SO 4A: Provide enough funding for regeneration to positively transform the image of Southwark
- SO 4B: Making sure we consult effectively
- SO 5A: Developing in growth areas

Our approach is

Development will improve the places we live and work in and enable a better quality of life for Southwark's diverse population. It must contribute to our strategic vision, objectives and strategy for further protecting, enhancing and regenerating our places in Southwark between 2009 and 2026 so that our borough continues to be successful and vibrant. We will work with our partners, local communities and developers to ensure that developments achieve the required growth and improvements to achieve our targets including:

1. 80,000 sqm net new shopping and leisure floorspace
2. 24,450 net new homes between 2011 and 2026
3. 8558 new affordable homes between 2011 and 2026
4. 32,000 net new jobs
5. 425,000-530,000sqm additional business floorspace between 2011-2026



Section 4: Spatial Planning to Improve Places

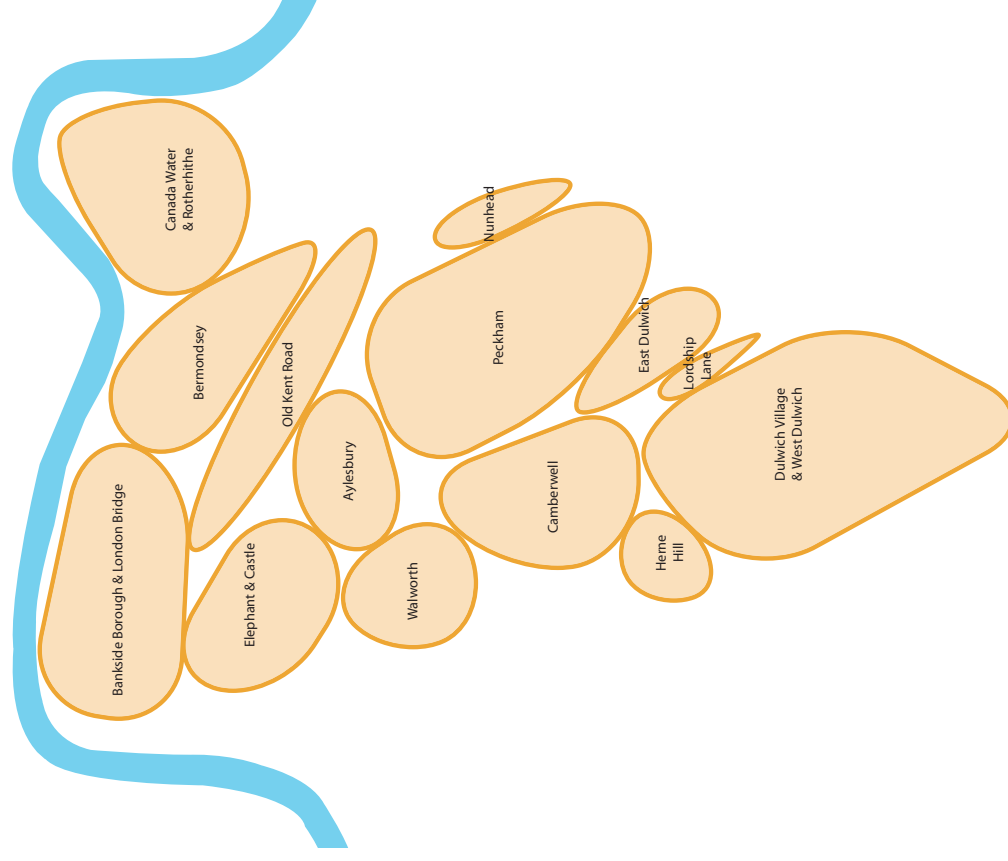
Improving places through sustainable development

4.1 Our spatial strategy is to improve places as part of the overall plan for Southwark as set out in section 3. We are doing this by tackling our challenges and maximising our opportunities using spatial planning. We set out our plan for achieving this through strengthening our distinctive places in our core strategy. This includes our vision for the future development of places between 2009 and 2026. We set out how we will achieve this through our themes, strategic objectives, strategic target policies, strategic policies, delivery programmes and monitoring. We provide our strategic approach to achieving this below.

4.2 Our strategy is to improve places in Southwark to build on each area's strengths and unique identities. This is to ensure that we have accessible, locally distinctive, well designed places which interconnect, are linked to the rest of London and that people consider successful. We link the quality of places and the quality of life through our themes and objectives to set the platform for the way we plan, build and design places. This complex place making process is continuous and needs to involve the diverse range of people who use it to be meaningful in creating places that people find successful to live in and use. Collectively we need to work together to improve each place through tackling the challenges and maximising our strengths.

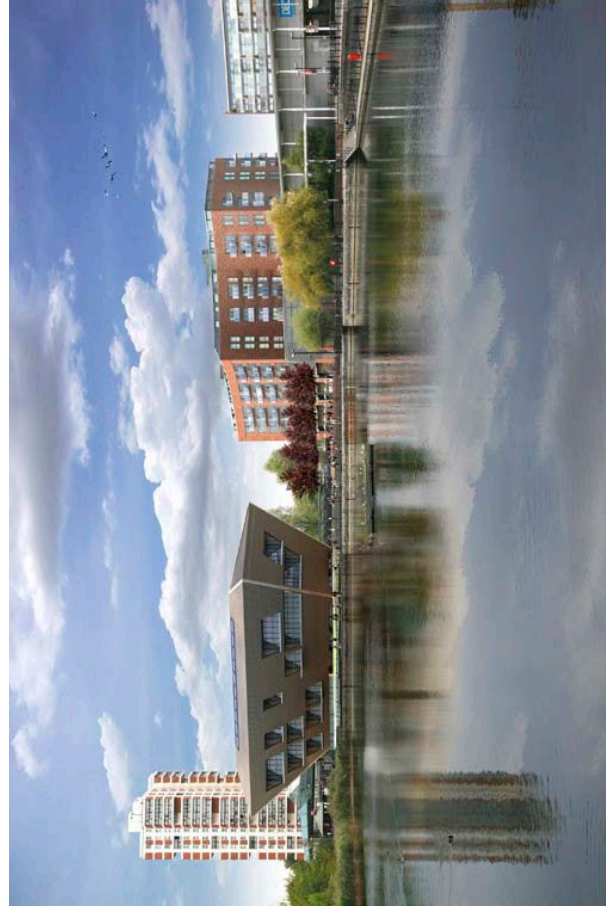
4.3 Most new development will happen in the growth areas, mainly in the opportunity areas and action area cores (Bankside, Borough and London Bridge, Elephant and Castle, Aylesbury, Canada Water, Camberwell, Peckham and Nunhead). We are aiming to balance providing as many homes as possible with

Figure 10: Our places





growth of other activities that create successful places such as places to work, leisure, arts and culture, sports, health centres and tourist activities. We will encourage developments to focus on the strengths of places that make the different areas of the borough distinctive and respect local and historic context. We are currently preparing area based planning documents to provide more detailed policies and guidance on each growth area to meet the needs of each local community. We will improve our other unique areas to strengthen their local characteristics (Bermondsey, Nunhead, East Dulwich, Herne Hill, Lordship Lane and Dulwich Village/ West Dulwich). This will include new schools, community facilities, open spaces, leisure, arts and culture, sports, health centres, youth facilities and tourist activities.



Strategic Targets Policy 2 - Improving places

How we will achieve our vision to improve our places:

- SO 1A: Create employment and link local people to jobs
- SO 1B: Achieve educational potential
- SO 1C: Be healthy and active
- SO 1D: Culture, creativity and diversity
- SO 1E: Be safe
- SO 2A: Create mixed communities
- SO 2B: Promote sustainable use of resources
- SO 2C: Provide more and better homes
- SO 2D: Create a vibrant economy
- SO2E: A liveable public realm
- SO 2F: Conserve and protect historic and natural places
- SO 3A: Accessible, customer focused, efficient and modern public services
- SO 4A: Provide enough funding for regeneration to positively transform the image of Southwark.
- SO 4B: Making sure we consult effectively
- SO 5A: Developing in growth areas

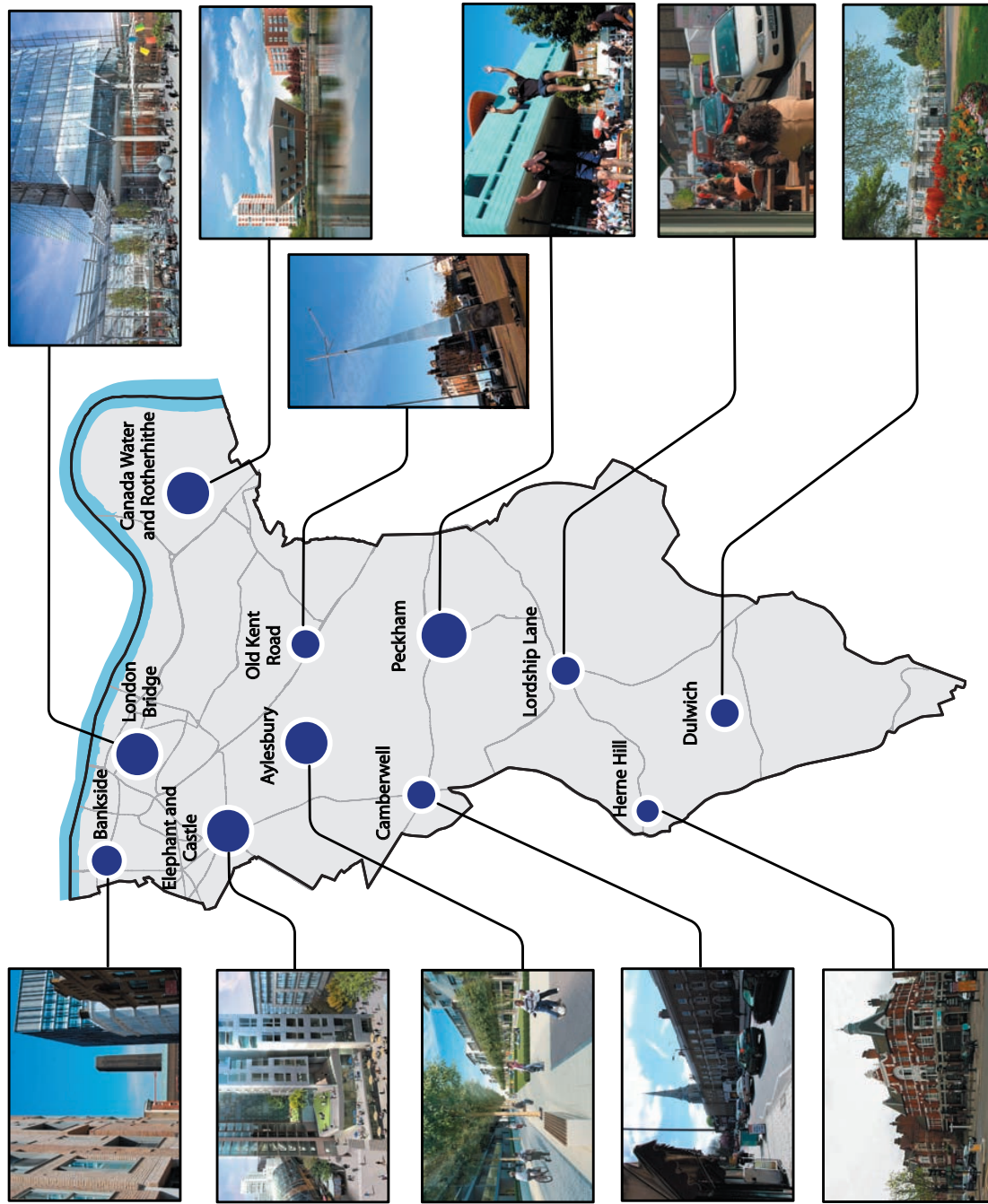
Our approach is

Development will improve the places we live and work in and enable a better quality of life for Southwark's diverse population. It must contribute to our strategic vision, objectives and strategy for the borough for further protecting, enhancing and regenerating Southwark between 2009 and 2026 so that our borough continues to be successful and vibrant. We will work with our partners, local communities and developers to ensure that developments improve our places through delivery of regeneration in our growth areas to achieve our targets. Our area targets are:

- Bankside, Borough and London Bridge
 - » 1900 net new homes
 - » 25,000 net new jobs
- Elephant and Castle
 - » 4000 net new homes
 - » 5000 net new jobs
 - » around 45,000 sqm of additional shopping and leisure space
- Canada Water
 - » 2500 net new homes
 - » 2000 net new jobs
 - » around 35,000sqm of additional shopping space and increased leisure space
- Aylesbury
 - » 4200 new homes (including around 1450 net new homes)



Figure 11: Our different areas





Central Activities Zone

Vision

4.4 Development in the Central Activities Zone will support the continued success of London as a world-class city as well as protecting and meeting the more local needs of the residential neighbourhoods. There will be new homes, office space, shopping and cultural facilities, as well as improved streets, spaces and community facilities.

4.5 It covers parts of a number of London boroughs including Southwark, Lambeth, Westminster, the City and Kensington and Chelsea as shown in figure 7. In Southwark, it includes two opportunity areas at Bankside, Borough and London Bridge and the Elephant and Castle. This area has a mix of office space, activities and attractions which are important to London. It contains nearly 30% of all London's jobs and is projected to accommodate 36% of London's employment growth up until 2026.

4.6 We are working with the local community, Greater London Authority, businesses, land owners, the London Development Agency, Transport for London, the City of London, City of Westminster, Lambeth, the Cross River Partnership, English Heritage, the Primary Care Trust, Better Bankside, Team London Bridge and developers to make the Central Activities Zone a successful place with a joined up approach to future development and improvements.

Bankside, Borough and London Bridge opportunity area

Vision

4.7 The opportunity area will continue to be home to a mix of uses providing high quality office accommodation alongside world-class retail, tourism, culture and entertainment facilities and public spaces. Local people will be supported to find jobs by local employment and training schemes.

4.8 We are working with the local community and landowners to deliver large scale development and improvements, providing over 1,900 new homes, 665 affordable housing units and around 25,000 new jobs by 2026.

4.9 Development and changes to places will be guided by a supplementary planning document/opportunity area framework which we are preparing with the GLA.

Bankside and Borough

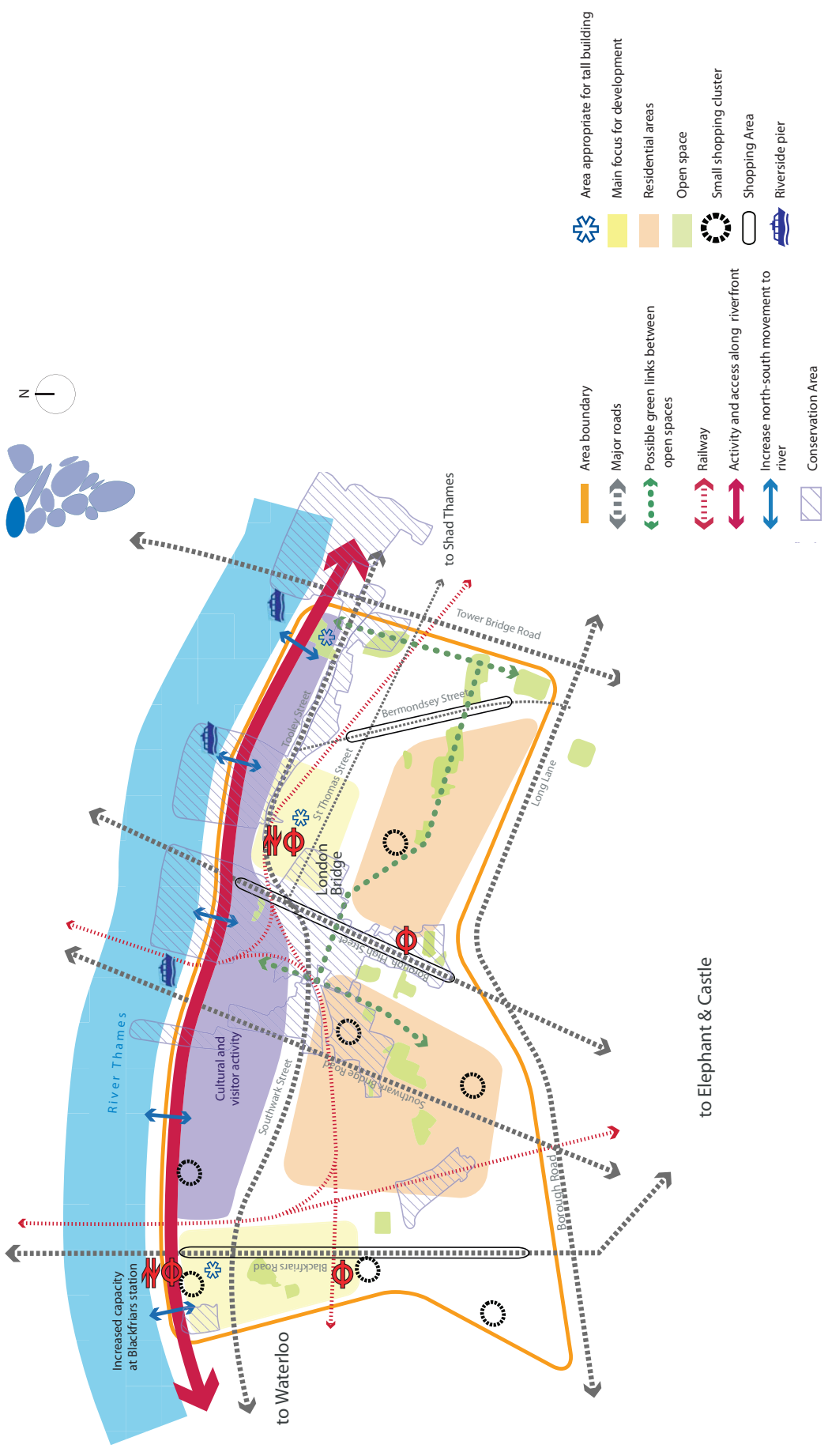
Vision

4.10 We are working with the local community, land owners, Better Bankside and the Cross River Partnership to enhance the area's mix of culture, history and business in a way that is sensitive to its residential communities. There will be new businesses, shops, housing and cultural facilities that will benefit local residents as well as raise the profile of Southwark. This will include new and improved community and youth facilities.





Figure 12: Bankside, Borough and London Bridge



- 4.11 New development will help improve the look, feel and safety of streets and public spaces through schemes like the Bankside Urban Forest. We will work with groups like the Bankside Open Spaces Trust to create better access to green spaces, including protecting the Crossbones Graveyard. New trees and landscaping improvements will make places feel greener.
- 4.12 It will be easier to get around by walking and cycling and access to and along the riverside will be protected. Car parking will be limited to deter car use and help reduce traffic.
- 4.13 New development will recognise and enhance the different character and roles of places across Bankside and Borough. These are focused around Blackfriars Road, Bankside, Borough South, Borough Market/Riverside, and Borough High Street.
- 4.14 There are development opportunities throughout the area, but the largest developments will be around Blackfriars Road and Bankside.
- 4.15 Bankside will be a location for large offices and major arts and cultural facilities, including an expanded Tate Modern. We will work with Network Rail to refurbish space under railway arches to provide modern accommodation for small businesses. Making sure that student accommodation is included without dominating is important for a balanced mix of activities.
- 4.16 Blackfriars Road will continue to have a mix of shops, services and offices serving both a local and wider need. There will be a cluster of tall buildings around the northern end of Blackfriars

- Road providing high quality offices, housing, hotels and shops. These buildings will be of exceptional design and will enhance the look of the area and provide new public spaces. We will set out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework.
- 4.17 Borough will continue to be a mainly residential area serving local needs. The hub of activity centred around Borough High Street will be improved so that it provides a better mix of shops and services to meet local people's needs as well as the needs of office workers and tourists.
- 4.18 Borough Market will be protected and improved and the riverside area will continue to be valued as an area steeped in history, reflected in its historic street pattern and a concentration of important buildings and remains, including Southwark Cathedral. We will work with Network Rail to ensure the Thameslink project is delivered with minimal disruption to the area and improve the contribution that railway archways make to the area.
- 4.19 We will look at ways to control licensed premises and hotels to ensure a good balance of uses and protect the character of the residential areas. This includes an alcohol saturation zone at Bankside.



London Bridge

Vision

4.20 We are working with the local community, land owners, Team London Bridge and the Cross River Partnership to continue transformation of London Bridge into a thriving centre of activity. There will be a mix of uses that blend well with and help improve the surrounding neighbourhood areas and historic places and create a lively and friendly place throughout the day and week. Small local businesses, including creative and media businesses will continue to thrive alongside large global companies, major tourist and cultural facilities, bars, cafes and restaurants. New shops and facilities will be provided to better meet the needs of local people.

4.21 Development will be mainly focused in the area around London Bridge station, which serves stations in Southwark, where Transport for London, Network Rail, the Primary Care Trust, King's College and major land owners will help deliver large-scale change. This will include major redevelopment of the station to improve capacity and links between transport types as well as provide more shops and offices. These stations improvements should prioritise links to buses and train stations within Southwark. This will improve the transport accessibility to Bermondsey, Rotherhithe and Elephant and Castle in the north, Camberwell, Peckham and Nunhead in the centre and Lordship Lane, Herne Hill, East Dulwich, West Dulwich and Dulwich in the south. Guy's and St Thomas' hospital will be improved to provide new housing for staff and students and modern world-class health and education facilities. A number of other sites in the area will be developed to provide shops,

cafes, restaurants, offices and homes, including a major new cultural facility next to Potters Fields Park.

4.22 There will be excellently designed tall buildings in the area around London Bridge Station east of Borough High Street, which will add interest to the skyline, raise the profile of Southwark and London, and create new public spaces. We will set out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework.

4.23 Bermondsey Street and Shad Thames will continue to be attractive areas with a hive of activity. Evening and night-time uses will be controlled to keep a good balance of uses and protect the character of residential areas.

4.24 New development will help bring improvements to streets and public spaces, helping to improve the look, feel and safety of the area. As there will be a lot of activity, streets will be easy to move along and free of clutter, particularly along Tooley Street. It will be easier to get around by walking and cycling and people will continue to enjoy access to and along the riverside. Car parking will be limited to deter car use and help reduce traffic.

4.25 We are working with Network Rail to make sure the railway arches continue to be well used for a mix of entertainment, cultural, leisure and business uses. The frontages of railway arches will be improved and where possible opened up onto the street to bring new life to areas, such as along St Thomas Street.



Elephant and Castle opportunity area

Vision

4.26 Elephant and Castle has potential for redevelopment into an attractive central London destination. We will facilitate regeneration of the Elephant and Castle into a more desirable place for both existing and new residents. There will be excellent shopping, leisure facilities and cultural activities. London South Bank University and London University of the Arts will develop further as important centres of learning. Elephant and Castle will continue to be highly accessible from other places in Southwark and London.

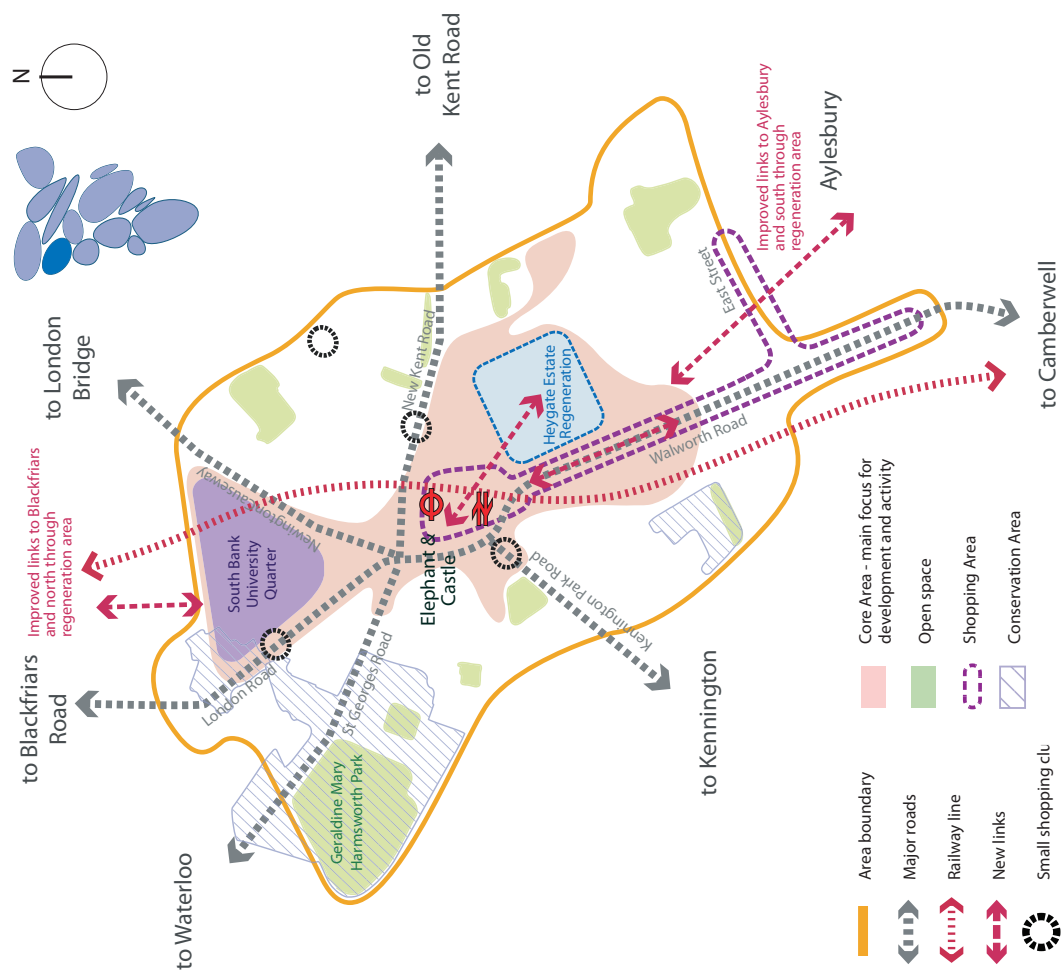
4.27 We are using our land at the heart of the area to stimulate 440,000 sqm of new development with of up to 45,000 sqm new shopping and leisure floor space and 25,000-30,000 sqm of business floorspace. We will meet our target of 4000 new homes and a minimum of 1,400 affordable housing units by working with the local community, registered providers and private developers to deliver new homes. We will also meet the London plan target of 5,000 new jobs by encouraging the more offices, hotels, small businesses and developing the evening economy and cultural activities. There could be tall buildings on some sites in the core area where this helps stimulate regeneration and creates a distinctive place. We will set out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework.

4.28 The regeneration of the Opportunity Area will create a highly integrated and efficient public transport hub. This will comprise an improved Northern line station with a new ticket hall and escalators under the shopping centre, enhanced conditions for bus and rail users and an improved interchange between the various modes. All development will be phased to ensure that the funding is available so that the necessary transport capacity and improvements can be delivered in time to accommodate the new residents, businesses and leisure activities in the opportunity area. Existing subways will be removed and replaced by surface pedestrian crossings creating a more attractive and safe environment with priority for public transport users, cyclists and walkers over the car. A minimum level of car parking and limitations on traffic will reduce pollution. A new and improved street layout including public open spaces will be created allowing those who live and work in the area to move around easily and safely. We will work with Transport for London and Network Rail to bring forward these improvements and will have due regard to the detailed principles set out in the Elephant & Castle Development Framework (2004), or any development plan documents or updated supplementary planning documents which may from time to time be adopted to guide development in this Opportunity Area.

4.29 Elephant and Castle will be a leading example for sustainable development with a new local network (the multi utility services company) providing heat, power, water and data services.



Figure 13: Elephant and Castle



4.30 We are working with the local community, Greater London Authority, businesses including local traders, land owners, the London Development Agency, Transport for London, Lambeth Council, the Cross River Partnership, English Heritage, the Primary Care Trust, and developers to make the Elephant and Castle a successful place.

Canada Water (and Rotherhithe) action area

Vision

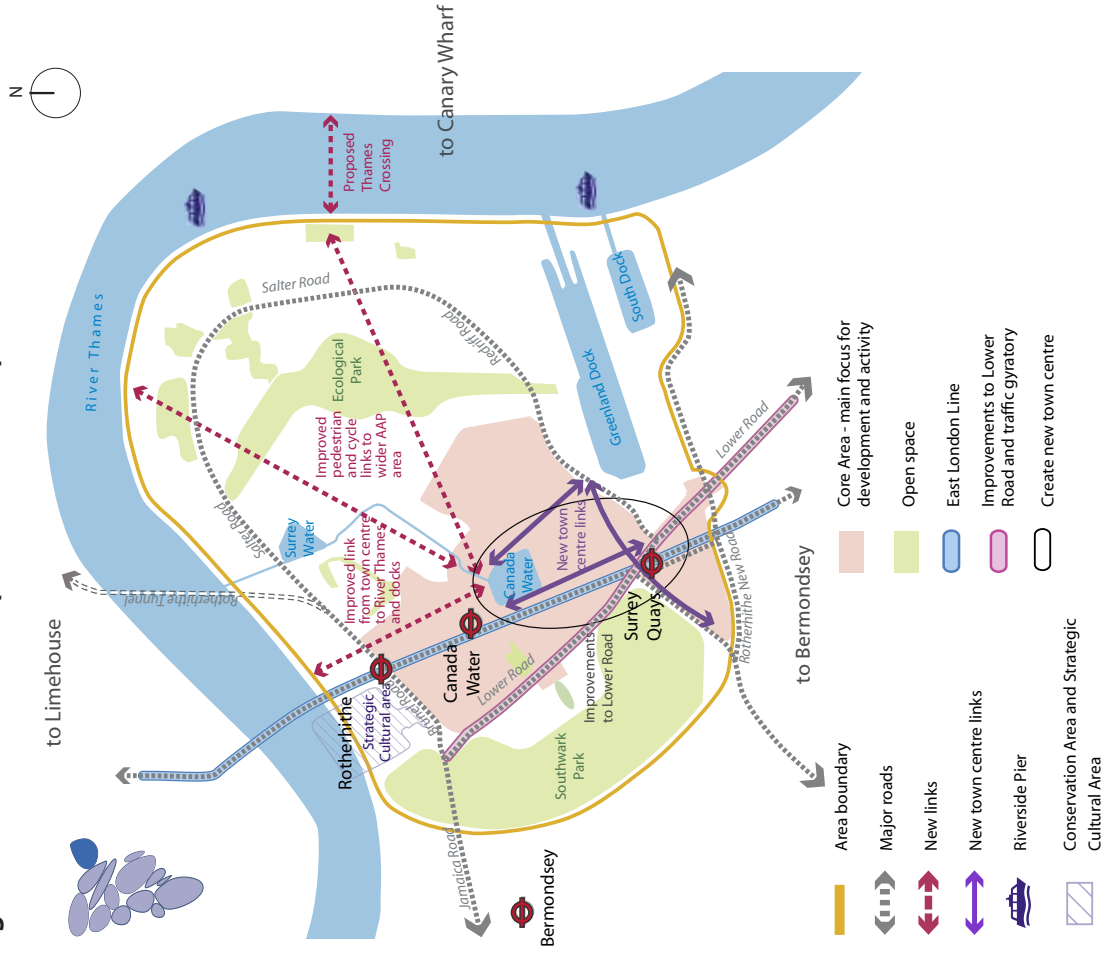
4.31 We are working with the local community, landowners, and developers to transform Canada Water into a town centre as set out in the Canada Water Area Action Plan. Our aim is to make best use of the great opportunity to create a new destination around the Canada Water basin which combines shopping, civic and leisure, business and residential uses to create a new heart for Rotherhithe.

4.32 We want to strengthen Canada Water's role as a shopping destination, expanding the amount of retail space by around 35,000sqm and providing a much more diverse range of shops than at present, including a new department store and independent shops. The action area's core will provide at least 2,500 high quality new homes, which will be accommodated in generally mixed use development. The action area will provide at least 875 affordable housing units. Office development will provide much needed space for local occupiers and, together with retail development, will generate around 2,000 new jobs.



- 4.33 Existing facilities in the town centre are currently separated and poorly linked, being built originally to serve car-borne visitors. Development in the town centre will contribute towards creating an open environment with a high street feel, and high quality public realm and open spaces. We want to make better use of car parking, ensuring that it is shared between town centre uses. The centre must reach out to the wider Rotherhithe area, ensuring that it is accessible, particularly on foot, by bicycle and by public transport. In addition we will work with Transport for London to improve the road network around Lower Road. There could be tall buildings on some sites in the core area where this helps stimulate regeneration and creates a distinctive place. We will set out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the area action plan.
- 4.34 Outside the town centre and core area of the area action plan, development will be less dense and should reflect the leafy and suburban character of much of the area.
- 4.35 Rotherhithe should be a desirable place to live, particularly for families. To help achieve this, we will build a new secondary school, to complement existing schools in the area. Across the action area, development will contribute to achieving a great network of parks and open spaces, which, together with the docks and the River Thames, can help make Rotherhithe known as an attractive destination to visit, relax in and have fun.
- 4.36 We are working with Lewisham Council to make sure we

Figure 14: Canada Water (and Rotherhithe)





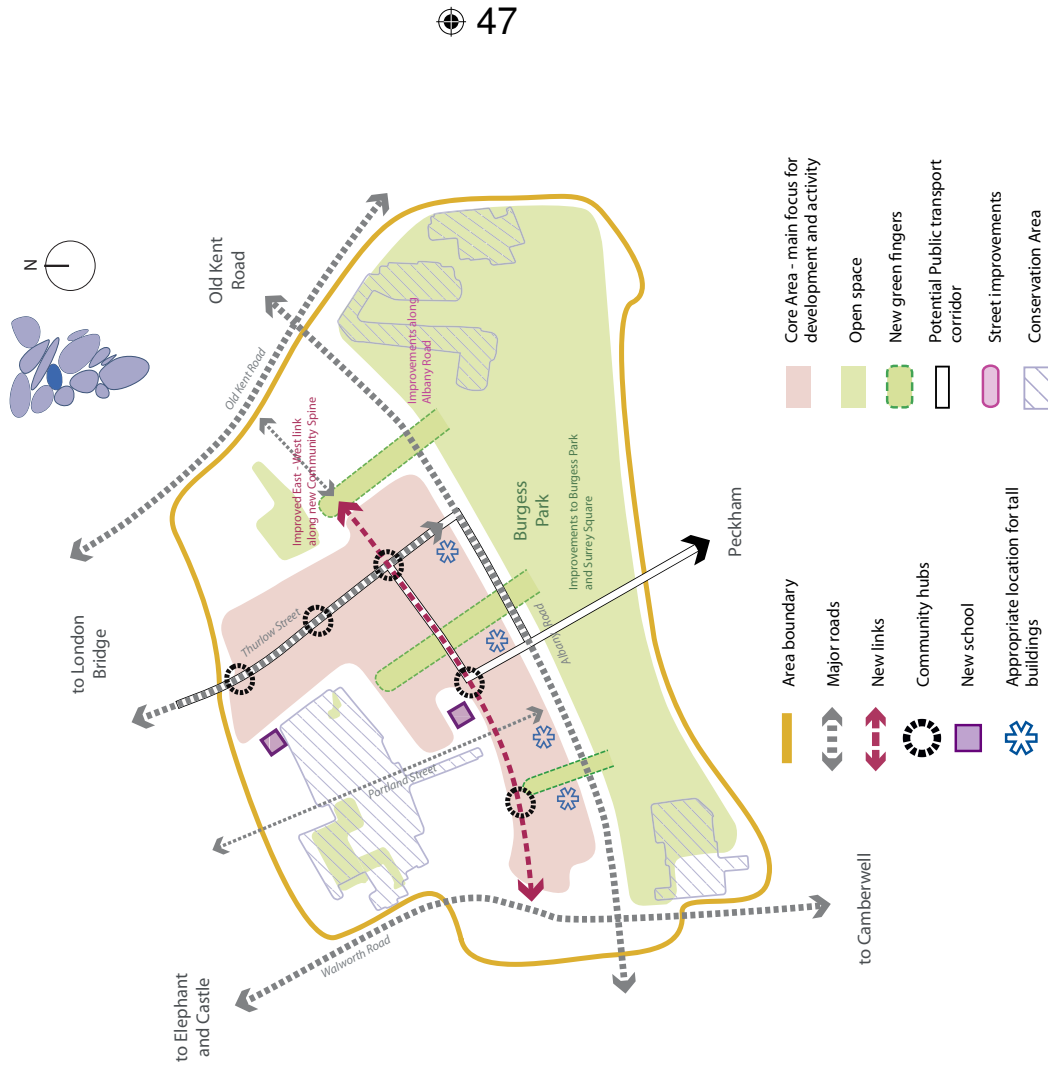
have a joined up approach to future development and improvements to Rotherhithe.

Aylesbury action area

Vision

- 4.37 We will use the guidance in the Aylesbury Area Action Plan to achieve a phased redevelopment of the Aylesbury estate between 2009 and 2027.
- 4.38 Working with tenants groups, other voluntary sector organisations such as the Friends of Burgess Park and partners including the Aylesbury New Deal for the Communities, the Homes and Communities Agency, the GLA and developers, we will deliver a new community with different types of housing and far better living conditions. The plan will deliver quality private, intermediate, and social rented housing. Social rented homes will be generously sized taking the Parker Morris standard and adding 10%. There will be lots of family homes with 23% houses, together with all the facilities needed by families to make sure that the whole area is family-friendly.
- 4.39 The new development will broadly keep the existing street layout, but will have attractive streets that are safer and easier to travel around. The new homes will overlook the streets and spaces so that there will be much better natural security. Good urban design and high quality architecture will enable us to provide homes for 4,200 households, many more than at present. These will benefit from the accessible position of the Aylesbury area with its good transport links to the centre

Figure 15: Aylesbury



of London and the emerging centre at Elephant and Castle. Design excellence will be at the core of the redevelopment and we will emphasise and control design quality at each stage of the project to create a varied and interesting new residential neighbourhood. We set out in detail the approach to building heights in the area action plan.

4.40 To reinforce its image as a place for families to live, the Area action plan will also deliver an excellent range of quality public and private open spaces. It will strengthen the role of Burgess Park as metropolitan open land and a park which serves south east London. The Area action plan will provide new local opportunities for shopping and employment in Thurlow Street and East Street and help provide local people with access to jobs and training and support existing town centres.

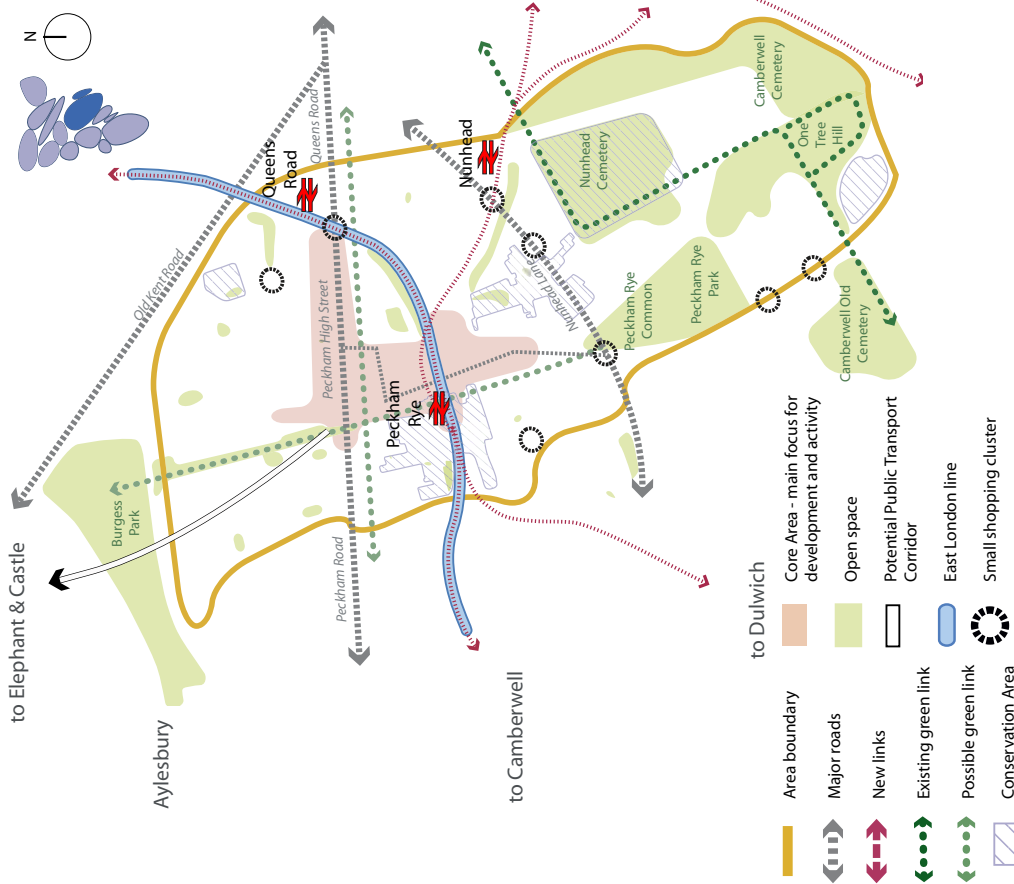
Peckham and Nunhead action area

Vision

4.41 The area will continue to be home to a diverse and dynamic community with shops, community facilities and services. New development will help bring improvements to streets and public spaces, making them greener, more pleasant and safe. It will be easier to get around by walking and cycling and there will continue to be good public transport links.

4.42 Changes and improvements in the area will be guided by an area action plan. Whilst the Mayor has not set a target for Peckham and Nunhead, we will set targets for homes, employment and retail through the area action plan.

Figure 16: Peckham and Nunhead



Note: We are investigating the designation of a conservation area along Rye Lane. We will update the vision map if this is taken forward



4.43 As Peckham and Nunhead is a growth area, there will be more new homes and offices built and a small increase in retail space, mainly around the Peckham town centre. The level of growth will be higher than in the residential areas that surround the town centre but not as high as in places like Canada Water, Bankside, Borough and London Bridge.

Peckham

Vision

4.44 We are working with the local community, landowners, the police, Safer Southwark Partnership and the Primary Care Trust so that Peckham is a friendly, safe and enterprising place. It will have attractive and pleasant neighbourhoods surrounding a lively town centre that meets the needs of a very diverse community. Most development will be in and around the town centre, making the most of good public transport links, a number of large sites and its role as one of the largest town centres in Southwark.

4.45 There will be new housing to help accommodate Southwark's growing population. This will include providing more private housing so that there is a mix of housing and choice for people on a range of incomes.

4.46 Peckham town centre will continue to play a major role in Southwark, providing a mix of activities throughout the day for both local residents and visitors. New development will help bring improvements to shop fronts and the town centre

environment. This will help the area's independent shops, businesses and creative industries to flourish. There will be new space for local businesses, improved cultural and arts spaces, successful street markets and a good mix of shops, cafes, restaurants and licensed premises, including both larger and smaller shops.

4.47 Peckham Square will be enlivened and improved as a focus for the community. We will work with Network Rail to help deliver improvements to areas around Peckham Rye and Queens Road stations and railway lines. This includes a possible new square that will transform the area around Peckham Rye station and the railway arches.

4.48 Development and activity in the town centre will be carefully managed to protect the character and pleasantness of the surrounding residential neighbourhoods. This includes continuing to control the number of new licensed premises in the area.

4.49 The areas surrounding the town centre will also be improved, with better walking and cycling links, greener streets and improvements to parks such as Peckham Rye and Burgess Park. Traffic and parking will be managed on local streets to improve safety, reduce congestion and reduce barriers caused by the traffic system. Local employment and training schemes will help local people into jobs.

4.50 The scale of development would stay much the same except in the town centre where there could be some taller buildings and more intense development on some sites. The area's



heritage will be celebrated and used to stimulate regeneration. We will set out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the area action plan.

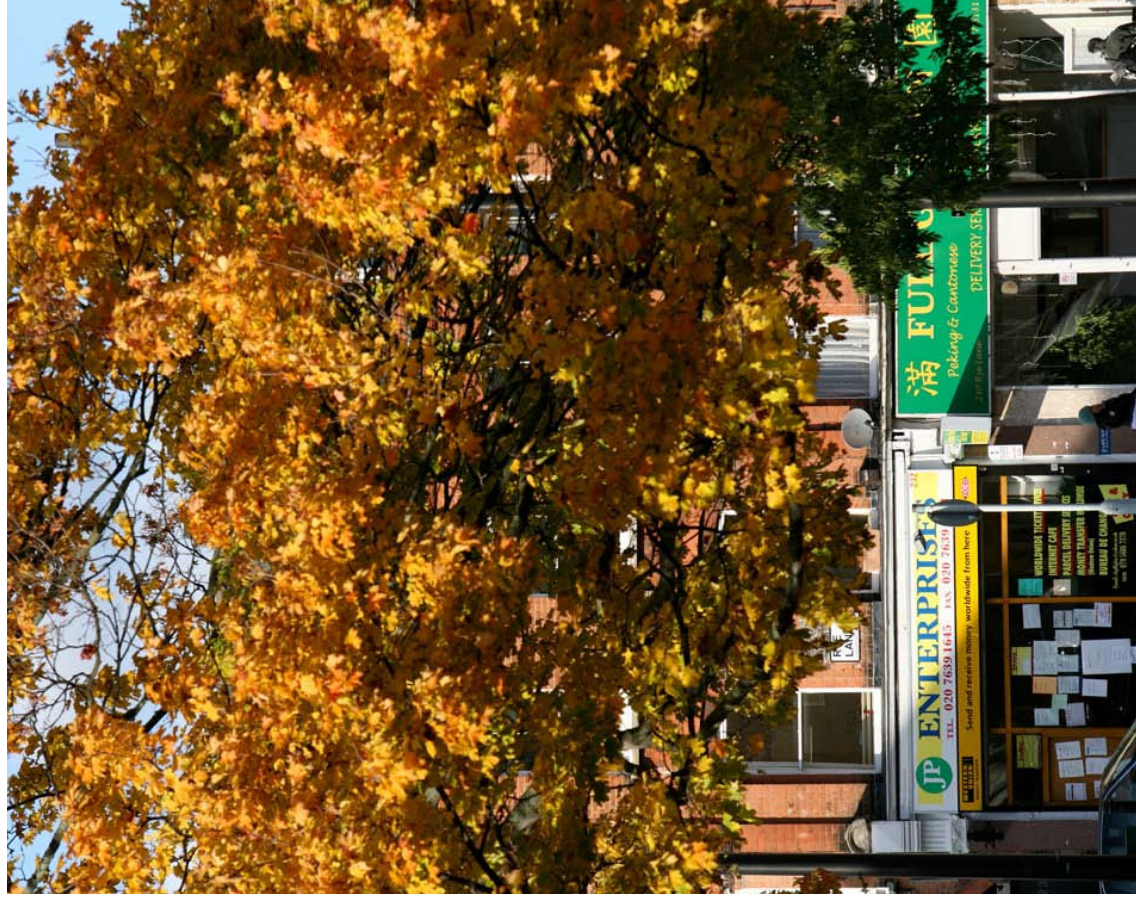
4.51 Peckham will be a leading low carbon area, including having one of London's first Low Carbon Zones and, possibly, a local energy network.

Nunhead

Vision

- 4.52 We are working with the local community to protect the special character of Nunhead so that it continues to be a neighbourhood of low density housing.
- 4.53 There is very little capacity for new development except from small infill sites for housing. The local shopping areas along Evelina Road/Nunhead Green and Gibbon Road will be improved through streetscape and shopfront schemes and will continue to provide for a range of local needs including access to space for community use.
- 4.54 Traffic will be well managed so streets are safer and quiet and there will be good cycling and walking links.
- 4.55 Important open spaces such as Nunhead Cemetery will be protected and improved, helping to create a special character and provide important leisure opportunities and habitat. These open spaces will be improved. There is no capacity for development in Nunhead.

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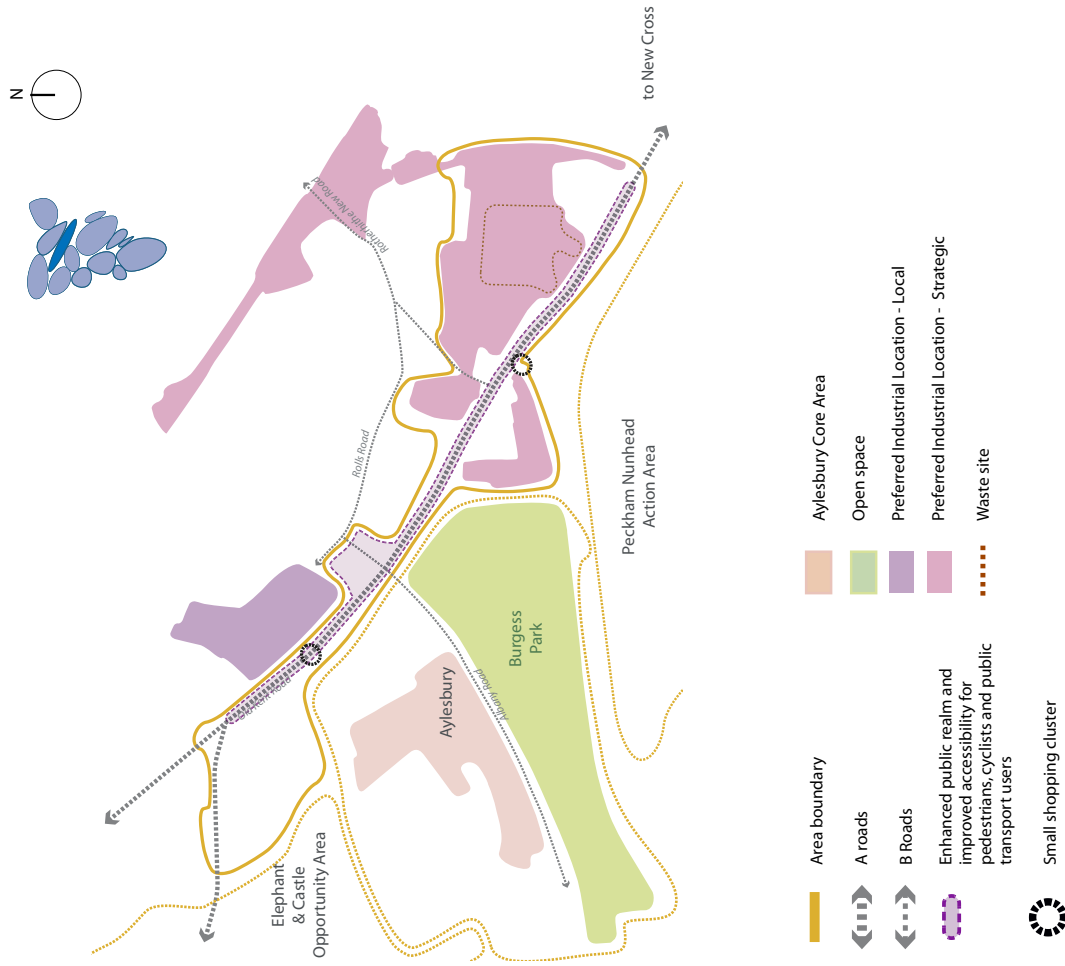


Old Kent Road action area

Vision

- 4.56 We will set out guidance in an area action plan for the provision of housing, employment and small, local shops to complement the multiple retailers already there. This will include a review of the proposals map designations.
- 4.57 We will work with the local community, local businesses and retail operators, private developers and landowners to improve the area. We want to exploit the expected increased growth in innovative industries in this area, particularly new sectors in green manufacturing, bio-sciences and the knowledge economy, which could provide a range of jobs for Southwark residents. We want to create a more distinctive environment on Old Kent Road at a scale that is comfortable to walk around. We would like new homes to overlook streets and spaces so that there will be much better natural security. The area will benefit from good urban design and high quality architecture to transform it into a place with its own identity rather than a busy road. These must be within a strategy for improved accessibility for pedestrians, cyclists and public transport users, and an enhanced public realm. We will work with Transport for London to develop a strategy for improved accessibility.
- 4.58 We will ensure that the Old Kent Road and Elephant and Castle regeneration work together to benefit each other. We are working with Lewisham Council to make sure we have a joined up approach to future development and improvements to Old Kent Road.

Figure 17: Old Kent Road



4.59 Whilst the Mayor does not set us targets for Old Kent road, we will set targets for homes, employment and retail in an area action plan. This will set out the capacity for development and how the potential for change can be implemented.

Camberwell action area

Vision

4.60 We will continue to protect this successful town centre which has many small and medium sized businesses. Many of them are independently run which helps to give Camberwell a special character. Butterfly Walk shopping centre is the only large development site. However the focus is on improving current shops rather than retail growth or new development, particularly businesses in the town centre and along Camberwell New Road towards the Oval.

4.61 Camberwell has a well-known reputation as a creative place with artistic influences clustering around Camberwell College of the Arts. We will continue to encourage this as they add to the vibrancy of the area and provide employment.

4.62 We will also protect and encourage more small businesses within the town centre and the wider action area, including the large area of council housing and small businesses to the north west of the main town centre.

4.63 We will work with Transport for London to reduce traffic congestion, and improve parking, safety and accessibility to and within Camberwell action area by bike, foot and public

Figure 18: Camberwell





transport. We will continue to improve Camberwell Green as an important open space within the town centre.

4.64 We are working with the local community and Lambeth Council to make sure that we have a joined-up approach to development and improvements to Camberwell action area, and will produce a supplementary planning document to guide development and improvements.

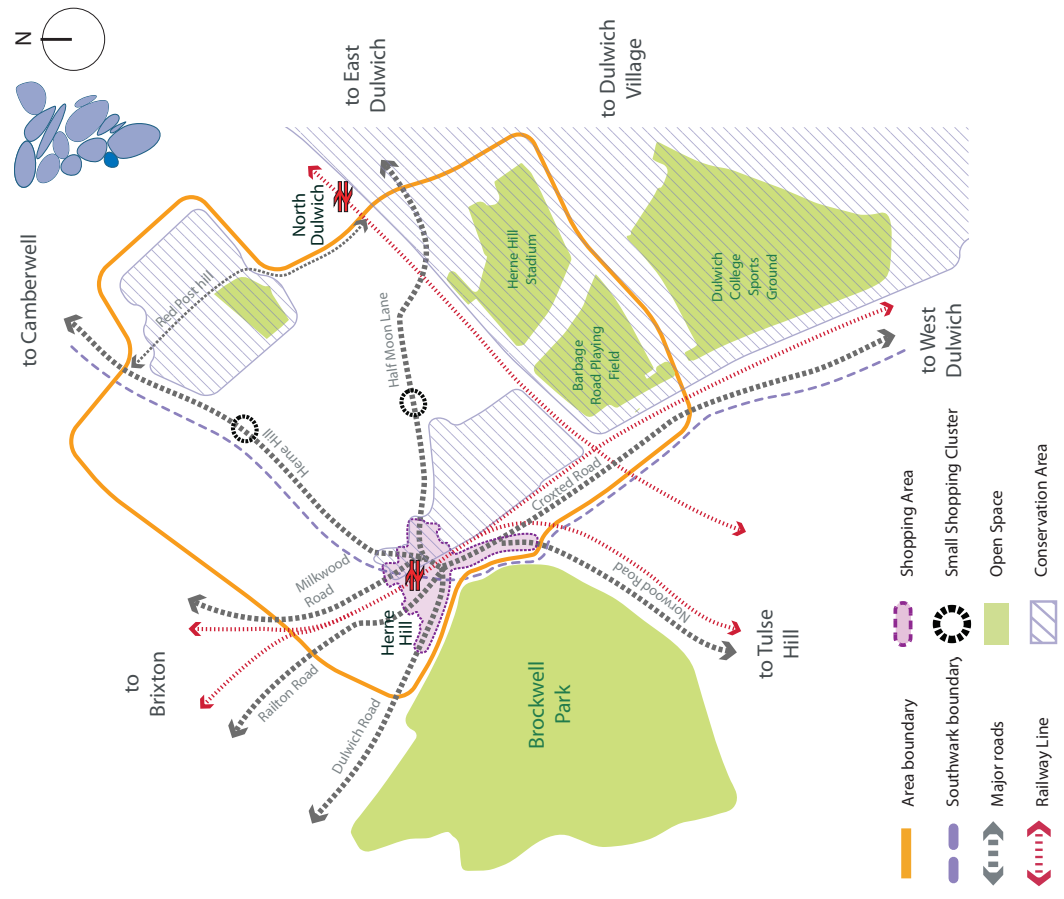
4.65 We are focusing on improving current businesses rather than retail growth. This may change in the future if resources become available to develop Camberwell action area. We will prepare an area supplementary planning document providing as many homes as possible, improving current businesses to create a more successful place that could have more leisure, arts and culture, sports and health centres. Whilst the Mayor does not set out targets for Camberwell, we will set targets for homes, employment and retail in an area supplementary planning document.

Herne Hill

Vision

4.66 We are working with the local community to further improve Herne Hill as a pleasant district town centre providing a range of independent shops, bars, restaurants and other services that support the surrounding residents. Evening and night-time uses will be controlled to keep a good balance of uses and protect the amenity of residential areas.

Figure 19: Herne Hill



4.67 There are a few small development opportunities that need to respect the conservation area protection. The railway arches will continue to be well used and we will work with Network Rail to offer the opportunity for businesses or other activities that add to the vibrancy to the town centre.

4.68 Street and road junction improvements in the town centre will provide a more pleasant and safer environment for residents and shoppers. This will include improvements to Norwood Road, Dulwich Road and Half Moon Lane junction, closing Railton Road off to traffic, and parade regeneration along Norwood Road and Half Moon Lane.

4.69 We are working with Lambeth council to make sure we have a joined up approach to future development and improvements to Herne Hill.

4.70 We are focusing on further improving Herne Hill with local shops and services for the surrounding residents and businesses. As there are few development sites in Herne Hill there is little capacity for growth. However, the Dulwich supplementary planning document will set out guidance on how to further improve Herne Hill. The Mayor does not set us targets for Herne Hill.





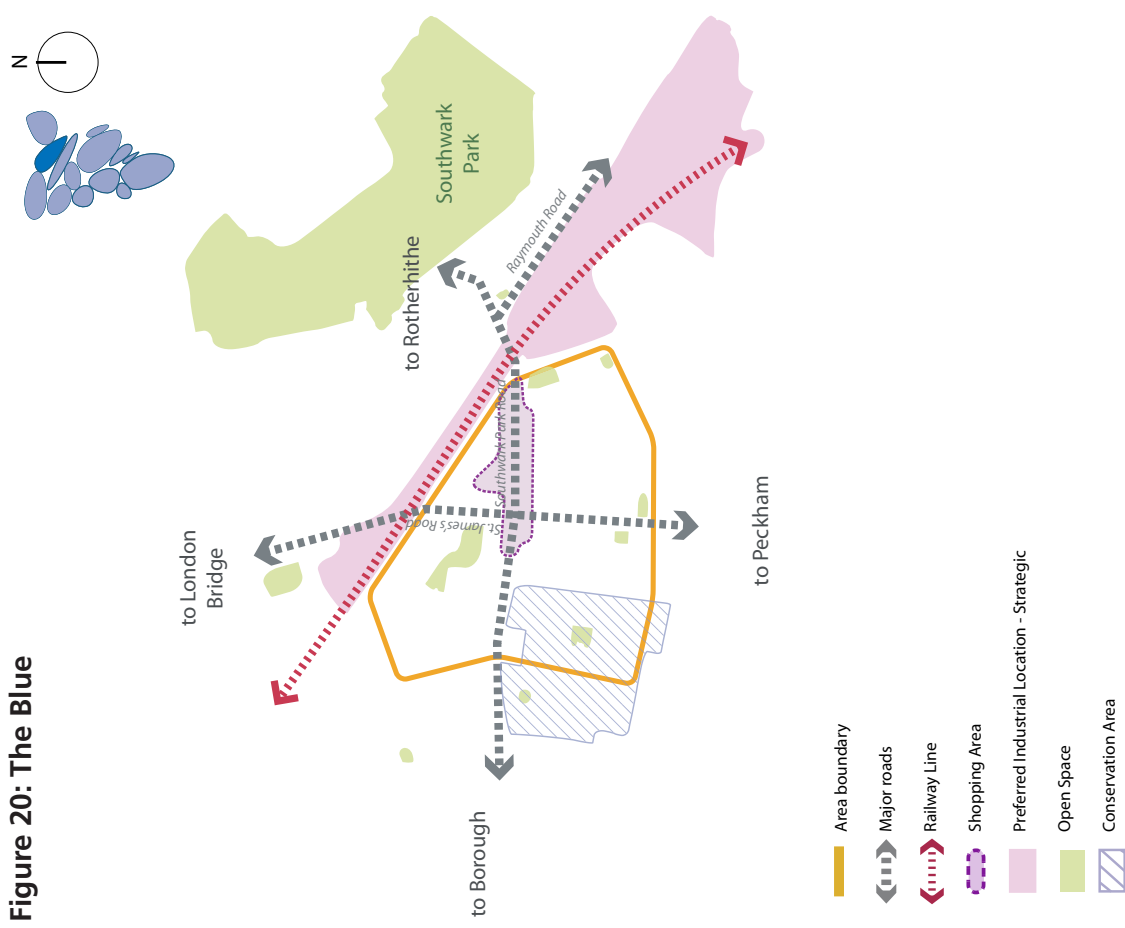
The Blue

Vision

4.71 The Blue has a market place and is a busy local shopping area along Southwark Park Road. However, there are high number of vacant units and a lack of variety on offer in shops. We own many of the shopping units and we will review the contribution they could make towards revitalising the Blue. Working with the local community, we will be preparing a strategy to improve the quality of the shops and services for local people to encourage them to use the Blue. This will include limiting take aways and encouraging shops that provide local goods and cafes to add vitality. We need to find niche shops that will build up momentum for rejuvenating the area and that will encourage other mainstream local shops and services to start up. We will be improving the quality of the environment and links into and around the area to encourage people to walk through and use the area. The increase in the numbers of homes at Bermondsey Spa as a result of the regeneration project which is nearing completion and the increase in the numbers of homes in other areas around the Blue will increase the number of potential shoppers to the area.

4.72 The Mayor does not set us targets for the Blue. We are not preparing planning guidance for this area and there is no planned large scale growth.

Figure 20: The Blue

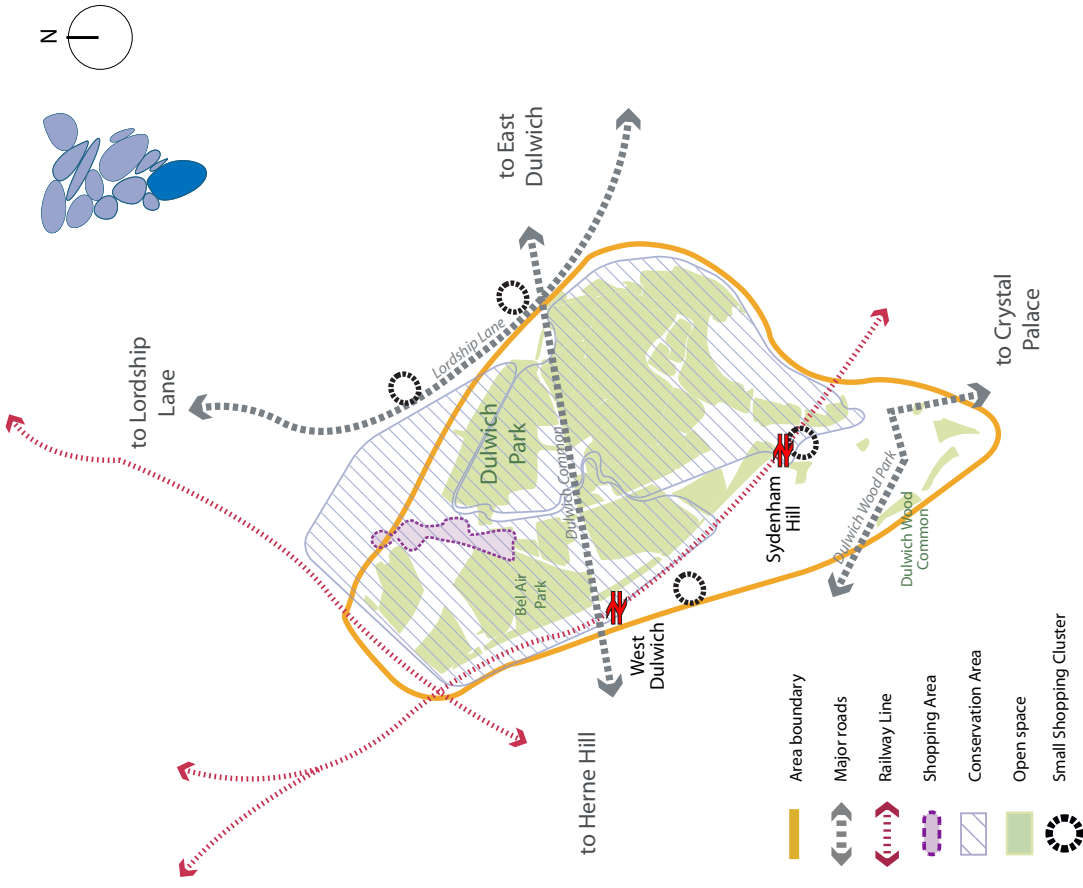


Dulwich Village/West Dulwich

Vision

- 4.73 We are working with the local community and organisations such as the Dulwich Estate and the Dulwich Society to continue to protect Dulwich Village/West Dulwich. Dulwich Village/West Dulwich is a suburban area with many playing fields, parks, tree lined roads and large gardens. There are shops and services for the local community within an historic shopping street.
- 4.74 We will continue to protect Dulwich Village/West Dulwich as a historic area with a good range of local shops and services, open spaces and homes. Evening and night-time uses will be controlled to keep a good balance of uses and protect the amenity of residential areas. There are two conservation areas: Dulwich Village and Dulwich Woods. Dulwich Village conservation area is mainly housing with the village itself at its heart. Dulwich Wood is mostly open space (including parkland, playing fields, allotments and a golf course) surrounded by housing. We will continue to protect the character of these areas and the historic buildings within them. This includes attractive and well used landmark buildings such as Dulwich College and Dulwich Picture Gallery and large open spaces such as Dulwich Park.
- 4.75 The Mayor does not set us targets for Dulwich Village/West Dulwich. We are conserving Dulwich Village/West Dulwich and there is no capacity for large scale growth. We are producing a supplementary planning document to provide further guidance on how we will protect Dulwich Village/West Dulwich.

Figure 21: Dulwich Village/West Dulwich





East Dulwich

Vision

4.76 We are working with the local community to further improve East Dulwich as a pleasant and popular place to live. The area is mostly residential with lots of Victorian terraced housing. Local residents have good access to local shops along Northcross Road and Grove Vale and a wider variety of shops on Lordship Lane. There is plenty of access to surrounding attractive open spaces including Goose Green, Dulwich Park and Peckham Rye Common. East Dulwich Station provides train services to London Bridge which are well used by the many East Dulwich residents. Current improvements to Dulwich Leisure Centre will improve the facility for local residents.

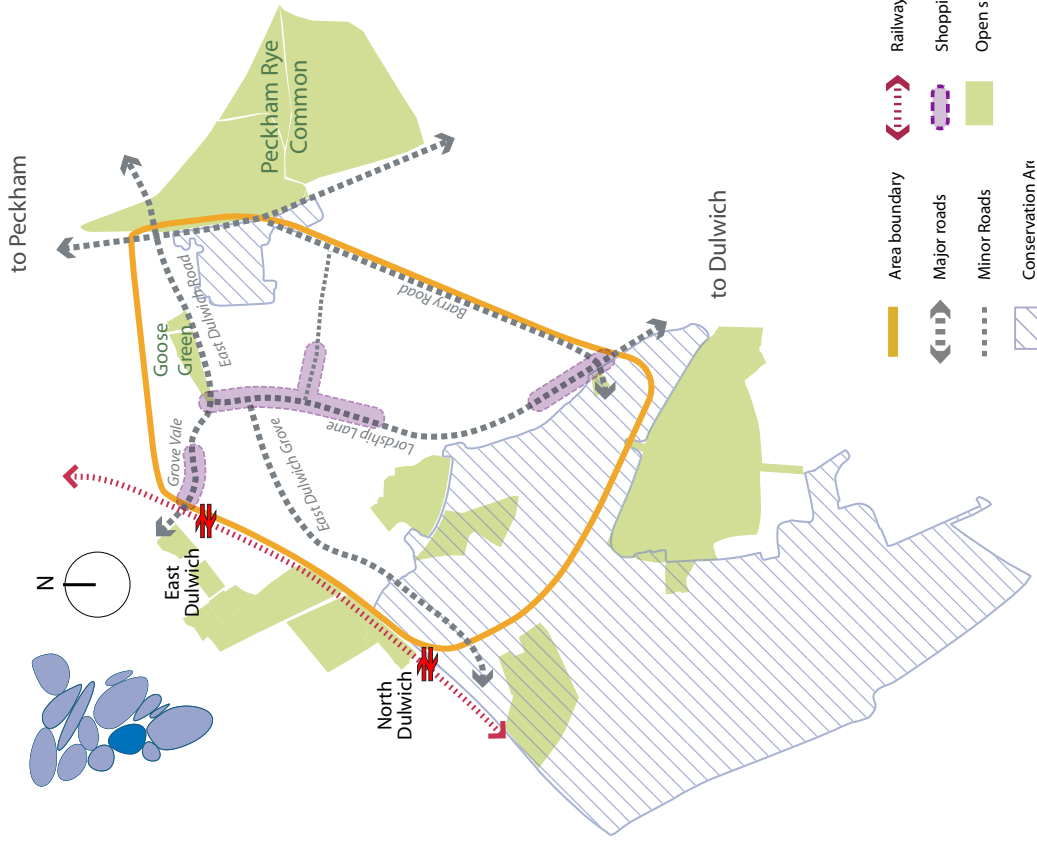
4.77 The mayor does not set us targets for East Dulwich. There will be very little growth, with the focus on improving what is already there and protecting its suburban character. The Dulwich supplementary planning document will set out guidance on how to further improve East Dulwich.

Lordship Lane town centre

Vision

4.78 Lordship Lane is an area with a variety of shops, cafes and bars providing amenities for local residents. There are many independent operators and a diverse range of shops which all help to make Lordship Lane a very attractive place to visit and shop. We will continue to protect the interesting character of this popular street created by the specialist businesses, cafes

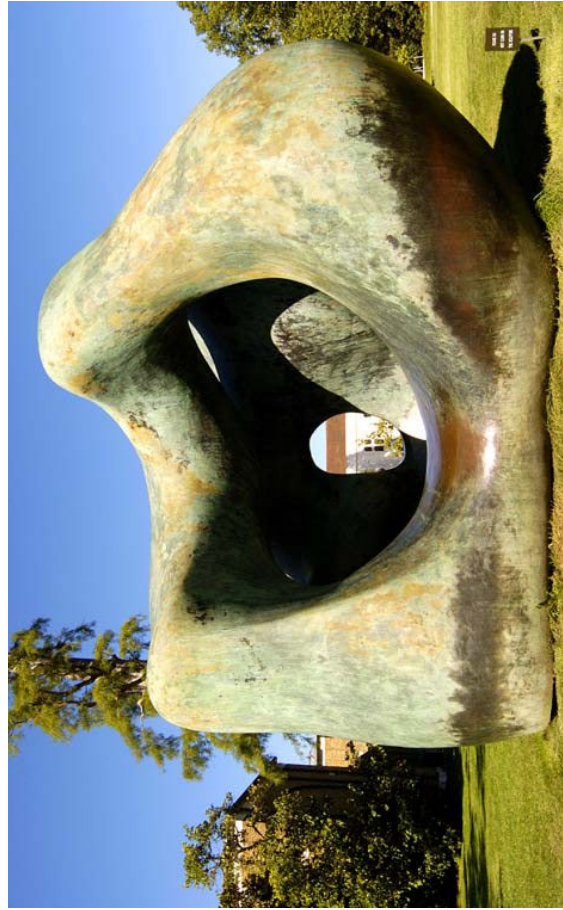
Figure 22: East Dulwich and Lordship Lane





and attractive shop fronts by working with the local community, businesses and groups.

4.79 The Mayor does not set us targets for Lordship Lane. We are conserving the area and there is no capacity for large scale growth. The Dulwich supplementary planning document will provide further guidance on how we will protect Lordship Lane.





Section 5: The Policies

5.1 The core strategy policies set out our strategic approach to development. They will deliver our strategic vision, themes and objectives set out in section 3 which are based on the Sustainable Community Strategy (Southwark 2016). They will be used to make decisions on planning applications together with the London Plan, saved Southwark Plan policies and policies in our other development plan documents. The way we will implement each policy is set out in section 6 and our monitoring arrangements are set out in section 7.

Strategic Policy 1 – Sustainable development

How we will achieve our vision to improve our places

- SO 1A: *Create employment and link local people to jobs*
- SO 1B: *Achieve educational potential*
- SO 1C: *Be healthy and active*
- SO 1D: *Culture, creativity and diversity*
- SO 1E: *Be safe*
- SO 2A: *Create mixed communities*
- SO 2B: *Promote sustainable use of resources*
- SO 2C: *Provide more and better homes*
- SO 2D: *Create a vibrant economy*
- SO 2E: *A liveable public realm*
- SO 2F: *Conserve and protect historic and natural places*
- SO 3A: *Accessible, customer focused, efficient and modern public services*
- SO 4A: *Provide enough funding for regeneration to positively transform the image of Southwark*
- SO 4B: *Making sure we consult effectively*
- SO 5A: *Developing in growth area*

Our approach is

Development will improve the places we live and work in and enable a better quality of life for Southwark's diverse population. It will help meet the needs of a growing population in a way that respects the limits of the planet's resources and protects the environment.

We will do this by

1. Allowing more intense development for a mix of uses in the growth areas and making sure development makes the most of a site's potential and protects open space.
2. Regenerating areas like Aylesbury, Elephant and Castle, Peckham, Camberwell, Old Kent Road, and Canada Water.
3. Testing the impact of our development plan documents by carrying out sustainability appraisals and equalities impacts assessments and consulting on them widely.
4. Requiring a sustainability assessment with applications to show how a scheme is the best possible development for a place by balancing economic, social and environmental needs. This includes taking into account the needs of all the community, including people of different ages, genders, faith, ethnicity, sexual orientation, income and disability.



We are doing this because

5.2 We want Southwark to be a sustainable place where people want to live. Southwark has a very diverse population with lots of different needs. Our population is growing and there is pressure on the limited amount of land we have to provide the homes, business space and community facilities that places need. We need the right balance between different land uses. Development also places pressure on the environment and the resources current and future generations rely on for a good quality of life. We need to make sure that we do not use more resources than we have or faster than they can be replaced as this will mean future generations will have a lower quality of life. It will also damage the environment.

5.3 To achieve this we need to make sure that our planning policies encourage the most sustainable development possible. We do this by requiring a sustainability appraisal and an equalities impact assessment as part of the process for preparing all our development plan documents. The sustainability appraisal looks at the social, environmental and economic impacts of the policies, whilst the equalities impact assessment makes sure that the needs of all the community are met and that it does not disadvantage any of our equalities target groups. We consult widely on both these documents as part of the consultation on our development plan documents, as set out in our Statement of Community Involvement. This approach is in line with London Plan Policy 2A.1 Sustainable Development, which states that we should promote, support and encourage the development of London in ways that secure social, environmental and economic objectives.

5.4 We also need to make sure that the most beneficial approach is put forward for each proposal. This should make sure that new development contributes to sustainable development rather than building for building's sake. To do this a wide range of factors needs to be considered as part of the sustainability appraisal of planning proposals. These will include considering the needs of the community in which the development occurs. Factors include, helping people into jobs, providing local services, and protecting the character of areas, as well as how the development helps achieve objectives that are important to all of Southwark and even the world, such as climate change, population growth and managing waste. Involving local people early on in the design process will be very important in achieving this. This requires weighing up the environmental, economic and social impacts of the development to make sure it helps create places that are fairer both for the community and the environment.

5.5 We are saving policy 3.3 in the Southwark Plan which sets out how we will implement the requirement for a sustainability assessment. We will review this through the Development Management development plan document.



Strategic Policy 2 – Sustainable transport

How we will achieve our vision to improve our places:

- SO 1C: *Be healthy and active*
- SO 2A: *Create mixed communities*
- SO 2B: *Promote sustainable use of resources*
- SO 2E: *A liveable public realm*
- SO 5A: *Developing in growth areas*

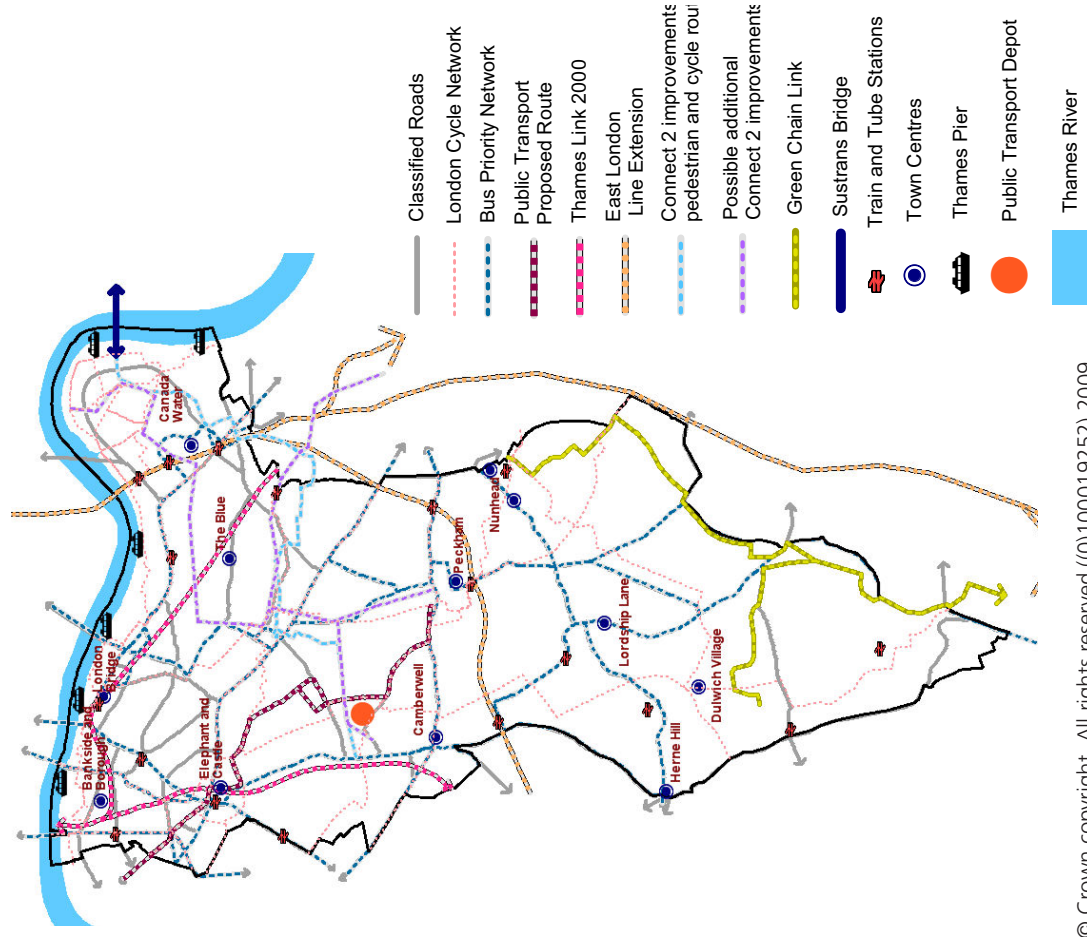
Our approach is

We will encourage walking, cycling and the use of public transport rather than travel by car. This will help create safe, attractive, vibrant and healthy places for people to live and work by reducing congestion, traffic and pollution.

We will do this by

1. Planning places and development with priority for walking and cycling, whilst maximising the use of public transport and minimising car use.
2. Directing large developments to areas that are very accessible by walking, cycling and public transport.
3. Safeguarding land for planned public transport improvements and where the need arises in the future.
4. Improving access to mixed use town and local centres.
5. Encouraging use of the River Thames for transport and improving links between Southwark and north of the river.
6. Requiring a transport assessment with applications to show that schemes minimise their impacts, minimise car parking and maximise cycle parking to provide as many sustainable transport options as possible.

Figure 23: How this will look



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We are doing this because

5.6 The way that people get to places for work, living, shopping and other activities has a huge impact on their quality of life. High levels of traffic can cause congestion, pollution and impact on the pleasantness of places and the success of town centres.

5.7 We need to cater for the travel needs of residents, local businesses and the increasing number of visitors to the borough and address the overdependence on the car. We will also need to provide improved access for the mobility impaired and those who are less mobile.

5.8 Transport for London has predicted an overall growth in travel, both within Southwark and from the south east. Our policies reduce the need to travel and use cars whilst increasing accessibility and safety for those walking, cycling and using public transport. This was identified in the sustainability appraisal as an important issue and is in line with London Plan policy 3C.3 Sustainable Transport. This dual approach is self-perpetuating. More people walking and cycling and fewer people using private cars reduces traffic, making roads and places more pleasant so encouraging more people to walk or cycle and so on.

5.9 52% of Southwark households do not have access to a car, which is similar to the inner London average but considerably higher than the greater London average of 38%. Despite this, the number of cars in Southwark has been steadily increasing, from 38,029 vehicles in 1981 to 62,733 vehicles in 2001. The 2001 London Area Transport Study (LATS) indicates that up to 29% of all journeys in Southwark were carried out by private car, 35% were carried out by public transport and 36% by non

motorised means. Around a quarter of the private car trips are short journeys suitable for walking or cycling.

5.10 Travel to work has a major impact on traffic and transport capacity. According to the 2001 Census, 77% of Southwark's actively employed residents commute to work by means other than a private motor vehicle, including 16% that either walk or cycle.

5.11 We need to ensure that all of our large developments that generate lots of travel are in our town centres and growth areas which are more accessible and where people can satisfy a range of needs with fewer trips. This will make our town centres and growth areas more vibrant and reduce the need to travel by car. Improving accessibility and locating large development in town centres and growth areas will also have the benefit of helping people have more job opportunities and a safer and more pleasant environment.

5.12 Improving opportunities for cycling and walking will help improve people's quality of life and improve the health of our population by making it easier, safer and more enjoyable to walk and cycle. Encouraging active travel and reducing traffic levels and speeds will have positive health impacts for improved air quality, safer roads and encouraging physical activity and successful communities Our Local Implementation Plan (2006) sets targets for walking and cycling. The cycling targets are based on the London Cycling Action Plan targets and include achieving an 80% increase in cycling levels between 2000 and 2010 and a 200% increase between 2000 and 2020. The walking targets





Fact box: What is sustainable transport?

Sustainable transport includes modes of transport that have a minimal impact on the environment, this includes walking, cycling and public transport and in some circumstances car clubs and car sharing. These modes of transport are less damaging to the environment and contribute less to traffic congestion.

include increasing the number of journeys made by foot by 15% between 2001 and 2015.

5.13 Many cycling and walking improvement schemes have already been successfully developed in the borough and we have plans for many more schemes in the future. Our improvement schemes include the Jubilee Walk and the Jubilee Greenway which connects all of London's 2012 Olympic and Paralympics Games venues and links to the Thames Path to improve people's access to and within the borough. More projects are planned for the future such as Connect2 South Bermondsey which will create a largely traffic-free connection between Southwark and Lewisham by making use of a disused rail bridge and former tracks. We will work with local communities in both boroughs to bring this project forward.

5.14 Most of the Central Activities Zone and the north of Southwark have very good public transport by tube, train and bus. This contrasts with the rest of the borough where there is no tube, including the Aylesbury area, south Bermondsey, north Peckham and the south. The Old Kent Road and Walworth Road are very accessible by bus, however access from within Aylesbury could be improved. The Aylesbury area action plan sets out an improved bus service to provide for the increase in residents. Transport

access in North Peckham will be considered through the area action plan.

- 5.15 The majority of Southwark is well served by the London Bus Priority Network. The network is particularly extensive in the northern half of the borough where there are approximately 50 high frequency and 12 low frequency bus services.
- 5.16 The south of Southwark is serviced by a number of rail stations. However away from the stations transport accessibility is poor and there is more reliance on the car and cycling.
- 5.17 Throughout the borough, accessibility to transport services can also be poor for the mobility impaired.
- 5.18 It is important that we increase the capacity, quality and integration of public transport as a co-ordinated network. This includes saving land for important new public transport improvements and protecting these in the future in line with Policy 3C.4 Land for transport functions of the London Plan and the Mayor's Land for Transport Supplementary Planning Guidance.

- 5.19 Our support of public transport improvements is important for current residents and businesses and also to ensure that provision is made for new development. There are a number of transport schemes that could improve Southwark:
 - We would like the Cross River Tram to come to Southwark. We would like to provide a corridor where public transport improvements are needed running from the Elephant and Castle through the Aylesbury area and north Peckham. We will work





with Transport for London to bring the Cross River Tram or an alternative providing public transport for Southwark linking the area with Waterloo, the West End, Kings Cross and Camden. We will consider the need for safeguarding land for any such project in the Peckham and Nunhead Area Action Plan.

- The Thameslink Programme is a massive rail investment programme which will provide many more journey options for passengers travelling through or to London from the North and South.
- Blackfriars station is being rebuilt to span the River Thames with a new entrance on the south bank.
- The East London line phase 2 extension will be part of the new London Overground network and this extension will connect services between Surrey Quays and Clapham Junction.

5.20 Our ambition is that the Bakerloo Line will be extended to considerably improve accessibility in Camberwell and Peckham. We will support any forthcoming proposals by making appropriate land available when required. Southwark will continue to seek additional improvements to accessibility in these areas such as the proposed new station on the Thameslink line at Camberwell.

5.21 Being on the River Thames, river crossings and piers are important to Southwark. There are road crossings at Blackfriars Bridge, Southwark Bridge, London Bridge, Tower Bridge and the Rotherhithe Tunnel. There are two rail bridges serving Blackfriars and Cannon Street stations, three tube tunnels (including the Brunel Tunnel) and the Millennium Bridge footbridge. There are no bridges linking Rotherhithe to Canary Wharf although there is



Fact box: Public transport accessibility levels (PTALs)

These are a method of assessment utilised by TfL and Southwark to show levels of accessibility to the public transport network. Generally car use reduces as access to public transport, as measured by PTALs, increases. The coverage and accessibility of public transport varies significantly across Southwark. We have responded to this in setting our parking policies.

a proposal by Sustrans for a walking/cycling bridge. We also have the opportunity to encourage freight transport along the river as well as increase the use of the river for transport in general. However this must be balanced with possible environmental and amenity impacts on the River and riverfront areas.

5.22 A number of major roads pass through Southwark. These provide important access to destinations across the country but also result in large volumes of traffic passing through the borough. The Mayor's congestion charging scheme (CCS) has made a significant difference to the pattern of flows within the zone although generally, volumes around the edge of the zone on the inner ring road have remained relatively unchanged. Traffic volumes on many of the roads in the south of the borough are high especially along the A202 (comprised of Camberwell New Road, Peckham Road, Peckham High Street and Queens Road); Walworth Road; Camberwell Road; Denmark Hill; and Dulwich Common. This causes problems for air quality, road safety and impacts on our neighbourhood areas. It is important that the

existing road network is properly maintained and improved to ensure that these roads allow vehicles to pass through Southwark with minimum delay and keep congestion and pollution as low as possible.

5.23 By requiring transport assessments in line with Policy 3C.2 'matching development to transport capacity' of the London Plan we will be able to make sure the new development encourages sustainable transport and minimises the impact of the journeys it generates as much as possible. This was identified in the sustainability appraisal as an important issue and includes improving walking routes, providing cycling parking, encouraging river use, making sure developments are accessible by public transport and providing car clubs. We will also make sure servicing is in place for businesses as well as adequate car parking is provided in town centres based on public transport accessibility.

5.24 We are working with the government, Transport for London, Network Rail, neighbouring authorities, local communities, developers, transport operators and London River Services to create attractive places and encourage sustainable transport. By working with these organisations and requiring financial contributions (planning obligations/section 106) we will make sure there is enough funding to bring forward sustainable transport improvements alongside the growth in the borough.



2011 Sellar Group



Strategic Policy 3 – Shopping, leisure and entertainment

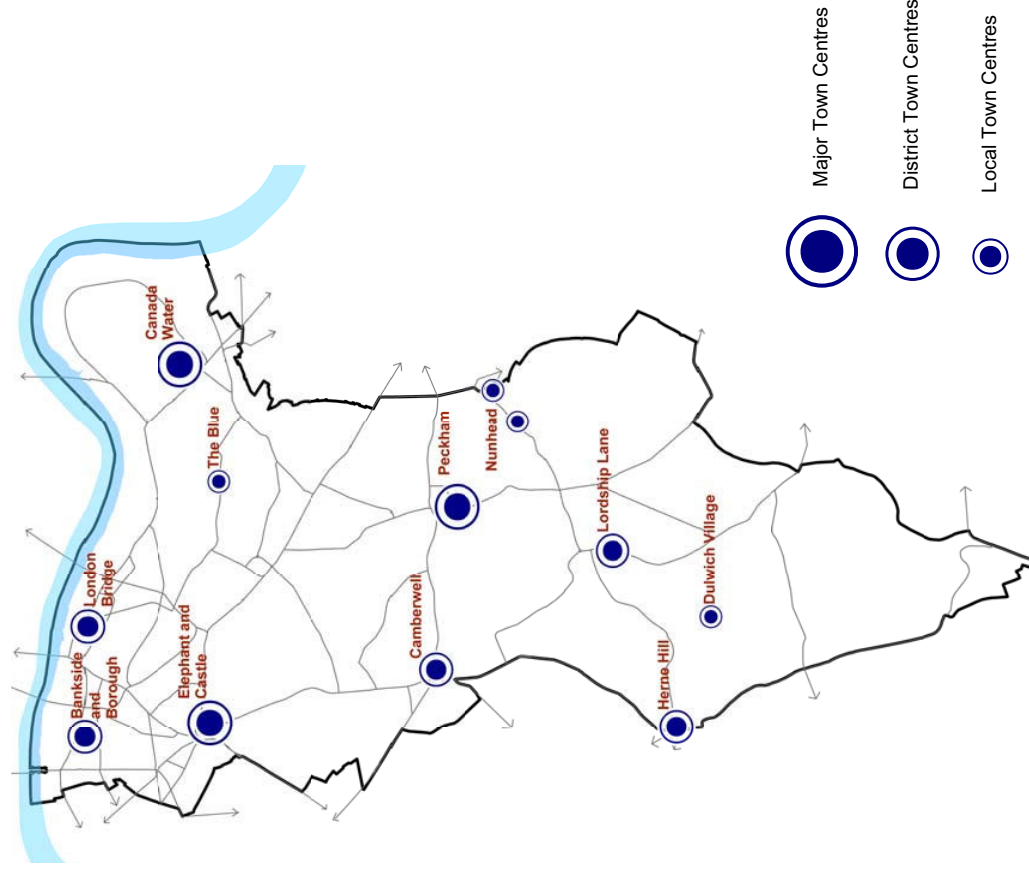
How we will achieve our vision to improve our places

- SO 1A: Create employment and link local people to jobs
- SO 1C: Be healthy and active
- SO 1D: Culture, creativity and diversity
- SO 2A: Create mixed communities
- SO 2D: Create a vibrant economy
- SO 2F: Conserve and protect historic and natural places
- SO 3A: Accessible, customer focused, efficient and modern public services

Our approach is

We will maintain a network of successful town centres which have a wide range of shops, services and facilities, to help meet the needs of Southwark's population. Our centres will be well used because they are vibrant, easy to get to, friendly and safe.

Figure 24: How this will look



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We will do this by

- 1. Defining a hierarchy of town and local centres which reflect their sizes and roles. We will direct large leisure and retail developments to town and local centres. The approach to our centres will be as follows:

Elephant and Castle/Walworth Road

Major town centre
Existing retail floorspace: 69,000 sqm

We will enable the provision of around 45,000 sqm of additional shopping and leisure space at Elephant and Castle/Walworth Road, focusing on provision of new non-food shopping and strengthening its role as a major town centre.

Peckham

Major town centre
Existing retail floorspace: 75,000 sqm

Through the Peckham area action plan, we will support some increase in shopping and leisure space to help improve the quality and mix of retail and leisure facilities.

Canada Water

Major town centre
Existing retail floorspace: 45,000 sqm

Through the Canada Water area action plan, we will enable the provision of around 35,000sqm of additional shopping

space and increased leisure space at Canada Water to create a range of retail opportunities and improve choice, particularly for non-food shopping. Canada Water will become a major town centre.

London Bridge

District town centre
Existing retail floorspace: 45,000 sqm

We will support the provision of new shopping space in Bankside, Borough and London Bridge. This should include both food and non-food space and aim to meet the needs of local residents, as well as visitors and businesses

Bankside and Borough

District town centre
Existing retail floorspace: 17,000 sqm

We will support the provision of new shopping space in Bankside, Borough and London Bridge. This should include both food and non-food space and aim to meet the needs of local residents, as well as visitors and businesses.

Camberwell

District town centre
Existing retail floorspace: 29,000 sqm

Lordship Lane

District town centre
Existing retail floorspace: 21,000 sqm



Herne Hill

District town centre

The Blue

Local centre

Dulwich Village

Local centre

Nunhead

Local centre

2. Applying the tests set out in national planning policy and the London Plan to assess developments of new shopping and leisure space which are proposed outside town and local centres.
3. Protecting and enhancing our centres by ensuring that the scale of new development is appropriate to their role and character, that a balance of different uses, including shops, bars, restaurants and cafes is maintained, and that we support the provision of markets.
4. Protecting small scale retail facilities ('A' class uses) outside town and local centres to help meet day-to-day needs.

Fact box: Town and centre hierarchy

Southwark has a variety of centres which have different levels of importance and which provide different ranges of services. We have arranged the centres into a hierarchy which is based on the number and types of shops in the centre, and the distances people will travel to visit them.

Major Town Centres:

These are important shopping and service centres. They have a mixture of different types of shops, and usually some leisure and entertainment facilities. Generally they serve people from across the borough and possibly outside the borough, and usually have over 50,000 sqm of retail floorspace.

District Town Centres:

These provide shops and services for more local communities. They can contain groups of shops with at least one supermarket and a range of non retail services such as banks, building societies and restaurants. They usually also include local public facilities such as a library.

Local Centres:

These provide shops for the local community and cover a smaller catchment area than district centres. They usually include small shops such as a small supermarket, newsagent, post office, laundrette and pharmacy.



We are doing this because

5.25 Town centre activities, including shops, leisure and entertainment facilities can have a big impact on the environment due to the numbers of people who may visit. It is important these activities are located in places which are easily accessible by sustainable types of transport, including walking, cycling and public transport as this helps reduce the need to use cars.

5.26 We have arranged our town and local centres into a hierarchy to signal their importance and the role they play. Generally larger centres are more accessible and have a wider catchment and are appropriate locations for large developments that will attract a lot of people. In contrast the local centres have a smaller catchment and are more suited to meeting the day-today needs of surrounding residents.

5.27 Our 2009 Retail Study provides an assessment of the existing shopping provision within the centres around the borough, and the scope to improve shopping functions. It suggests that although Southwark residents generally do their food shopping in the borough, most people do not shop for things like clothes, shoes, music and books (comparison goods) in Southwark.

5.28 Over the coming years, increases in population and also disposable income will increase the available shopping expenditure. The 2009 Retail Study suggests that we can expand retail floorspace, particularly for comparison goods, without harming the vitality of centres outside the borough.

5.29 Our strategy is to improve the choice available in our centres, particularly at Elephant and Castle/Walworth Road, Canada Water and Peckham which have the most capacity for growth. As well as improving choice, this should reduce the number of trips made to places further away outside the borough and also boost the local economy.

5.30 New and improved shopping and leisure floorspace at Elephant and Castle and Walworth Road will be provided to create a new mixed use environment which serves the growing population as well as the surrounding catchment.

5.31 Peckham currently has a diverse range of shops and services, but with an emphasis on convenience shopping (i.e. day to day requirements). There is scope to improve the comparison goods shopping function of the town centre.

5.32 There is scope to provide additional shopping floorspace at Canada Water which can help drive the regeneration of the town centre. Through the area action plan, our aim is to improve choice at Canada Water, transforming it from an out-of-town style destination to a genuine town centre and reinforcing its role in the shopping hierarchy.

5.33 Bankside, Borough and London Bridge currently performs the role of a leisure, retail and specialist food shopping destination, which mainly serves the visitor and business population. With growth in businesses and homes in the area, the retail capacity will continue to grow. It has been noted that the area lacks a supermarket and in the future there should be more emphasis on meeting the needs of local residents.





5.34 Camberwell, Herne Hill and Lordship Lane have been identified as vibrant, busy centres providing a range of independent shops. There is limited capacity to provide a significant amount of additional shopping and leisure floorspace in these centres.

5.35 Within the local centres there is limited scope to increase the amount of shopping space, and instead our focus will be on maintaining and improving the existing shopping offer. We will be preparing a strategy for the Blue to help revitalise shopping activity in the centre.

5.36 Markets have an important role in providing choice for local people. Markets can help enliven town centres and add vitality to an area, by helping to provide a more varied shopping experience. They have the added benefit of giving more people access to fresh fruit and vegetables and also create a route into setting up small businesses. We have recently carried out a review of markets in Southwark. This study emphasised the importance of maintaining our strong tradition of markets in the borough.

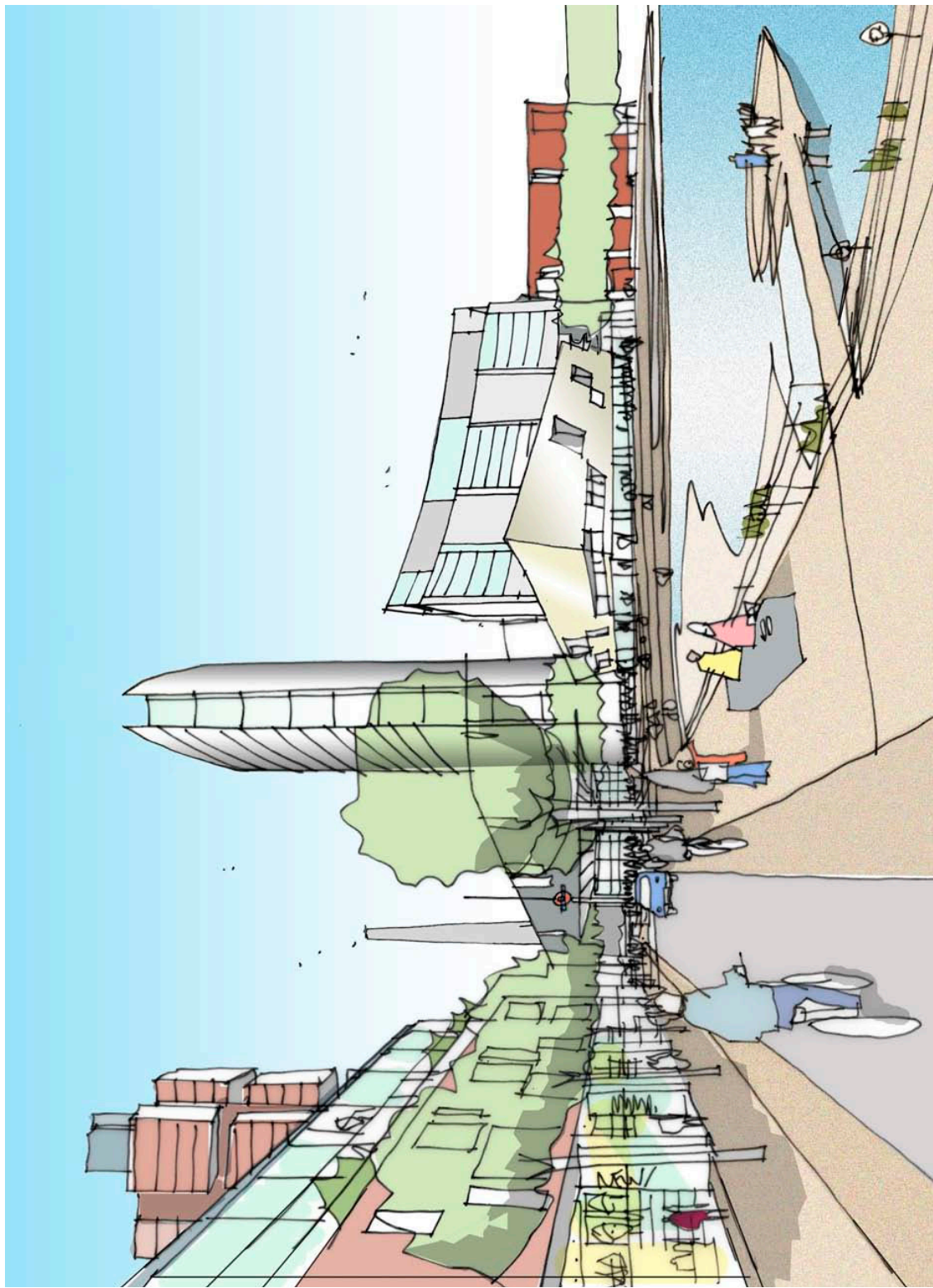
5.37 Encouraging a mix of compatible uses in the centres will also provide a stronger economic environment and will help stimulate a greater diversity of entertainment and evening activities. Restaurants, bars and cafes add to the vitality and life of town centres but can also have negative impacts on the community such as noise until late at night. We have licensing saturation policies in some areas of the borough so we need to make sure our decisions about bars, cafes and restaurants are linked in with these.

5.38 Too many hot food takeaways in centres can restrict opportunities for residents, workers and visitors to access healthy, fresh food. We will prepare detailed policies to manage the mix of restaurants, bars, cafes and hot food takeaways in the development management DPD and area action plans.

5.39 Small retail facilities located outside of the town and local centres will continue to be protected. These facilities provide a valuable resource to neighbourhoods in the borough, and reduce the need to travel.

5.40 Across our centres we are working with the local communities, and key partners including the business improvement districts (BIDs) at Bankside and London Bridge and key landowners at Elephant and Castle and Canada Water to bring forward development which is consistent with the strategy set out here.







Strategic Policy 4 – Places for learning, enjoyment and healthy lifestyles

How we will achieve our vision to improve our places

- SO 1B: *Achieve educational potential*
- SO 1C: *Be healthy and active*
- SO 1D: *Culture, creativity and diversity*
- SO 1E: *Be Safe*
- SO 2A: *Create mixed communities*
- SO 3A: *Accessible, customer focused, efficient and modern public services*

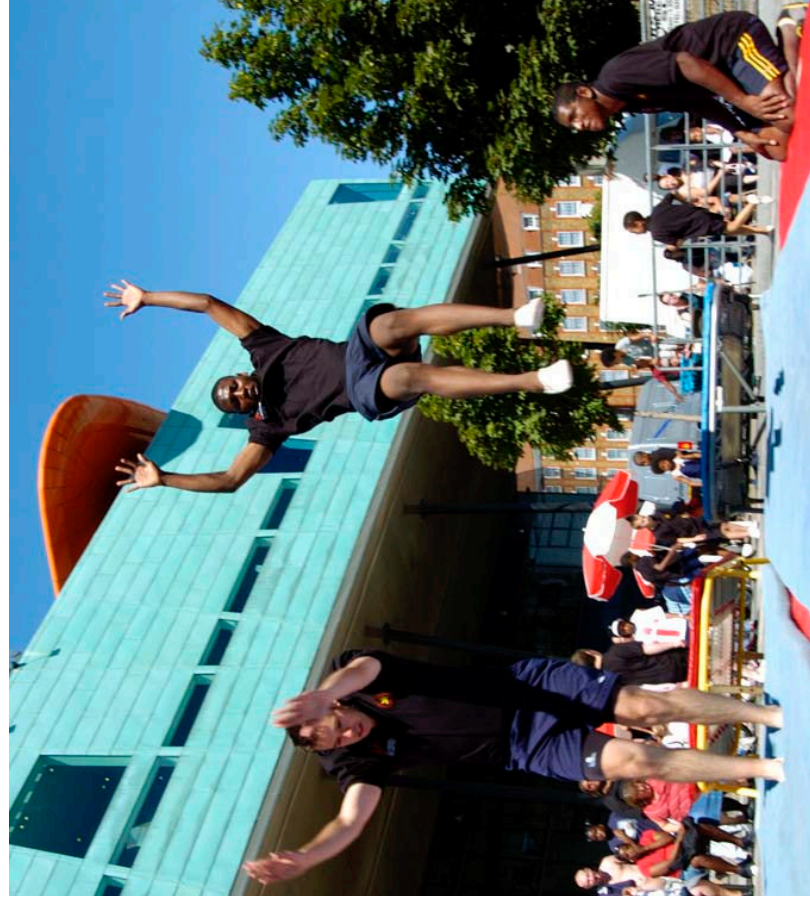
Our approach is

There will be a wide range of well used community facilities that provide spaces for many different communities and activities in accessible areas. Development will help create safe, healthy and mixed communities.

We will do this by

1. Facilitating a network of community facilities that meet the needs of local communities.
2. Ensuring development provides flexible community spaces that can be shared by many groups, where there is a local need and an identified occupier for the space.
3. Protecting schools where there is a long-term local need.
4. Building new schools and improving existing schools to provide improved education opportunities.
5. Ensuring development provides for new school places to increase the provision of education.

6. Supporting the retention and improvement of facilities which encourage physical activity and ensuring that development promotes healthy lifestyles and addresses negative impacts on physical and mental health.
7. Ensuring development provides for increases in local health facilities in partnership with NHS Southwark.





We are doing this because

- 5.41 We need to make sure everyone has access to community facilities that meet their needs, including good quality schools, health facilities and community centres.
- 5.42 Community facilities are a very important resource to provide places for activities. It is essential that they are planned carefully to make sure that when they are built local users can afford to manage them otherwise they can be left empty. Community facilities must have a management plan setting out who the identified users are and how they will use the community facility, ensuring that it is accessible for local groups.

5.43 We are already investing a lot of money to improve existing community facilities and open new facilities. We are investing £12.3 million in the council's leisure centres, with work on Dulwich Leisure Centre, Camberwell Leisure Centre and Surrey Docks Water Sports Centre already under way. We are investing in our libraries, including John Harvard library which has recently undergone huge refurbishment, and a new state of the art library at Canada Water to add to our portfolio of 13 libraries, including the award winning Peckham library.

5.44 We will continue to develop our network of community facilities to make sure everyone has access to the facilities they need. This includes looking at wider community facilities such as libraries, sports centres, community halls, court facilities, places of worship and children's play areas as required by London Plan Policy 3A.18. We will identify sites within our major regeneration projects for new community facilities. We are working with the voluntary and community sector to provide for their needs for accessible and

affordable facilities through the Voluntary and Community Sector Asset Management Strategy. Southwark has a diverse population that brings challenges to providing community facilities. There are a wide range of needs across people of different ages, genders, faith, ethnicity, sexual orientation, income and disability that we need to consider. We will encourage flexible community space so that different groups can share the spaces to meet a wide range of needs. We will encourage better use of community facilities that are currently underused.

5.45 Providing for London's diverse faith communities needs to be addressed regionally. Within Southwark our approach is to encourage different community groups including those of different faiths to share facilities to make the most effective possible use of opportunities.

5.46 Education is very important for the future opportunities of children and young adults and is very important to address inequalities and unemployment. Our most recent figures from the 2009 School Census show that Southwark has approximately 36,000 pupils on roll, of which 85% are residents. There are 22,091 pupils in primary schools, 12,842 pupils in secondary schools, 463 in special schools, 103 in pupil referral units and 552 in nursery schools. We will ensure adequate provision of educational facilities by working with the local community and our local strategic partnership (Southwark Alliance) to improve our existing educational facilities and build new ones in line with London Plan Policy 3A.25 Higher and Further Education.



5.47 In May 2009 we signed a £200 million local education partnership agreement with our partner Balfour Beatty and national government's Building Schools for the Future Investments to form a new local education partnership company called 4 Futures. 4 Futures will deliver seven secondary school rebuilds, two brand new schools and four building refurbishments across Southwark and provide the services to support them. We will also rebuild 4 primary schools (Eveline Lowe, Michael Faraday, Southwark Park and Cherry Gardens).

5.48 We will continue to work together in the preparation of area planning policy documents to ensure the needs of the education sector are met in line with London Plan Policy 3A.25 Higher and Further Education. As well as building new schools it is also very important that we continue to increase the quality of our existing schools. As a council we have a commitment to ensure all parents have a choice of good schools. Southwark schools have never been more successful and are increasing in popularity. The unvalidated Key Stage 2 results for summer 2009 based on the percentage of pupils achieving the new benchmark of a level 4 in both English and mathematics places Southwark above the national average, and ahead of all similar inner London authorities, and Kent and East Sussex. Around two-thirds of our primary schools have been recognised by Ofsted as being good or outstanding, with this number approximately doubling over the last two years.

5.49 Our Extended Schools Programme encourages the use of school buildings for community activities outside of school hours to help meet the needs of local communities for facilities. This is in accordance with London Plan policy 3A.24 Education facilities.

Fact box: Community facilities

Community facilities are all those facilities used by the local community. These are:

- Buildings used by voluntary sector and community groups
- Libraries or public reading rooms
- Social service and day centres
- Places used for or in connection with public worship or religious instruction
- Medical or health services, and healthy living centres (except for the use of premises attached to the residence of the consultant or practitioner)
- Facilities for youth provision
- Sport, leisure and recreational facilities
- Arts and culture facilities
- Crèche, day nurseries or other childcare facilities
- Public halls and exhibition halls
- Law courts
- Facilities for the provision of education

The improvement to our schools will therefore benefit the wider community who will have access to the improved school outside of school hours.

5.50 Southwark experiences the typical social and health issues of an inner London borough. The Joint Strategic Needs Assessment for Southwark describes in detail health needs in the borough,



demography and deprivation. This assessment has informed the key health priorities in NHS Southwark's Commissioning Strategic Plan and the health and social care aspects of the Local Area Agreement. Different areas of Southwark experience very different levels of health deprivation, with the people living in the wards of East Walworth, Nunhead, Rotherhithe and South Bermondsey having the worst level of health. Through the policies in the core strategy and our other local planning documents we will work towards improving the health of our population and reduce health inequalities across the borough, in accordance with Policy 3A.20 Health objectives of the London Plan. Improving health is a cross-cutting theme through many of our policies, particularly core strategy policies 2 (transport), 7 (family housing) and 11 (open spaces). Improving and offering more public transport choices and improving opportunities for cycling and walking will have a direct impact on improving people's health. Having more family housing and larger room sizes will mean less overcrowding (which can have a direct negative impact on health) and more space for children to play. Protecting and encouraging more open spaces will give people places to play, walk, relax and be active and healthy.

5.51 Southwark's Primary Care Trust (PCT) is continuously improving and helping to improve health across the whole borough, and the 2006/2007 Health Care Commission Annual Health Check gave Southwark PCT a rating of 'good' for both service quality and use of resources. Only four other London PCTs achieved a similar rating. We work very closely with the PCT to improve health for everyone in the borough. This includes supporting the provision of new infrastructure to allow local health services

to grow and adapt to meet future population health needs, in accordance with London Plan Policy 3A.21 Locations for health care. The PCT's recent consultation document 'Transforming Southwark's NHS' sets out its strategy for transforming and improving health facilities. Through our area action plans and area supplementary planning documents, we will work together to identify areas for new health facilities to be built. We will also continue to support the expansion of our well-recognised national and international health facilities as required by London Plan Policy 3A.22 Medical excellence.

5.52 We will also continue to follow London Plan Policy 3A.23 Health impacts and require health impact assessments. This makes sure that major developments consider the impact of the development on health and also promote public health within the borough.

5.53 We will be building thousands more homes, and encouraging more businesses in Southwark over the next 15 years. This means more people living and working in the borough, and so an increased pressure on our community, health and educational facilities. We will make sure that the increased population has the facilities to support its growth by requiring major developments to pay financial contributions (section 106/planning obligations) for health, education and community facilities. This will make sure that we can continue to improve these facilities as our population grows.



Strategic Policy 5 – Providing new homes

How we will achieve our vision to improve our places

- SO 1C: *Be healthy and active*
- SO 1D: *Culture, creativity and diversity*
- SO 2A: *Create mixed communities*
- SO 2C: *Provide more and better homes*
- SO 2F: *Conserve and protect historic and natural places*
- SO 5A: *Developing in growth areas*

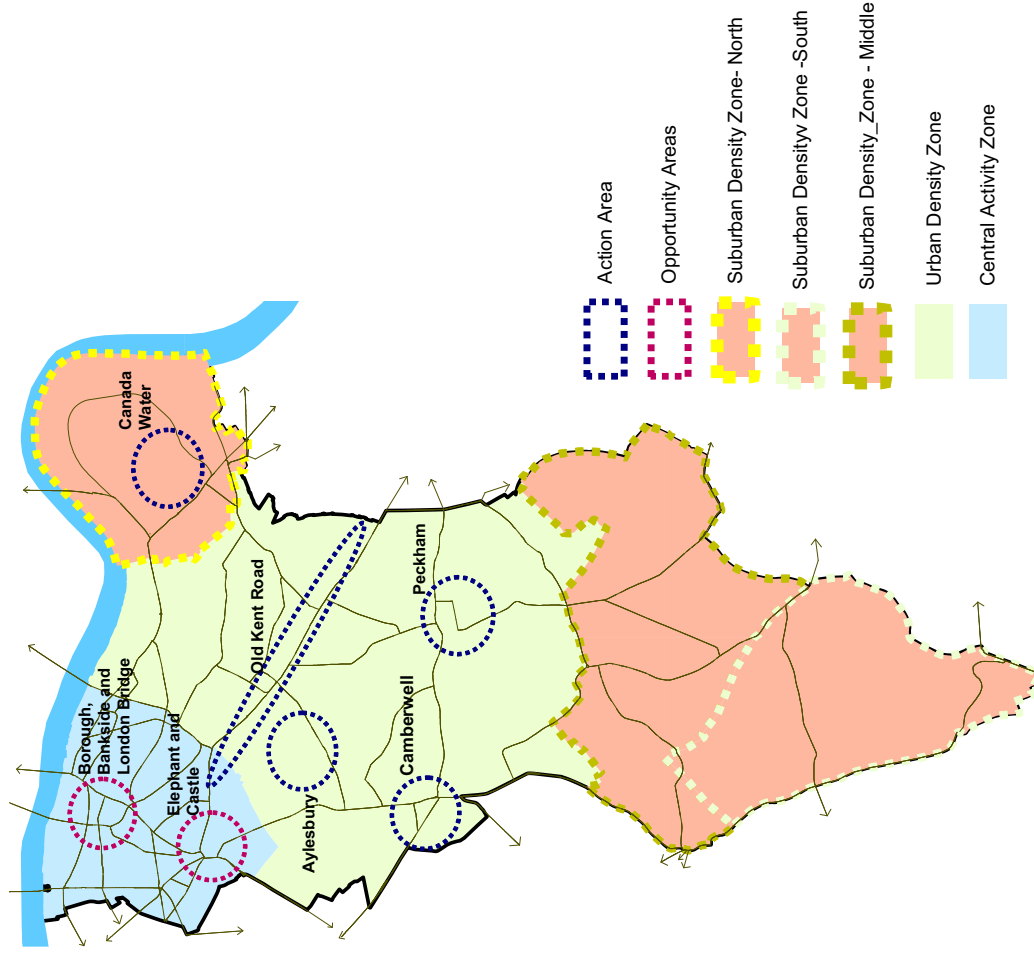
Our approach is

Development will meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive environments, particularly in our growth areas. Development will provide as much housing as possible whilst also making sure that we have enough land for other types of development and that new housing is in keeping with the character of the area.

We will do this by

1. Providing 24,450 net new homes between 2011 and 2026.
2. Meeting targets for the following areas between 2011 and 2026:
 - Bankside, Borough and London Bridge Opportunity Area – 1,900 net new homes.
 - Elephant and Castle Opportunity Area – 4,000 net new homes.
 - Canada Water Action Area - 2,500 net new homes.

Figure 25: How this will look



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- Aylebury Action Area – 4,200 new homes (including around 1,450 net new homes) (2009 to 2026)
- 3. Residential density will be expected to comply with the following ranges, taking into account matters which include the quantity and impact of any non-residential uses:
 - Central Activities Zone: 650 to 1,100 habitable rooms per hectare
 - Urban Zone: 200 to 700 habitable rooms per hectare
 - Suburban Zones – North, Middle and South: 200 to 350 habitable rooms per hectare
- 4. Within the opportunities areas and action area cores the maximum densities set out above may be exceeded when developments are of an exemplary standard of design.



We are doing this because

- 5.54 Our Sustainable Community Strategy, Southwark 2016 highlights the need to provide more and better homes in the borough, whilst conserving open spaces and making best use of existing housing. Our Strategic Housing Market Assessment and our Housing Requirements Study also highlight that we need to provide more housing in the borough to meet the needs of local people and those wanting to live in Southwark. By focusing housing in growth areas that are being regenerated and have good accessibility we can continue to protect our open spaces and the character of all of the different places in Southwark whilst also ensuring a continuous supply of housing.
- 5.55 The London Plan 2008 sets us a target of 16,300 net new homes between 2007/08 and 2016/17. We have rolled this target forward to 2026 to cover the 15 years timeframe of the core strategy to give ourselves a target of 24,450 net new homes between 2011 and 2026. The consultation draft replacement London Plan 2009 target of 2005 units per year was released on 12 October 2009. We will work with GLA officers to reach a common view on the most appropriate target. Through our housing trajectory (figure 25) we have identified our estimate of housing supply based on looking at how much housing has been completed over previous years and sites that we expect to come forward in the future. We will update the trajectory every year as part of our annual monitoring report. We will also take into account the revised housing figures from the Strategic Housing Land Availability Assessment. Through our input into the Mayor's Strategic Housing Land Availability Assessment we have identified sites which we think we can deliver 20,115 net





Figure 26: Housing trajectory

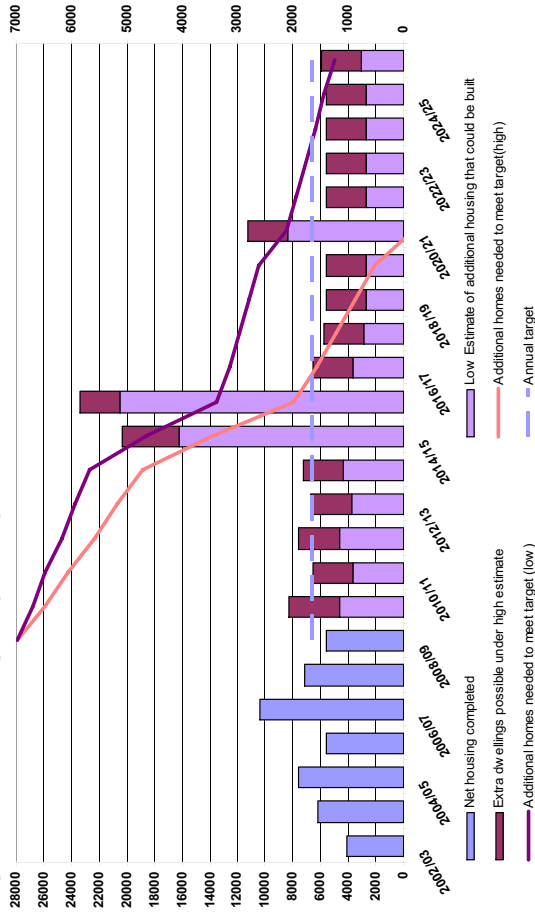
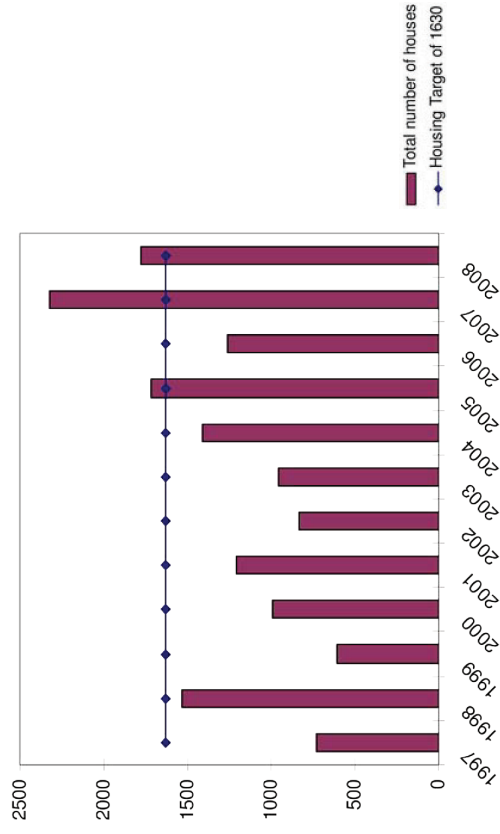


Figure 27: Net new housing units completed



new homes between 2011 and 2026 on sites of 0.25 hectares or above, of which 2,744 already have planning permission. We have met our current annual target of 1,630 net new homes a year twice in recent years. This is the 5th highest housing target in London. In addition to these sites we expect some smaller sites to come forward to help us deliver 24,450 net new homes. This is the most housing we expect to be able to deliver based on past experience, new sites we have identified and possible future windfall sites. We do not own a lot of the sites that will need to be delivered to meet this target and so because we do not have direct control on all these sites, there is a risk that not all of the housing will get built. We will use our own assets and work in partnership with the local community, the Homes and Community Agency, registered providers and private developers to bring forward as much housing as possible.

5.56 The Mayor also consulted on targets for Bankside, Borough and London Bridge, Elephant and Castle, and Canada Water through the draft replacement London Plan 2009. Our target for Bankside, Borough and London Bridge is 1,900 net new homes between 2009 and 2026. We have identified 1,449 new homes that we expect to be delivering during this time, of which 884 already have planning permission. Our target for Elephant and Castle is 4,000. We have identified sites to deliver 3,334 net new homes, of which 528 already have planning permission. Our target for Canada Water is 2,500 net new homes. We have identified sites to deliver 2,491 new homes, of which 852 already have planning permission. Through the Aylesbury area action plan we will deliver 4,200 homes. There is capacity within these areas to deliver these targets. We will use our own assets and work in partnership with the local community, the Homes and





Community Agency, registered providers and private developers to bring forward as much of this housing as possible.

5.57 Having an area based approach where most sustainable development will happen in the growth areas will deliver our Sustainable Community Strategy (Southwark 2016) and our strategic housing targets in the London Plan.

5.58 It is important that we bring forward as much housing as possible whilst also protecting the character of our places, including their local and historic context and creating places where people want to live. We have set broad density ranges for different areas with the aim that the right amount of development happens in the right places. These ranges will apply to both residential and non-residential development and there is a general expectation that development will comply with the densities indicated. This will make sure that the opportunity and action area cores continue to be more developed successful places for people to live whilst the more suburban areas of the borough will continue to have developments that are a similar scale to those already there. It will also make sure that we make efficient use of our land by providing as much housing as possible without negative impacts on the environment. This policy will be used alongside saved Policy 3.11 Efficient Use of Land of the Southwark Plan. Where development exceeds the density ranges within the opportunity areas and action area cores we will require the development to be of an exemplary standard of design. This is because too much

development can have a negative impact on the environment unless it is built to a very high standard of design and living accommodation. The criteria for exemplary standard of design are currently set out in section 2.2 of our Residential Design Standards supplementary planning document 2008. We may review and update this through our Development Management development plan document.

Fact box: Bedroom sizes and habitable rooms

A habitable room is a room that could be used for sleeping, whether or not it is. It includes bedrooms and living rooms.

Fact box: Density

Density is the measure of the amount (intensity) of development. Both residential and mixed use residential development should be within our density ranges. Our Residential Design Standards supplementary planning document sets out how we calculate density. We may review and update this through our development management or housing development plan documents.



Strategic Policy 6 – Homes for people on different incomes

How we will achieve our vision to improve our places

- SO 2A: Create mixed communities
- SO 2C: Provide more and better homes
- SO 4A: Provide enough funding for regeneration to positively transform the image of Southwark
- SO5A: Developing in growth areas

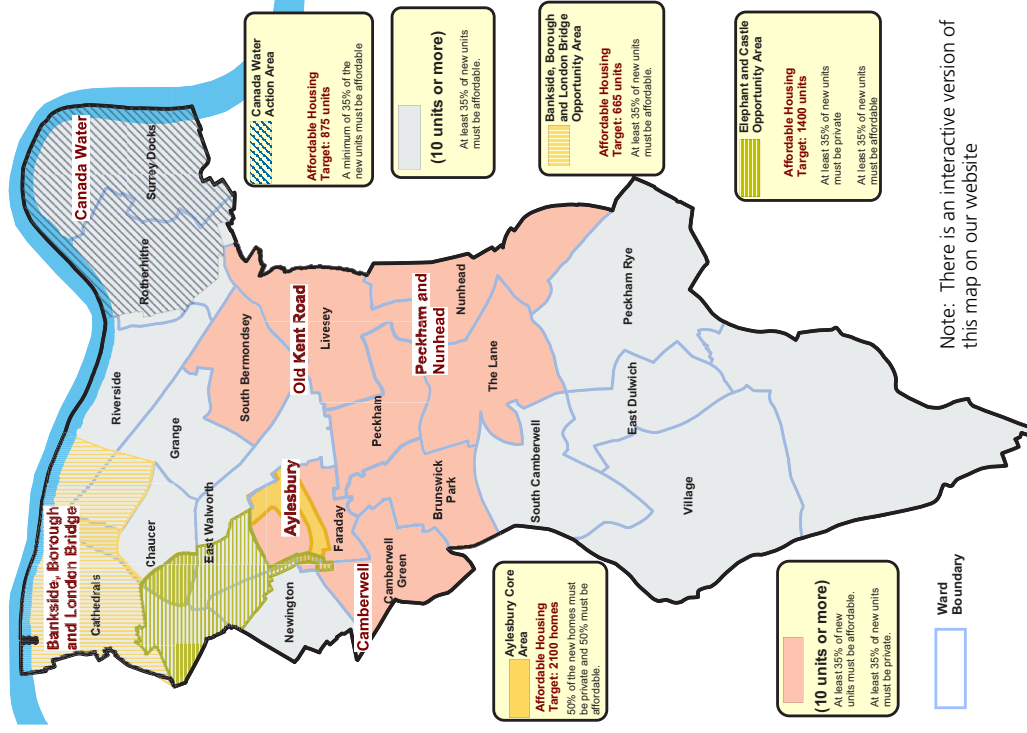
Our approach is

Development will provide homes including social rented, intermediate and private for people on a wide range of incomes. Development should provide as much affordable housing as is reasonably possible whilst also meeting the needs for other types of development and encouraging mixed communities.

We will do this by

1. Requiring as much affordable housing on developments of 10 or more units as is financially viable.
2. Providing a minimum of 8,558 net affordable housing units between 2011 and 2026.
3. Providing a minimum of 665 affordable housing units in Bankside, Borough and London Bridge Opportunity Area between 2011 and 2026.
4. Providing a minimum of 1,400 affordable housing units in Elephant and Castle Opportunity Area and Peckham and Nunhead housing sites between 2011 and 2026.
5. Providing a minimum of 875 affordable housing units in Canada Water Action Area between 2011 and 2026.

Figure 28: Affordable and private housing requirements



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- 6. Providing 2,100 affordable housing units in Aylesbury Action Area between 2009 and 2026.
- 7. Requiring a minimum of 35% affordable housing units on developments with 10 or more units.
- 8. Requiring 50% affordable housing and 50% private housing in the Aylesbury Action Area.
- 9. Requiring a minimum of 35% private housing units in the Elephant and Castle opportunity area and South Bermondsey, Faraday, Livesey, Nunhead, Peckham, The Lane, Brunswick Park and Camberwell Green wards.
- 10. Monitoring and reviewing our targets annually with changes if required to ensure that we meet our targets.
- 11. Developments of 10 or more units must provide a mix of housing as set out in figure 28.



We are doing this because

- 5.59 There is a shortage of affordable homes, in Southwark, across London and the whole of the UK. So a key objective of the government, the Greater London Authority and Southwark is to provide more affordable housing. Providing people with access to homes they can afford is a priority for us to make sure that Southwark is a better place for people to live, irrespective of their income. We will use our own land to work with the government, the Greater London Authority, private developers, registered providers and the Homes and Communities Agency to bring forward the maximum reasonable amount of affordable housing.
- 5.60 Our Strategic Housing Market Assessment and our Housing Requirements Study support our priority of needing more affordable housing to meet local need. They set out that there is a large need for more affordable housing, including both social rented and intermediate housing. We cannot meet all of this need as we also need to create mixed and balanced communities with a range of types of housing in all areas. We have set numerical targets for affordable housing. These are 35% of the numerical targets for the total number of units set out in policy 5. The one exception is the Aylesbury Action Area where the target is 50%. We require development of 10 or more units to provide affordable housing as shown in figure 22. The same 35% minimum affordable housing policy will apply to both new and replacement housing. We have a strategic priority to encourage as much affordable housing to be built as possible. To enable us to measure our success we have set an overall minimum target of 8,558 net affordable homes (35% of our target for new homes). We have also set targets for areas where there are a large number of new homes planned. These are not





Fact box: Affordable and private housing

There are two types of housing:

1. Private (or market) housing is available to either buy or rent privately on the open market
2. Affordable housing, as set out in London Plan policy 3A.8, meets the needs of households whose incomes are not enough to allow them to buy or rent decent and appropriate housing in their borough.

There are two types of affordable housing:

1. Social Rented Housing is housing that is available to rent either from the council, a housing association (known as registered providers) or other affordable housing providers. Access to social housing is based on housing need.
2. Intermediate affordable housing is housing at prices and rents above those of social rented but below private housing prices or rents. It can include part buy/part rent, key worker housing and intermediate rent housing.



net as the provision of affordable homes will vary depending on the deliverability of the regeneration of large estates. The new affordable homes in these areas will contribute to the net borough target along with the new affordable homes in the rest of Southwark. Our required split between social rented and intermediate housing is being saved in Policy 4.4 of the Southwark Plan. We may review and update this through our housing development plan document. This is to provide increased housing choice, a wide range of housing types and to unlock the development of sites which would not otherwise be viable. This will help to meet some of the need identified in our studies. Based on how much housing we expect to deliver between 2011 and 2026, development will provide 8,558 affordable homes.

5.61

Our Affordable Housing Viability Study shows that this is an achievable amount of affordable housing to build across most of the borough. Our requirement for affordable housing needs to be within the context of our family homes policy where we are requiring larger room sizes and more family homes. This will mean that more affordable homes will be larger. The provision of larger affordable family homes can have positive health benefits by reducing numbers of households in overcrowded accommodation and ensuring good living conditions and providing more space for children to play.

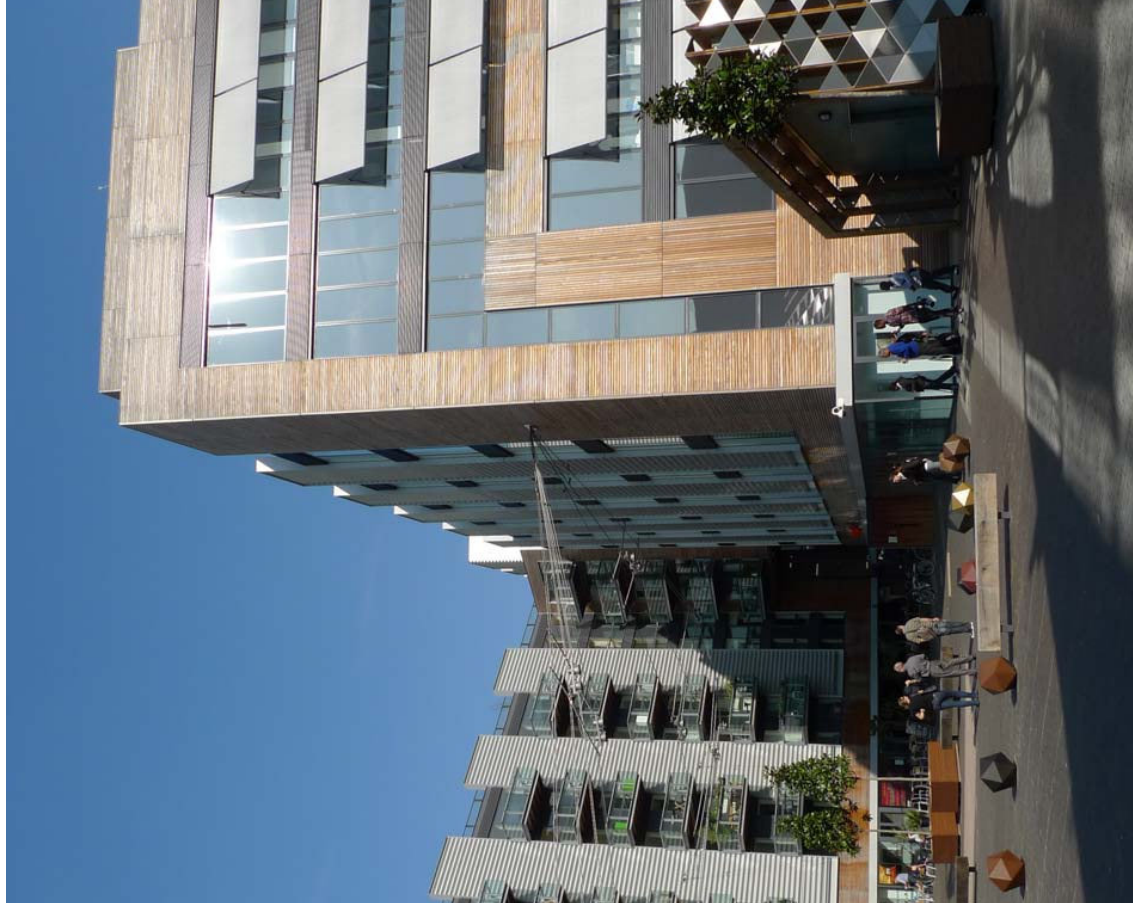
5.62

We currently have one of the highest amounts of affordable housing in the whole country, with 45% of our 123,948 dwellings being affordable homes. We own 33% of the housing in the borough, 12% is owned by registered providers and 55% is privately owned. Certain areas in the borough contain a lot of affordable housing and also the majority of new affordable





housing is built in these areas. Based on the existing levels of affordable housing and new affordable housing built over the last 10 years, the areas with the highest amounts are: Elephant and Castle Opportunity area and the wards of Faraday, Camberwell Green, Brunswick Park, Peckham, Livesey, Nunhead, South Bermondsey and the Lane. Within these areas our annual monitoring report shows that there are mainly 100% affordable housing developments being built. We want to make sure that these areas provide a range of housing types with varied neighbourhoods. Our policy requiring an element of private housing in these areas will make sure in the future that there is a choice of housing types rather than areas being dominated by one type of housing. Having an area based approach where most development will happen in the growth areas will deliver our Community Strategy (Southwark 2016) objectives and our strategic housing and affordable housing targets.



Strategic Policy 7 – Family homes

How we will achieve our vision to improve our places

- SO 1C: *Be healthy and active*
- SO 2A: *Create mixed communities*
- SO 2C: *Provide more and better homes*

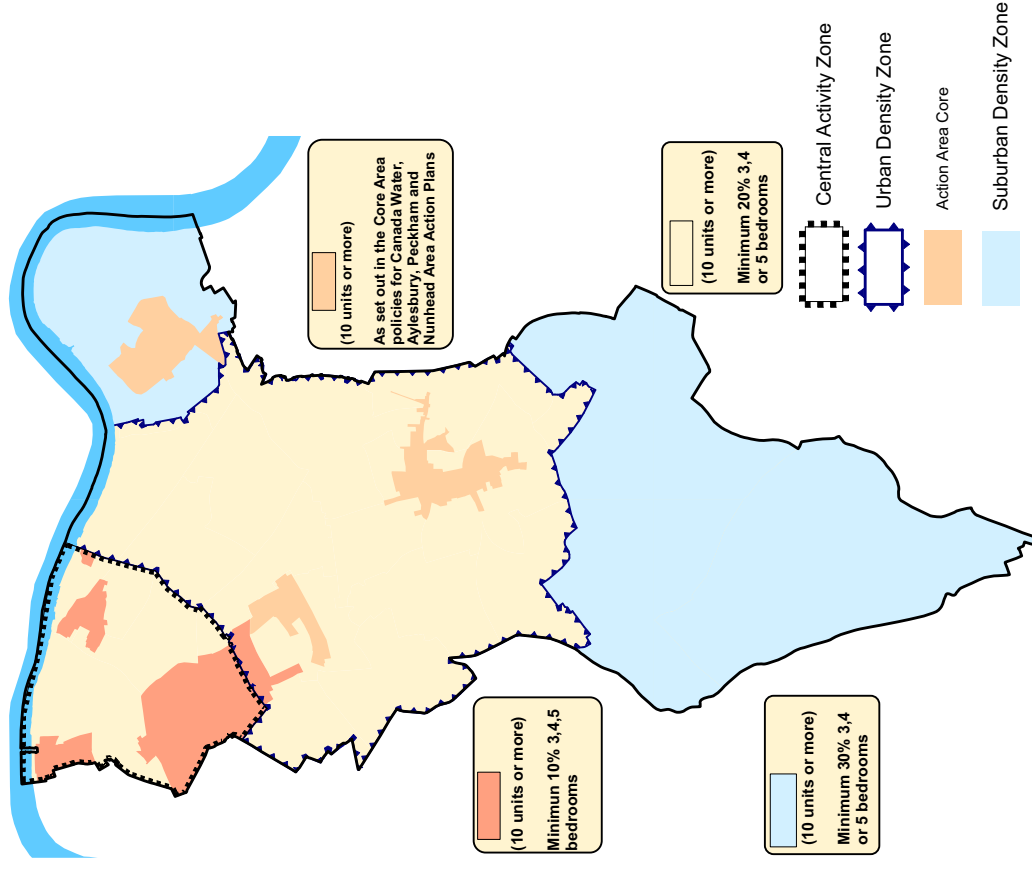
Our approach is

Development will provide more family housing with 3 or more bedrooms for people of all incomes to help make Southwark a borough which is affordable for families. New homes will have enough space for the needs of occupants.

We will do this by

1. Developments of 10 or more units must have:
 - At least 60% 2 or more bedrooms
 - 3, 4 or 5 bedrooms as set out in Figure 29. This requires:
 - » At least 10% 3,4 or 5 bedrooms in Potters Field, London Bridge, Elephant and Castle opportunity area and the north of Blackfriars road.
 - » At least 20% 3,4 or 5 bedrooms in the urban zone and the Central Activities Zone except where set out above.
 - » At least 20% of units with 3,4, or 5 bedrooms in the Canada Water Action Area core
 - » At least 30% 3,4 or 5 bedrooms in the suburban zone.

Figure 29: How this will look



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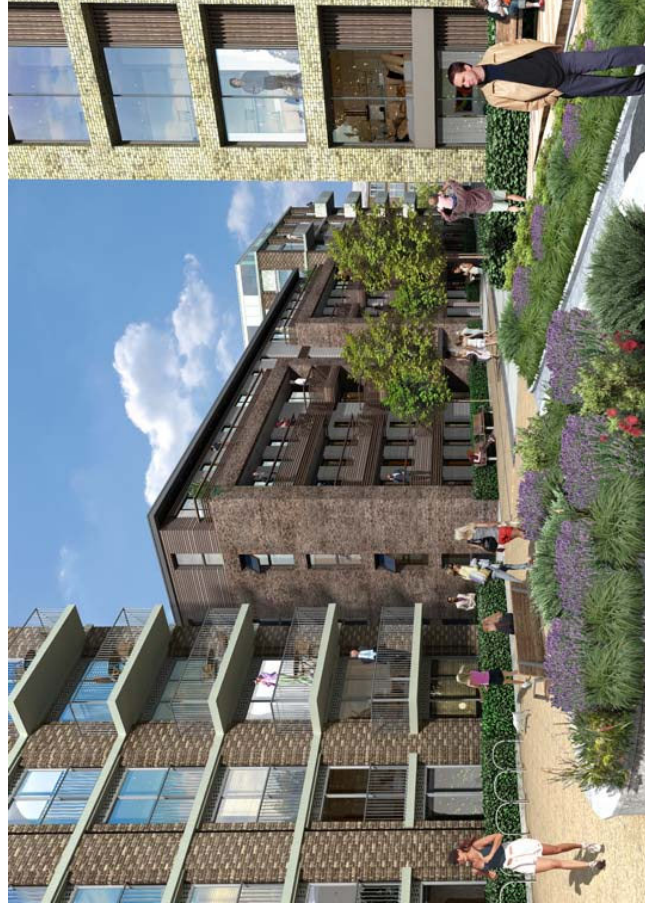
- This may be split between private, social and intermediate housing.
2. A maximum of 5% as studios and only for private housing
 3. All developments will be expected to meet the Council's minimum overall floor sizes.

We are doing this because

5.63 We want to provide a range of housing sizes (especially more 3 or more bedroom homes) for people of all incomes. This will make Southwark a borough that is attractive for everyone as residents will be able to afford homes as their family grows.

5.64 London Plan Policy 3A.5 Housing choice requires us to make sure that new development offers a range of housing choices. This includes needing to provide a mix of housing sizes and types to meet the housing needs of different groups. Our Strategic Housing Market Assessment and our Housing Requirements Study identify the housing needs within Southwark. They show that there is a need for more family housing in the borough across all tenures. At the moment we do not have enough family housing to meet the need within Southwark. Of the borough's existing households 34% are 3 bedroom plus, 35% are 2 bedrooms, 26% are 1 bedrooms and 5% are bedsits. This is not enough to meet our need for family housing and so many families are forced to live in overcrowded homes or unsuitable housing. Many are forced to move out of the borough to find affordable family housing. We need to provide more family housing to meet these needs so that people have suitable housing and do not need to move out of Southwark. We also need to provide larger 2 bedroom units as they often house families due to the affordability of larger homes. We will work with the local community, government, the Greater London Authority, registered providers and private developers to do this.

5.65 Over the past three years we have delivered between 8 and 12% of all new homes as family housing. This has not been enough to meet our need for family housing. Through implementing the



policy requiring between 10% and 30% as family housing we will help to ensure that families do not need to move out of the borough or live in unsuitable or overcrowded accommodation.

5.66 The level of family housing that we require is based on the density of development and the ability of development to provide amenity space for families. We require 30% in the suburban zone because these areas are less dense and are more suitable for families. We also require 30% in Aylesbury to create a new area that is attractive for families and to meet the re-housing needs of existing tenants. We require 20% in the urban zone and the areas with a lower density in the Central Activities Zone. We may vary the level of family housing further through our area action plans for Canada Water and Peckham and Nunhead.

5.67 The policies put forward through the area action plans for family housing will take precedence over the family housing policy in the core strategy. We consulted on the level of family housing in Canada Water through the Canada Water Area Action Plan. Following consultation we updated the core strategy and inserted the policy requirement for family housing set out in this policy and policy 23 of the Canada Water area action plan. For Peckham and Nunhead, we will consider whether we should vary the level of family housing through the preferred options consultation in 2011. Family housing must provide a minimum of 10sqm of private amenity space to ensure that children have somewhere safe to play. This requirement is set out in our Residential Design Standards supplementary planning document. New housing developments must also provide additional communal play areas for children, as required by the Mayor's Supplementary Planning Guidance on Providing for Children and Young People's Play and

Fact box: Family housing

A self-contained housing unit containing three or more bedrooms. Rooms must meet our minimum room sizes and the location of the family unit within the development, along with the provision of amenity space should meet the requirements as set out in the residential design standards supplementary planning document.

Informal Recreation. The type of developments in denser areas do not provide enough space to meet these requirements and is more suitable for higher levels of one and two bedroom homes to help transform the area.

5.68 We want all new development to be high quality with good living conditions. Requiring suitable floor areas will help to achieve this by making sure that an adequate amount of space is provided to create pleasant and healthy living environments. This is also a priority for the Mayor, who, through the draft replacement London Plan and the London Housing Design Guide, will require minimum space standards in order to make new homes provide good living conditions. At the moment within the UK we build homes to a far smaller space standard than the rest of Europe. We need to change this to make sure that we provide high quality homes. Evidence shows that there can be many long-term effects of overcrowding including affecting how children perform at school and an increased risk of infection for children. Sufficient space is needed by everyone in the home to have space to play, work and study, and for privacy and quiet. Also there needs to be sufficient space for storage and for circulation within



the home. To help us improve the quality of development we intend to identify the standards we require within a subsequent planning document. In the interim we will expect development to follow the standards within the Council's Residential Design Standards supplementary planning document.





Strategic Policy 8 – Student homes

How we will achieve our vision to improve our places

SO 1B: *Achieve educational potential*

SO 2A: *Create mixed communities*

SO 2C: *Provide more and better homes*

SO 2D: *Create a vibrant economy*

Our approach is

Development will meet the needs of universities and colleges for new student housing whilst balancing the building of student homes with other types of housing such as affordable and family housing.

We will do this by

1. Allowing development of student homes within the town centres, and places with good access to public transport services, providing that these do not harm the local character.
2. Requiring 35% of student developments as affordable housing in line with policy 6 and figure 28.

We are doing this because

5.69 There is a need for more student accommodation across the whole of London and Southwark. We want to encourage new student homes. However this needs to be balanced with making sure we have enough sites on which to build other types of homes, including affordable and family homes. London Plan Policy 3A.5 Housing choice requires us to identify the range of housing needs in the borough and offer a range of housing choices. Whilst London as a whole has a recognised need for more student bed spaces, our Strategic Housing Market Assessment and Housing Requirements Study also highlight the huge need for more family and affordable housing.

5.70 We already have the second largest number of student homes in London. Since 2008 there have been four significant planning permissions for student housing. If these are all built they will provide 1,796 new student bedrooms. Had these been developed for general needs housing, approximately 703 new homes would have been built of which at least 246 would have been affordable homes and at least 45 would have been family homes. Increasingly we are receiving more and more planning applications and pre-application inquiries about new large scale student homes. Allowing too much student accommodation will restrict our ability to deliver more family and affordable housing.

5.71 Through our Strategic Housing Land Availability Assessment we have identified sites that need to be developed to make sure we can meet our housing targets. If these sites come forward without affordable housing we would not be able to meet our affordable housing target. Policy 3A.7 Affordable housing targets of the London Plan encourages boroughs to look at





a range of sources of supply of affordable housing including provision for non-self-contained housing (which includes student housing). By requiring an element of affordable housing or a contribution to affordable housing (as conventional affordable housing as defined in the fact box on page 84) from student accommodation schemes we can make sure we work towards meeting the needs for both student accommodation and affordable accommodation. It will also help us to provide more family housing as within the affordable housing there will be an element of family housing.

5.72 As with all types of major development, student housing development has an impact on the surrounding area. By requiring a section 106 agreement we can make sure that the environmental, economic, transport, cultural and social impacts of the development are minimised. We will only allow student housing in our town centres and areas with good public transport accessibility as these are the areas which can accommodate growth. We will work with local universities to make sure that student accommodation is focused where there is a need.



Strategic Policy 9 – Homes for Travellers and Gypsies

How we will achieve our vision to improve our places

SO 2A: Create mixed communities

SO 2C: Provide more and better homes

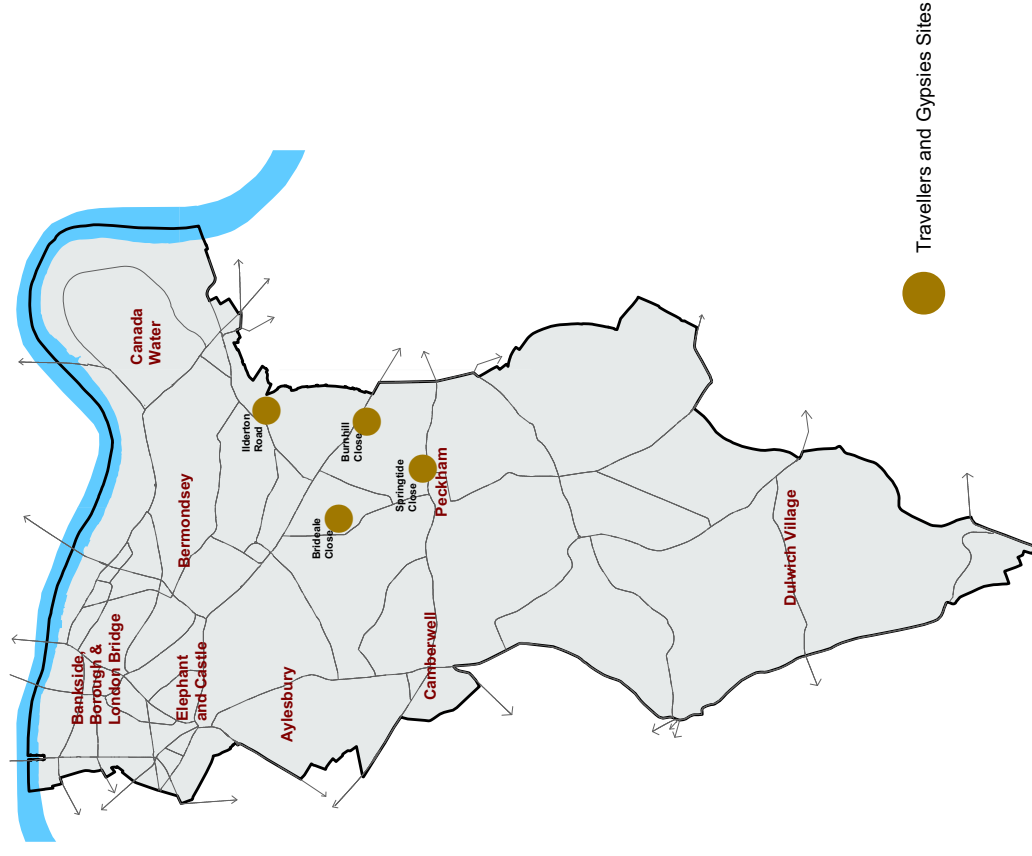
Our approach is

We will continue to protect our existing Traveller and Gypsy sites. We will provide new sites in the future to meet the accommodation needs of Travellers and Gypsies.

We will do this by

1. Safeguarding the existing four Traveller and Gypsy sites in Southwark.
2. Identifying new sites for additional facilities to meet the needs of Travellers and Gypsies having regard to:
 - » The need for safe access to the road network.
 - » The impact on the local environment and character
 - » The impact on amenity.
 - » The availability of essential services, such as water, sewerage and drainage and waste disposal.
 - » The proximity to shops, services and community facilities.
 - » The need to avoid areas at high risk of flooding.

Figure 30: How this will look



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Appendix B

Inspector's Report on the Core Strategy (available in the members' offices and on the internet)

Appendix B for Planning Committee Report and Cabinet Report:
Core Strategy

Planning Committee: 21 March 2011
Cabinet: 22 March 2011

Appendix A	Core strategy final version and proposals map changes (available on the internet and with report)
Appendix B	Inspector's report on the Core Strategy (available in the members offices and on the internet)
Appendix C	Consultation and sustainability statement (available in the members offices and on the internet)
Appendix D	Core strategy publication/submission version consultation report (available in the members offices and on the internet)
Appendix E	Core strategy publication/submission version sustainability appraisal (available in the members offices and on the internet)
Appendix F	Core Strategy publication/submission version equalities impact assessment (available in the members offices and on the internet)
Appendix G	Core Strategy publication/ submission version appropriate assessment (available in the members offices and on the internet)



The Planning
Inspectorate

Report to The London Borough of Southwark

By Andrew Seaman BA (Hons) MA MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 3 February 2011

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO THE
SOUTHWARK COUNCIL CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 26 March 2010

Examination hearings held between 20 July and 30 July 2010

File Ref: PINS/A5840/429/5

ABBREVIATIONS USED IN THIS REPORT

AA	Appropriate Assessment
AAP	Area Action Plan
AMR	Annual Monitoring Report
BREEAM	Building Research Establishment Environmental Assessment Method
CAZ	Central Activities Zone
CD	Core Document
CS	Core Strategy
DCA	Development Capacity Assessment
DMDPD	Development Management Development Plan Document
DPD	Development Plan Document
ELR	Employment Land Review
EqIA	Equalities Impact Assessment
GLA	Greater London Authority
HRS	Housing Requirements Study
IC	Inspector Change
LDF	Local Development Framework
LDS	Local Development Scheme
MOL	Metropolitan Open Land
PC	Proposed Change
PCT	Primary Care Trust
PIL	Preferred Industrial Land
PPG	Planning Policy Guidance Note
PPS	Planning Policy Statement
RPC	Representor Preferred Change (from CDAI35)
RSS	Regional Spatial Strategy
S106	Section 106 Planning Obligation
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SINCS	Sites of Importance for Nature Conservation
SO	Strategic Objectives
SoS	Secretary of State
SP	Strategic Policy
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
TOC	Table of Changes
UDP	Unitary Development Plan

Non-Technical Summary

This report concludes that the Southwark Council Core Strategy Development Plan Document provides an appropriate basis for the planning of the borough over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A number of changes are needed to meet legal and statutory requirements. These can be summarised as follows:

- Ensuring a consistent link between the strategic policies and the strategic objectives within the plan;
- Ensuring the document is aligned suitably with current national planning policy and circular advice;
- Ensuring that the document is aligned correctly with the extant development plan and the Council's Local Development Scheme (LDS);
- Clarifying the document's approach to, and amount of, housing to be delivered throughout the Borough;
- Ensuring that there is clarity as to how the document will be implemented and monitored effectively.

All but three of the changes recommended in this report are based on proposals put forward by the Council. These respond to points raised in relation to the submitted Core Strategy and to suggestions discussed during the public examination. The changes do not alter the thrust of the Council's overall strategy.

Introduction

- i. This report contains my assessment of the Southwark Council Core Strategy (CS) Development Plan Document in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12¹ (paragraphs 4.51- 4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy. As established at the Pre-Hearing Meeting, this report does not deal with every individual comment or objection made to the submitted CS.
- ii. The Council's SCI has been found sound by the Secretary of State. With this in mind, I received submissions with regard to the adequacy of community consultation undertaken in relation to the CS. With due regard to the content of PPS 1² and PPS12, I recognise the importance of such processes and the Council will no doubt, as expressed at the Hearings, wish to develop further the effectiveness of the consultation it undertakes. Nevertheless, the documents submitted, including the Core Strategy Submission Consultation Report³ and its Self Assessment Paper⁴, indicate that the requirements as set out in the Regulations have been met.
- iii. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted Southwark Council CS and the Table of Recommended Changes for the Planning Inspectorate⁵.
- iv. My report deals with the changes that are needed to make the DPD sound and they are identified in bold in the report (**TOC/IC**). All but three of these changes have been proposed by the Council and are presented in the Consolidated Table of Recommended Changes for the Planning Inspectorate⁶ attached at Appendix A and highlighted in green. This table incorporates those within CDCS17. All suggested changes have been published on the Council's website and been placed in the document library; those arising from discussions held at the Hearing sessions have been made available for comment. The changes that I recommend are set out in Appendix B which also includes two general clarifications. None of these changes should materially alter the substance of the plan and its policies, or undermine the SA and participatory processes undertaken.
- v. Many of the changes put forward by the Council are factual updates, corrections of minor errors or other minor amendments in the interests of clarity. As these changes do not relate to soundness they are generally not referred to in this report. Nevertheless and when considered overall, I endorse the Council's view that they improve the plan. These are also included within Appendix A and are not highlighted. I am content for the Council to make any additional minor changes to general presentation, page

¹ Local Spatial Planning

² Delivering Sustainable Development

³ CDCS16

⁴ CDB13

⁵ CDCS17

⁶ CDAI36

layouts, figures, paragraph numbering and to correct any spelling and minor factual errors prior to adoption.

- vi. I endorse the suggested changes of the Council (**TOC 3, 182, 205**) to ensure clarity between the CS and the adopted LDS. The Council intends to change its LDS to take account of revised priorities and a detailed draft has been produced. Until adopted, further changes to the CS to reflect the new LDS, are not required to achieve overall soundness.
- vii. References in my report to documentary sources are provided in footnotes, quoting the reference number in the examination library. I have had regard to the core documents (CD) provided.

Assessment of Soundness

Preamble

1. The Mayor of London has indicated that the DPD is in general conformity with the London Plan⁷. Submissions were made to the contrary upon a number of specific policy areas and I deal with these below as necessary. Ultimately, I agree with the Mayor. Consequently, in this respect, the CS is sound.

2. At the time of the hearings the draft replacement London Plan was undergoing its Examination in Public. As evidenced by the updates provided to me during the course of the hearing sessions, it is a document which is subject to potential change. It is not adopted policy. These factors limit the weight it should be afforded as overarching strategy. The Mayor has confirmed that the Southwark CS is in general conformity with the draft replacement London Plan and whilst there are areas between the two documents which are not in precise alignment, the evidence submitted does not persuade me otherwise. The Southwark CS is not unsound in terms of its flexibility and effectiveness as a result.

3. The CS evidence base has reacted to the passage of time by necessary updates, including those offered by the Annual Monitoring Report (AMR) and particularly as relates to matters of housing, design and tall buildings. Throughout the examination I have been most mindful to consider the extent to which the CS is effective in its approach to achieving the strategic objectives, particularly with regard to its flexibility.

4. The Council considered two primary alternatives for its CS: that based upon growth areas and that based upon housing growth. With full regard to the SA, the London Plan and its draft replacement, the Council has generally followed the growth areas approach in combination with elements of the housing growth option where warranted. I heard concerns that the early scoping work undertaken for the Issues and Options and related SA was flawed, but I am not persuaded that the Council failed to consider adequately matters which would influence the spatial vision for the Borough. The Council's overall approach is justified and consistent with national policy.

Main Issues

⁷ CDCS 35, 36

5. Taking account of all the representations, written evidence and the discussions that took place at the examination Hearings, I have identified twelve matters upon which the soundness of the plan depends. The structure of the report follows that of the Hearing sessions held.

Matters 1 and 2: Vision, Strategy and Spatial Approach; Sustainability, Equalities, Proposals Map & General Presentation

With due regard to its means of production, does the CS provide an adequate strategic vision for the Borough leading to an effective spatial plan containing clear objectives for the plan period in accord with the aims of PPS12?

6. The CS is evidently informed by⁸, and adequately aligned with, the SCS. It demonstrates, as seen within Section 2, a suitable understanding of the Borough, particularly in terms of its demographics.

7. Although detailed, Section 3 of the CS contains a clear vision for the Borough. The Council intends that the vision will be realised by working towards five Core Strategy Themes, each cogently expressed, which will pull together a number of Strategic Objectives (SOs). The Vision, the Themes and the SOs are all logical, comprehensive and understandable. Cumulatively they provide a framework against which the individual policies of the CS can be used to influence development and be monitored effectively.

8. To ensure clarity and effectiveness I endorse the Council's suggested changes to SO1c to reflect fully the cross cutting approach to health (**TOC17**), to SO2f to bring it into alignment with PPS5 (**TOC18**), to SO4a to incorporate local stakeholders into the context of regeneration and to Strategic Targets Policies (**TOC22 and 28**) which will provide consistency within the CS itself.

9. As evidenced by Section 4, the CS demonstrates a broad awareness of the individual areas within the Borough⁹ and an understanding of their distinctive characteristics. The identification of individual area visions and the inclusion of specific levels of development for certain areas aid, on balance, the clarity of the plan. The stated amount of development, for example office space in the Bankside, Borough and London Bridge Opportunity Area or retail space in the Canada Water (and Rotherhithe) Action Area, are challenging in their scope but are broadly expressed. At a strategic level, the plan is neither unrealistic nor so prescriptive as to be inflexible and ineffective. In the interests of clarity and effectiveness of these matters, I endorse the Council's suggested changes (**TOC 32, 35, 37, 40, 41, 49, 50, 60, and 66**).

10. I endorse the Council's suggested alteration to the text of the CS as relates to the Elephant and Castle (**TOC 42**) which is necessary to ensure clarity and the deliverability of the CS. The other suggested changes of the Council to Section 4 do not affect directly the soundness of the document.

11. I received and heard submissions with regard to the characteristics and issues facing many of the identified parts of the Borough and heard discussion with regard to ways in which individual area visions could be altered and

⁸ CS Section 1 p10 et al

⁹ CS Section 4 and Fig 10

developed. Nevertheless, whilst such submissions may bear further exploration, the visions and intentions submitted by the Council within the CS are not unsound as a consequence.

12. The Council has taken account of cross border issues adequately¹⁰ and there is recognition within the CS that working with all partners is necessary to ensure the success of the plan. The totality of the CS approach is clear and it will provide an adequate strategic vision for the Borough for the next 15 years.

13. The CS endeavours to strike a balance between necessary development and matters surrounding sustainability. As referenced further with regard to Matter 3 below, the CS is sound in such regards.

14. In addition to compliance with its SCI, the Council has undertaken an iterative Equalities Impact Assessment¹¹ (EqIA) in relation to the CS which involved the Council's Equality and Diversity Panel. Whilst I acknowledge those representations made as to its methodology and scope, and was mindful in particular of Section 71 of the Race Relations Act (as amended) and am mindful subsequently of the Equality Act 2010, I am satisfied that the EqIA is adequate for the strategic vision contained in the CS.

15. As a consequence, the CS is sound in such regards. The CS recognises to a sufficient degree the diversity of those who live, work and visit the Borough and the issues they face. Through its Vision, Themes, Strategic Objectives, Strategic Targets and Strategic Policies, the CS seeks a suitably balanced approach to securing necessary development throughout the Borough. Invariably, further positive consideration and analysis of equality issues will need to flow from the LDF documents linked to the CS, particularly AAPs and subsequent DPDs.

16. The submitted CS is, on the whole, logically presented. Whilst not affecting soundness, the majority of the various changes proposed by the Council to improve the clarity and presentation of the document appear useful. The Proposals Map is not part of the CS although necessary changes would flow from its adoption. As such, at this point, I make no comments as to its general content or appearance.

Matter 3 – Sustainable Development

Does the DPD provide the most appropriate strategy for sustainable development across the Borough; is the approach in general conformity with the London Plan and evidenced adequately?

17. In producing the submitted CS, the Council considered its Issues and Options¹² for the Borough in conjunction with an analysis of the sustainability implications¹³. Similarly, the Preferred Options¹⁴ were subject to SA¹⁵. This iterative assessment of the primary options, namely housing-led growth and

¹⁰ CS Section 2 p 24 et al

¹¹ CDCS15

¹² CDCS 8

¹³ CDCS 12

¹⁴ CDCS 9

¹⁵ CDCS 13

growth areas, informed the submitted CS which is also accompanied by its own SA¹⁶.

18. Such an approach has incorporated national planning guidance suitably, for example PPS1 and 4¹⁷, and acknowledges both the London Plan and its draft replacement. The identified growth areas of the CS, including Canada Water as a major town centre, do not conflict with the strategic approach of the London Plan and its draft replacement and the CS is in general conformity with both documents on this matter.

19. Inevitably there will be challenges in securing satisfactory new development and regeneration within the existing urban form of the Borough, for example as may arise from increased housing densities particularly in those areas with identified social and economic problems. However, despite the submitted concerns of some local residents and representative groups, I am not persuaded that the Council's approach is flawed in terms of the tests of soundness. Furthermore, I note that the CS is also supported by the EqIA¹⁸ which, despite concerns voiced at the Hearings, remains valid and supportive of the strategy taken.

20. The CS must be read as a whole and it will form part of the development plan. As a consequence, the policies of the CS, for example as relating to design and infrastructure, will apply in conjunction with those within the London Plan, other DPDs, SPDs and, in the interim, the Unitary Development Plan (UDP). The cumulative effect will provide sufficient opportunity to ensure that matters of social deprivation and social impacts are addressed adequately, aided by the reasonable need for a sustainability assessment as part of development proposals which come forward over the life of the CS. In this context, I endorse the Council's suggested changes to SP1 (**TOC 78 and 79**) which will clarify how the policy will be implemented effectively with due regard to the needs of the local community.

21. The growth areas approach adopted by the Council will focus development towards existing centres with requisite facilities, services and transport links. I acknowledge that the existing geographic distribution of centres will result in a greater proportion of new development being directed towards the northern half of the Borough yet, in planning terms, this would appear reasonable and not iniquitous or unsound. I am consequently content that the predominantly growth area approach towards new development contained within the CS is supported by an adequate evidence base and is the most appropriate strategy for sustainable development across the Borough.

Matter 4 – Sustainable Transport

Is the advocated approach to sustainable transport the most appropriate strategy within the context of the Borough? Does the evidence support sufficiently the premise that the approach will be effective?

22. Given the relatively central urban location of the Borough within London, transport is an important consideration. The submitted CS has evolved

¹⁶ CDCS 14

¹⁷ Delivering Sustainable Development; Planning for Sustainable Economic Growth

¹⁸ CDCS 15

considerably from its inception and has been subject to continuous SA. This is a valid and important part of the evidence base. It appears to me that the CS takes a pragmatic and reasonable approach toward the transport implications of necessary future development and the needs of the Borough. Such an approach will prioritise walking, cycling and the use of public transport over the private car which is in accord with national guidance.

23. In its approach, SP2 incorporates an awareness of, and a broad alignment with, the Business Plan for Transport for London. This is a rational, reasonable and proportionate evidential position to take. Within this context, the CS acknowledges¹⁹ the existing and planned transport routes which serve the Borough. Whilst I heard concerns at the strategic ambition of the CS, for example as regards routes travelling east-west, I am conscious that the objectives of the CS must be deliverable and thereby effective. As a consequence the Council's approach is satisfactory. With this in mind, I am also satisfied that adequate land is safeguarded, for example at Parkhouse Street, for significant public transport schemes intended over the life of the CS.

24. With due regard to the applicable saved policies of the UDP which would affect the implementation of SP2, the requirement for a transport assessment would not be inflexible or ineffective and is necessary to ensure that adequate transport infrastructure is available to serve new development. The policy is sound and a requirement for a development size threshold is unnecessary.

25. Whilst I heard and received submissions that the CS provides insufficient priority for cycling, I note that the CS indicates clearly the role of cycling within the transport objectives of the plan. There is no conflict with government guidance such as found within PPG13²⁰ or PPS1 in this regard. I agree with the Council that the CS is not a suitable document to prescribe particular cycling requirements for the Borough and new development proposals. The document as a whole provides sufficient strategic direction for the spatial planning of the Borough. In addition there are adequate 'hooks' upon which detailed matters and standards can subsequently be identified and delivered, for example via DPDs/SPDs, to support the policies themselves.

26. Detailed car parking requirements do not form part of the CS. Whilst an important issue, I agree with the Council that such matters will be more appropriately resolved through subsequent DPDs at which time the details within the London Plan and its draft replacement can be considered. The intention of SP2 to minimise car parking provision as part of the strategy towards sustainable transport is sound and does not preclude, as part of the specifics of any development proposal, considerations of economic viability for any development as a whole. The policy would be sufficiently flexible and effective in these regards.

27. Overall, SP2 and the CS as a whole promote the most appropriate strategy towards sustainable transport within the context of the Borough; the available evidence supports the stance taken and its effectiveness for the plan period.

¹⁹ CS Figure 17

²⁰ 'Transport'

Matter 5 – Jobs and Business

Does the DPD provide the most appropriate strategy towards jobs and business within the Borough? Is the approach in general conformity with the London Plan and evidenced adequately? Will the approach be effective, particularly with regard to flexibility?

28. In broad terms, the CS seeks, via SP10, to increase jobs within the Borough, create a positive business environment and protect existing business space in established centres. As indicated in the core documents²¹, the CS draws upon government guidance adequately (for example PPS4) in conjunction with that which is specific to London, the Borough and its immediate neighbours.

29. The chosen strategy has evolved from the Issues and Options and is consistent with the growth areas approach of the CS as a whole. The Mayor of London identifies no issues with regard to conformity with the London Plan and I agree. With due regard to the submissions made and considerations of transport sustainability, it is the most appropriate strategy towards jobs and business in the Borough.

30. The Council's Employment Land Review²² (ELR) has led, in part, to the final wording of SP10 and its supporting text which intend the controlled release of around 20ha of industrial and warehousing land over the life of the CS. This is in line with Policy 3B.4 of the London Plan and the Mayor's SPG on Industrial Capacity²³. Discrepancies exist within the evidence base between the Borough and the GLA concerning the release of Preferred Industrial Land (PIL) to date. These discrepancies are relatively minor and due in part to the passage of time between the respective pieces of research; they do not undermine the legitimacy of the policy or introduce unacceptable conflict with the objectives of the draft replacement London Plan²⁴. To my mind, they restrict the scope for further release of PIL beyond that identified in the CS.

31. The ELR, and the identified locally PIL, is underpinned by empirical evidence based upon an analysis of employment land clusters. I recognise that such an approach, as highlighted for example at Mandela Way and in part at Ilderton Road, does not provide an individual breakdown of all site components within a cluster and their relationship to surrounding land uses. However, following my site visits, I saw nothing in those locations which leads me to consider the credibility of the ELR is fundamentally diminished.

32. The Council's evidence represents a proportionate and credible means of assessing employment land for the purposes of setting a strategy for the Borough and for controlling the release of surplus land. It is a tailored approach to the Borough which has had due regard to government advice²⁵ and is capable of monitoring. By such monitoring, and in accordance with the principles of 'plan, monitor and manage', the need for further reviews of PIL against economic circumstances and site specific characteristics would be ascertained. I am therefore satisfied that the CS is predicated on a robust evidence base and is

²¹ CDE1 – 12, CDB6 et al

²² CDE1

²³ CDR8

²⁴ CDAI46

²⁵ CDN32

sound in such regards. I endorse the Council's suggested change to the CS (**TOC 141**) which clarifies that released sites could also be used for social infrastructure.

33. The accurate forecasting of job creation can be difficult yet I am not persuaded that the methodology of the ELR which links the provision of new business space to the net creation of jobs is flawed or leads to an inappropriate strategy. Many variables influence job creation, including other land uses, and I appreciate that there are a number of alternative forecasting assumptions which could be made; nevertheless, such options do not undermine the Council's chosen approach which is sound.

34. The Development Management DPD (DMDPD) will set out details of where the loss of business space in certain centres may be acceptable and this approach is neither unreasonable nor ineffective. In conjunction with SP10, the saved policies of the UDP (for example Policy 1.4) will provide adequate flexibility in relation to the use of employment land and premises for alternative purposes, including residential, in the majority of the Borough. The CS will be effective and sound in such regards.

35. SP10 and its supporting text acknowledge adequately the importance of small business units in providing employment opportunities, including those of a micro size. I note that the policy applies to both business and retail premises; such an approach is supported by the evidence base and is sound. In a similar vein, and mindful of the above position and saved UDP Policy 1.11, the CS acknowledges the role of cultural and creative activities to an adequate degree.

36. Tourism is recognised by the CS as important to the Borough economy. SP10 strikes a strategic balance between the provision of hotels within certain established centres, the need to avoid harm to local character and the maintenance of stable residential communities, for example in Bankside and Borough. The Council's intention to provide further details of potential hotel locations and assessment criteria through its DMDPD and, for example, the Bankside and Borough SPD is an appropriate means by which the details of the strategy can be honed and delivered.

37. Overall the CS approach to business and jobs is adequately evidenced, is the most appropriate strategy and will be effective. I endorse the proposed change of the Council to clarify the role of the policy in relation to SO1a (**TOC139**) and I consider SP10 to be sound.

Matter 6 – Shopping, Leisure and Entertainment

Does the DPD provide the most appropriate and sufficiently comprehensive strategy towards shopping, leisure and entertainment within the Borough with due regard to cross border issues? Is the approach in general conformity with the London Plan and evidenced adequately with due regard to PPS4? Will the approach be effective, particularly with regard to flexibility?

38. With regard to retail matters the CS draws upon a wide evidence base²⁶. This includes an analysis of data²⁷ gathered from across the Borough and from

²⁶ CDB5, CDCS14, CDCS15 et al

beyond its boundaries which acknowledges adequately the context set by PPS4 and related guidance. Whilst the evidence often assumes a broad and generally more strategic nature, it does include data on the health of towns and analyses predicted impacts arising, for example, from enlarging town centres. Such matters incorporate considerations of social and economic deprivation to an adequate degree.

39. I am satisfied that the available evidence addresses proportionately the plan making policies of PPS4. This has led to a sufficiently robust strategic approach for retail provision within the Borough linking, as necessary, to the intended DPDs and SPDs identified in the LDS. Such latter documents will be able to address appropriately matters such as parking. To ensure the effectiveness of the CS in relation to SOs, I endorse the Council's suggested changes (**TOC 83 and 84**).

40. The CS sets out a clear hierarchy of town centres, in line with the London Plan and its draft replacement, within which the capacity for providing additional comparison and convenience goods is identified. I have no substantive reason to dispute the data or the Council's conclusions with regard to the quantum of future additional floor space for each identified town centre. The strategic nature of the CS, the scope of the evidence and the role of centres set lower within the hierarchy make the allocation of an amount of new retail floor space for the latter unnecessary and potentially inflexible.

41. The Central Activities Zone (CAZ) includes the town centres of Borough and Bankside, London Bridge and Elephant and Castle but I find no conflict or confusion of purpose between the dual designations. Furthermore, the identification of Canada Water as a future Major Town Centre does not conflict with the provisions of the London Plan, its intended replacement or PPS4. Such a designation, similar to that for the Elephant and Castle (including Walworth Road), is consistent with the strategic growth area approach of the CS as a whole and is supported in its detail by the evidence submitted which includes the Southwark Retail Study and the Canada Water AAP Retail Background Paper²⁸.

42. The CS identifies the importance of town and local centres and indicates clearly how such centres will be protected and enhanced. The CS, in evidence and content, does reflect cross-border issues; future supporting documents, such as the intended Camberwell SPD, will be able to respond directly to specific retail and leisure concerns relating to areas influenced by neighbouring Boroughs such as Lambeth.

43. I am particularly mindful of the London Plan and the saved content of the UDP which will support the approach of the CS. Outside of the centres, small scale retail facilities will be protected adequately and, particularly in light of the UDP saved policies such as Policy 1.10, such protection would not be unduly prescriptive.

44. Street markets are explicitly referenced within the CS. Whilst the collation of evidence can be achieved in a number of ways, their importance within Southwark is evidenced adequately²⁹ and credibly. Subject to the Council's

²⁷ CDE5 et al

²⁸ CDCW16

²⁹ CDE5, CDE6 et al

suggested change to the CS, which I endorse for reasons of justification (**TOC 86**), I am satisfied that the role of markets within the Borough is acknowledged positively and suitably. Further wording as suggested within Document CDAI30³⁰ would not affect the essential soundness of the policy in this regard.

45. The available evidence which underpins Policy SP3 relating to leisure and entertainment matters is more limited. Nonetheless, various sources of data exist within the core documents, for example within the Infrastructure Background Paper³¹ and within the town centre health checks. On balance, I find that the available evidence is proportionate. It provides sufficient support for the CS approach, particularly when considered in its entirety, to secure a balance of different uses within a range of successful town centres.

46. An explicit reference to social infrastructure is unnecessary within SP3 due to the deliberate use of 'facilities' within the policy which encompasses matters such as policing.

47. Overall, as identified by the Mayor of London, the CS is in general conformity with the London Plan and its draft replacement and it provides a cogent and robust strategy for shopping, leisure and entertainment across the Borough. The evidence base is credible and the strategic intentions of SP3, in the context of other development plan documents, are deliverable and capable of monitoring. The policy is sound in such regards.

Matter 7 – Education and Services

Does the DPD provide the most appropriate and sufficiently comprehensive strategy towards education and services within the Borough? Will the approach be effective, particularly with regard to flexibility?

48. SP4 seeks to cover a broad range of matters that will contribute significantly to achieving the vision of the CS and the SCS. In its formulation, SP4 has drawn upon a wide evidence base³² which is proportionate to the issues at hand.

49. In terms of education, the Council has adequate evidence to support its strategic approach. As shown within the Infrastructure Background Paper³³, this includes an analysis of early year's facilities and schools provision related to anticipated need and the provision of further and higher education facilities. The Council has identified its requirement for new secondary schools and I have no reason to find this approach unsound; the details of the proposed new school at Rotherhithe will be carried forward and examined as necessary via the Canada Water AAP process.

50. The combined effect of the CS and the extant development plan will provide an adequate and deliverable framework to safeguard and develop necessary educational facilities which respond suitably to identified demands. Overall, the CS is sound in these respects.

³⁰ RPC9

³¹ CDB10

³² CDB10 et al

³³ CDB10

51. With regard to community facilities, the available evidence base focuses upon the Council's extensive property portfolio. This indicates an insufficient supply of suitable premises to accommodate the various needs of many community groups and is supported by the submissions made to the Examination. Subject to the suggested changes of the Council which I endorse to ensure clarity and effectiveness (**TOC 96, 97 and 98**), SP4 is clear that it seeks to achieve a network of flexible community facilities that can be shared by many groups. Indeed, SP4 will operate alongside the saved policies of the UDP, for example Policies 2.1, 2.2 and 2.5. Thus, whilst additional survey data upon the needs of the voluntary and resident led community sectors would provide a more comprehensive picture of Borough wide needs, I am nonetheless satisfied that the CS is based upon a proportionate evidence base which provides a clear strategic steer towards the provision of facilities for all groups.

52. Such provision is linked to local need which is an established part of the UDP. The term 'local' is undefined within the CS but there is no persuasive reason to consider that such an approach will not enable flexibility to be brought to bear upon the site specific requirements of individual development proposals and that it would be consequently effective. The suggested change RPC12³⁴, relating to the use of empty offices, is not necessary to make the CS sound.

53. The submissions, both verbal and written, indicate an evident need for the provision of premises for faith groups throughout the Borough³⁵. I recognise that it would be challenging to quantify with any precision such need within a dynamic and diverse borough such as Southwark; indeed, I accept that the requirements of differing faith groups transcends Borough boundaries and can be more regional in their origins.

54. The issue is not ignored. The Council's proposed changes to the CS (**TOC 100**) which I endorse, would ensure that the issue is addressed adequately at a strategic level. Overall, the DPD will provide a strategic framework for the provision and efficient use of suitable premises to serve the community, which would include faith groups, over the life of the document. A change to the policy wording to specifically reference faith would highlight the exclusion of other interest groups and is unnecessary.

55. The Council has agreed a statement of common ground with the Southwark PCT, a principal delivery partner, which appears to address the PCT's original concerns. The Council has suggested changes to SP4 which I endorse in order that the cross cutting concern of health is recognised adequately, consistently and effectively (**TOC 88, 89, 90, 91, 95 and 99**). With full regard to these and the available data, for example to be found within the Joint Strategic Needs Assessment³⁶, I subsequently find the approach of the CS to health matters to be founded on a credible and adequate evidence base and consequently sound.

56. The evidence base in support of SP4 is robust. Subject to the suggested changes and with regard to the saved policies and applicable guidance of the UDP, the CS objectives are both deliverable and capable of monitoring in such

³⁴ CDAI35

³⁵ Including CDI28, CDI25 et al

³⁶ CDI24

regards. The CS will provide a suitable and effective strategy for education and services within the Borough.

Matter 8 – Housing

Is the Core Strategy's approach to housing provision deliverable, sufficiently justified and consistent with the London Plan and national planning policy in Planning Policy Statement 3: Housing (PPS 3)? Is the Core Strategy effective in meeting the varied housing needs of the Borough, including students?

57. The provision of adequate housing is a key issue for Southwark and the CS. The Mayor of London has expressed an intention to follow the housing related targets identified within the draft replacement London Plan, with the exception of those relating to Travellers and Gypsies. The Mayor's representatives confirmed that, with particular regard to the quantum of total housing and its approach to student housing in particular, the CS is in general conformity with the existing and draft replacement London Plan. In summary, I have no reason to disagree.

58. The CS draws on national policy guidance and has been produced with a clear awareness of the London Plan, its draft replacement and the London Housing Strategy. In addition the Council has produced a considerable level of data and information focussed upon the South East of London and the Borough in particular. Whilst I heard concerns expressed with regard to the content and accuracy of parts of the available background documents, I am not persuaded that they are methodologically flawed or produced contrary to the available guidance, particularly PPS3. When taken in its entirety, the evidence supporting the Council's strategy is comprehensive³⁷ and sufficiently up to date.

59. The Council's overall approach to housing follows the CS growth areas strategy and, in time, will be supplemented by a Housing DPD which will contain housing site allocations. With due regard to the evidence contained within the Issues and Options, Preferred Options, the EqIA and the available SAs, this is consistent, rational and sound.

Providing New Homes

60. With regard to the Strategic Housing Market Assessment (SHMA), the Housing Requirements Study (HRS) and the Development Capacity Assessment (DCA)³⁸, the CS plans for a net provision of 24,450 new homes. This figure accords with the objectives of the London Plan, although it falls some way short of that contained within the draft replacement London Plan. I note, however, that this is not cause for the Mayor to raise a fundamental concern.

61. The latter has been subject to examination to which the Council intended to contribute further upon housing matters, particularly regarding the issue of overall targets and the methodology of the Mayor of London's Strategic Housing Land Availability Assessment (SHLAA)³⁹. The outcome of the examination is not yet known. Furthermore, based upon an analysis of historic build rates which

³⁷ CDR4; CDB2, 3, 4; CDH1 – 21, CDH23—38; CDCW17; CDAI 6, 15, 73 et al

³⁸ CDH20, 29

³⁹ See CDB3

includes a period when the economy was particularly buoyant, the Council identify that there is no consistent precedent for annual housing completions at a rate which would cumulatively achieve the targets of the draft replacement London Plan. This is undisputed. I am also conscious of the information within the DCA as regards the extent of potential sites.

62. The CS must be flexible and also deliverable, factors which may be prejudiced by overly ambitious targets. Subject to the necessary clarifications suggested by the Council which I endorse for reasons of clarity and effectiveness (**TOC 101, 102, 103 and 108**) and based upon the available evidence which importantly includes the revised housing trajectory for the life of the plan, the amount of housing proposed within the CS, is justified and acceptable.

63. Following on from the overall quantum of housing provision and with due regard to the DCA, CS Policy SP5 provides targets for net new homes in certain areas based upon the London Plan and its draft replacement. I note that the housing indicated within the CS for Bankside, Borough and London Bridge is lower than the target within the London Plan, albeit in accord with the draft replacement LP. In the absence of objection from the GLA and mindful of the strategic nature of the CS, such targets are acceptable.

64. The identification of targets for areas of the Borough not included in the London Plan would, to my mind, increase unduly the prescription of the plan and limit its flexibility in the delivery of overall housing numbers. The submitted approach, which will link to the Housing DPD and relevant SPDs/AAPs in due course for site allocations and associated details, is justified, capable of implementation and therefore sound.

65. In following a growth areas approach to new development, the Council wishes to make sure that as much housing as possible is brought forward whilst, amongst other things, protecting the character of individual places. This is a sound policy aim to which I heard no persuasive dissenting voices.

66. As identified by the Council⁴⁰, PPS1 indicates that development should respond positively to its local context and this is further reflected in the advice of PPS3 which also suggests that, in policy, a range of densities across a plan area should be considered.

67. The CS, in accordance with the aims of national guidance, seeks to make efficient use of land. Policy SP5 includes density ranges for different parts of the Borough and its summary evidence base is provided by CDB4. The principle of linking density to location in terms of 'central', 'urban' and 'suburban' zones is established by the London Plan and its draft replacement. To ensure the effectiveness of the CS, I endorse the Council's suggested change relating to density calculations (**TOC 115**).

68. The CS identifies three simple density zones. The consideration of local character and transport accessibility would be secured to a degree by the CS and SP5. The principle of such an approach, whilst different, is not opposed to the London Plan. I note the comments and absence of concerns from the Mayor of London on this point.

⁴⁰ CDB4 p18

69. The demarcation of the three CS density zones follows on from those found within the UDP which was subject to a direction from the Secretary of State (SoS). I agree with the Inspector's report into the UDP which noted that the identification of zones is bound to be of a generalised nature and that some suburban zones will include parts with more urban characteristics. As a consequence, the use of zones for development control purposes will inevitably be a blunt tool. The Inspector continued to identify that other policies will, in the assessment of specific schemes, also apply; thereby ensuring that, for example, higher densities where appropriate would not be precluded by a particular density zoning.

70. Such a position is unaltered by the simplification within the CS of the density ranges found within the London Plan. CS Policy SP5 dispenses with a specific link to PTAL scores and sets density ranges at the upper level of each zone as defined in the London Plan. SP5 is designed to operate at a strategic level and in conjunction with the criteria of saved UDP Policy 3.11 which relates to the efficient use of land. I consider that this link is important. However, despite the suggested change of the Council to increase the flexibility of SP5 (TOC 105) I remain concerned as to whether the Council's approach to development and density is sufficiently flexible and thereby effective.

71. The justification for Policy SP5 includes an aim to make sure that the right amount of development happens in the right places, making efficient use of land and avoiding harm to the environment. As noted above, the three simple density zones within the CS are crude indicators of general density levels; the achievement of the policy aims would not necessarily be secured by the mechanistic application of Policy SP5. The blunt tool referred to by the UDP Inspector requires honing to ensure effectiveness. Density zones, as acknowledged by the Mayor's Housing SPG, are a guide and not a rule and for this reason I consider that there should be adequate flexibility within the policy to ensure the effective delivery of its aims.

72. Based upon the available evidence, in recognition that the CS is a strategic document and given the very broad nature of the density zones identified, I conclude that this is best achieved by identifying the normal level of expectations relating to density; this should acknowledge, in an explicit manner, the need to take account of other matters. These will include non-residential uses and considerations such as, for example, UDP Policy 3.11 and any relevant SPG/SPD. Such an approach would reinforce suitably the flexibility of policy in applying density requirements without undermining the growth area approach to housing which underpins the Council's strategy. I therefore recommend a change to SP5 (See **IC1** – Appendix B).

73. The primary difference between the CS and the UDP relates to the increased size of the suburban density zone to include the Rotherhithe peninsula and land to the centre of the Borough. Whilst Core Document CDB4 indicates that this change is derived from research found in the Borough-wide Strategic Tall Building Study⁴¹, this is unconvincing in its detail.

74. I am conscious of the background to this issue, particularly prior to the adoption of the UDP⁴² when the Secretary of State (SoS) directed that the

⁴¹ CDD1

⁴² CDL14, 15, CDH18 et al

Rotherhithe peninsula should be designated as an 'urban' zone. The available evidence for the density characteristics in the Rotherhithe area was based primarily upon that produced in 2002/3. It is evident that since 2002 and since the adoption of the UDP further urban intensification has occurred in parts of the Borough such as Canada Water. I have been mindful of what has altered since the adoption of the UDP.

75. I sought clarification of the evidence in support of this aspect of the CS. Following consideration of its position and partly in conjunction with the Mayor of London, the Council provided further information relating to the issue of density⁴³. This analysed the character of distinct areas and has been presented in support of the submitted CS. This has been subject to public consultation.

76. The evidence presented by the Council in relation to the Rotherhithe (North Suburban Density Zone) identifies a number of distinct character areas which it cites in support of its 'suburban' designation. The analysis provided does indicate, in line with the definitions within the London Plan, areas of lower density development, essentially residential with small footprints and of low building heights set amongst significant areas of open space.

77. However, there is limited analysis of public transport accessibility, an inevitable degree of selection in the building blocks analysed and a limited recognition of consented developments yet to be implemented fully. This is certainly the case around the Canada Water Core Area which would appear to maintain more urban characteristics. With the latter in mind, the defined Core Area/town centre boundary contained within the CS is not justified adequately by the available evidence.

78. Nevertheless, the CS is a strategic document and subsequent DPDs, such as the Canada Water AAP, will focus on specific details pertaining to certain areas of the Borough. Whilst the majority of the available evidence supports the suburban designation of the wider Rotherhithe peninsula, I identify the need for further examination into the justification for the Canada Water Core Area/town centre boundary. To avoid further delay, I am satisfied that this can be secured through the scheduled examination into the Canada Water AAP. This will examine and establish the appropriate boundary position and specific details relating to the development of identified sites. I therefore do not endorse Map N2, Appendix Q⁴⁴ which indicates specifically the proposed Action Area Core Boundary.

79. With regard to the 'Middle Suburban Density Zone' and following my own visit to the area, I acknowledge that East Dulwich and Peckham Rye do display various suburban traits. Whilst the density characteristics of Lordship Lane are increasingly akin to the urban zone to the north, on balance, the revised density zone of the CS is supported adequately by the available evidence and the application of SP5 will ensure that development densities reflect the Council's policy aim of promoting suitable levels of housing which reflect local character.

80. The Council has chosen, where warranted by exemplary design, to explicitly permit development of greater density within its action area cores and opportunity areas. This is broadly consistent with the growth area approach of

⁴³ CDAI72, CDAI73 et al

⁴⁴ CDAI36

the CS as a whole. Subject to the Council's suggested changes in relation to design, which I endorse for reasons of clarity and deliverability (**TOC 109, 110 and 111**), I have no reason to consider this aspect of the policy is unsound. I am not persuaded that the CS should be altered to enable exemplary design to warrant unduly great densities outside of such areas; although, in the context of Policy SP5, design is invariably a material consideration which will attract appropriate weight in the determination process of any housing scheme.

Homes for people on different incomes

81. CS SP6 aims to provide a minimum number of new homes of different tenures to people on a wide range of incomes. It has evidently evolved logically from the Issues and Options stage. The chosen approach follows the growth areas strategy of the CS and, on the whole, is supported adequately by both the SA and the EqIA.

82. I endorse the Council's suggested changes (**TOC 117, 118, 119, 120, 217 and 218**) which provide necessary clarity to the wording of SP6 and ensure its effectiveness in relation to the net provision of affordable housing over the plan period, both as an overall total and within specific parts of the Borough.

83. The CS seeks to strike an appropriate balance between the provision of a suitable mix of housing across all tenures and parts of the Borough with a requisite and viable provision of as many as possible affordable units. Indeed, the viability evidence is robust and neither indicates that SP6 would constrain housing delivery unacceptably nor support a percentage target for affordable housing in excess of 35%. This target is expressed as a minimum which will enable a higher provision of affordable homes in certain circumstances.

84. I have considered the extent to which the use of the word 'must' in the final bullet point of SP6 will be effective in delivering the policy aims. Undoubtedly, the worded policy provides clear strategic direction for the provision of a suitable housing mix. Development proposals which may seek to vary from the CS in this regard would not be precluded from identifying material factors in their support. On balance, I am satisfied that the importance of this issue and the geographic distribution identified within Figure 22 means that the CS would not be unduly prescriptive and, with regard to flexibility, would be effective.

85. SP6 sets out the Council's chosen policy position clearly and cross references suitably the saved elements of the UDP regarding tenure splits⁴⁵ and the detail which will follow within the Housing DPD. It does not preclude the consideration of development viability in its wording, is in general conformity with the London Plan and consequently is not too prescriptive or inflexible.

86. Undoubtedly the housing needs of the Borough present a challenge to the Council and its partners. This includes housing of all tenures. I have noted the submissions made, including those from the participants to the Hearings, with particular regard to the social rented sector and the need for accessible intermediate housing. Even so and with regard to the London Housing Strategy and the draft replacement London Plan, the Council has chosen a balanced strategy to deliver a range of housing which, on the basis of the available evidence, is cogent. The Council will use the AMR to manage, and as necessary

⁴⁵ CS page 79

review, the overall delivery of the policy objectives which appear feasible. I do not find this approach unsound.

87. The matter of migrant workers has been addressed adequately within the evidence base, if not by a level of detail that some participants would have wished. Whilst undoubtedly an important consideration, I am persuaded that the manner in which the Council has considered migrant households has not skewed assessments of housing need across the Borough such that SP6 is insufficiently justified.

Family Homes

88. The available evidence, for example the SHMA and the HRS, indicates the range of housing needs within the Borough set within the London context. There is a particular need for family housing of various sizes and it is a strategic concern which warrants specific inclusion within the CS. However, PPS3 and the London Plan require a mix of housing to be provided. It is consequently challenging for the Borough to deliver sufficient housing to meet its needs, such as 3 bedroomed homes, and ensure an adequate housing mix which is viable and not inflexibly prescribed.

89. SP7 has been simplified from that contained in the Preferred Options and I endorse the Council's proposed changes to ensure clarity and effectiveness of the chosen approach (**TOC 125 and 126**). Linked to the issue of density and in line with the growth areas approach of the CS as a whole, it seeks to provide a range of housing sizes with as many family sized dwellings as possible across all tenures which are not differentiated within the policy. I accept the SA and EqIA both of which identify the positive impacts arising from the offer of a wider choice of suitable housing types.

90. The CS identifies family sized dwellings as having 3 or more bedrooms yet acknowledges that larger 2 bedroomed properties can, to a degree, fulfil some family needs. I have no substantive reason to dispute this position and endorse the Council's suggested change (**TOC 128**) to ensure clarity.

91. With due regard to the submissions made, there is insufficient evidence to suggest that a greater proportion of three bedroomed and larger homes would be deliverable. I consider that the Council's targets are reasonable minimums. Further details in relation to implementation will, as necessary, flow from the intended Housing DPD.

92. The stated requirements for proportions of family housing provides clear strategic direction linked to the identified objectives. Development proposals which may vary from the CS in this regard would not be precluded from identifying material factors, for example site or local area characteristics, in their support; such considerations would be taken into account and given appropriate weight in the determination of any planning application. On balance and similar to my finding in relation to SP6, I conclude that SP7 would not be unduly prescriptive and would be clear and effective.

93. I note the aims of the London Housing Strategy, for example Policy 1.1.C which requires the provision of more family sized affordable homes, but this is a London wide, rather than Borough specific, strategy and the draft replacement London Plan allows for local variations in provision. SP7 will set minimum targets

for the delivery of 2, 3, 4 or more bedroomed housing, dependent upon location, which will enable flexibility in actual provision with full regard to the site characteristics of particular development proposals. This strikes me as a pragmatic and acceptable response to the needs of the Borough.

94. As a strategic document, the CS provides adequate detail with regard to family housing and I am not persuaded of the need to address specifically the matter of supported housing units. The need for supported units is addressed to a degree by the extant development plan and can be addressed further by the Council's Housing Strategy and, as required, by details in future DPDs. At a strategic level I identify no fundamental conflict between the CS and the content of CDAI63⁴⁶.

95. As set out within CDB3, I do not dispute the necessity for minimum floor area standards to apply within the Borough and, as illustrated by their inclusion within the draft replacement London Plan, they can be considered a matter of strategic concern. However, their inclusion within the Core Strategy in the form proposed is not justified adequately and I am concerned that they will not aid the effective delivery of the housing policy objectives.

96. The sizes required by SP7 exceed the minimum floor areas indicated by the Council's Aylesbury AAP, its Residential Design Standards SPD and, excluding 1 bedroom units, those within the draft replacement London Plan and the Mayor's London Housing Design Guide. Indeed, the simplistic approach indicated by SP7, unlike the draft replacement London Plan and the Aylesbury AAP, makes no allowance for levels of intended occupancy within different dwelling types, for example three or four persons within a two bedroom flat; a factor which inevitably influences the necessity and requirement for adequate space.

97. The submitted evidence does not, unlike the reasoning provided within the Aylesbury AAP for example, justify the standards within SP7. Their inclusion gives insufficient flexibility to the CS to allow, for example, the innovative design of 2 bedroomed (three person) housing developments which may be able to deliver suitable quality housing below the size threshold required. Floor space standards could be placed reasonably in a supporting DPD, as seen in the Aylesbury AAP or, for example, the intended Housing DPD. They should incorporate a degree of flexibility to allow for the specifics of development sites and development schemes. As submitted, SP7 is too prescriptive, inflexible and consequently ineffective. I therefore recommend a change to SP7 (**IC2** – Appendix B) and its supporting text to delete the inclusion of the standards shown and to allow greater flexibility for the implementation of the policy objectives. The existing position upon floor space standards will remain operational and such a change will neither impact to a material degree upon SA nor necessitate further reasonable consultation.

Student Homes

98. There is no doubt that the Council recognises the need for more student housing across London and that it seeks to balance this against the significant need within Southwark for other types of housing. This is demonstrated within SP8. Whilst the Council have unsurprisingly focussed upon Southwark, the

⁴⁶ Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing in an Ageing Society

submitted evidence⁴⁷ base includes data for London as a whole. Borough targets for the provision of student housing have not been set by the Mayor of London and, when taken in the round, the available evidence in support of the Council's approach is sufficiently robust.

99. The Council have suggested a change to the CS which, by deleting reference to 'local' universities, would acknowledge the nature of the pan-London student housing market and its need. By so doing the CS would conform with the London Plan. For the reasons outlined by the Council⁴⁸, the deletion of 'local' would not represent a substantive alteration to the policy and I endorse the proposed change (**TOC 131**).

100. In recognition of the Council's aim to balance student and non-student housing, SP8 requires an element of affordable housing to be provided as part of student schemes, either on-site or via paid contributions and in line with SP6. This is particularly important given the finite land supply and the likelihood that possible housing sites identified in the SHLAA and the DCA could come forward for student housing provision.

101. The evidence relating to the viability of providing affordable housing includes testing⁴⁹. This indicates a potential difference between the likely viability of private student schemes to achieve 35% affordable housing and those schemes promoted by universities. Nevertheless, site specific circumstances will determine precisely the viability of developments which come forward. I endorse the changes proposed by the Council which will aid the clarity and effectiveness of the policy (**TOC 133 and 134**) and I am satisfied that the CS sets out clearly the policy objectives of the Council in a credible and deliverable fashion.

102. In terms of the effective implementation of SP8, adequate flexibility will be achieved via policy and guidance which currently exists at a national level (including circulars), the extant development plan, including UDP Policy 4.7, and the intended details which will be set out in the Council's future Housing and/or Development Management DPDs and associated guidance. The balanced nature of SP8 and its supporting text would not limit unduly the supply of necessary student housing.

103. SP8 is underpinned by a requirement to demonstrate a 'need' for development. This, in conjunction with considerations relating to the location and accessibility of emerging sites, will provide some control over speculative student development. A maximum total or 'quota' of students within the Borough would not ensure flexibility in the CS nor be practical given the London wide dynamics of the need. The provisions of SP8 provide adequate reference for the protection of local character.

Homes for Travellers and Gypsies

104. SP9 identifies an intention to protect existing Traveller and Gypsy sites and provide new sites to meet future accommodation needs, as summarised in the Housing Background Papers⁵⁰, via a criterion based approach. I am mindful of

⁴⁷ CDR23, CDH15 et al

⁴⁸ CDA110

⁴⁹ CDH16

⁵⁰ CDB 2 and 3

the advice of Circular 1/06, albeit acknowledging that the Government intend to withdraw this document, and note that the Council proposes changes to its supporting text in order to express its intentions in a more positive manner.

105. The Mayor of London no longer intends to set a prescriptive target for the provision of pitches/accommodation. This is reflected in the CS approach. A specific CS target is not necessary, being a matter which can be resolved, for example, through the intended Housing DPD. Overall, the CS approach is adequately evidenced in terms of current and forecast needs.

106. I endorse the suggested changes of the Council to ensure the effectiveness of the CS and its consistency with government advice (**TOC 136 and 137**) and I find SP9 sufficiently flexible in terms of future provision, both with regard to the amount of accommodation and its location.

Matter 9 – Open Space and Wildlife/Habitats

Is the approach of the DPD in general conformity with the London Plan and evidenced adequately with due regard to PPS9⁵¹ and PPG17⁵²? Will the approach be effective, particularly with regard to flexibility?

107. Strategic Policy 11 sets out the Council's approach to open space and wildlife. In terms of open space, the evidence for SP11 relies in large part upon the Council's Open Spaces Strategy⁵³. This document seeks to follow the advice of PPG17 and its Companion Guide. As such it justifies adequately the strategic aims of the policy itself, particularly in seeking to protect existing open space and resolve deficiencies in provision throughout the Borough.

108. In advance of the intended DMDPD, the policy objectives of the CS will be achieved with sufficient flexibility via the saved policies of the UDP and associated guidance. This will encompass existing open spaces and those required in relation to new development. In reaching this view and notwithstanding my comments below, the proposed policy is, as stated by the Mayor of London, in general conformity with the London Plan.

109. However, the Open Spaces Strategy available to me is, with due regard to PPG17, the Companion Guide and its own content, incomplete. It is an evidence base from which a strategy is intended to be developed encompassing standards, quantity and accessibility. This strategy has, regrettably, not been published. Thus the evidence base for the details proposed within the CS is, with due regard to the guidance of PPG17, inadequate. Against this context, there is consequently insufficient justification for the proposed allocation of new open spaces, for example at Carter Place, Crossbones Graveyard and others.

110. PPS12 identifies the strategic nature of a CS. Such detailed matters can flow reasonably from the CS and be advanced, as acknowledged by the Council⁵⁴, through subsequent DPDs/SPDs. This would be the most suitable mechanism to take forward such work, allowing for any necessary examination/assessment of the more detailed evidence which would be available to support proposed site

⁵¹ Biodiversity and Geological Conservation

⁵² Planning for open space, sport and recreation

⁵³ CDEN3

⁵⁴ CDAI29

allocations, particularly with regard to open space standards, the specific open space deficiencies throughout the Borough and the suitability of alternative proposals. I endorse the Council's suggested changes in this regard (**TOC 146 and 148**).

111. With regard to the proposals map, notwithstanding the necessary corrections to the inaccurately drawn MOL boundary, I find that the evidence which supports the proposed alterations in respect of open space allocations most unpersuasive and, in light of the changes endorsed above, should not be pursued at this immediate time.

112. With regard to habitats, wildlife conservation and biodiversity, the available evidence base, particularly the AA and the Biodiversity Action Plans for Southwark and London, indicates general conformity with the London Plan and its draft replacement. In such terms SP11 accords with the thrust of PPS9.

113. At the time of the Hearings there was limited evidence pertaining to geological conservation. In the context of PPS9 and subsequent to the hearing sessions, the Council has prepared a factual note on geological diversity⁵⁵. This, in conjunction with supporting evidence found within the flood risk information and the additional documentation relevant to London⁵⁶, leads me to find that, at a strategic level, geological interests would be conserved.

114. The evidence in support of new Sites of Importance for Nature Conservation (SINCs) is variable and not necessarily comprehensive across the Borough. For example, the identification of certain proposed sites appears predicated on a simple 'walkover' inspection. I therefore consider that such new designations are insufficiently justified and should not be taken forward through the CS. To reflect this I recommend a change (**IC3** – Appendix B) to the text of the CS as shown. The CS is a strategic document and I am unpersuaded that it is the appropriate means by which specific new areas should be designated. Such important matters, as recognised by the Council, can be comprehensively identified and tested through subsequent detailed DPDs/SPDs.

115. The Council's suggested changes to SP11 will provide consistency with the London Plan and the work of community partners. They will ensure that the CS recognises adequately the role of green chains, corridors and links within the Borough and accord with the Mayor's Biodiversity Strategy. Similarly the proposed changes will identify suitably the acknowledged role of local food production. I endorse such necessary changes in the interests of clarity, effectiveness and deliverability (**TOC 142, 143, 144, 150, 151 and 152**).

116. The Council have agreed with English Heritage the need to recognise the heritage importance of certain open spaces through suggested changes to the text of the CS (**TOC 145**). I do not dissent from this approach which will aid the recognition of the significance of heritage assets in line with PPS5 and ensure the CS is sound in its content.

117. Subject to the changes identified above, SP11 and the CS approach to open space and wildlife is based upon a sufficiently sound and robust evidence base. The CS, in conjunction with subsequent DPDs and related SPDs, will

⁵⁵ CDAI56

⁵⁶ CDAI57, CDAI58,

provide a deliverable strategy towards open space and wildlife interests that, in light of the monitoring intended, will be effective.

Matter 10 – Waste and Environmental Standards

Is the evidence base in support of the CS approach to waste robust? Are the Core Strategy's measures for addressing climate change, air quality and water resources supported adequately by the evidence base, consistent with national policy in PPS 1's Climate Change Supplement and effective?

118. SP13 sets out the Council's intention to secure high environmental standards for development. In relation to non-waste or flooding related matters it is evidenced by a range of documents⁵⁷ including the SA. Within the context of the stated objectives of the London Plan and its draft replacement, SP13 cross references suitably such matters as the Code for Sustainable Homes, BREEAM objectives and the application of the energy hierarchy. Whilst submissions made to the Hearings sought a greater ambition for the vision of the CS in this area, SP13 and the CS as a whole, particularly when set against the context of PPS1 and its Climate Change supplement, is adequate, in conformity with the London Plan and sound.

119. I heard and received a number of detailed submissions which sought to identify targets for the Borough in terms of low carbon building stock, the use of biomass, the provision of sustainable infrastructure and the need to analyse fully the implications of embedded energy within buildings, particularly in the context of urban renewal. Such matters are certainly of potential importance in assessing the environmental implications of development proposals. Nevertheless, the CS provides sufficient strategic direction and a number of potential policy 'hooks' upon which more detailed policy and guidance can be devised and suitable targets secured, for example the DMDPD and any review of the Council's Sustainable Construction SPD. The absence of specific details on a number of energy related matters within the CS does not make the document unsound or contrary to the city wide objectives within the London Plan and its draft replacement.

120. I agree with the Council's suggested changes to the supporting text of SP13 (**TOC 169**) which will provide a suitable reference to the 'retro-fitting' of existing buildings to improve energy efficiency and their performance in sustainability terms. However, I see no reason why the requirements of the 'retro-fitting' industry (in terms of location, storage and operational bases) cannot be met by the commercial and industrial sites which exist within the Borough and elsewhere; a change to SP13 and its text is unnecessary in this regard.

121. I endorse the Council's suggested alterations to the text of SP13 (**TOC 178 and 179**) which will introduce suitable clarity and flexibility to the application of targets on CS page 108 which development will be expected, rather than required, to meet. Such matters will be subject to updates as necessary and I am satisfied that they are not unduly prescriptive, that they will complement the Building Regulations and that the evidence does not support concerns that they will suppress new development coming forward throughout the Borough.

⁵⁷ CDB1, CDB7, CDB10 et al

122. The evidence base relating to flood risk and water resources is adequate and credible⁵⁸. The Council has suggested changes to the CS to recognise the importance of the Thames Tunnel and available water resources (**TOC 168 and 176**). I agree that such changes are necessary to ensure completeness and clarity within the CS and to complement the stated strategic intention to manage the consumption and disposal of water resources whilst addressing positively issues of water quality.

123. Air quality and pollution are of particular concern in parts of the Borough. To this end, SP13 and its supporting text, which identifies clearly the designated Air Quality Management Area, will enable the Council to address effectively matters of air pollution, particularly with regard to the saved UDP policies and future DPDs and associated guidance.

124. The evidence base in support of the Council's approach to waste⁵⁹ incorporates an updated and adequately robust analysis of the Borough's waste management strategy and demonstrates a commitment to working with neighbouring Councils and relevant partners. Subject to suggested changes to the CS, I note that the Mayor of London confirms no outstanding issues of general conformity with the London Plan. With this in mind, the CS, in conjunction with the extant development plan policies and the intended DPDs, will safeguard adequate land for waste management within the Borough of sufficient capacity for the life of the CS. I endorse the suggested changes of the Council in these regards to ensure clarity and an effective policy (**TOC 166, 167 and 173**).

125. In the interests of clarity and of consistency with the London Plan and its draft replacement, I endorse the Council's suggested and necessary clarifications to the text of the CS as they relate to its approach to hazardous waste (**TOC 175**) and its affirmation of a commitment to the waste hierarchy and any resulting Waste Management Strategy (**TOC 170 and 171**).

126. Subject to the changes identified, SP13 does not carry an implication that development will be required to specifically and unreasonably address pre-existing pollution and amenity problems. The evidence base to SP13 is robust and its objectives are deliverable, capable of monitoring and thereby effective.

Matter 11 – Design and Conservation

Is the approach of the DPD to design and tall buildings justified by the evidence base and the most appropriate strategy when considered against alternatives, with particular regard to the historic environment?

127. SP12 draws upon a broad evidence base which includes recent and on-going work into tall buildings⁶⁰. The CS reflects the direction provided by the Mayor of London and, despite variations in the use of descriptive language, is in general conformity with the London Plan and its draft replacement.

128. I note the statement of common ground⁶¹ between the Council and English Heritage which, amongst other things, clarified the approach of the former in

⁵⁸ CDEN2, CDB7, CDB8 et al

⁵⁹ CDB10, CDB12, CDEN7, CDAI16 et al

⁶⁰ CDB11, CDAI14, CDD1, CDD2 et al

⁶¹ CDAI13

compiling its evidence and has led to the withdrawal of concerns from the latter. Whilst many in number, the suggested changes of the Council are necessary to ensure consistency between the CS, PPS5 and the London Plan whilst also ensuring the extent and intentions of the policy itself are clarified. Such changes are not significant in their individual or cumulative effect such that further consultation or SA is required. I therefore endorse the Council's suggested changes (**TOC 14, 153-156 and 163**).

129. The CS has been informed by, and drawn adequately upon, the English Heritage and CABA advice on tall buildings⁶². The CS does not seek to identify specific tall building sites but broad locations where such structures may be acceptable and identifies those via a logical and credible methodology. The extant development plan will manage the delivery of tall buildings in the short term and will be supplemented or replaced by further detailed policy and guidance which will flow from the CS, for example in the form of AAPs and/or SPDs.

130. Such documents will influence directly the delivery and implementation of tall buildings and, in their production, will provide further and appropriate opportunity for consultation and consideration of site specific matters, for example as relates to the SPD for Bankside, Borough and London Bridge. Such an arrangement is sound.

131. I endorse the Council's change (**TOC 164**) which ensures that the factual definition of a tall building is clear and consistent with national advice. Bearing in mind the stated approach of the CS to tall buildings, SP12 does not preclude the consideration of context for a site specific proposal, particularly given the extant provisions of the current development plan. The UDP and related guidance⁶³ provide an adequate indication of what is meant by 'exemplary design' and the CS is neither unduly prescriptive nor unclear upon such matters. The Council will be able to consider the merits of individual proposals and their potential effects on a range of issues, for example the local context and their proximity to public parks. Thus a change to explicitly direct tall buildings away from public park boundaries is unnecessary.

132. I heard concerns that the increased population density potentially created by tall buildings and more intensive regeneration will merely repeat mistakes of earlier eras and result in a range of socio-economic difficulties for residents in particular and the Borough as a whole. However, there is no substantive evidence that tall buildings and regeneration invariably create such outcomes. I am mindful of the Council's SA and its EqIA in this regard and consider that the breadth of the Council's policies which are to be found currently within the CS, the UDP and associated guidance provide a range of tools to address with suitable care the implementation of tall structures and wider regeneration development, for example, as relate to design, tenure mix, open space and infrastructure support. I do not consider the CS unsound for these reasons.

133. As indicated by the references to the London View Management Framework, strategically important landmarks have been considered adequately in formulating SP12. Furthermore, and as emphasised by the Council's suggested changes, the CS makes suitable reference to the range of heritage assets which

⁶² CDN25

⁶³ CDSPD8 et al

exist within Southwark and its neighbouring areas, including the Tower of London World Heritage Site. The CS acknowledges the updated government advice relating to archaeology⁶⁴ and the available evidence upon this matter is sufficiently robust.

134. Overall, the Council's approach to design and conservation is supported by a robust and credible evidence base which is capable of effective implementation and monitoring.

Matter 12 – Implementation and Monitoring

Does the CS address adequately the provision of necessary infrastructure to support the delivery of the strategic objectives? Are the Core Strategy's monitoring targets justified adequately and of a level of detail that is appropriate to a Core Strategy?

135. Sections 6 and 7, including SP14, of the CS relate specifically to Implementation and Monitoring. These parts of the plan are adequately focussed upon the delivery of the vision of the CS and are logically linked to the Themes and SOs identified within Section 3. In so doing the Council recognises suitably the importance of partners, local communities and developers.

136. The CS contains appropriate and adequate reference to the Community Infrastructure Levy and the role of planning obligations in securing necessary infrastructure and facilities. To provide clarity and in support of effective implementation I endorse the Council's suggested change (**TOC 20**) in relation to the text of the CS.

137. Tables 1 and 2 of Section 6 provide a reasonable indication of the delivery and implementation implications for each policy, including infrastructure. I recognise the difficulties faced in assessing the extent of infrastructure required for all aspects of the CS, particularly in terms of timescale and cost. With this in mind, I endorse the Council's suggested changes to SP14 and its text (**TOC 185-203; 207, 208, 216-220**) which will ensure the clarity of the CS and the effectiveness of the plan in terms of infrastructure provision. On balance, the CS provides sufficient strategic clarity as to what will be required and clear direction that necessary infrastructure must be timetabled and available to serve the developments concerned.

138. Table 3 in Section 7 provides details of what indicators will be used to monitor the outcomes of the CS policies; linked closely to the SOs. This recognises the value of the AMR adequately. The AMR will also ensure that area specific data, including the health of town centres and the effectiveness of transport policies, is obtained to ensure the effectiveness of CS policy and, at a subsequent date, other elements of the LDF (eg AAPs/SPDs). The monitoring targets are sufficient to ensure the policy aims of the CS are being assessed; enabling management and review as consequently required.

139. The revised Table 4, in Appendix B of the CS, provides useful and adequate detail and information with regard to the relationship of the CS to the extant development plan and any planned DPD/SPD/associated guidance.

⁶⁴ CDEN25 et al

140. Even in times of economic uncertainty, I have no substantive reason to doubt that the infrastructure necessary to support the development indicated over the life of the plan will be secured. Overall, the implementation and monitoring of the CS is addressed adequately and in broad accord with national guidance, including PPS4.

Minor Changes

141. The Council has proposed a range of minor changes to the submitted DPD in order to clarify, correct and update various parts of the document. Although these changes do not address key aspects of soundness, I recognise that many have emerged from the discussions held at the Hearing sessions. Excepting those relating to new open space/SINCs, including revised Figure N27 and TOC149, they generally assist the clarity, consistency and accuracy of the document. I note that the Figures within the CS are intended to be indicative and not prescriptive. These changes, not referenced above, are the remainder of those shown in Appendix A.

Legal Requirements

142. My examination of the compliance of the Core Strategy with the legal requirements is summarised in the table below. I conclude that the Core Strategy meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS January 2010 ⁶⁵ which sets out an expected adoption date of January 2011. Due to the necessity for the submission of additional evidence, this will likely slip but, notwithstanding this fact, the Core Strategy is in overall compliance with the LDS. The LDS is likely to alter in accordance with a revised draft ⁶⁶ but, other than with regard to the adoption date, this will not impact directly upon the Core Strategy.
Statement of Community Involvement (SCI) and relevant regulations	Consultation has been compliant with the requirements of the adopted SCI ⁶⁷ (2008). The documents submitted, including the Core Strategy Submission Consultation Report ⁶⁸ and its Self Assessment Paper ⁶⁹ , indicate that the requirements as set out in the Regulations have been met.
Sustainability Appraisal (SA)	SA ⁷⁰ has been carried out and is adequate.
Appropriate Assessment (AA)	The Appropriate Assessment Screening ⁷¹ sets out that none of the policies of the submitted Core

⁶⁵ CDL5

⁶⁶ CDL16

⁶⁷ CDL4

⁶⁸ CDCS16

⁶⁹ CDB13

⁷⁰ CDCS14

⁷¹ CDCS5

	Strategy, or the document as a whole, are likely to have any significant discernible adverse impacts on designated European sites.
National Policy	The Core Strategy complies with national policy.
The London Plan	The Core Strategy conforms with The London Plan.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS ⁷² .
2004 Act and Regulations (as amended)	The Core Strategy complies with the Act and the Regulations.

Overall Conclusions

143. I conclude that with the changes proposed by the Council, as set out within the highlighted parts of Appendix A, and the changes that I recommend, set out in Appendix B, the Southwark Council Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. I therefore recommend that the plan be changed accordingly, and for the avoidance of doubt except where previously referenced, I endorse the Council's proposed minor changes, also included within Appendix A.

A J Seaman

INSPECTOR

This report is accompanied by:

Appendix A (separate document) - Consolidated Table of Proposed Changes from Southwark Council.

Appendix B (separate document) - Inspector's Recommended Changes

⁷² CDL2

Appendix A

Consolidated Table of Proposed Changes from Southwark Borough Council.

Those changes endorsed by the Planning Inspector for reasons of soundness are shaded in green.

Table of changes:

Table of changes reference	Previous reference number	Page	Paragraph/policy/figure	Errata Change (CH)	Proposed change (deleted text is struck-through and new text is underlined)	Reason for change	Representation No. Addressed	Core document number where relevant	Date of proposed change	Replaces previous proposed change?
TOC1	PC05		General comment	Ch	Change Camberwell AAP to SPD throughout the document.	To reflect changes in the draft Local Development Scheme.			22 July 2010	
TOC2	PC06		General comment	Ch	Put all bullet points in the policies into numbers	To improve ease of referencing			21 July 2010	
TOC3	TOC1	10 and 197	6 th paragraph and figure 30	Ch	Page 10 "... planning obligations/section 106, Aylesbury public realm, Aylesbury planning obligations/section 106, sustainability..." Page 197 Delete "Aylesbury-section 106-SPD prepeseed" from the figure 30.	The Local Development Scheme has subsequently been agreed with Government Office for London. The planning obligations/section 106 SPD will also cover the Aylesbury rather than having a separate section 106 SPD for the Aylesbury.			26 March 2010	
TOC4	TOC2	11	Supporting documents for the core strategy	Ch	Background papers (the evidence base): <u>This</u> These reports provides more information...	We have split up our background papers to make them easier to read rather than having one background paper.			26 March 2010	
TOC5	TOC3	11	Introduction: Supporting documents for the core strategy	Ch	Add in the web addresses for the supporting documents and background papers. The supporting documents are available at http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/planningpolicy/corestrategy.html The full evidence base is available at http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/planningpolicy/researchandinformation/	Government Office for London (rep 798) advised us to make better links between the documents and evidence base.	Rep 798 – Government Office for London		26 March 2010	
TOC6	PC07	13	Finding the objectives, policies, maps and appendices	Ch	Add in additional bullet point: There are a number of environmental targets. These may be updated and will be found at www.southwark.gov.uk/corestrategy	To cross reference to targets set out in Strategic Policy 13 text			29 July 2010	
TOC7	TOC4	14	2 nd paragraph add as second sentence	Ch	Insert: "Southwark's population is projected to increase by 12% to 2029 based on data from the Office of National Statistics and by 39% based on figures from the Greater London Authority. This means that the population is likely to grow between 1,300 and 4,000 additional people each year."	This information would be useful as background information. This is in response to rep 803.	Rep 803 – NHS PCT		26 March 2010	

Table of changes reference	Previous reference number	Page	Paragraph/ figure	Errata (E) Change (CH)	Proposed change (deleted text is struck-through and new text is underlined)	Reason for change	Representation No. Addressed	Core document number where relevant	Date of proposed change	Replaces previous proposed change?
TOC8	TOC5	14	5 th paragraph	Ch	However the government estimates the borough is still in 48 th 26 th position nationally out of the 354 councils for the extent of deprivation.	The most up-to-date Indices of Multiple Deprivation show Southwark as 26 th most deprived rather than 18 th .			26 March 2010	
TOC9	TOC6	17	under the 2 nd paragraph	Ch	Insert: "The major health problems in Southwark are heart disease and stroke, cancer, diabetes, mental health problems and obesity leading to other diseases. These health conditions are influenced by wide range of determinants, such as demography, location, socio-economic status, access to services, housing conditions and the quality of the built and natural environment."	This additional fact could be useful as background information. This is in response to rep 803.	Rep 803 – NHS PCT		26 March 2010	
TOC10	TOC7	17	2 nd sentence of 3 rd paragraph	Ch	Southwark also has a high rate of child obesity with 11.5% of children in reception year recorded as obese in 2006/7 compared with 10% nationally. "A major risk factor for long term health of local children is the continuing trend of obesity. Over a quarter (26%) of Year 6 children in the borough are obese, one of the highest rates in the country."	Although the fact in the core strategy is correct, the target used by the government to measure performance is based on the suggested change. This is in response to rep 803.	Rep 803 – NHS PCT		26 March 2010	
TOC11	AC01	20	inserted after paragraph 8	CH	The underground network is concentrated in the north where there are nine underground stations including London Bridge, Borough, Elephant and Castle, Kennington, Surrey Quays, Rotherhithe, Southwark, Bermondsey and Canada Water. These are on four different lines including the Northern, Bakerloo, Jubilee and East London lines.	TfL suggested that on pages 20-21 there should be further mention of underground stations.	565	CDA13	12 July 2010	
TOC12	TOC8	Page 20, figure 17, change to proposals map E43	2 – Getting around, 2 nd from bottom paragraph	E	There are also 8 6 piers for ferries, and private boats, which are owned and run by London River Services, the Port of London Authority, and businesses. Amendments to figure 17 and the proposals map via map E45 to remove Jacob's Pier. These changes are set out in the appendices to this table of changes: Appendix A: Figure 17 Appendix B: Figure N43	Factual update. The Port of London Authority (rep 51) commented that there are only 7 piers not 8. Jacob's pier is for private residential use and should not be included.	Rep 51 – Port of London Authority		26 March 2010	

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TOC13	TOC9	23	Challenges and opportunities	Ch	"Help tackle the major health issues and inequalities in Southwark, such as obesity and mental health by addressing the environmental, social and economic factors that can influence health."	The PCT have identified this as a challenge. This is useful background information. This is in response to rep 803.	Rep 803 – NHS PCT		26 March 2010	
TOC14	AC02	24	Challenges and opportunities	Ch	Amend 2 nd bullet of Challenges and opportunities on page 24 as follows: <u>Protect</u> <u>Conserve</u> and enhance heritage assets and wider historic environment historic areas and make sure open spaces are cared for and used.	To be consistent with PPS5	214	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	TOC10
TOC15	TOC11	26	Figure 7	Er	Change wording in the legend for proposed metropolitan-centre-should be amended to proposed major town centre. This change is set out in appendix C to this table of changes.	Error in the key, as picked up through rep 343.	Rep 343 – Waterloo Community Development Group		26 March 2010	
TOC16	PC71	29	Figure 9 Key Diagram	Ch	Enlarge Figure 9 to become A4 size	Updated to provide more clarity			27 July 2010	
TOC17	PC08	30	Strategic Objective 1C	Ch	Amend Strategic Objective 1C. Be healthy and active as follows; "Southwark's community will be healthy and active. By delivering sustainable growth people will have access to good health, education, sports, leisure and community facilities. Access to open spaces and nature, opportunities for active travel and access to fresh, healthy food will encourage healthy lifestyles. Good quality affordable and family homes will help improve living conditions. The negative impacts of development on health will be addressed and developments will be well designed and able to cope with climate change. High quality sports and leisure centres will be located across the whole borough and everyone will have access to them. Open spaces will be protected and the local community will be able to enjoy using these spaces, including parks, nature reserves and River Thames. Good quality and accessible health facilities will be located across the whole borough. Southwark will be without concentrations of people with poor	To fully reflect the cross-cutting approach to health.			30 July 2010	

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TOC18	AC03	31	Strategic Objective 2F	Ch	health because everyone has access to good health, sports and leisure facilities, and open spaces. The policies related to this theme are SP1, SP2, SP3, SP4, SP5, SP7, SP11, SP12, SP13 and SP14."	To be consistent with terminology used in national guidance.	206, 216	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	TOC12
TOC19	PC01	31	Objective 4a	Ch	We will work with landowners, local stakeholders and developers to achieve regeneration, continuing to make Southwark a place that people aspire to be in and that developers and landowners want to invest in.	Add in 'local stakeholders' to ensure all stakeholders are included to remove repetition.		20 July 2010		
TOC20	AC04	33	Section 3, the penultimate bullet point (9).	CH	Providing a clear, needs based borough-wide approach to planning obligations (section 106) based on the impact of development. Implemented through a tariff, or (where appropriate) the community infrastructure levy or equivalent.	On this basis, regulation 123 would be correctly accommodated within the Core Strategy and introduces the necessary level of flexibility and deliverability to ensure that the transport and other infrastructure and improvements can be funded whether or not the Community Infrastructure Regulations 2010 continue to apply.	568	CDAI3	12 July 2010	
TOC21	TOC13	34	Strategic Targets Policy 1	Er	Cover the "our approach is" section with shading to show it is a policy in line with the rest of the policies.	Printing error. This is in response to rep 74.	Rep 74 – GOL		26 March 2010	
TOC22	PC03	34	Strategic Target Policy 1	Ch	Under "Our approach is" Insert final bullet point • 425,000-530,000sqm additional business floorspace between 2011-2026	Add in business floorspace targets for consistency.			20 July 2010	
TOC23	TOC14	34	Footnote	Ch	Amend wording **Our target is the same as the consultation draft replacement London Plan 2009 target. This is in general conformity with the adopted London Plan 2008. We will provide evidence at the London Plan EIP to demonstrate that we can meet this target.	To make it more clear that the EIP being referred to is to the London Plan EIP. Change made in response to rep 75.	Rep 75 – GOL		26 March 2010	
TOC24	TOC15	34, 65,	Footnote	Ch	***Our target is in general conformity with the adopted London Plan 2008. We will provide	To make it more clear that the EIP being referred to is to the London	Rep 75 – GOL		26 March 2010	

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TOC25		75			evidence at the London Plan EIP to demonstrate that we can meet this target.	Plan EIP. Change made in response to rep 75.				
TOC26	TOC16	36	Figure 10	Ch	Change the colour of this diagram to all be one colour. This is set out in appendix D to this table of changes.	Government Office for London requested this change to be more clear. Change made in response to rep 71.	Rep 71 – GOL		26 March 2010	
TOC27	PC04	40	Strategic Targets Policy 2	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC28	AC05	37	Improving places through sustainable development	CH	Improving places. Amend second sentence at top of page 37 to read: We will encourage developments to focus on the strengths of places that make the different areas of the borough distinctive and respect local and historic context...	Clarify that many of the 'unique identities' of the 'borough's places' are born out of their specific historical development.	218	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	
TOC29	AC06	38	Strategic Targets Policy 2		• "Aylesbury 4200 new homes (including around 1450 net new homes)	To provide further clarity on how many net new homes will be provided on within the Aylesbury action area. These figures and descriptions are consistent with those in the adopted Aylesbury Area Action Plan	758 (part)	CDAI7 Statement of common ground between the council and Richard Lee	2 July 2010	
TOC30	TOC14	38	Footnote	Ch	Amend wording **Our target is the same as the consultation draft replacement London Plan 2009 target. This is in general conformity with the adopted London Plan 2008. We will provide evidence at the London Plan EIP to demonstrate that we can meet this target.	To make it more clear that the EIP being referred to is to the London Plan EIP. Change made in response to rep 75.	Rep 75 – GOL		26 March 2010	
TOC31	PC04	40	Central Activities Zone vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC32	PC04	41	Bankside, Borough and London Bridge vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC33	TOC17	41	3 rd paragraph	Ch	Bankside, Borough and London Bridge Opportunity area vision. We are working with the local community and landowners to deliver large scale development and improvements, providing over 1900** new homes, 665** affordable housing units and around 25,000*** new jobs by 2026.	To increase the clarity of the area visions. These are the same targets that are already in policy 6.			26 March 2010	

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TOC33	TOC25	41	Figure 12: Bankside, Borough and London Bridge	Ch	Update all the existing area visions to show conservation areas and to provide consistency between the different diagrams. These are set out in appendix E to this table of changes. Put area vision in grey box	To provide further clarity and consistency.			26 March 2010	
TOC34	PC04	41	Bankside and Borough vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC35	AC07	42	Bankside and Borough vision	Ch	<u>Bankside and Borough Vision: Insert the following text at end of sixth paragraph on page 42:</u> <u>We will set out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework.</u>	Emphasise the need for development in this area to conserve and enhance heritage assets and the historic environment, in particular the potential impact on the Tower of London WHS.	219	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	
TOC36	PC04	43	London Bridge vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC37	AC08	43	London Bridge vision	Ch	<u>London Bridge Vision: Insert the following text at end of third paragraph on page 43:</u> <u>We will set out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework.</u>	Emphasise the need for development in this area to conserve and enhance heritage assets and the historic environment, in particular the potential impact on the Tower of London WHS.	219	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	
TOC38	PC04	44	Elephant and Castle Opportunity area vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC39	TOC18	44	2 nd paragraph	Ch	Elephant and Castle Opportunity Area vision We will meet our target of 4000* new homes and a minimum 1400** affordable housing units by working with the	To increase the clarity of the area visions. These are the same targets are already in policy 6.			26 March 2010	
TOC40	TOC21	44	Elephant and Castle vision	Ch	<u>Insert the following text at the end of the second paragraph:</u> <u>There could be tall buildings on some sites in the core area where this helps stimulate regeneration and creates a distinctive place.</u>	To make the vision consistent with Policy 12. This is in response to reps 770, 779 and 220 – English Heritage	Rep 770, 779 and 220 – English Heritage		26 March 2010	
TOC41	AC09	44	Elephant and Castle opportunity area vision	CH	Elephant and Castle Opportunity Area: Amend the vision as follows: Insert the following at the end of the second paragraph on page 44: We will set out in detail which sites are appropriate, sensitive and inappropriate for	Emphasise the need for development in this area to conserve and enhance heritage assets and the historic environment	220, 770	CDAI 13 Statement of common ground between council and	12 July 2010	

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TOC42	AC10	44	Amend the third paragraph	CH	<p><u>tail buildings through the supplementary planning document/opportunity area framework.</u></p> <p><u>The regeneration of the Opportunity Area will create a highly integrated and efficient public transport hub. This will comprise an improved Northern line station with a new ticket hall and escalators under the shopping centre, enhanced conditions for bus and rail users and an improved interchange between the various modes. All development will be phased to ensure that the funding is available so that the necessary transport capacity and improvements can be delivered in time to accommodate the new residents, businesses and leisure activities in the opportunity area. Public transport will become more accessible. Existing subways will be removed and replaced by surface pedestrian crossings creating a more lively, attractive and safe environment with priority for public transport users, cyclists and walkers over the car. A minimum level of car parking and limitations on traffic will reduce pollution. A new and improved street layout including public open spaces will be created allowing those who live and work in the area to move around easily and safely. We will work with Transport for London and Network Rail to bring forward these improvements and will have due regard to the detailed principles set out in the Elephant & Castle Development Framework (2004), or any Development Plan Documents or updated Supplementary Planning Documents which may from time to time be adopted to guide development in this Opportunity Area.</u></p> <p>We are working with the local community, Greater London Authority, businesses including local traders...</p> <p>Amend wording</p> <p>**Our target is the same as the consultation draft replacement London Plan 2009 target. This is in general conformity with the adopted London Plan 2008. We will provide evidence at the London Plan EIP to demonstrate that</p>	<p>The amendments above help clarify the nature of the public transport improvements required to accommodate growth at Elephants and Castle. They also help emphasise that increases in capacity will be phased to correspond with the phasing of development.</p>	570	English Heritage CDAI3	12 July 2010	
TOC43	PC02	44	Elephant & Castle vision	Ch	<p>Amend wording</p> <p>**Our target is the same as the consultation draft replacement London Plan 2009 target. This is in general conformity with the adopted London Plan 2008. We will provide evidence at the London Plan EIP to demonstrate that</p>	<p>Add in reference to 'local traders' to ensure consideration is given to local traders.</p> <p>To make it more clear that the EIP being referred to is to the London Plan EIP. Change made in response to rep 75.</p>			20 July 2010	
TOC44	TOC14	44	Footnote	Ch	<p>Amend wording</p> <p>**Our target is the same as the consultation draft replacement London Plan 2009 target. This is in general conformity with the adopted London Plan 2008. We will provide evidence at the London Plan EIP to demonstrate that</p>	<p>To make it more clear that the EIP being referred to is to the London Plan EIP. Change made in response to rep 75.</p>	Rep 75 – GOL		26 March 2010	

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TOC45	TOC25	41	Figure 13: Elephant & Castle Opportunity Area	Ch	we can meet this target. Update all the existing area visions to show conservation areas and to provide consistency between the different diagrams. These are set out in appendix E to this table of changes. The shopping area has been amended to ensure that its eastern arm is aligned with East Street. This is shown in appendix F of this table of changes. Put area vision in grey box	To provide further clarity and consistency.			26 March 2010	
TOC46	PC14	45	Figure 13	Ch		This change is proposed to ensure that the map reflects the geographical location of East Street.			30 July 2010	
TOC47	PC04	46	Canada Water (and Rotherhithe) Action area vision 2 nd paragraph	Ch		To clarify what is policy.			20 July 2010	
TOC48	TOC19	46		Ch	.Canada Water Action Area vision ..which will be accommodated in generally mixed use development. The action area will provide at least 875*** affordable housing units. Office development....	To increase the clarity of the area visions. These are the same targets are already in policy 6.			26 March 2010	
TOC49	TOC22	46	Canada Water (and Rotherhithe) action area	Ch	Insert the following text at the end of the third paragraph: <u>There could be tall buildings on some sites in the core area where this helps stimulate regeneration and creates a distinctive place.</u> Canada Water Action Area: Amend the vision as follows: Insert the following at the end of the third paragraph on page 46: <u>We will set out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the area action plan.</u>	To make the vision consistent with Policy 12. This is in response to reps 770, 779 and 221.	Reps 770, 779 and 221 – English Heritage		26 March 2010	
TOC50	AC11	46	Canada Water action area vision	CH		Emphasise the need for development in this area to conserve and enhance heritage assets and the historic environment	221, 770	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	
TOC51	TOC14	46	Footnote	Ch	Amend wording **Our target is the same as the consultation draft replacement London Plan 2009 target. This is in general conformity with the adopted London Plan 2008. We will provide evidence at the London Plan EIP to demonstrate that we can meet this target.	To make it more clear that the EIP being referred to is to the London Plan EIP. Change made in response to rep 75.	Rep 75 – GOL		26 March 2010	
TOC52	TOC25	47	Figure 14: Canada Water	Ch	Update all the existing area visions to show conservation areas and to provide	To provide further clarity and consistency.			26 March 2010	

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TOC53			(and Rotherhithe)		consistency between the different diagrams. These are set out in appendix E to this table of changes.					
TOC54	PC04	48	Aylesbury Action area vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC54	AC12	48	Aylesbury action area vision	CH	Aylesbury Action Area: Amend the vision as follows: Insert the following at the end of the third paragraph on page 48: <u>We set out in detail the approach building heights in the area action plan.</u>	Emphasise the need for development in this area to conserve and enhance heritage assets and the historic environment	222	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	
TOC55	TOC25	48	Figure 15: Aylesbury	Ch	Update all the existing area visions to show conservation areas and to provide consistency between the different diagrams. These are set out in appendix E to this table of changes.	To provide further clarity and consistency.			26 March 2010	
TOC56	PC04	49	Peckham vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC57	TOC20	49	Figure 16	Er	Rename figure 16 to say: <u>Figure 16: Peckham and Nunhead</u>	Error in designing the document. The diagram covers both areas.			26 March 2010	
TOC58	TOC25	49	Figure 16: Peckham	Ch	Update all the existing area visions to show conservation areas and to provide consistency between the different diagrams. These are set out in appendix E to this table of changes.	To provide further clarity and consistency.			26 March 2010	
TOC59	TOC26	50	Peckham Area vision, 6 th paragraph	Ch	Amend: Traffic and parking will be managed to improve safety, and reduce congestion on local streets and reduce barriers caused by the traffic system. Local employment and training schemes will help local people into jobs.	To increase distinctiveness of vision and clarify specific local issue. This is in response to rep 84.	Rep 84 – Southwark Living Streets		26 March 2010	
TOC60	AC13	50	Peckham vision	CH	Amend the vision as follows: Insert the following at the end of the sixth paragraph on page 50: <u>We will set out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the area action plan.</u>	Emphasise the need for development in this area to conserve and enhance heritage assets and the historic environment	223	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	

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TOC61	PC04	51	Nunhead vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC62	PC04	51	Old Kent Road Action area vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC63	TOC23	51	Area visions	Ch	Insert further area diagrams for: Old Kent Road These are set out in appendix G to this table of changes.	Government Office for London (rep 71) suggested that we include diagrams on the sub-areas.	Rep 71 – GOL		26 March 2010	
TOC64	PC04	52	Herne Hill vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC65	TOC23	52	Area visions	Ch	Insert further area diagrams for: Herne Hill These are set out in appendix G to this table of changes.	Government Office for London (rep 71) suggested that we include diagrams on the sub-areas.	Rep 71 – GOL		26 March 2010	
TOC66	TOC27	52	Title of Camberwell	Er	Change the title to read <u>Camberwell Action Area</u>	Council Assembly on the 4 November 2009 agreed that there would be an area action plan for Camberwell. This is referred to in the vision for Camberwell. The title needs amending to reflect the change.			26 March 2010	
TOC67	PC04	52	Camberwell vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC68	TOC23	52	Area visions	Ch	Insert further area diagrams for: Camberwell Action Area, These are set out in appendix G to this table of changes.	Government Office for London (rep 71) suggested that we include diagrams on the sub-areas.	Rep 71 – GOL		26 March 2010	
TOC69	PC04	53	The Blue vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC70	TOC23	53	Area visions	Ch	Insert further area diagrams for: The Blue These are set out in appendix G to this table of changes.	Government Office for London (rep 71) suggested that we include diagrams on the sub-areas.	Rep 71 – GOL		26 March 2010	
TOC71	PC04	53	Dulwich Village / West Dulwich vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC72	TOC23	54	Area visions	Ch	Insert further area diagrams for: Dulwich Village/West Dulwich, These are set out in appendix G to this table of changes.	Government Office for London (rep 71) suggested that we include diagrams on the sub-areas.	Rep 71 – GOL		26 March 2010	
TOC73	PC04	54	East Dulwich vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC74	TOC23	54	Area visions	Ch	Insert further area diagrams for: East Dulwich	Government Office for London (rep 71) suggested that we include diagrams on the sub-areas.	Rep 71 – GOL		26 March 2010	

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TOC75					These are set out in appendix G to this table of changes. Put area vision in grey box	71) suggested that we include diagrams on the sub-areas. To clarify what is policy.	GOL		2010	
TOC76	PC04 TOC23	54 54	Lordship Lane town centre vision Area visions	Ch Ch	Insert further area diagrams for: Lordship Lane Town Centre. These are set out in appendix G to this table of changes.	Government Office for London (rep 71) suggested that we include diagrams on the sub-areas.	Rep 71 – GOL		26 March 2010	
TOC77	PC17	56	Strategic Policy 1	Ch	We will do this by amend bullet point 2 to read: Regenerating areas like Aylesbury, Elephant and Castle, Peckham, Camberwell, Old Kent Road and Canada Water to very high standards.	To make policy consistent with the strategy set out in section 4 and remove repetition			21 July 2010	
TOC78	PC18	56	Strategic Policy 1	Ch	We will do this by Amend bullet point to read: Requiring a sustainability assessment with applications to show how a scheme is the best possible development for a place by balancing economic, social and environmental needs. This includes taking into account the needs of all the community, including making sure it is fairer for people of different ages, genders, faith, ethnicity, sexual orientation, income and disability. Following last paragraph	To include reference to all members of the community			22 July 2010	
TOC79	PC16	57	Strategic Policy 1	Ch	We are saving policy 3.3 in the Southwark Plan which sets out how we will implement the requirement for a sustainability assessment. We will review this through the Development Management DPD	To make clear our approach to implementing requirements for Sustainability Appraisals.			20 July 2010	
TOC225		58	Strategic policy 2		Under "How we will achieve our vision to improve places" add: SO 1C: Be healthy and active Add in walking and cycling network	To fully reflect the cross-cutting approach to health.			30 July 2010	
TOC80	PC20	58	Figure 17	Ch	Insert wording: "Encouraging active travel and reducing traffic levels and speeds will have positive health impacts for improved air quality, safer	To provide further clarity			21 July 2010	
TOC81	TOC28	59	Policy 5 after 1 st sentence of 7 th paragraph,	Ch		This additional fact could be useful as background information. Respond made due to rep 805.	Rep 805 – NHS Southwark		26 March 2010	

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TOC82	PC19	62	Strategic Policy 2	Ch	<u>roads and encouraging physical activity and successful communities."</u>				21 July 2010	
TOC83	PC09	64	Strategic Policy 3	Ch	Under "How we will achieve our vision to improve places" add: SO 1C: Be healthy and active	To fully reflect the cross-cutting approach to health.			30 July 2010	
TOC84	AC14	64	Policy 3 "How we will achieve our vision to improve our places"	Ch	Include reference to objective SO2F under "How we will achieve our vision to improve places"	Emphasise the need for development in this area to conserve and enhance heritage assets and the historic environment.	224	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	
TOC85	TOC15	65	Footnote	Ch	***Our target is in general conformity with the adopted London Plan 2008. We will provide evidence at the London Plan EIP to demonstrate that we can meet this target.	To make it more clear that the EIP being referred to is to the London Plan EIP. Change made in response to rep 75.	Rep 75 – GOL		26 March 2010	
TOC86	PC24	68	Strategic Policy 3	Ch	Amend paragraph to: Markets have an important role in providing choice for local people. We have recently carried out a review of markets in Southwark. This study emphasised the importance of maintaining our strong tradition of markets in the borough. Markets can help enliven town centres and add vitality to an area, by helping to provide a more varied shopping experience. They have the added benefit of giving more people access to fresh fruit and vegetables and also create a route into setting up small businesses. We have recently carried out a review of markets in Southwark. This study emphasised the importance of maintaining our strong tradition of markets in the borough.	Strengthen the positive references to markets in first sentence and move text around.		22 July 2010		
TOC87	PC64	68	Strategic Policy 3	Ch	After fourth paragraph on page 68 insert: "Too many hot food takeaways in centres can restrict opportunities for residents, workers and visitors to access healthy, fresh food. We will prepare detailed policies to manage the mix of restaurants, bars, cafes and hot food	To set out how the potential health issues associated with hot food takeaways will be addressed in our LDF.			30 July 2010	

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TOC88	TOC29	70	Policy 4	Ch	takeaways in the development management DPD and area action plans." Change heading from <u>Places to Learn and Enjoy to Places for learning, enjoyment and healthy lifestyles.</u> Under 'our approach is', amend to read: "There will be a wide range of well used community facilities that provide spaces for many different communities and activities in accessible areas. Development will help create safe, healthy and mixed communities." Under 'We will do this by', amend sixth bullet point to read: "Supporting the retention and improvement of facilities which encourage physical activity and ensuring that development promotes healthy lifestyles and addresses negative impacts on physical and mental health. Encouraging a healthy lifestyle by supporting the retention and improvement of facilities which promote healthy lifestyles and which promote healthy ways to travel." "in partnership with NHS Southwark"	This would be more inclusive of health. This is in response to rep 809. to clearly reflect the objectives to create safe, healthy and mixed communities.	Rep 809 – NHS Southwark		26 March 2010	
TOC89	PC34	70	Strategic Policy 4	Ch					30 July 2010	
TOC90	PC35	70	Strategic Policy 4	Ch					30 July 2010	
TOC91	TOC30	70	Policy 4, we will do this by 7 th bullet	Ch					26 March 2010	
TOC92	PC32	71	Strategic Policy 4	Ch	Amend fourth paragraph We will continue to develop our network of community facilities to make sure everyone has access to the facilities they need. This includes looking at wider community facilities such as libraries, sports centres, community halls, court facilities, places of worship and children's play areas as required by London Plan 3A.18 In 4 th paragraph, insert penultimate sentence. Southwark has a diverse population that brings challenges to providing community facilities. There are a wide range of needs across people of different ages, genders, faith, ethnicity, sexual orientation, income and disability that we need to consider.	To provide clarity on the challenges of providing premises for diverse needs		29 July 2010		
TOC93	PC26	71	Strategic policy 4						22 July 2010	
TOC94	PC25	71	Strategic Policy	Ch	At the bottom of the 4 th paragraph	Reference to encouraging community			22 July 2010	

Table of changes reference	Previous reference number	Page	Paragraph/ figure	Errata (E) Change (CH)	Proposed change (deleted text is struck-through and new text is underlined)	Reason for change	Representation No. Addressed	Core document number where relevant	Date of proposed change	Replaces previous proposed change?
			4		We will encourage better use of <u>community facilities that are currently underused.</u>	use in under used buildings / better use of underused buildings.				
TOC95	TOC31	72	Policy 4 We are doing this because	Ch	Amend 3 rd paragraph, first and second sentences to read: "Southwark experiences the typical social and health issues <u>The annual report of the Director of Health, Southwark, A Closer Look identified obesity, smoking, teenage pregnancy, alcohol abuse, mental health and long-term conditions as being key issues within our borough.</u> <u>The Joint Strategic Needs Assessment for Southwark describes in detail health needs in the borough, demography and deprivation.</u> <u>This assessment has informed the key health priorities in NHS Southwark's Commissioning Strategic Plan and the health and social care aspects of the Local Area Agreement."</u>	We are suggesting to the inspector to make the change to provide updated information. This is in response to rep 809.	Rep 809 – NHS Southwark		26 March 2010	
TOC96	PC29	72	Fact box: Community facilities	Ch	In first bullet point • Buildings used by voluntary sector and community groups.	Ensure community uses are included.			22 July 2010	
TOC97	PC30	72	Fact box: Community facilities		Change 4 th bullet point: • Places of public worship or religious instruction To • Places used for or in connection with public worship or religious instruction	Change reference to faith premises to 'activities in connection with places of worship' to be in line with the use class order			22 July 2010	
TOC98	PC28	72	Fact box: Community facilities	Ch	Remove last bullet point • Ancillary uses Add • Public halls and exhibition halls • Law courts • Facilities for the provision of education	Include all references in the use classes order D1 e.g. 'law courts'			22 July 2010	
TOC99	TOC32	73	Policy 4		Amend text: "We work very closely with the PCT to improve health and reduce health inequalities in the borough. This includes supporting the provision of additional health facilities in the borough; new infrastructure to allow local health services to grow and adapt to meet future population health needs, in accordance	We are suggesting to the inspector to make the change to provide clarity. This is in response to rep 809.	Rep 809 – NHS Southwark		26 March 2010	

Table of changes reference	Previous reference number	Page	Paragraph/policy/figure	Errata (E) Change (CH)	Proposed change (deleted text is struck-through and new text is underlined)	Reason for change	Representation No. Addressed	Core document number where relevant	Date of proposed change	Replaces previous proposed change?
TOC100	PC27	73	Strategic policy 4	Ch	with London Plan Policy 3A.21 Locations for health care."	To provide clarity on the challenges of providing premises for diverse needs.			22 July 2010	
TOC101	AC15	74	Policy 5 "How we will achieve our vision to improve places"	Ch	After 2 nd paragraph Providing for London's diverse faith communities needs to be addressed regionally. <u>Within Southwark our approach is to encourage different community groups including those of different faiths to share facilities to make the most effective possible use of opportunities.</u> Include reference to objective SO2F under "How we will achieve our vision to improve places"	Emphasise the need to ensure that historic context is taken into consideration in the development of new homes.	225	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	
TOC102	TOC33	74	Policy 5	Er	Add in wording to say: <u>Providing 24,450 net new homes between 2011 and 2026.</u>	This was an omission in policy 5 "we will do this". Strategic Target Policy on page 34 says 24,450 net new homes. The supporting text for policy 5 also refers to 24,450 net new homes.			26 March 2010	
TOC103	AC16	74	Policy 5 "We will do this by"	E	<ul style="list-style-type: none"> "Aylesbury Action Area – 4200 new homes (including around 1450 net new homes)(2009 to 2026)" 	To provide further clarity on how many net new homes will be provided on within the Aylesbury action area. These figures and descriptions are consistent with those in the adopted Aylesbury Area Action Plan	758 (part)	CDAI7 Statement of common ground between the council and Richard Lee	2 July 2010	
TOC104	PC49	74	Strategic Policy 5	E	Amend Figure 19 'how this will look' This is set out in appendix H of this table of changes. <u>The density of developments being within the range set out below</u> <u>Density for both residential and mixed-use development will need to be within the following ranges:</u> <u>Residential density will be expected to comply with the following ranges, taking into account the quantity and impact of any non-</u>	To be consistent with the proposed amended Figure 14 page 47			28 July 2010	
TOC105	PC36	75	Strategic policy 5	Ch	<u>Density for both residential and mixed-use development will need to be within the following ranges:</u> <u>Residential density will be expected to comply with the following ranges, taking into account the quantity and impact of any non-</u>	To clarify the density requirements.			28 July 2010	

Table of changes reference	Previous reference number	Page	Paragraph/ policy/ figure	Errata (E) Change (CH)	Proposed change (deleted text is struck-through and new text is underlined)	Reason for change	Representation No. Addressed	Core document number where relevant	Date of proposed change	Replaces previous proposed change?
TOC106	TOC14	75	Footnote	Ch	residential uses: Amend wording **Our target is the same as the consultation draft replacement London Plan 2009 target. This is in general conformity with the adopted London Plan 2008. We will provide evidence at the London Plan EIP to demonstrate that we can meet this target. ***Our target is in general conformity with the adopted London Plan 2008. We will provide evidence at the London Plan EIP to demonstrate that we can meet this target.	To make it more clear that the EIP being referred to is to the London Plan EIP. Change made in response to rep 75.	Rep 75 – GOL		26 March 2010	
TOC107	TOC15	75	Footnote	Ch	Updated housing trajectory to cover the 15 years of the core strategy. The revised trajectory is set out in appendix I to this table of changes.	To make it more clear that the EIP being referred to is to the London Plan EIP. Change made in response to rep 75.	Rep 75 – GOL		26 March 2010	
TOC108	TOC36	76	Policy 5 Figure 20 Housing trajectory	Ch	Under we are doing this, amend second paragraph on page 77 to read: It is important that we bring forward as much housing as possible whilst also protecting the character of our places, <u>including their local and historic context, and creating places where people want to live</u>	Government Office for London (rep 62) advised that we should expand the housing trajectory in accordance with paragraph 55 of PPS3.	Rep 62 - GOL		26 March 2010	
TOC109	AC18	77	Policy 5 "We are doing this because"	Ch	Insert 2 nd paragraph It will also make sure that we make efficient use of our land by providing as much housing as possible without negative impacts on the environment. <u>This policy will be used alongside saved Policy 3.11 'Efficient Use of Land' of the Southwark Plan. Where development exceeds...</u>	Emphasise the need to ensure that historic context is taken into consideration in the development of new homes.	225	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	
TOC110	PC39	77	Strategic Policy 5	Ch	Insert 2 nd paragraph This is because too much development can have a negative impact on the environment unless it is built to a very high standard of design and living accommodation. The criteria for exemplary standard of design <u>are</u> currently set out in Section 2.2 of our Residential Design Standards SPD 2008. <u>We may review and update this through our will</u>	To clarify that Policy 3.11 will continue to be used alongside Policy 5 of the Core Strategy			28 July 2010	
TOC111	PC38	77	Strategic Policy 5	Ch		To clarify where the existing Exemplary Standard of Design is set out.			28 July 2010	

Table of changes reference	Previous reference number	Page	Paragraph/policy/figure	Errata (E) Change (CH)	Proposed change (deleted text is struck-through and new text is underlined)	Reason for change	Representation No. Addressed	Core document number where relevant	Date of proposed change	Replaces previous proposed change?
TOC112	DELETED				<u>be set out in detail in our Development Management Development Plan Document.</u>					
TOC113	AC17	77	Policy 5 amend fact box	Ch	Bedroom sizes and habitable rooms. "A habitable room is a room that could be used for sleeping, whether or not it is. It includes bedrooms and living rooms. We measure things such as density, number of family units and affordable housing based on the number of habitable rooms in a development."	Clarify. The fact box is currently inconsistent with the definition in the glossary.			15 July 2010	
TOC114	DELETED									
TOC115	PC37	77	Strategic Policy 5	Ch	Density is the measure of the amount (intensity) of development. Both residential and mixed use residential development should be within our density ranges. Appendix 2, Section 2.6 of the Southwark Plan sets out how we calculate density. We may review and update this through our development management development or housing development plan document. <u>will set out how to calculate density for different types of development.</u>	To clarify that we already have an appendix in the Southwark Plan explaining density calculations. This is being saved.			28 July 2010	
TOC116	TOC14	77	Footnote	Ch	Amend wording **Our target is the same as the consultation draft replacement London Plan 2009 target. This is in general conformity with the adopted London Plan 2008. We will provide evidence at the London Plan EIP to demonstrate that we can meet this target.	To make it more clear that the EIP being referred to is to the London Plan EIP. Change made in response to rep 75.	Rep 75 – GOL		26 March 2010	
TOC117	PC40	78	Strategic Policy 6	Ch	Under 'we will do this by': <ul style="list-style-type: none"> Providing a minimum of 8558 net affordable housing units between 2011 and 2026 Providing a minimum of 665 affordable housing units in Bankside, Borough and London Bridge Opportunity Area between 2011 and 2026. Providing a minimum of 1400 affordable housing units in Elephant and Castle Opportunity Area and 	To clarify that the overall affordable housing figure is a net figure and that each area target is a gross target. To also clarify that the area targets are guidance and that the overall target is the strategic target. The overall net target will ensure that we maximise affordable housing across the borough to which the gross area targets will contribute. All the targets are minimums which we will seek to exceed.			28 July 2010	

Appendix C

Consultation and sustainability statement (available in the members' offices and on the internet)

Appendix C for Planning Committee Report and
Cabinet Report:
Core Strategy

Planning Committee: 21 March 2011
Cabinet: 22 March 2011

Appendix A	Core strategy final version and proposals map changes (available on the internet and with report)
Appendix B	Inspector's report on the Core Strategy (available in the members offices and on the internet)
Appendix C	Consultation and sustainability statement (available in the members offices and on the internet)
Appendix D	Core strategy publication/submission version consultation report (available in the members offices and on the internet)
Appendix E	Core strategy publication/submission version sustainability appraisal (available in the members offices and on the internet)
Appendix F	Core Strategy publication/submission version equalities impact assessment (available in the members offices and on the internet)
Appendix G	Core Strategy publication/ submission version appropriate assessment (available in the members offices and on the internet)

SUSTAINABILITY ADOPTION STATEMENT: CORE STRATEGY

Planning and Compulsory Purchase Act 2004

The Town and Country Planning (Local Development) (England) Regulations 2004 (Amended 2008)

This Adoption Statement has been prepared in accordance with Regulation 24(4), Regulation 35(2) and Regulation 36 of the Town and Country Planning (Local Development) (England) Regulations 2004 and gives notice that Southwark Council formally adopted the Core Strategy on the 6/4/2011.

In accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (16) (3) and (4), this Statement sets out:

How the findings of the full Sustainability Appraisal (SA) process have been taken into account

How sustainability considerations have been integrated into the DPD including any changes that have been made to the DPD as a result of the SA process and responses to consultation

The reasons for choosing the plan as adopted and the difference the SA has made to the process

The measures that are to be taken to monitor the performance of the plan during implementation

The Core Strategy forms part of the Southwark Local Development Framework (LDF), which will replace, in part, the Southwark Plan (2007). The Core Strategy is the second Local Development Document (LDD) to be adopted by the Council. Andrew Seaman, an Independent Inspector appointed by the Secretary of State for Communities and Local Government, considered the Core Strategy at an Examination in Public held in 10 sessions between 20 and 30 July 2010. The Inspector's Report, with its recommendations, was published on 3 February 2011. The adopted Core Strategy contains the Inspector's recommendations that are binding on the Council.

SUSTAINABILITY APPRAISAL (SA) / STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

The Planning and Compulsory Purchase Act 2004 requires the preparation of a Sustainability Appraisal (SA) as part of the plan making process. As part of the development of the Core Strategy, the Council undertook an SA in accordance with Government guidance - *A Practical Guide to the Strategic Environmental Assessment Directive, ODPM 2005; Planning Policy Statement 12: Local Spatial Planning 2008* and the *Plan Making Manual*. The findings of the SA were taken into account at each stage in the preparation of the Core Strategy. In addition, the Core Strategy falls within the definition of a 'plan or programme' under European Directive 2001/42 (the 'Strategic Environmental Assessment' or 'SEA' Directive), which requires a formal environmental assessment of plans which are likely to have significant environmental effects. In accordance with Government guidance, this SA incorporates an assessment of the strategic environmental impacts of the Core Strategy and meets the requirements of both the Planning and Compulsory Purchase Act and EU Directive 2001/42 in a single document.

How the findings of the full SA process have been taken into account

Sustainability Appraisals (SA) help local planning authorities to promote sustainable development in preparing plans through a structured assessment of objectives against key

sustainability issues for an area. The SA has contributed to the development of the Core Strategy by providing an independent, strategic and qualitative appraisal of the plan's Issues and Options, Preferred Options and revised Preferred Options as they were developed. The sustainability appraisal process has helped to identify the environmental, social and economic issues that the Core Strategy needs to address and any links between the issues. The core strategy addresses all these issues through its policies, implementation and monitoring. This is very important, as the most effective approach will be one that can address the issues in a coordinated way. The preparation of the sustainability appraisal has been carried out alongside the preparation of the Core Strategy as part of an iterative process. This has helped to inform decisions to ensure that the Core Strategy policies contribute effectively to achieving sustainable development. The sustainability appraisal has also performed a key role in providing a sound evidence base for the core strategy. As part of the sustainability appraisal we have reviewed the evidence informing the decisions made in the core strategy. This has included looking at both statistics and factual evidence about the borough, and also our many studies that underpin our core strategy. Our background papers provide more information on the studies undertaken.

The sustainability appraisal has informed the decision making process to facilitate the evaluation of alternatives and has helped to demonstrate that the plan is the most appropriate given the reasonable alternatives. At each stage of plan preparation we have appraised the options to ensure that the approach taken forward has the most positive impact; environmentally, socially and economically. The final approach taken forward through the core strategy is considered to be the most effective at achieving sustainable development. The appraisal process has also provided the opportunity to consider how the Core Strategy should be monitored to keep track of how well it performs after it is adopted. The sustainability indicators identified through the sustainability appraisal have been incorporated into the monitoring framework set out in section 7 of the core strategy. This will make sure that as part of our monitoring process through the annual monitoring report we also review the impact of the core strategy policies on these sustainability indicators. The SA has provided a formal statement and audit trail of the sustainability assessment undertaken. It is important to note that the outcomes of the appraisal work are based on an extensive options development, consultation and assessment process undertaken as part of the preparation of the Core Strategy. In particular, the SA incorporated the following:

- Identified the relevant plans, programmes and policies which should be taken into account in preparing the Core Strategy to ensure that the messages from the policies are taken into account and to enable a robust appraisal of the impacts of the policies

- Baseline information to measure the current characteristics of the area, to enable an assessment of how it is likely to change in the future and to monitor future implementation

- The data that has been collected describes the social, environmental and economic characteristics of the borough

- Identified the key sustainability issues for Southwark that need to be considered in the development of the plan

- A sustainability appraisal framework including seventeen sustainability objectives with supporting indicators and targets

- The framework will be used to assess the sustainability performance of development

- The framework reflects the current social, economic and environmental issues affecting the area and was part of the consultation at each stage of the SA

- An assessment of the compatibility of the objectives of the Core Strategy with the Sustainable Development Objectives in order to identify potential synergies or possible inconsistencies

Appendix D

**Core Strategy publication/submission version
consultation report (available in the members' offices
and on the internet)**

Appendix D for Planning Committee Report and
Cabinet Report:
Core Strategy

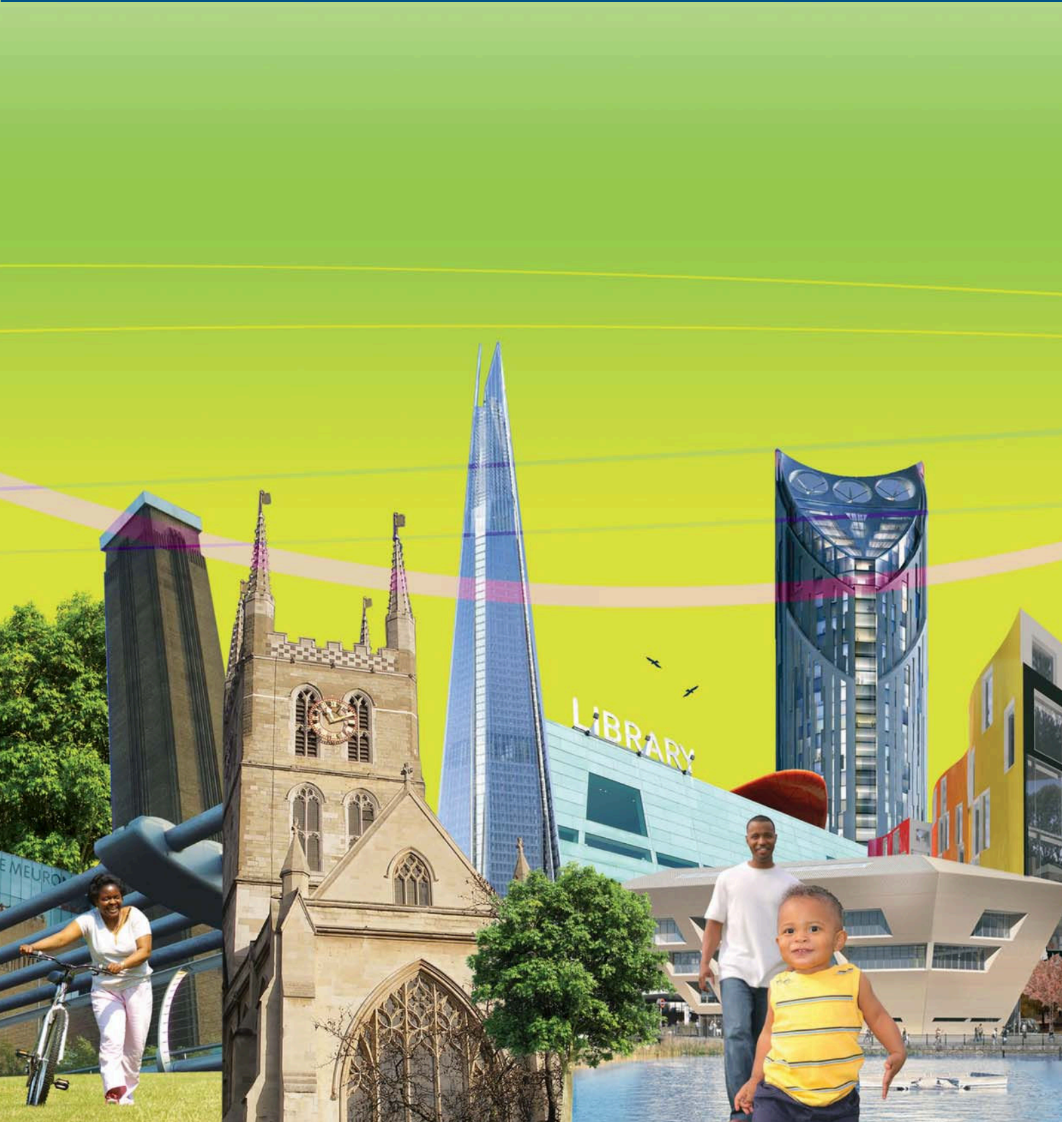
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Core strategy

CDCS16 Consultation Report

March 2010



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1. Introduction

- Purpose of the consultation report
- The consultation strategy and objectives of the consultation
- What is the core strategy
- How we have prepared the core strategy

2. Who and how we consulted

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- Who we consulted
- Methods of consultation at each stage

3. Summary of consultation responses

- Issues and options consultation
- Preferred options consultation
- Publication/submission

4. Monitoring the consultation

Appendices

(these are available on our website at:

<http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/planningpolicy/localdevelopmentframework/corestrategy.html>)

Appendix A: Breakdown of our consultees

Appendix B: Issues and options consultation plan

Appendix C: Preferred options consultation plan

Appendix D: Publication/submission consultation plan

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-Letter to residents for preferred options

-Letter to residents for publication/submission

Appendix I: Newspaper advertisements

-Advertisement for issues and options

-Advertisement for preferred options

-Advertisement for publication/submission

Appendix J: Report locations

Appendix K: Table of representations and our officer comments

-Issues and options

-Preferred options

Appendix L: Table of representations and our officer comments

-Publication/submission

1. INTRODUCTION

1.1 Purpose of this consultation report

1.1.1 The purpose of this document is to set out the consultation we undertook to prepare the core strategy submission. This document is prepared under Regulation 30 of the Town and Country (Local development) (England) Regulations 2004 (amended 2008). This report shows who has been consulted, how they were consulted, a summary of the main issues raised during the consultation and how we monitored and reviewed our consultation. The report demonstrates our compliance with our adopted Statement of Community Involvement 2008 (SCI).

1.1.2 This report is structured as follows

- This first introductory section sets out the purpose of the report and explains why we are preparing the core strategy and what the core strategy does.
- The second section identifies who and how we consulted, in compliance with Regulations 25 and 27 of the Town and Country (Local Development) (England) Regulations 2004 (amended 2008) and our adopted statement of community involvement.
- The third section sets out a summary of the consultations made and explains how these were taken into account in the development of the core strategy.
- The final section sets out how consultation has been monitored and reviewed and how we have taken this into account.

1.2 The consultation strategy and the objectives of the consultation

1.2.1 The core strategy has been developed through consultation with the local community. At the first stage of consultation we produced a consultation strategy. The purpose and main objective of the consultation strategy was to make sure we consider the needs of local people and statutory organisations when preparing the core strategy

1.2.2 The strategy set out the main different groups in Southwark who would be affected by the core strategy and what we could do to engage them in the preparation of the core strategy. We set out information about our community and identified potential barriers for different groups and ways that we could work to overcome these barriers so that as many as people as possible could fully participate in the preparation of the core strategy.

1.2.3 The consultation strategy sets out how, when and who we were planning on consulting at each stage of the consultation. It also sets out the main methods we could use to successfully consult and engage the community. This is to ensure that local people's views are taken into account at every stage of preparation of the core strategy.

- 1.2.4 We set out that we will produce a consultation plan and report for each stage of consultation and how we give feedback on the comments we receive.
- 1.2.5 We prepared the consultation by following the requirements set out in our statement of community involvement, and at each stage of the core strategy preparation we have met or exceeded the minimum requirements.
- 1.2.6 Our consultation strategy can be viewed at:
<http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/plannin gpolicy/localdevelopmentframework/corestrategy.html>

1.3 What is the core strategy?

- 1.3.1 The core strategy is a planning document that sets out how Southwark will change up to 2026 to be the type of place set out in our sustainable community strategy, Southwark 2016. It will be a spatial plan which delivers the vision and objectives for Southwark as set out in Southwark 2016. Looking forward to 2026, it will set out the kind of place we want Southwark to be. This will show the areas where we expect growth, locations for employment uses, and Southwark's approach to maintaining a stable and balanced community through the delivery of schools, affordable housing, protection of open space and leisure facilities. Like all development plans, the core strategy must be consistent with national planning guidance and in general conformity with the London Plan. It must show how Southwark will deliver its regional housing target, as well as targets set for the opportunity areas (Elephant and Castle and Bankside, Borough and London Bridge) and our area for intensification (Canada Water). It will also need to focus on implementation and show how and when development in strategic areas will be delivered. It will also need to address how the transport and social infrastructure which are needed to support growth will be provided.
- 1.3.2 The core strategy is one of a set of planning documents, called the local development framework. The core strategy is one of the most important documents in the local development framework. It sets out our approach to development and planning across the whole of Southwark and sets out the strategic policies we will use to make decisions on planning applications.

1.4 How we have prepared the core strategy

- 1.4.1 We have prepared the core strategy over 18 months and over several stages. This report sets out how we consulted on each stage of the core strategy preparation and how that informed the next stage of the core strategy preparation. We also produced a number of supporting documents to help us prepare the core strategy submission. These are set out below and available on our website at:

<http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/planningpolicy/localdevelopmentframework/corestrategy.html>

- Background papers (the evidence base): These research background papers provide more information on the core strategy, and set out all of the research, evidence and statistics we have collected to help prepare the core strategy. The papers include information on why we chose the preferred options and submission core strategy, how we have taken into account consultation on the core strategy, how the equalities impact assessment has impacted on the development of the core strategy and how the policies are in conformity with the London Plan.
- Sustainability appraisal: This tests policies to make sure they have positive social, environmental and economic impacts. This also includes further information on why we chose the preferred options and strategic policies rather than the alternatives in the issues and options paper.
- Equalities impact assessment: This examines how the core strategy meets the needs of the whole community and makes sure that the core strategy does not disadvantage anyone in the community.
- Appropriate assessment: This has been carried out under the EU Habitats Directive assessing the impact of the submission version on EU Protected wildlife habitats.

2. WHO AND HOW WE CONSULTED

2.1 The process and stages of consultation

2.1.1 We have carried out a number of stages of consultation as set out below

- The first stage involved preparing and consulting on the sustainability appraisal scoping report (July to September 2008).
- The second stage involved consulting on issues and options (October until December 2008). These set out two different approaches that could be taken forward for development in Southwark.
- The third stage involved a consultation on preferred options (April to July 2009). These established a direction for policies such as the amount of new housing, tenure, transport, open spaces, schools and health facilities.
- The fourth stage of consultation involved consultation on the publication/submission version of the core strategy. During this stage we published documents for comments from September 2009 until March 5 2010 and we invited people to comment on the soundness of the core strategy. To be “sound”, as set out in Planning Policy Statement 12, the core strategy should be justified, effective and consistent with national policy. “Justified” means that the document must be founded on a robust and credible evidence base, and be the most appropriate strategy when considered against the reasonable alternatives. “Effective” means that the document must be deliverable, flexible and able to be monitored.

2.1.2 Consultation has now closed and we have collated all the responses together with the final submission documents. This is the consultation statement that we are submitting to the Secretary of State for Communities and Local Government. It sets out the number of representations made on the publication/submission core strategy and a summary of the main issues made in these representations. We also set out a brief summary of officer responses to the main issues raised. The full representations and our officer comments on these will be submitted in full to the Planning Inspector and are set out in appendix L of this report.

2.1.3 We have also set out information on the issues and options and preferred options consultation in this report. As with the final stage of consultation, we have set out the main issues made at both stages. We have also summarised how we have taken these representations into consideration in the development of the next stage of the core strategy. The full representations and our officer comments at both issues and options and preferred options are set out in appendix K of this report.

2.1.4 Guidance on the preparation of development plan documents states that at the time the plan is published under regulation 27 it should be considered sound. There were no significant changes to the proposed submission following the six-week period of formal consultation on the soundness of the documents. We have set out a table of

recommended changes to the Planning Inspectorate (CDCS17). These are minor changes for clarity and factual updates. There are no significant or substantial changes in the table of recommended changes. This table of changes has been agreed by our Strategic Director for Regeneration in conjunction with our Executive Member for Regeneration (DCCS18). Further detail on the table of changes is set out in section 3 of this report.

- 2.1.5 The final submission documents are now being submitted to the Secretary of State in accordance with regulation 30 of the Town and Country Planning (Local Document) (England) (Amendment) Regulations 2008.
- 2.1.6 At this point the final submission documents must be made publicly available in accordance with regulation 30(3). This includes making the documents available in the council's offices, libraries, the one-stop shops and neighbourhood housing offices; publishing the documents on the council website; notifying all consultees previously invited to make representations that the core strategy and supporting documents have been submitted to the Secretary of State; and publishing a local advertisement to notify a wider audience that the final submission documents are available to view. This will all be done by the time the core strategy is submitted at the end of March 2010. We are putting all our submission document in the One Stop Shop on the Walworth Road. We will also have copies of the core Strategy, SA, consultation statement, EQIA, changes to proposals map and appropriate assessment in all our libraries and one stop shops.
- 2.1.7 An Examination in Public is expected to be held in summer 2010 where a planning inspector will be appointed to examine the soundness of the core strategy.

2.2 Who we consulted

- 2.2.1 Regulations 25 and 27 of the Town and Country (Local Development) (England) Regulations 2004 (amended 2008) state that local planning authorities must notify appropriate organisations ("specific and general consultation bodies") which may be affected by or have an interest in development plan documents, which include the core strategy, and invite them to make representations. In addition, the Regulations state that the local planning authority must also consider whether it is appropriate to invite representations from local residents or businesses in the area. Southwark's SCI sets out a list of statutory and non-statutory consultees for development plan documents Appendix E of our SCI).
- 2.2.2 Specific Consultation Bodies: All the statutory organisations set out in Appendix E of our SCI were notified at each stage of the core strategy preparation process.

- 2.2.3 General Consultation Bodies: Notification letters were sent to everyone on our planning policy mailing list at each stage of consultation. This list consists of approximately 2500 individuals and organisations. These included all the local and other consultees set out in Appendix E of the SCI. A breakdown of these consultees is set out in Appendix A of this report.
- 2.2.4 We also invited local residents, groups and business to participate in consultation through other means including stakeholders events, local shopping centres, local festivals, website updates and presentations at public meetings. Further detail on the methods we used at each stage of consultation is set out in section 2.3 of this report.
- 2.2.5 By consulting the specific and general consultation bodies, as well as local residents and businesses, we have met the requirements of Regulations 25 and 27 and our statement of community involvement.

2.3 Methods of consultation at each stage

- 2.3.1 The following table explains how we consulted at each stage of the core strategy preparation to meet the requirements of the Regulations and our statement of community involvement. We set out how we met our statement of community involvement requirements and how we exceeded these requirements.
- 2.3.2 The consultation plans for the issues and options, preferred options and publication/submission consultations are set out in appendices B, C and D.
- 2.3.3 The questionnaires for issues and options, preferred options and publication/submission consultation are set out in appendices E, F and G.
- 2.3.4 Copies of the letters we sent to everyone on our mailing list for the scoping report, issues and options, preferred options and publication/submission consultation are set out in appendix H.
- 2.3.5 Copies of the press notices for the scoping report, issues and options, preferred options and publication/submission are set out in appendix I.
- 2.3.6 Appendix J sets out the locations where the documents were distributed to for public viewing at each stage of consultation.

Timescales of consultation on each stage of the core strategy

Requirement of SCI	When did it occur?
Scoping/drafting	
Consult on the sustainability appraisal scoping report (5 weeks)	28 July 2008 to 1 September 2008
Issues and options	

6 weeks informal consultation on the core strategy issues and options report, draft sustainability appraisal, consultation plan and equalities impact assessment.	1 September – 3 November 2008 (we also consulted for an additional 2 weeks at this stage)
6 weeks formal consultation on the core strategy issues and options report, draft sustainability appraisal, consultation plan and equalities impact assessment.	3 November – 15 December 2008
Preferred options	
6 weeks informal consultation on the core strategy preferred options report, draft sustainability appraisal, consultation plan and equalities impact assessment.	28 April – 10 June 2009
6 weeks formal consultation on the core strategy preferred options report, draft sustainability appraisal, consultation plan and equalities impact assessment.	11 June – 23 July 2009
Publication/submission	
6 weeks informal consultation on the core strategy preferred options report, draft sustainability appraisal, consultation plan and equalities impact assessment.	29 September 2009 – 21 January 2010
6 weeks formal consultation on the core strategy preferred options report, draft sustainability appraisal, consultation plan and equalities impact assessment.	22 January 2010 to 5 March 2010 We changed the dates from the consultation plan to allow an extra week of informal consultation.

Scoping report and issues and options consultation

	Type of consultation:	Stage of consultation:	
		Sustainability Appraisal Scoping Report	Core strategy issues & options
Statutory	Mailout to statutory consultees	Natural England, English Heritage and the Environment Agency all written to 28 July 2008 for the scoping report 28 July 2008 to all consultees on planning policy's mailing list. (Not a	31 October 2008 to all consultees on planning policy's mailing list.

		statutory requirement for the scoping.)	
	Displaying documents at council offices	Not a statutory requirement for the scoping. SA scoping report distributed to libraries, council offices, Town Hall, One Stops shops.	Core strategy issues and options report, consultation plan, EQIA and draft SA report all distributed to libraries, council offices, Town Hall, One Stops shops, Housing Offices.
	Advertisement in local press	Not a statutory requirement for the scoping. Advertisement detailing the consultation was put in Southwark News on 30 July 2008.	Advertisement detailing the consultation was put in the Southwark News on 6 November 2008.
	Putting document on council website	Not a statutory requirement for the scoping. 28 July 2008 – scoping report put on website.	1 September 2008 Core strategy issues and options report, consultation plan, EQIA and draft SA report put on website.
Additional consultation in accordance with the SCI	Presentations to Community Councils	Not a requirement	We attended the following and either gave a presentation or had a stall with information and copies of the documents: 17 Sept 2008 Camberwell Community Council 1 Oct 2008 Walworth Community Council 1 Oct 2008 Nunhead & Peckham Rye Community Council

			<p>28 Oct 2008 Borough & Bankside Community Council</p> <p>29 Oct 2008 Walworth Community Council</p> <p>29 Oct 2008 Peckham Community Council</p> <p>11 Nov 2008 Bermondsey Community Council</p> <p>11 Nov 2008 Dulwich Community Council</p> <p>12 Nov 2008 Camberwell Community Council</p> <p>12 Nov 2008 Nunhead & Peckham Rye Community Council</p>
	Presentations to Area Housing Forums	Not a requirement	<p>We attended and gave a presentation to the following:</p> <p>30 Oct 2008 Walworth East Area Housing Forum</p> <p>30 Oct 2008 Nunhead & Peckham Rye Are Forum</p> <p>11 Nov 2008 Walworth Central Area Forum</p>
	Presentation to Equalities and Diversity Panel	Not a requirement	<p>We presented the issues and options and the equalities impact assessment to the Panel on 16 September 2008</p>

	Annual Tenants Conference	Not a requirement	We gave a presentation to the group on 18 October 2008
	Presentation at Somali Advisory Forum	Not a requirement	We gave a presentation on 23 October 2008
	Presentation to the Peckham Society	Not a requirement	We gave a presentation on 19 November 2008
	Presentation to the Bellenden Road Neighbourhood Group meeting	Not a requirement	We gave a presentation on 9 December 2008
	Breakfast briefing	Not a requirement	We held a breakfast briefing for landowners and developers
	Drop in sessions	Not a requirement	We were available for people to come along and speak to us about the issues and options core strategy on: 13 November 2008 Cator Street 9 December 2008 Bankside Community space
	Stalls	Not a requirement	We had information stalls with copies of the issues and options and other information at the following places, where we were available to talk to people about the core strategy. 6 November 2008 Stand at Peckham Rye Station 8 November 2008 Aylesham Centre

			<p>11 November 2008 Queens Road Station</p> <p>15 November 2008 Conversation Cafe in Peckham Pulse</p> <p>20 November 2008 Walworth Road One Stop Shop</p> <p>21 November 2008 Butterfly Walk, Camberwell</p> <p>25 November 2008 Hays Galleria</p> <p>27 November 2008 Bermondsey One Stop Shop</p> <p>29 November 2008 Brunel Museum</p> <p>4 December 2008 Dulwich Picture Gallery</p>
	Newspaper articles	Not a requirement	Short article in Southwark Life in October & December 2008
	Pride of Place events	Not a requirement	12 November 2008 Nunhead Pride of Place
	Souhag Housing Association Group (SOUHAG)	Not a requirement	We presented the document to SOUHAG on 17 September 2008 10 December 2008
	Translation of documents supplied	No requests made.	No requests made.
	Interviews carried out by Willowbrook	Not a requirement	Willowbrook carried out a number of interviews with local

			groups. This included interviews with the Pensioner, Disability, LGBT, Refugee, Muslim, Latin American and Sierra Leonean forums. Willowbrook began an interview with a group of Travellers and Gypsies but they felt the questions were not taking on board their needs.
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Preferred options consultation

	Type of consultation:	Stage of consultation
		Core strategy preferred options
Statutory	Mailout to statutory consultees	8 June 2009 - letter to all on planning policy consultee database
	Displaying documents at council offices	Core Strategy preferred options report, consultation report, EQIA and draft SA report distributed to all one-stop shops, libraries, offices & town halls
	Advertisement in local press	Press notice in local newspaper advertising consultation on preferred options report (at formal six week period) on 15 June 2009
	Putting document on council website	28 April 2009 Preferred options report, consultation plan, EQIA and draft SA report put on the council's website.
Additional consultation in accordance with the SCI	Presentations to Community Councils	Throughout the consultation period (28 April – July 23 2009) we attended the following and either gave a presentation or we managed a stall with information and copies of the documents: 3 June & 7 July 2009 Dulwich Community Council

		<p>16 June & 15 July 2009 Borough & Bankside Community Council</p> <p>3 June 2009 Peckham Community Council</p> <p>10 June 2009 Nunhead & Peckham Rye Community Council</p> <p>10 June 2009 Bermondsey Community Council</p> <p>16 June & 15 July 2009 Camberwell Community Council</p> <p>14 July 2009 Walworth Community Council</p> <p>15 July 2009 Rotherhithe Community Council</p>
	Presentations to Area Housing Forums	<p>We attended and gave a presentation to the following:</p> <p>9 June 2009 Peckham & Nunhead Area Housing Forum</p> <p>10 2009 June Walworth Central Area Housing Forum</p> <p>10 2009 June Rotherhithe Area Housing Forum</p> <p>11 2009 June Peckham Area Housing Forum</p> <p>11 2009 June Bermondsey Area Housing Forum</p> <p>17 June 2009 Walworth East Area Housing Forum</p>
	Equalities and Diversity Panel	We have a presentation to the Panel on the 16 June 2009
	Discussion at the Open Spaces Meeting on the open space study which formed part of the evidence base for	We discussed the core strategy and explained how people could get involved as part of a workshop on the Open Spaces

	Core Strategy	Study on 1 June 2009
	Public Transport Consultative Forum	We gave a presentation on the 7 May 2009
	Local Strategic Partnership (LSP) Southwark Alliance	We gave a presentation on the 10 June 2009
	Southwark Housing Association (SOUHAG)	We gave a presentation to the group on the 10 June 2009
	Strategic Housing Partnership	We gave presentations to the group on the 7 May & 9 June 2009
	Primary Care Trust (PCT) Board Meeting	We gave a presentation to the Board on the 10 June 2009
	Herne Hill Consultative Forum	We gave a presentation to the forum on the 25 June 2009
	Transform Southwark – Southwark for Jesus Initiative	We a presentation on the 29 June 2009
	Lesbian, gay, bisexual and transgender Forum	We gave a presentation to the forum on the 14 July 2009
	Southwark Travellers & Gypsies Group	We gave a presentation to the group on the 15 July 2009
	Canada Water Consultative Forum	We gave a presentation to the group on the 20 July 2009
	Landowners and Stakeholders Event	We gave a number of presentations on the core strategy including a guest speaker with a local developer on the 20 July 2009
	British Film Institute matinee and evening film screenings followed by, discussion and questions	We attended two events on the 18 th June 2009. Films by the BFI on Southwark's history were followed by discussion with a pensioners group in the after-noon and a wider group in the evening.
	Stalls	Throughout the consultation period we attended the following events and gave a presentation, held a discussion or had a stall with information and copies of the documents: 4 July 2009 Rotherhithe Festival 5 July 2009 Southwark Irish Festival

		<p>10 July 2009 The Green Event</p> <p>11 July 2009 Bermondsey Carnival & The Event</p> <p>17 July 2009 Elephant & Castle Shopping Centre</p> <p>18 July 2009 Surrey Quays Shopping Centre</p> <p>19 July 2009 Bandstand Southwark Park</p> <p>21 July 2009 Butterfly Walk Shopping Centre</p> <p>21 July 2009 Peckham Rye Station</p> <p>21 July 2009 Bandstand Concert</p> <p>29 July 2009 Bermondsey Carnival and The Event</p> <p>18 June 2009 Team London Bridge Tour of Tower – lunchtime event</p>
	Translation of documents supplied	No requests made.

Publication/submission stage

	Type of consultation:	Stage of consultation
		Core strategy publication/submission
Statutory	Mailout to statutory consultees	22 January 2010- letter to all on planning policy consultee database. Additional mailout on the 13 November 2009 setting out all the consultation planning policy are doing including the core strategy.
	Displaying documents at council offices	Core Strategy submission/publication report, consultation report, EQIA,

		changes to proposals maps, appropriate assessment and SA report distributed to all one-stop shops, libraries, offices & town halls. Background papers also distributed. Evidence documents made available at the One Stop Shop on the Walworth Road.
	Advertisement in local press	Press notice in local newspaper advertising consultation on preferred options report (at formal six week period) on 21 January 2010.
	Putting document on council website	29 September core strategy, SA, EQIA, appropriate assessment, changes to proposals map all put on council's website. 22 January (formal consultation) – background papers and evidence base put on council's website.
Additional consultation in accordance with the SCI	Presentations to Community Councils	Throughout the consultation period we attended the following and either gave a presentation or had a stall with information and copies of the documents: Dulwich Community Council – 14 December 2009 Borough & Bankside Community Council – 2 December 2009 Peckham Community Council 3 February 2010 Nunhead & Peckham Rye Community Council – 9 December 2009 Bermondsey Community Council – 8 December 2009 Camberwell Community

		<p>Council - 8 December 2009</p> <p>Walworth Community Council – 9 December 2009</p> <p>Rotherhithe Community Council – 2 December 2009</p>
	Southern Housing Association (SOUHAG)	We gave a presentation on the 9 December 2009
	Southwark Alliance	We gave a presentation on the 8 December 2009
	Southwark Strategic Housing Partnership	We gave a presentation on the 3 November 2009
	Canada Water Consultative Forum	We gave a presentation on the 22 February 2010
	Wydham and Comber TRA	We gave a presentation on the 2 March 2010
	Brunswick Park T and RA meeting	We gave a presentation on the 7 February 2010
	Equalities and Diversity Panel	We gave a presentation on the 11 November 2009

3. SUMMARY OF COMMENTS MADE ON THE CORE STRATEGY

3.1 Introduction

- 3.1.1 This section sets out a summary of comments received on the issues and options, preferred options and publication/submission consultation. Appendix K out all the representations we received on the issues and options and preferred options, and our officer response to the representations.
- 3.1.2 Appendix L sets out the representations received on the publication/submission consultation and our officer response to the representations.
- 3.1.3 The comments on the sustainability appraisal scoping report and the sustainability appraisal, and how we have responded to them are set out in our sustainability appraisal.

3.2 Issues and options consultation

- 3.2.1 81 organisations, groups or individuals made representation on the core strategy issues and options. This resulted in 388 representations. Further detail on the breakdown of those responding to the core strategy issues and options is set out in section 4.

3.2.2 Summary of comments

The main comments received in response to the issues and options consultation are summarised below.

3.2.3 Vision and objectives

- The vision and objectives are generally supported
- In order to achieve Objective 4 (making sure positive change happens) a clear and flexible plan will be needed
- Support for objectives that encourage new homes in the borough and provide a range of different housing options.
- They need to acknowledge the potential wider impacts of economic changes due to the present economic climate.

3.2.5 Living in Southwark

Overall approach to housing

- It was considered that there were advantages associated with both of the options (growth areas and housing-led growth).
- The core strategy housing policies should be in conformity with the London Plan policies and national policy.
- The core strategy needs to be sufficiently flexible in order to adapt to changing circumstances in the market. This includes allowing for site specific circumstances when determining the level and type of housing provision for a site.

Amount of housing and where it should be located

- Well-designed residential development should come forward throughout the borough

- Through detailed site assessment it is possible to identify and to deliver higher levels of housing than housing capacity assessments might suggest
- The capacity of growth areas should not be considered to be constrained to basic London Plan target levels.
- London Plan target for housing provision is a minimum. Consequently any policy should therefore reflect this and allow and seek to accept development on all appropriate sites.
- In order for the core strategy to be in line with London Plan policy there also needs to be adequate provision for social infrastructure and community facilities.
- With regards to where development should be located, it is considered that while more development might be focused in any growth areas, for sites to be truly sustainable and to meet Government guidance it may not be appropriate to protect all employment, shops and community uses. Each case should be considered on its individual merits on a case by case basis

Affordable housing and tenure mix

- The overall target for affordable homes should be 50% in line with the London Plan.
- The affordable housing target must be applied flexibly so that it encourages rather than constrains residential development.
- Flexibility is needed in the affordable housing tenure split and unit mix so as to accommodate changes in market conditions during the plan period.
- Overall support for having an area based approach for affordable housing policies.

Family housing

- Mixed response on whether we should have a policy of a minimum of 25% family housing. Some representations suggested it should be higher, others suggested it should be done on a case by case basis.

Student housing

- Student housing needs should be met in the Borough to recognise its potential links with higher education in situations such as King College London and South Bank University.
- Provision of purpose built student accommodation has many benefits, including adding to overall housing supply, reducing the pressure on the existing supply of market and affordable housing and freeing up properties that are more appropriate for family housing.

Wheelchair housing

- The Council should maintain the 10% target for housing for the disabled and the mobility impaired but should recognise that there maybe circumstances that make a site unsuitable for accommodating this type of housing.

Housing for Gypsies and Travellers

- The Council should maintain their current policy position of improving and enhancing current traveller and gypsy sites
- Both options for Gypsy and Traveller site provision are in line with London Plan policies

3.2.5 Working in Southwark

Protecting office space

- There should be a flexible approach allowing offices to relocate throughout the borough
- There was some support for not protecting existing employment sites
- Recommendations to the council to carry out employment land reviews and Strategic Housing Land Availability Assessments
- Comments on the level of unemployment and how we should address this
- There is a requirement for more modern space

Protecting industrial land

- In general there was support for growth areas (option 1)
- There is a requirement for more modern space
- Some suggestions for industrial sites to be released

Protecting creative and cultural industries

- There is a need to provide flexible buildings to meet the specific requirements
- More affordable space needed for small businesses

Tourism

- This was generally supported and encouraged
- Should improve existing facilities as well as creating new ones

New shops

- Ensure active frontages
- The sequential test needs to be applied appropriately so the vitality and viability of the existing centres is not compromised
- New development should be of an appropriate scale in line with PPS6

Cafe's, bars & restaurants

- Possible requirement for saturation policies around Borough and Bankside.
- Support for both options
- Ensure active frontages

3.2.7 Community facilities

- There should be protection of existing community facilities
- New community facilities should be provided in areas where they are most required and should meet the local need
- The grouping together of 'Be healthy, be active and be safe' as one of the objectives does not allow for specific treatment of each issue

3.2.7 Sustainable Southwark

- There was concern over having policies which exceed the requirements of the building regulations, particularly how these would impact on cost and viability of a scheme. However other respondents supported having stricter energy standards.
- We need to ensure there is enough infrastructure to support growth
- There was general support for district energy schemes, but concern over requiring higher Code for Sustainable Homes or BREEAM targets in these areas
- We need to prioritise energy efficiency measures over energy supply measures
- We need to make sure our policies respond to local water and flooding issues.

3.2.8 Aylesbury & Walworth

- Suggestions that we should refer to responses received on the Elephant and Castle and Walworth Road supplementary planning documents.

3.2.9 Bankside & Borough

- Development in Bankside should take full account of the wider impact on Lambeth.
- Protection of the residential and historic elements of this area should be considered
- The area should be developed as intensively as appropriate given its superior transport links.
- Ensure active frontages
- The historic environment needs to be sustained and enhanced
- Housing led mixed use developments in the area would encourage more vibrant and mixed communities.

3.2.10 Bermondsey & Old Kent Road

- Old Kent Road is a prime business site and retail location
- The Core Strategy should review the role and function of existing defined centres
- Some representations that Old Kent Road should be considered as a 'district centre'

3.2.11 Camberwell

- Support for the designation of Camberwell as a growth area
- Proposed growth in the area could be unsustainable and undermine the historic character of the area

3.2.11 Canada Water and Rotherhithe

- Need to preserve the unique local character of the area
- Policies for Rotherhithe should refer to the size, location and nature of new housing, retail, entertainment and business
- Support policies that will protect the suburban nature of Surrey docks

3.2.13 Central Activities Zone

- Support for growth areas (option 1) in order to maximise the number of new dwellings and jobs created in the area
- Support for the provision of student housing in this area

3.2.14 Dulwich & Herne Hill

- Need to support the aim's of Lambeth Council to promote and regenerate Herne Hill
- Support policies that will protect the suburban nature of East Dulwich

3.2.15 Elephant & Castle

- Need to consider how development in the area would impact on Lambeth

3.2.17 Peckham

- The designation of Peckham town centre as a conservation area should be considered under any option for growth
- Support for growth areas (option 1), with the inclusion of the conservation area
- Regeneration through the existing artistic communities should be encouraged
- Support high quality modern architecture in the area

3.2.17 Summary of officer comments and how they influenced the preparation of the preferred options core strategy

A full table of officer comments on each issues and options representation is attached as appendix K of this report. The key changes we made in developing the preferred options as a result of the issues and options consultation is set out below. Further detail is also set out in our background papers and our sustainability appraisal.

3.2.18 Vision and objectives

- The vision and objectives have been updated to reflect the nature of development proposed in the preferred option.
- The objectives have been explained more clearly to demonstrate what the objectives is trying to achieve.
- We have written visions for each area to expand on the overarching vision to make the document more area focused.

3.2.19 Living in Southwark Council

- We are focusing large development in our opportunity areas and core action areas. We have put a map into the preferred options showing all possible housing sites over 0.25 hectares to identify where housing will be likely to come forward.
- We have changes the density zones across the borough to focus higher density in the core action areas and opportunity areas, and to make more of the borough part of the suburban zone.
- We are taking forward an area based policy for affordable housing provision and private housing provision.
- We are requiring student housing to be linked with local universities.

3.2.20 Working in Southwark Council

The preferred option carries forward option 1 from the issues and options paper for all of the issues raised (10 - 16) with a few changes.

- We are trying to increase the number of jobs in the borough and reduce barriers to employment
- It is necessary to locate employment close to good public transport, therefore new business and creative and cultural business (excluding industrial uses) are being direct towards GA
- Protection of Strategic Industrial Locations (SIL's) and Preferred Industrial Locations (PIL's) (with the exception of Tower Bridge Industrial Park) ensures retention of successful industrial areas in the Borough
- The Preferred Office Location (POL) designation was seen as an unnecessary duplication of the growth area policies and so has been removed
- Arts, culture and tourism activities have flourished in Southwark in the decade. We want to build on this success through a balanced approach
- Directing retail and night time facilities existing town centres reinforces town centre uses and regenerates these areas which would be undermined if they could be located anywhere in the borough.

3.2.21 Community facilities

- Under the preferred option we will continue to protect existing community facilities unless it is demonstrated that there is no need
- In order to give more specific treatment to individual issues we will split the 'be healthy, be active and be safe' objective to 'be healthy and active' and 'be safe'
- Community facilities will be allowed any where in the borough providing there is a need in the area

3.2.22 Sustainable Southwark

- We will continue to require sustainability assessments
- We will continue to require section 106 agreements
- We will continue to protect open spaces and are proposing some more open spaces to protect
- We will continue to ask for high environmental standards which we think are financially viable.

3.2.23 Areas in Southwark

We have changed our approach to the different areas to reflect the direction set out in the preferred option. The areas will be covered under the following headings and each has detailed information and vision on what the place will be like:

- Central Activities Zone
We will continue to support the regeneration of the area and there are opportunities for a considerable amount of new development.
- River Thames
We will continue to protect and improve the Thames policy area to maintain the characteristics that help make it a special area.
- Elephant and Castle opportunity area
Elephant and Castle has lots of potential for redevelopment and we will be transforming it into an attractive part of central London. It will become a desirable place for high density living, shopping, leisure and study that is very accessible from other places in Southwark and London.
- Borough, Bankside and London Bridge opportunity area
We will continue to maintain the character which helps make Borough and Bankside a unique location, facilitating positive change that combines the area's historic character with the best attributes of new developments.
- Canada Water (and Rotherhithe) action area
Over the next 15 years we will work with landowners and the local community to transform Canada Water into a town centre. It will have a much more diverse range of shops. These will be accommodated in generally mixed use developments with new homes above.
- Peckham and Nunhead action area
There are a number of development opportunities in Peckham. We will work with landowners to bring forward key sites for development that will have knock-on benefits for the area so that it becomes a safe place

with a healthy community. This will include providing more housing in the area to provide choice for people on a range of incomes and a mix of uses including shops, cafes, businesses and cultural and leisure uses.

- Nunhead
We will protect the character and scale of development in Nunhead so that it continues to be mostly low density housing.
- Aylesbury action area
We will use the guidance established in the Aylesbury Area Action Plan to achieve a phased redevelopment of the Aylesbury Estate over the period 2009 to 2027, which will deliver a new and more balanced mixed community with far better living conditions.
- Herne Hill Town Centre
We will continue to protect shops and services to retain the range of independent shops, art galleries, bars and restaurants that give Herne Hill character. We will support development of the railway arches into niche businesses or other activities that provide vibrancy to the town centre. We will work with Lambeth to tackle traffic congestion.
- Camberwell Town Centre
We will continue to protect this successful, attractive town centre which has many small and medium sized businesses.
- The Blue
We will continue to protect the Blue as a local shopping centre providing essential services for local people.
- Dulwich Town Centre
We will continue to protect Dulwich Village as a historic area for homes, shops, local services and open spaces that retains an original shopping street and nearly all of its original 18th and 19th century buildings.
- Lordship Lane Town Centre
We will continue to protect Lordship Lane as a distinct and vibrant area with a variety of shops, cafes and bars providing amenities for the local residents. This is to retain the interesting character of this popular area created by the specialist businesses, cafes and unusual shop fronts.
- Old Kent Road regeneration area
We will set out an integrated plan for housing and employment and small, local shops to complement the multiple retailers already there. We want to create a stronger sense of place at a scale that is comfortable to walk around. We would like new homes to overlook new streets and spaces so that there will be much better natural security. The area will benefit from good urban design and high quality architecture to change the image to a place rather than a busy road
- West Camberwell housing regeneration area
West Camberwell is a large area of council housing which could be developed as a catalyst for regeneration taking advantage of the good transport links. Although we are not proposing to plan out this regeneration in the short term, there is potential for growth so we are flagging this up in the core strategy.
- Bermondsey Spa

Bermondsey Spa was an action area in the Southwark plan. This was because there was a large housing regeneration project taking place. Most of the housing has been built or projects are underway. There are only a few sites left to develop so this area no longer needs to be described as an action area with targets and an implementation plan as the regeneration is nearly complete.

3.3 Preferred options consultation

3.3.1 92 organisations, groups or individuals made representation on the core strategy preferred options. This resulted in 1253 representations. Further detail on the breakdown of those responding to the core strategy preferred options is set out in section 4. We also received comments from the Government Office for London and the Greater London Authority on the draft Publication/Submission Core Strategy.

Summary of comments and how they have influenced the publications/submission core strategy

3.3.2 Significant representations along with our responses and any changes between the preferred option and publication/submission are set out below.

Challenges

3.3.3 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- The Environment Agency's Corporate Strategy has been updated to reflect the most prominent environmental issues. Central to our strategy is encouraging adaptation to climate change. This is a key issue that lies at the heart of delivering sustainable development and should, therefore, be considered when deciding the most fundamental question of "what type of place should Southwark be?" We therefore advise promotion of living in a borough that achieves environmental sustainability. A challenge has been added to provide this information.
- English Heritage are concerned that overall, the vision statement is not particularly unique to Southwark - there is lack of focus on what is distinctive about the Borough today and how this is going to be enhanced in the future, beyond housing and business targets. There is no reference to the Boroughs rich history and the role this can play in successful regeneration of locally distinctive places. The vision and area visions have been updated to provide this information.
- Southwark PCT would like a mention of population turnover. And the type of population turnover or whether the proposed strategy will provide more population stability. Further information has been provided in Southwark today.

3.3.4 The other comments that have been addressed are:

- In some sections challenges are unfocused, for instance, "to improve north-west Southwark as a central London place". Other challenges do not make grammatical sense, for instance, "how we can make the south of Southwark to see little change". We have reworded them.

- Concern with the wording of the following challenge “How we can make the South of Southwark see little change”. A blanket restrictive policy approach to development in the south of the borough is not in accordance with the principles of good planning identified in PPS1. Amend wording to “seek to protect the more suburban character of the Southern part of the Borough. We have amended the wording.
- Greater emphasis on traffic and transport issues including congestion would be welcomed. These are included.
- Should include reference to the fact there are no toilet facilities for the public in general. This is a detailed issue that would be dealt with in supplementary planning documents and the development management development plan document.
- The challenges should refer to more than just needing to meeting housing targets. The challenges cover a wide range of issues.
- The challenges should refer to protecting local shopping parades. This is a detailed issue that would be dealt with in supplementary planning documents and the development management development plan document.
- A key challenge is how to stimulate and encourage new development and investment in Southwark. We include this as a deliverable challenge.
- A specific challenge should be added referring to the health and wellbeing of the community. We have included this as a consideration of quality of life.

Vision

3.3.5 The Greater London Authority (GLA) comments that have been addressed are:

- The overall vision and the area visions are supported.
- The priority for growth in the growth areas is supported.
- Targets must be provided in the publication/submission version. We have provided these targets.

3.3.6 The Government Office for London (GOL) comments that have been addressed are:

- The overall vision is not locally distinctive, nor does it set out the overall quantum of development. We have rewritten the vision to provide the quantum and be distinctive.
- The vision needs to link to the areas and provide a policy setting out the total and area quantum’s. We have linked the vision to the areas and added 2 strategic target policies.
- The overall spatial strategy for the borough is not evident. You need to add a clear strategy of what you are trying to delivery during the lifetime of the plan. We have added to sections 3 and 4 with spatial strategies for Southwark and areas.
- You need to clarify where your targets are from and the relationship with the London Plan. We have added end notes to clarify this.

3.3.7 The other comments that have been addressed are:

- The overarching approach for the whole of Southwark is weak and descriptive. It contains no analysis and instead relies upon identifying different visions for different areas. There is a strategy for Southwark and areas which sets out this information.
- The 'world class' element of the northern end of the Borough should not be ignored as it deserves recognition in the context of London as a whole. The CAZ and Bankside, Borough and London Bridge vision sets out this context.

Themes and objectives

3.3.8 The GLA comments that have been addressed are:

- Objective 1A - It is disappointing that in the 'Vision and Objectives' chapter no mention is made of reducing the need to travel or promoting sustainable travel and improving accessibility through transport measures. These are included.
- Objective 1C - It would be useful to see a link between health/activity and more sustainable modes of transport, i.e. walking and cycling. These are covered in 2E.

3.3.9 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- The PCT would like objective 1C to include access to healthy affordable food as this is a significant aspect of being healthy and is not referred to here. Income is a part of being able to afford a healthy diet. A concentration of the wrong type of food outlets is an adverse incentive to a healthy diet. This is included in policy 11.
- The PCT would like objective 1E to advocate the inclusion of safe play as Southwark children have the greatest levels of unhealthy weights in the country. This is covered in 1C.
- The Environment Agency would like objective 1C to recognise watersides as areas for recreation and enjoyment. Strategic objective 1C includes the Thames.
- English Heritage would like rewording of objective 2F to 'conserve and protect historic and natural places' and for design objectives to be included. These are now included in 2C and 2F.

3.3.10 The other comments that have been addressed are:

- Inclusion of a specific objective to identify, protect and enhance the Strategic Cultural Areas containing the world-class tourist attractions in the North. Objective 1D covers this issue.
- Objective 1A should mention social enterprises. We focus on small businesses and community facilities that provide for social enterprises.
- Objective 1 B has overlooked the important link between the provision of educational facilities and the ability of students to find appropriate accommodation where they can pursue their education. We provide for students in policy 8.

- Objective 1D should include reference to meeting the needs of the 6 equality target groups. This issue is covered in the objective and guidance for the groups is provided in policy 1.
- Objective 2B requires reference to environmental sustainability including zero carbon growth and energy efficient buildings. It also requires reference to new development is located in places with good public transport accessibility. These issues are covered.
- Objective 2C should specify more social rented housing, instead of the term affordable housing which is ambiguous; reference to provision of new homes for first time buyers; The housing mix of each development should be considered on a site by site basis to ensure the housing is appropriate to the locality and the type of development. This will ensure the objective is flexible and therefore sound. The objective sets out our approach to housing. This detail is discussed in policy 6.
- Objective 2F should acknowledge that new development adjacent to/within conservation areas and listed buildings can be acceptable where the historic environment is preserved/ enhanced. This is detail is discussed in policy 12.

Areas

3.3.11 The GLA comments that have been addressed are:

- All area approaches welcomed.

3.3.12 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- English Heritage are concerned that there are omissions of policy where tall building locations have been identified in conservation areas, highlighting the need for a detailed urban design study. We will provide a detailed tall buildings study as part of the background papers evidence base.

3.3.13 The other comments that have been addressed are:

- General support for the approach to providing a number of separate 'visions' to capture the varying nature of the different growth areas in Southwark.
- It is not appropriate to have 'no growth' as a key vision for some of the areas. There maybe some growth as windfall sites present themselves. This should be omitted. We have reworded our expectations for no growth. The purpose of this description is to be clear that the areas discussed will not be providing housing, retail or jobs that will meet our targets rather than setting guidance for windfall sites.

Central Activity Zone

3.3.14 The GLA comments that have been addressed are:

- There should be more explicit reference to the types of activities. We have included these.

3.3.15 The other comments that have been addressed are:

- The London-wide role is recognised for this area but concern about the negative impact of student accommodation ignores the role this area has in supporting central London located institutions. We set an approach to support student accommodation within the strategy to provide mixed and balanced communities with affordable and family housing.
- There is no mention of additional retail uses to support growing residential community needs to reflect Policy 3 hierarchy. This is included.

Bankside, Borough and London Bridge

3.3.16 The GLA comments that have been addressed are:

- There must be sound evidence for limiting students and hotels. We set an approach to support student accommodation within the strategy to provide mixed and balanced communities with affordable and family housing.

3.3.17 The other comments that have been addressed are:

We need to justify the rationale for the boundary of the Bankside, Borough and London Bridge opportunity area. It is not consistent with the Central London Sub Regional Development Frameworks (SRDF). The boundary is the same as the Bankside and Borough action area and London Bridge opportunity area with an extension south of London Bridge in the Southwark Plan. The extension was to include areas with a similar character that required guidance and that meet the general characteristics of the opportunity area. Further guidance will be set out in the SPD.

- Support for the overall vision for tall buildings.
- Concern with the approach to resist tall buildings except at the northern end of Blackfriars Road. There are a parts of Borough and Bankside that would benefit from tall buildings (those over 30m tall), which would not be out of character with the prevailing development. The general strategy will be set out in detail in the development management and housing development plan documents and the Bankside, Borough and London Bridge SPD.
- Specific reference should be made to the desire to facilitate the growth of offices in order to meet the Mayor's target of providing 30,000 new jobs by 2026. We have included a target agreed with the Mayor.
- The vision for London Bridge could go further and make specific reference to the immediate area surrounding London Bridge rail and underground station. This has been included.

Elephant and Castle

3.3.18 The GLA comments that have been addressed are:

- The policy should provide more detail about transport requirements to mitigate the impact of development and tariffs. The relevant detail is provided. More detail could be set out in a DPD or SPD.

3.3.19 The other comments that have been addressed are:

- Support for the range of uses proposed and improvements to public transport
- Elephant and Castle residents have not been consulted about the proposals for high density living and for hotels and office development. We have carried out consultation in the issues and options and preferred option as set out in the consultation report.
- There is no mention of any green space at the Elephant or of continuity for existing shops. We have added information about green space and about working with the local community and businesses to achieve the vision.

Canada Water

3.3.20 The GOL comments that have been addressed are:

- Need to say that the council are preparing an AAP. Need to set out the scale of predicated growth as a hook for the AAP. We have included these.

3.3.21 The other comments that have been addressed are:

- Support for fostering a “real” town centre at Canada Water.
- Redesignation of Canada Water as suburban zone from an urban zone is inappropriate and would prejudice development within the area. It is contrary to national and strategic guidance which promotes higher density development in areas of high levels of public transport accessibility. Also runs contrary to Canada Water action area designation and aspirations to promote Canada Water as a major town centre. Canada Water has not been designated as suburban. Some of the Rotherhithe area has been designated where it is suburban in character.

Peckham and Nunhead

3.3.22 The GLA comments that have been addressed are:

- The approach to growth should be clarified in the area vision. Evidence for housing numbers is included as part of the background for policies 5 and 6. Although the shopping centre may be redeveloped. There is no large scale anticipated growth within the next 5 years in jobs, retail or leisure. Therefore there is no target for this area.
- The approach to the tram is set out in the table where Executive consider planning committee comments.

3.3.23 The GOL comments that have been addressed are:

- Need to say that the council are preparing an AAP. Need to set out the scale of predicted growth as a hook for the AAP. We have set out our approach to development in Peckham and made reference to the AAP.

3.3.24 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- Network Rail notes the aspiration to create a new public square in front of Peckham Rye Station however there should be references to section

106 requirements for funding. This detail will be addressed in the Peckham Area Action Plan.

3.3.25 The other comments that have been addressed are:

- Peckham Vision should delete the section committing the borough to facilitating the better flow of traffic and instead commit itself to a comprehensive protected cycle route for the neighbourhood within 5 years. We have reworded the vision to focus on sustainable transport.
- Vision should also clarify that TfL recently announced they will not fund the Cross River Tram in the next 10 years. Please see the Executive response to the planning committee comments on this issue.

Aylesbury

3.3.26 The other comments that have been addressed are:

- There should be a target for jobs and continuity for the existing shopping on East Street. This level of detail would be considered in the Aylesbury Area Action Plan.

Camberwell

3.3.27 The other comments that have been addressed are:

- Concern for the absence of target and a no growth scenario. No growth often spells decline. This has been reworded to set out how we would like improvements to take place and the situations when growth may take place.
- Should include support for the re-development of the supermarket car-park and one storey retail centre to a density better matching its town-centre location. We have included this information.
- Support for the identification of "West Camberwell housing regeneration area" as a suitable location for regeneration which will contribute to providing sufficient housing to meet the identified targets and which can act as a catalyst for regeneration elsewhere in the borough.

The Blue

3.3.28 The other comments that have been addressed are:

- The Blue is shown as an area for no targets and no growth. We believe the Blue should be combined with the area around it as an area for, at least, modest growth. Further detail has been provided to encourage improvements of the area however there are no sites with capacity for growth.
- The Blue together with the Tower Bridge Business Complex should be designated a growth area. Tower Bridge Business Complex will be a proposals site with the level of growth set out in a supplementary planning document.
- We should note that the Blue can support arts, cultural and other community facilities once its rejuvenation is complete. We are focusing on strengthening the shops rather than other broader uses at present.

Old Kent Road regeneration area

3.3.29 The other comments that have been addressed are:

- More explanation is required relating to the reference to the biosciences and knowledge economy on Old Kent road. We have provided a vision, more detail will be provided in the Area Action Plan.
- There is a lack of detail about the area boundary (it is not shown in figure 1). This is shown in the proposals map changes.
- The area should be expanded to include sites on Ilderton Road. This area is included.
- Homes and jobs targets should be set out. These will be set out in the area action plan.

Herne Hill

3.3.30 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- Network Rail support is given to the council's statement that: "We will support development of the railway arches into niche businesses or other activities that provide vibrancy to the town centre." This aim is in accordance with Network Rail's wider drive to provide upgraded affordable work space for the "Small and Medium Enterprise" businesses that make up the bulk of our commercial tenants.

Strategic policies – general

3.3.31 The GLA comments that have been addressed are:

- All policy approaches welcomed except policy 9 which is addressed in the policy below.

Policy 1 Sustainable development

3.3.32 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- Natural England commends the Council for setting clear target indicators, defining major development schemes, which should help developers in bringing forward suitable and appropriate schemes.
- Environment Agency supports the inclusion of this policy as a means of determining and ensuring that new development is sustainable.
- PCT suggests that we should add 'health' to the list of assessments proposed i.e. social economic and environmental needs. We added into the 'we are doing this because'. We will continue to follow London Plan policy health impacts and require health impacts assessments. This makes sure that major developments consider the impact of the development on health and also promote public health.

3.3.33 The other comments that have been addressed are:

- We should make it clear that equalities issues need to be addressed through early consultation of residents in applications and through design and access statement. We have included this in our objective 4B.
- We should clarify if we are asking for sustainability assessments from all schemes. We have clarified this in the policy.

- The council needs to be flexible in approach and not impose rigid targets that might affect the viability of development. The assessment approach is flexible through a set of requirements that are balanced.
- Concern that planning obligations must relate to the development. The planning obligations have been moved to policy 14 on implementation and the reference to planning obligations has been confirmed.
- This is meaningless at the moment as it fails to define what it means by environmental sustainability. The policy is clear about the different factors that contribute to sustainability.
- Concern that the sustainability appraisal process is becoming more and more onerous. It adds to the cost of development, but it is not clear that it adds to the decision making equally. The sustainability appraisal process set out our approach to planning. It is not onerous as this is the process that should be followed to provide a detailed consideration of the issues that are required when submitting a planning application. This is the strategy rather than a new requirement and the Southwark Plan policy 3.3 will be saved setting out the detail.
- We need clearer guidance on measures to be practically employed to demonstrate that equalities target groups are not adversely impacted by development. It should be made clearer in the document that this is done through consultation and reporting in the design and access statement. We set out our approach to meet this requirement in the policy in more detail.
- We should amend the wording to remove the broad assumption that all development should contribute to all of the facilities and services noted in the Core Strategy. The policy has been amended to remove this assumption.
- We should rely on existing mechanisms to provide assessment such as Code for Sustainable Homes and/or BRE Environmental Assessment Method (BREEAM). We do use existing mechanisms to provide assessments including code for sustainable homes and BREEAM. These are part of the sustainability assessment. The sustainability assessment needs to consider all relevant assessments and how the various issues interact.
- We need to specify how we will ensure sustainability or obtain payments for all the other (non major) developments. All developments need to be considered on their merits. These factors include sustainability and the measures that may be required to mitigate the impact of development. We use major development as the threshold as we consider that requiring a general provision for minor developments would be onerous when weighed up against the impacts of the scheme. If a specific requirement from a scheme is necessary then this can be requested based on the policy for that issue.
- We need to make it clearer what 'requiring payments for local facilities' actually means and how it will be distributed. We have moved the payments issue to the delivery policy 14 where we have provided further clarification.
- We should require environmental, economic and social impact assessment for all developments (especially infill sites and those

covering existing back gardens or brown field sites). All developments need to be considered on their merits. These factors include sustainability and the measures that may be required to mitigate the impact of development. We use major development as the threshold as we consider that requiring a general provision for minor developments would be onerous when weighed up against the impacts of the scheme. If a specific requirement from a scheme is necessary then this can be requested based on the policy for that issue.

- We should clarify that the requirement for Sustainability Assessments to be submitted is as part of major planning applications. We need to set out how this sits alongside Environmental Assessments that are typically required for major developments. The core strategy sets out the strategy. We are saving policy 3.3 in the Southwark Plan which sets out the detail. There sustainability SPDs also provide further detail about the specific requirements.
- Consider that the sustainability assessment policy is an inappropriate place to have the requirement for payments under section 106 legal agreements and that this should be covered under a separate policy. We have moved this to policy 14 on delivery.
- Consider that Southwark's sustainability assessments are based on presumption and not evidence and that there should be a requirement that local residents are involved in the sustainability assessment process. The core strategy sets out the strategy. We are saving policy 3.3 in the Southwark Plan which sets out the detail. There sustainability SPDs also provide further detail about the specific requirements.
- Consider the fact box mentioning 9 equality target groups is confusing. We have now included these groups in the policy.

Policy 2 Sustainable transport

3.3.34 The GLA comments (including Transport for London) that have been addressed are:

- References to the London Plan and strategies should be included. We have included these in the justifications.
- Further clarity has been provided about the tram and the issues around delivery within the time period of the plan and actions that may be taken to improve transport connections southwards to Peckham. We have provided this information and agreed with the GLA that this is an acceptable approach.
- Further detail should be provided on safeguarding public transport. We have set out detail about safeguarding in the policy. There is further detail in the saved policy in the Southwark Plan.
- Further detail should be provided on car parking, blue badge motorists and motor bike parking. This is too much detail for the Core Strategy. This information is in the saved policies in the Southwark Plan.
- Further detail should be provided on travel plans, service plans and freight. This information is in the saved policies in the Southwark Plan.
- The policy should provide more detail about transport requirements to mitigate the impact of development and tariffs. This information is in the

saved policies in the Southwark Plan and the Section 106 Planning Obligations SPD.

3.3.35 The GOL comments that have been addressed are:

- Further clarity has been provided about the tram and the issues around delivery within the time period of the plan and actions that may be taken to improve transport connections southwards to Peckham. We have provided this information and agreed with the GLA that this is an acceptable approach.

3.3.36 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- Natural England encourage and welcome the aspiration to improve accessibility to, through and around the Borough by sustainable transport options, including walking and cycling.
- The PCT would like us to include reference to the better health outcomes under the heading 'Why are we doing this'. We have included this information.
- The PCT recommend including explicit ratios of the different forms of transport to be encouraged. We would want to see a high percentage of people using walking or cycling as opposed to public transport or private car. Unless this is made specific there is a risk of designing in long term focus on public transport rather than on healthier self-transport especially cycling and walking. We have set targets in the implementation table accompanying policy 14.

3.3.37 The other comments that have been addressed are:

- General support for the council's aspiration to make Southwark accessible by sustainable modes of transport.
- We should include river transport in the list of sustainable types of transport in the "We are trying to" section on page 22. We have included this information.
- Consider the opportunity to widen the policy to incorporate the sustainable transport of freight in to the policy. We consider freight in the transport assessments part of the policy and we discuss issues concerning freight and how we will address them in the 'we are doing this because'. We are saving our Southwark Plan policy that provides guidance on freight for development control decisions.
- General support for asking for planning contributions to transport schemes.
- Request for more detailed policies such as setting out cycling routes across the borough. We have included the strategy for this in the policy and 'we are doing this because'. We are saving our Southwark Plan policy that provides guidance on cycling routes.
- We need to show a clear commitment to a comprehensive physically protected cycling network across the borough and a map detailing such a network needs to be included with the Core Document and the Neighbourhood Action Plans. We have included the strategy for this in the policy and 'we are doing this because'. We are saving our

Southwark Plan policy that provides guidance on cycling routes. Further detail will be provided in our development management development plan document, our area action plans and supplementary planning documents.

- Support the removal of the Tower Bridge Business Complex from the Preferred Industrial Location (P.I.L.) designation supports this sustainable transport policy.
- Payments for transport improvements should be considered on a case by case basis. We set out the approach in the core strategy. We are saving our policy in the Southwark Plan and we set out the detail in our Section 106 Planning Obligations SPD.
- There should be acceptance of car free development where in areas of high public transport accessibility. We have included the strategy for this in the policy and 'we are doing this because'. We are saving our Southwark Plan policy that provides guidance on car parking. Further detail will be provided in our development management development plan document, our area action plans and supplementary planning documents.
- There should not be a broad assumption that all development should contribute to sustainable transport improvements. We set out the approach in the core strategy. We are saving our policy in the Southwark Plan and we set out the detail in our Section 106 Planning Obligations SPD.
- We need to increase the accessibility of other means of transport without penalising the car borne visitor. If car borne visitors are not catered for they are likely to have to make less sustainable longer journeys to fulfil their shopping needs. We are setting out our strategy to increase provision of sustainable transport and reduce the number of car trips. This does cater for car borne users where these are essential journeys.
- We need to include the use of the River Thames for transport of passengers, goods and freight in Policy 2 sustainable transport. We have included this information.
- Emphasis could also be placed on the importance of walking and cycling routes which approach and cross the river since these are essential for sustainable access to employment and visitor attractions in Southwark and the City. We set out the approach in the core strategy. We are saving our policy in the Southwark Plan and we set out the detail in our transport SPD.
- Maximising the effective use of the Overground Rail Network in Southwark should be referred to in the list of actions in this section. We set out our strategy to maximise the use of public transport and our approach to this in our policy.
- We should amend "as well as how much parking is needed", to say "to ensure parking provision reflects the potential need in the development, does not cause overspill and is free and adequate" – ie the incentive/necessity to park on the adjoining residential streets is reduced. This guidance has been changed to set a strategy rather than a development control requirement.

Policy 3 Shopping, leisure and entertainment

3.3.38 The GLA comments that have been addressed are:

- The town centre hierarchy should be consistent with London Plan and Mayor strategies and emerging strategies. It should provide clarification on the quantum of additional leisure and shopping space in town centres and should be based on local evidence assessments. We have added in quantum's of planned future retail development where we know what these will be. Our area action plans and area specific supplementary planning documents will provide further detailed information.
- More detail should be provided on reducing the impacts of noise. This detail will be provided in area action plans, supplementary planning documents and the development management development plan document.

3.3.39 The GOL comments that have been addressed are:

- There needs to be more detail about infrastructure to provide for the growth in town centres. We have added this to policy 14 and the implementation table.
- This policy does not refer to the overall quantum of retail development being proposed. You are proposing that Canada Water becomes a Major shopping centre. You will need to provide a robust evidence base to justify this proposal, which is currently not in line with the London Plan. We have added the overall quantum and have been clear how Canada Water will become a Major shopping centre.

3.3.40 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- Southwark PCT would like us to introduce clear planning policies relating to balancing the numbers of fast food outlets with better opportunities to buy affordable healthy foods such as vegetable and fish and more healthy restaurants. This more detailed policy would be more appropriate in the development management development plan document, supplementary planning documents and area action plans. We will follow up this issue in the preparation of these documents.
- Southwark PCT would like us to see a vibrant nightlife but with a balance of venues selling alcohol with other venues for evening entertainment e.g. cinemas, theatre and other family friendly venues. We have set out these issues where they are appropriate in the visions. This more detailed policy would be more appropriate in the development management development plan document, supplementary planning documents and area action plans. We will follow up this issue in the preparation of these documents.

3.3.41 The other comments that have been addressed are:

- General support for the hierarchy of town and local centres for new retail development and support for proposed additional shopping and leisure floorspace.
- Request for a review of the hierarchy of town and local centres to be undertaken, to include some re-designation of centres. The major town

centres should include Bermondsey and Camberwell. The Elephant and Castle development should extend down the Walworth Rd to Burgess Park. The CAZ should be recognised as at the top of the hierarchy, above 'Major Town Centres'. The hierarchy has been set up based on current level of retail or potential for retail that we will be aiming to deliver. This suggestion would not accord with our retail assessment evidence which is available.

- Local parades of amenity shops needs protecting and enhancing. This is included in the policy.
- Policy should promote residential development above shops, and encourage development on existing retail and commercial premises to encourage efficient use of land. This level of detail is in our saved policy, AAPs and SPDs rather than the Core Strategy.
- Conclusions of retail study should be included in the Core Strategy, with commentary on the potential distribution, phasing and quantum of future retail development to meet need. This will be available in the background papers and the retail assessment.
- Policy should reflect PPS6 guidance i.e. Need, impact, sequential approach, scale and also reflect PPS4 draft which recognises out of centre sites as part of sequential approach to site selection. The policy does reflect PPS6 guidance.
- Introduce a policy opposing open air car parking provision for retail and commercial developments due to the huge pressure for land and introduce a policy supporting development on existing retail and commercial car parks and single storey retail / commercial premises. This is too detailed for the core strategy and is in the saved policy in the Southwark Plan.
- The role that retail can have in enhancing culture and arts by increasing vitality and foot fall should be acknowledged. This is acknowledged in the justification.
- The local centres need to be lifetime neighbourhoods, an important emerging theme in the new London Plan. Lifetime neighbourhoods means local shops, social and community facilities, parks and open spaces within walking distance of where people live. The concept of lifetime neighbourhoods is not intended to apply specifically to town centres. These cover larger areas which might include town centres. Southwark will keep the concept under review as it evolves through the London Plan.

Policy 4 Places to learn and enjoy

3.3.42 The GLA comments that have been addressed are:

- This policy would benefit from expansion with further detail about health and education. We have added this to the reasons, policy 14 and the implementation table.

3.3.43 The GOL comments that have been addressed are:

- There needs to be more detail about how schools will be provided. We have added this to the reasons, policy 14 and the implementation table.

3.3.44 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- The Primary Care Trust suggests that we need to make sure that planning contributions for community facilities are related to the new development. This has been added into the policy 'we are doing this because'.
- The Primary Care Trust suggests that if a developer demonstrates that there is no longer a need for a community facility, then the building should be allowed to be used for a different use. This is being saved as part of the Southwark Plan policy and may be considered as part of the development plan document for development control.
- Policies should be included specific to health. We have included health issues in most of the policies and we have addressed all of the relevant issues.

3.3.45 The other comments that have been addressed are:

- Need to ensure support, opportunities for enhancements and flexibility in the approach to community buildings and educational facilities. The policy achieves this.
- The metropolitan policy authority suggests that we should identify police facilities as a form of community facility. The community facilities group as set out by the government does not include the police. Our Strategy is to facilitate a network of community services that are well used by the local community and to be located in accessible areas. Policy 3 includes a mix of uses within town centres, which could potentially include policing services.
- In the Fact Box Community Facilities there should be an extra bullet point referring to Wildlife Gardens. These are covered in policy 11.
- Clarify how the core strategy joins up with existing strategies and plans such as the Sports and Physical Activity plan and the Play strategy. We will provide this information in the background papers.
- Include reference to health centre's in the payments section. This is included .
- We should be more specific in identifying suitable sites for new health facilities. We have set out the strategy. We will provide more detail in line with the strategy set out by the Primary Care Trust.
- Consider whether it is appropriate that contributions derived from development are used to improve the community infrastructure provided by Her Majesty's Courts Services. Detail of provision for section 106 is covered in our supplementary planning documents and area action plans.
- Include reference to the community services provided by Faith Groups. The fact box includes faith groups as community facilities.
- Include guidance to support the need for premises by faith communities. This is provided as part of the strategy for community facilities.

Policy 5 Providing new homes

3.3.46 The GLA comments (including Transport for London (TfL)) that have been addressed are:

- The housing targets should be until 2026 and should be in conformity with the London Plan. We have added the housing target which is in general conformity with the London Plan. We have also included the new draft London Plan target in the justifications.
- The wording of the density policy should be consistent with the London Plan. The wording has been changed to be consistent.
- The council must include the new target with a footnote and a commitment to work with the GLA to find an agreed target. We have included this.
- This policy can only be achieved with adequate provision of highway and public transport infrastructure. TfL therefore recommends that all high density and large scale development should be carefully planned and should not result in an unacceptable adverse traffic and safety impact to the local Transport for London Road. Our strategy for this is set out in policy 2, our vision and the area visions.

3.3.47 The GOL comments that have been addressed are:

- Make reference to the SHLAA in the justification to the policy with the caveat that this is part of the London Plan that has not been subject to examination. We have included this.
- You should not be including windfalls in your first 10 years land supply unless there are genuine local circumstances. We have removed the windfall reference and added in more detail about how we will meet our target.
- Include a reference to your proposed Housing DPD within the justification as this is where you intend to allocate sites. We have added this.
- It should be more clear where the housing will be built. We have included phasing, area targets and been clear that the housing will be met in growth areas.

3.3.48 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- Southwark PCT recommend conducting a health impact assessment that would identify the impact of the developments and the density of the developments on the following aspects that relate to health. We have included these issues in our sustainability and equalities assessments rather than carrying out a bespoke assessment.
- Natural England supports the intent not to harm the environment or open spaces under this policy.

3.3.49 The other comments that have been addressed are:

- Support for the aim to provide new homes in attractive environments (particularly in Growth Areas) and meeting targets set out in the London Plan to build in excess of 31,000 new homes between 1997 and 2017 provided that the local character, environment, open spaces and Southwark's heritage are not detrimentally affected.

- The targets for new housing provision should extend beyond 2017 to cover the period up to the end date of the Core Strategy. These are now until 2026 which is the length of the plan period.
- Question whether we should encourage housing development in all brownfield sites not just growth areas. We took the growth areas approach as set out in our preferred options to maximise development of housing in growth areas.
- We need to be clearer how the SHLAA sites designation impacts on individual sites. The SHLAA sites are not designations they are possible sites for development that could provide housing to meet out targets.
- Overall support for allowing increased density in core action areas and opportunity areas.
- Support for focusing large developments (0.25 ha and over) in Opportunity Areas and Core Action Areas and permitting the construction of housing on employment or industrial estates that are deemed obsolete (excluding those protected in policy 10).
- Core Strategy should not include a maximum density figure, but instead the density of development proposals should be guided by the existing local context, proposed plot sizes, design quality and public transport capacity in accordance with the London Plan. The density requirements are expressed as ranges and should not be taken as precise requirements. There is range for a higher density in certain appropriate areas where this can be justified.
- The statement that Southwark will “no longer allow higher densities in area just because have high PTAL” is contrary to both the advice set out at national level by the Government and within the London Plan. Within both these documents high density development is encouraged where a site has good/excellent public transport accessibility. Such decisions should be balanced with the schemes ability to demonstrate good design. We are following the approach set out in the comment the issue is that mixed use should be in growth areas rather than areas where there is high public transport.
- Larger development and higher density ranges should also be promoted in other areas specifically with a high PTAL, where redevelopment of the site would give wider community benefits and assist in on-going regeneration. Larger development should be in mixed use, growth areas rather than where there is just high levels of public transport.
- Housing need and targets should not outweigh encouraging development for other land uses e.g. Employment floorspace necessary to meet the other objectives of the Core Strategy. This is the approach we have taken with growth areas.
- Support for the range of densities in town centre, opportunity and core action areas and support the target of densities in excess of 700 hrh in such areas. With good quality design, densities significantly in excess of this can be achieved in the right locations.
- The fact box should be amended to accord with national policy in relation to the use of planning obligations, such that any contributions

sought are reasonable in all respects. This has been moved to new policy 14 implementation.

- High densities are achievable with high standards of design and should be subject to the same design standards as other development. Developments with high densities must have exemplary design standards as they have a more significant impact on the local area.
- Support changing more of the borough into a suburban zone and not to link the designation to PTAL index: transport provision can change very quickly and is not a true indicator of whether the transport infrastructure can cope with the increased demand of urban status/density.

Policy 6 Homes for people on different incomes

3.3.50 The GLA comments that have been addressed are:

- The plan should define affordable housing. We have a definition in a fact box.
- The policy should include a requirement for all housing over 10 units to provide affordable housing. We have included this requirement. We have changed the policy for Elephant and Castle to require a minimum of 35% affordable housing in line with the rest of the borough.
- The policy must seek the maximum reasonable proportion of affordable housing. The policy includes this requirement.
- The council must set out a robust evidence base to support the requirement of affordable housing and the target that should be set. We have set out our new affordable housing target and the policy for how we will achieve this. We have a robust evidence base.
- We have removed the section on tenure and will continue to use the saved Southwark Plan policies on tenure at the moment.

3.3.51 The GOL comments that have been addressed are:

- The policy must seek the maximum reasonable proportion of affordable housing. The policy includes this requirement.
- The policy should include a requirement for all housing over 10 units to provide affordable housing. We have included this requirement. We have changed the policy for Elephant and Castle to require a minimum of 35% affordable housing in line with the rest of the borough.
- The policy could include the overall percentage of affordable housing. The policy includes this.
- The policy should set out the percentage of social and intermediate housing. This is too detailed for the strategic core strategy. We have saved the Southwark Plan policy and will address this issue in the Housing DPD.
- The council must set out a robust evidence base to support the requirement of affordable housing and the target that should be set. We have set out our new affordable housing target and the policy for how we will achieve this. We have a robust evidence base.
- It is not clear how this policy will be implemented. We have set out in the table for implementation and policy 14 how this will be implemented along with the justification of policy 6.

3.3.52 The other comments that have been addressed are:

- General support for the area based approach.
- Concern at Elephant & Castle only requiring 10% affordable housing. 'A minimum of 10% to 35% of new homes should be affordable' is meaningless. The policy would cut the amount of affordable housing required by the Southwark Plan from 35% to 10%. No private developer will submit a plan for 35% affordable housing where 10% will do; the current ratio should therefore be retained. It should also be strengthened by treating 35% as a true minimum and only applied after the developer has demonstrated that the 50% target given in the London Plan is economically unviable. The Elephant and Castle now has a minimum 35% affordable housing requirement.
- The proposal to make little change outside the opportunity and action areas is contrary to Government policy on creating mixed communities. The Government policy is for growth in areas such as those set out in the Core Strategy. We will still be requiring mixed housing to create mixed communities outside the growth areas.
- Key Worker accommodation as part of Policy 6, recognising the importance of this to key local employers such as health and education. We require affordable housing in this policy.
- The approach to the mix of different unit sizes in new development is prescriptive, allowing no flexibility for schemes to respond to local need, market requirements, site specific issues and overall viability. The approach will allow for larger units to provide for local need as set out in our evidence and research.
- The "New Plan For London" publication from the GLA (April 2009) confirms the Mayor's intention to move away from percentages towards numerical targets for affordable houses on a Borough by Borough basis. Policy should be amended to reflect this shift in regional policy to ensure Policy 6 is in compliance with the emerging London Plan. We have a numerical affordable housing policy.
- The prescriptive mix of housing tenures should be guidance only to ensure the Policy is adequately flexible to allow the ambitious housing targets to be deliverable and to ensure that the Policy can be considered sound. Tenure has been saved as part of the Southwark Plan and has been removed from the Core Strategy as this is too detailed.

Policy 7 Family housing

3.3.53 The GLA comments that have been addressed are:

- The council should consider broadening it to all non self contained housing. This detail will be addressed in the development management development plan document.
- It is not clear how this policy will be implemented. We have set out in the table for implementation and policy 14 how this will be implemented along with the justification of policy 6.

3.3.54 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- Southwark PCT welcome the access to a greater range of family homes. However we are unclear that the proposed policy will achieve the required numbers or the required mix. We welcome the recognition of the needs of families for access to a garden. We would hope that the mix of family homes are in the right numbers, places with easy access to open spaces, schools and health centres. We have changed the policy approach to require higher levels of family housing where there are lower densities which is the approach set out in this comment.

3.3.55 The other comments that have been addressed are:

- General support for the approach of 30% family housing.
- A standard requirement for 30% 3, 4 or 5 bed in each development is impractical. The mix of units should be carried out on an individual site basis and the policy should have more flexibility. For example, high-density developments of tall buildings in opportunity areas may not be as appropriate for large family units on alternative sites. The policy has been altered to have a differential approach based on density.
- It is also important to provide for single and childless couples as well as family housing. We allow for 1 and 2 bed flats for this.
- The policy should be 42% of homes as 3 bed+ in line with the London Plan. This would not be viable, nor would it be physically possible in higher density areas. Therefore this would reduce the number of units delivered.
- 50% of family sized units should be social rented housing is unrealistic. The number of family affordable housing units is the product of a number of factors including suitability of the site for family housing, size and layout of units and economic considerations. We have reduced this to a differential approach that is achievable.
- Family accommodation should be appropriately located where access to schools, open space and a range of family based activities are available. The policy has been altered to have a differential approach based on density.
- Introducing a requirement for 2/3 bedroom homes to have a required minimum of two double bedrooms to be too inflexible and should be considered on a site by site basis. The policy has been altered to have a differential approach based on density.
- The maximum requirement of 35% 1 bed units and minimum of 60% 2 or more beds is inconsistent. Providing a mix of units is provided that is appropriate to the development, there should be no standard limits. The policy has been altered to have a differential approach based on density.
- The size ranges for accommodation should be consistent with the London Plan. The use of minimum unit sizes is onerous: reliance should be placed on existing alternative standards e.g. Lifetime Homes. This new standard is consistent with the Mayors new proposed standards.
- The proposal that developments in the Elephant and Castle Opportunity Area should only have 10% of homes with 3 bedrooms should be dropped and the Elephant brought into line with the rest of

the borough. The policy has been altered to have a differential approach based on density.

Policy 8 Student housing

3.3.56 The GLA comments that have been addressed are:

- The policy is required to be in general conformity with the London Plan. It should demonstrate that need has been considered with evidence for the approach taken. We have provided this detail.
- It is not clear how this policy will be implemented. We have set out in the table for implementation and policy 14 how this will be implemented along with the justification of policy 6.

3.3.57 There were no additional comments from statutory consultees (other than GOL and GLA).

3.3.58 Other comments that have been addressed are:

- Concern with asking for affordable housing as part of student schemes; The London Plan and the Housing Strategy identifies that affordable housing should not normally be sought in relation to student housing and therefore this should be removed. The GLA have not objected to this policy as not being in general conformity. They have asked us to provide evidence for this which we can provide.
- We should work together with other London boroughs to provide student housing. We are working with other London boroughs in our sub regional housing group.
- Should encourage student housing in the growth areas. We are allowing student housing in the growth areas.
- Developers should be made to meet Southwark policies even when building student housing – student housing can later be used as ordinary family housing if built to a high enough standard. This can not take place due to the layout and also the need for student housing is increasing so it is unlikely that it will change to family housing.
- Objection to the Council's approach to limiting the amount of student housing. The provision of student accommodation is essential as it frees up the more affordable element of the private rented market and reduces market stress upon this sector of housing. The provision of student housing can relieve localised housing need; The proposed policy seeks to limit student housing, which appears contradictory to Objective 2C, which seeks to encourage more student housing. The aim is to allow student housing whilst enabling us to meet our housing targets and provide for affordable housing need.
- The requirement to demonstrate that the housing is for local students in Southwark is unduly onerous given the cross borough boundary nature of such educational establishments. This requirement is not in the policy.
- Section 106 contribution requests relating to student accommodation proposals should not seek to pay for the replication of facilities which are already being provided on a university's campus, for example contributions towards health facilities or community facilities are not appropriate where these facilities already exist on a university's

campus. The requirement for student housing is different to general needs policies and will be set out in more detail in AAPs and SPDs.

Policy 9 Homes for Gypsies and travellers

3.3.59 The GLA comments that have been addressed are:

- The policy should be changed to be in general conformity with the London Plan. We have amended the policy to set out that we will be safeguard the existing four Gypsy and traveller sites. We have also set out criteria for how new sites will be identified if needed in the future.
- It is not clear how this policy will be implemented. We have set out in the table for implementation and policy 14 how this will be implemented along with the justification of policy 6.

3.3.60 Other comments that have been addressed are:

- The current policy is too vague. We have provided further detail.
- We should refer to the Gypsy and traveller Needs Assessment. This is included in the reasons.
- We do not believe that land in the CAZ or Urban Zone is most efficiently used to house low density Gypsy/traveller communities. Policy should be clear that they will be housed outside these areas. We have set out a criteria based approach to provision as set out in national guidance based on sites rather than areas.
- This is a blank space. It is of concern that Southwark has no interest in what is a statutory duty. There need to be more and better sites to promote inclusion and equality. We have provided a criteria based approach and protected current sites.
- The section on Gypsies and travellers has overlooked the fact that research - in the form of a London boroughs' Gypsy and traveller Accommodation Needs Assessment, to which Southwark was party - has been carried out (There is no GLA research to wait for). We have provided a criteria based approach and protected current sites.
- Recommended that boroughs should be seen to be getting on with seeking to meet at least the minimum level of need. Council may have problems (e.g. with planning appeals) if, as suggested by the text in the core strategy, there is no effort made or commitment to meet this stated need and are presented with Gypsies and travellers taking a DIY approach to providing new sites. We have provided a criteria based approach and protected current sites.

Policy 10 Jobs and business

3.3.61 The GLA comments that have been addressed are:

- The policy must support this with an evidence based study particularly removal of the Tower industrial site. We have removed part of one the PILs, as supported by the owners of the site. We have an Employment Land Review that supports this change.
- The policy must support this with an evidence based study particularly the approach to hotels. We have amended the policy to set out where we will encourage hotels.

3.3.62 The GOL comments that have been addressed are:

- How will the release of 20ha of industrial and warehousing land be achieved? We are achieving this through implementing and saving our Southwark Plan policy.

3.3.63 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- Southwark PCT suggest that development would need to consider how many jobs might be created and also how many posts would be available for local people including those who move into the area. There is no discussion in this section on the role and development of the existing large employers locally i.e. NHS and council. In addition there is no consideration of the potential to develop small high technology industries in the area in connection with the new Academic Health Sciences Centre - Kings Health Partners with its role in getting experimental developments into business ready technologies in a short space of time. Through our section 106 SPD and through policy 10 we target new jobs and training opportunities towards local people. Our employment and enterprise strategies set out in more detail how we do this. We recognise the contribution to employment which the NHS makes, but do not consider it appropriate to refer to the NHS in the Core Strategy policy. There are many organisations which contribute to employment and the Core Strategy cannot refer to all of them. The potential to develop small high tech industries is noted and would be consistent with our approach as set out in the Core Strategy.

3.3.64 The other comments that have been addressed are:

- Support for the continuing protection of Preferred Industrial Locations and designated employment zones, subject to the continuing demand for industrial and employment floorspace.
- Policy 10 should not seek to protect all business space in the locations set out. It should be more flexible and allow other uses where there is no demand, high vacancy, redundant land etc. The core strategy sets out the strategy to protect all business space in locations where this is appropriate and necessary to meet need for jobs and businesses. We have more detailed development management policies in the Southwark Plan which we will be saving that provide the further detail and criteria suggested by this comment. We will also be updating the detail in the development management development plan document, area action plans and supplementary planning documents.
- Policy does not include any flexibility for losing business space which has been vacant and marketed for a length of time nor does it take into account the quality of the existing floorspace vs. the potential quality of replacement floorspace. The core strategy sets out the strategy to protect all business space in locations where this is appropriate and necessary to meet need for jobs and businesses. We have more detailed development management policies in the Southwark Plan which we will be saving that provide the further detail and criteria suggested by this comment. We will also be updating the detail in the

development management development plan document, area action plans and supplementary planning documents.

- All industrial locations and business sites must be protected from all types of ongoing harmful housing led developments. Regular reviews of these sites should be carried out to assess whether it is still needed. The core strategy sets out the strategy to protect all business space in locations where this is appropriate and necessary to meet need for jobs and businesses. We have more detailed development management policies in the Southwark Plan which we will be saving that provide the further detail and criteria suggested by this comment. We will also be updating the detail in the development management development plan document, area action plans and supplementary planning documents.
- Existing office floorspace should only be protected in the CAZ, town centres, core action areas and strategic cultural areas where there is a demonstrated need for its retention and subject to a range of criteria. The core strategy sets out the strategy to protect all business space in locations where this is appropriate and necessary to meet need for jobs and businesses. We have more detailed development management policies in the Southwark Plan which we will be saving that provide the further detail and criteria suggested by this comment. We will also be updating the detail in the development management development plan document, area action plans and supplementary planning documents.
- Existing arts, cultural and tourist facilities use should only be protected where there is a demonstrated need for it. The core strategy sets out the strategy to protect all arts, cultural and tourist facilities in locations where this is appropriate and necessary to meet need for jobs and businesses. We have more detailed development management policies in the Southwark Plan which we will be saving that provide the further detail and criteria suggested by this comment. We will also be updating the detail in the development management development plan document, area action plans and supplementary planning documents.
- The policy should recognise the employment generating potential of other forms of business space e.g. hotels. The policy has been changed to provide information suggested by this comment.
- The policy should only protect PILs where there is a need. It should be more flexible and allow mixed use development in the PILs. It should also allow places of worship subject to criteria, such as a 24 month period of vacancy. The core strategy sets out the strategy to protect all business space in locations where this is appropriate and necessary to meet need for jobs and businesses. We have more detailed development management policies in the Southwark Plan which we will be saving that provide the further detail and criteria suggested by this comment. We will also be updating the detail in the development management development plan document, area action plans and supplementary planning documents.
- The following sites should be released from PILs, in the light of surrounding residential land use and the contribution which the sites could make towards housing growth: The Rich Industrial Estate, Crimscott Street; the Surrey Canal Triangle, Ilderton Road; 347-359 Ilderton Road. We are not intending on releasing any more land to

meet our targets or strategy for provision of employment land. We will be considering all small sites in the development management development plan document where more detailed considerations rather than strategic sites will be assessed.

- Targeting new jobs and training opportunities arising from specific developments towards local people through S106 obligations is an onerous burden which will make Southwark a less attractive place to invest. This is our strategy as we consider it to be important to link opportunities to local people to ensure that we are trying to take opportunities to reduce the gap between the number of jobs provided within Southwark and the number of people in work.
- There should be reference to affordable business units to ensure continuity of existing businesses. Our Employment Land Review suggests that the majority of SMEs are seeking premises of between 200sqm and 500sqm. Size of premises is particularly important for small and start up businesses, with smaller premises generally being more affordable. The emphasis will therefore be on providing space designed for the needs of SMEs, rather than providing subsidised floorspace.
- There should be reference to apprenticeship schemes, employment skills training centres, training and mentoring schemes. This is too detailed for the core strategy. This information is set out in the Southwark Plan policy which we are saving and the Section 106 Planning Obligations SPD.
- Policy should refer to providing a flexible range of business accommodation where appropriate and realistic. We encourage provision which meets the suggestion in this comment.
- Specific policies upon the need to protect small offices, such as at bullet point 3, are unnecessary and create a two tier market. We have worded the policy to emphasise the importance of flexibility. The requirement for flexibility does not negate the evidence that the majority of SME occupiers are seeking spaces of between 200sqm and 500sqm. In order to ensure a supply of premises suitable for SME occupiers, we consider the protection of these spaces to be justified.
- It is not appropriate to restrict the building of hotels given the overall shortage of tourist accommodation in London and the ease of accessibility of the CAZ in particular to many of the capital's main attractions. Southwark needs to provide an additional 2500 hotel bed spaces by 2026 to meet projected need. The CAZ is the most appropriate area to accommodate hotel growth. The policy sets the strategy to allow more hotels in areas such as the CAZ as long as they do not harm local character. This would meet the suggestion in the comment.
- The council should continue to protect the current widely consulted on tram depot at Peckham and not be starting from scratch with Parkhouse Street. The proposal for Parkhouse Street Depot has come out of nowhere with no consultation with the local community. The proposal is part of the Transport for London suggested way forward for the tram. This was consulted upon as part of the preferred options.

- The Policy should have regard to Draft PPS4, which recognises a range of uses as a form of economic development. We have taken PPS4 into account.
- The improvement and redevelopment of existing business space should be promoted to ensure a supply of high quality stock to meet occupier requirements. Our strategy promotes growth in a range of suitable locations which include the CAZ. Other locations include town centres, strategic cultural areas and AAP core areas.

Policy 11 Open spaces and wildlife

3.3.65 The GLA comments that have been addressed are:

- The policy should provide clear references to the London Plan. These references are now included.

3.3.66 The GOL comments that have been addressed are:

- Whilst the aim is laudable it is questioned how successfully the Core Strategy will be in encouraging individuals to grow their own food. This is an important issue that the Executive decided to retain.

3.3.67 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- Natural England would like to also give consideration to the potential for new green/open spaces as part of large scale development/redevelopment opportunities. We encourage this in the policy.
- The Environment agency would like additional references to the Thames. We have added additional references to strengthen our strategy. Further detail can be set out in supplementary planning documents and area action plans.
- English Heritage suggest that we need to recognise that many open spaces in the Borough are of historic value, including Registered Historic Parks and Gardens. We protect these in the policy.
- Natural England support for the protection of open spaces and the consideration of new Sites of Interest for Nature Conservation.

3.3.68 The other comments that have been addressed are:

- The vision for the River Thames is unnecessarily restrictive and is not justified. Further flexibility is required to achieve the strategic objectives in accordance with PPS12. This has been redrafted.
- Reference to the height of tall building in the Thames Policy area is not clear. The reference to 25 metres is not justified or flexible and therefore is not considered sound. A number of existing buildings in the Thames Policy Area exceed 25 metres whilst maintaining the character of the Thames Policy Area. The draft wording is also inconsistent with Core Strategy Policy 12 which identifies parts of the Thames Policy Area as suitable locations for tall buildings. This has been redrafted.
- The Core Strategy should identify other possible green chains and routes. Suggested green chains and routes from the network are

included. More can be included in other planning documents if they are set out through the network.

- We need to clarify the boundary of Burgess Park MOL and SINC. This has been clarified in the proposals map changes.
- The tram corridor through Burgess Park should be designated as a traffic-free corridor. Please see the comment on the tram in the Executive responses to Planning committee comments.
- MOL protection should not be eroded by AAPs and building heights should be restricted along park boundaries to avoid overshadowing. The building heights in AAPs will be considered in the AAPs.
- The Core Strategy should protect back gardens from being built on. This is a detailed policy which will be considered in the supplementary planning documents or development management development plan document.
- There should be a reference to food growing and preparing a food strategy. This is included.
- Payments for improving open spaces and sports facilities should only be sought from developments which result in an increased population and where a need arises that can not be met existing facilities. Each development should be considered on a case by case basis. Section 106 and payments are too detailed and will be considered in area action plans and supplementary planning documents.
- We should acknowledge the opportunities that exist to enhance existing areas of green open space. This is included.

Policy 12 Design and conservation

3.3.69 The GLA comments that have been addressed are:

- The policy should provide clear references to the London Plan and Mayor strategies. These references are now included.
- The tall buildings approach is welcome. The wording should reference the London View Management Framework and must support the approach to tall buildings with a borough evidence study. The wording in the policy has been amended to be more consistent and to make our policy on tall buildings more clear. We have identified that London Bridge, the northern end of Blackfriars Road, Elephant and Castle and action area cores are appropriate locations for tall buildings. All proposed tall buildings will need to be measured against criteria to determine design excellence and appropriateness.

3.3.70 Comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- English Heritage note the role of the historic environment in defining local distinctiveness and character, and its role in regeneration and place making, is underplayed. 'we will do this by' again focuses solely on designated assets and the wider historic environment is not considered. This is now considered in the policy and area visions.
- English Heritage welcome initiatives to update conservation area and archaeology priority zone boundaries.

- English Heritage consider that other practical steps could include a heritage strategy, work to define local views, characterisation, reducing heritage at risk in the borough, etc. Views (LVMF and local), setting and world heritage site issues have not been considered. These would be in background papers and other planning documents.
- English Heritage consider that 'We are doing this because' needs to acknowledge the development pressures faced in the Borough due to housing and employment targets etc. These are set out in the themes, objectives and strategy.
- English Heritage consider that in terms of the tall building locations we have serious concerns over the London Bridge/Thames River zone, which overlaps with conservation areas and could conflict with views of the World Heritage Site. This has been amended.
- English Heritage are also concerned that there is no evidence for an urban design study to justify their location. This study will be available in the background paper.

3.3.71 The other comments that have been addressed are:

- The Core Strategy has not justified why tall buildings are not suitable across most of the borough. This study will be available in the background paper.
- We should not encourage any tall buildings in the borough and this section should be deleted. In addition we should adopt a policy of opposing the building of tall residential private and social housing across the borough above heights that fire-brigade ladders can reach safely. Tall buildings should be allowed in line with London Plan guidance policy 4B.10. We set out a strategy for where we think they would be appropriate and beneficial for areas.
- Various comments about the tall buildings areas. We have set out a strategy with areas on the key diagram. These will be designated in the development management development plan document and area action plans with further guidance in supplementary planning documents.
- Consider that innovative design is appropriate in Conservation Areas and in the vicinity to buildings of historic value and should not be disregarded as inappropriate. This is set out in the core strategy.
- We need to clarify the design criteria show no consistency ranging from making sure that all new development is of "high quality design" to requiring "highest possible design" in other circumstances and then finally requiring "exceptional design quality". These three measures imply very different levels of quality and certainly in terms of "highest" and "exceptional" will impose an unreasonable burden upon applicants to discharge. This more detailed information will be saved in the Southwark Plan and provided in the review of the development management development plan document and supplementary planning documents.
- We should ensure that all new development adheres to the guidelines as set out in 'Secured by Design' and 'Safer Places'. This strategy for safety is set out, detail will be provided in other planning documents.

- We should consider locations in the Canada Water Growth Area represent a suitable location for tall buildings due to making an efficient use of land, exploiting the prominent corner location formed by the divergence of Quebec Way and Redriff Road and close proximity to both the Surrey Quays Shopping Centre and the London Underground. The site may also afford potential outstanding views across to Canary Wharf and the River Thames at higher height levels and provides open green space for residents in the form of existing Metropolitan Open Land (MOL) to the north and east of the site. This is an area where tall buildings could be appropriate. Further detail will be set out in the area action plan.

Policy 13 High Environmental Standards

3.3.72 The GLA comments that have been addressed are:

- The waste apportionment targets should be met by identified land either independently or as part of a group. The wording has been redrafted to show how we will meet the apportionment figure.
- The policy should be split into two. The policy has been reordered to provide further clarity.
- The council should safeguard all existing waste management sites unless appropriate compensatory provision is made. This is too much detail and the policy in the Southwark Plan is being saved.
- The council should set out the criteria for the selection of sites for waste management and disposal. This is too much detail and the policy in the Southwark Plan is being saved.

3.3.73 The GOL comments that have been addressed are:

- You may want to include the waste targets within the policy. We have included these within the policy.
- You will need to provide strong evidence to suggest that the policy for code for sustainable homes level 4 is achievable. We have evidence to provide this in our background paper.
- The wording of the waste policy could be more clearly set out to show the 5 London boroughs that are working together on a Technical Waste paper to meet the apportionment figure. The wording has been redrafted to show how we will meet the apportionment figure.

3.3.74 The comments by statutory consultees (excluding GOL and the GLA) that have been addressed are:

- The Environment Agency ask for us to consider including further targets to reduce waste produced, space provided and for introducing local initiatives. These would be included in the more detailed development management development plan document and sustainability SPDs.
- The Environment Agency ask for us to consider Sustainable Urban Drainage Strategies for all developments. We do this in the sustainable design and construction SPD.

3.3.75 The other comments that have been addressed are:

- We should reference the climate change strategy target. This is included.
- We should include reference to passive design and natural ventilation. This more detailed information is in the design and sustainability supplementary planning documents.
- We should refer to PPS25 and development needing to reduce flood risk. This is included.
- The Core Strategy should require development to be designed to cope with climate conditions over lifetime of the development. We should make reference to specific retrofitting projects. This more detailed information is in the design and sustainability supplementary planning documents.
- We need to be flexible in our approach and not impose rigid targets, energy, water, waste reduction requirements that might affect the viability of development. We are set targets nationally and within London in addition to setting our own targets. We have a system within this that considers viability of developments so that we are being reasonable when making decisions.
- Consider a policy protecting installed wind and solar systems from being blocked by new developments or for the systems to be moved to remain viable and also a policy to protect installed solar and wind systems from being blocked by neighbouring tree growth. This more detailed information is in the design and sustainability supplementary planning documents.
- We should include a commitment to preserving Burgess Park for open space uses and as a biodiversity hotspot for the Borough's residents and stating clearly that the any improvements of the park are for all the borough's citizens. The Park is referenced in the Aylesbury vision.
- Consideration should be given to opportunities for energy from efficient sources on or off site and subject to a cost benefit analysis of suitable technologies or measures. In addition, consideration should be given to the whole carbon lifecycle of the development and overall scheme viability. This more detailed information is in the design and sustainability supplementary planning documents.

Policy 14 Delivery and Implementation

3.3.76 The GLA comments that have been addressed are:

- A delivery plan should be included at the next stage. We have included a whole section on implementation to include a policy on implementation and a table showing how we will implement each of our policies and the main growth area visions.

3.3.77 The other comments that have been addressed are:

- We should consult on the Community Infrastructure Levy if we are going to require it. We are not requiring CIL, we are awaiting further guidance from the Government. If we introduce CIL we will update our Section 106 Planning Obligations SPD.

Delivery, monitoring and implementation

3.3.78 The GLA comments that have been addressed are:

- A delivery and implementation plan must be provided at the next stage. We have included a whole section on implementation to include a policy on implementation and a table showing how we will implement each of our policies and the main growth area visions.

3.3.79 The GOL comments that have been addressed are:

- The delivery and implementation and policy need to be more detailed. They need to ensure that they include information about infrastructure and hooks for the DPDs and SPDs. This information has been provided.

3.4 Publication/submission consultation

3.4.1 80 organisations, groups or individuals made representation on the core publication/submission version. This resulted in 789 representations. Further detail on the breakdown of those responding to the core strategy publication/submission is set out in section 4.

What happens next

3.4.2 All of these representations are being sent to the Planning Inspectorate alongside the publication core strategy.

3.4.3 We have also prepared a table of recommended minor changes for consideration by the Planning Inspector (CDCS17). The Strategic Director of Regeneration and Neighbourhoods in consultation with the Executive Member for Regeneration has agreed this table of minor changes (CDCS18). These are not part of the formal process and are provided on the basis of the decision by Council Assembly on 4 November 2009 to delegate further proposed minor changes to the core strategy to the Director of Regeneration and Neighbourhoods in consultation with the Executive Member for Regeneration. The reason for these changes are as follows:

- Editorial corrections and other corrections to factual information
- Area diagrams for all of Southwark's sub-areas
- Updated housing trajectory and housing figures
- Updated waste apportionment figures
- Updating the area visions with information from the strategic policies including information on tall buildings and affordable housing figures.
- Amending the boundaries of Crossbones open space.

3.4.4 Some of the representations we received through the publication/submission consultation have led to these changes. Within the table of changes we set out the representation number that has informed the change. We have set out below where we have put forward a proposed change as a result of a representation.

Summary of representations and our responses

3.4.5 A summary of the main responses received on the publication/submission core strategy and how we have responded to these representations is set out below. The full representations and the full officer response to each representation is set out in appendix L of this report. We have set out the responses initially under statutory consultee, and then under each policy for the non-statutory consultees.

Government Office for London (GOL)

3.4.6 Justified

- In terms of being justified, GOL commented that the core strategy evidence should be as up-to-date as possible. They also commented that it is important that we have clear links between the evidence base and the justification to policies and it would be helpful to have cross-references to where this can be found. We are suggesting to the inspector that the research website address is included in the introduction.
- GOL commented that provided the evidence base is up to date and accurate, the policies appear to be supported by evidence. We are suggesting to the inspector that the research website address is included in the introduction.

3.4.7 Effective

- In terms of being effective, GOL commented that it would be helpful to clarify which infrastructure schemes are essential to deliver the vision and objectives. We are suggesting to the inspector that the following wording is included in the phasing column of the implementation section. "Infrastructure is not essential for development to take place unless this is stated. Where infrastructure is essential this is then stated".
- They also commented that we could provide more detail in the implementation, delivery and infrastructure tables regarding proposed phasing of development and funding, including actions necessary to overcome any shortfalls. We are suggesting the wording as set out for the above bullet point as a change to the Inspector.
- GOL consider that the plan does not provide adequate information regarding the quantum and phasing of proposed development. They comment that there needs to be more detail for Camberwell, Peckham and Nunhead and Old Kent Road action areas. They also commented that we should include targets for these growth areas in strategic targets policy 2 and policy 5. We consider the approach for housing of providing a total for the borough and then targets for areas with area action plans and opportunity areas that are currently being prepared to be the most effective. This is because these figures are based on the local evidence base that has been prepared for local planning documents and therefore has been locally scrutinised in a great level of

detail. We have set out possible housing figures based on the SHLAA if the Inspector chooses to include targets for areas. We are not proposing to provide employment or retail targets as the purpose of developing these action areas is to provide more small scale rather than large retail and employment developments to improve these places.

- GOL commented that policy 10 could be more robust by indicating where employment land should be released, to prove the strategic policy framework for subsequent DPDs. We consider the policy to be clear but in case the Inspector considers that it is necessary to provide more information, we have set out draft wording in our full officer response.

3.4.8 Flexible

- GOL commented that the plan does not overtly address the issue of the need for flexibility to deal with changes in circumstances that may occur in the plan period. In particular they comment that we need to indicate any work that we have done for contingency planning should any of the planned infrastructure not proceed. We are suggesting to the inspector that the following wording is included in the phasing column of the implementation section. Infrastructure is not essential for development to take place unless this is stated. Where infrastructure is essential this is then stated.

3.4.9 Monitoring

- GOL commented that we may want to make our monitoring table more robust by showing how it relates to the plan's policies. We do provide this information in the table as all indicators are listed by policy

3.4.10 Consistent with national policy

- GOL commented that it would be useful to explain the housing trajectory and for it to cover the whole plan period. We are suggesting to the Inspector that we insert a housing trajectory to cover the period up to 2026,
- It will also be useful to explain whether a Housing Implementation Strategy has been developed as part of the evidence base. We could provide a link to this in the strategy or state when we expect it to be completed. We have updated housing background paper 2 to provide all the necessary information.
- GOL commented that we should provide a broad indication on how much affordable housing we expect in Peckham and Nunhead, Old Kent Road and Camberwell action areas. We are suggesting to the inspector that the Canada Water percentage is inserted at 35%. The remaining action areas are covered in the area with very high social housing and therefore the issue is to ensure provision of some market housing rather than affordable housing.

- Within policy 9 we may want to make reference to the number of Traveller and Gypsy pitches required in the draft replacement London Plan. We do not consider a change to be necessary. We make the provisions required in the London Plan as we set out the strategy in the core strategy. We discuss the number of pitches in the background papers
- Government Office for London stated that our waste targets should reflect those in the draft replacement London Plan 2009. They also stated that we should make sure the waste technical paper covers the whole plan period. They also commented that the supporting text does not refer to the waste hierarchy. We have suggested these changes to the Inspectorate.
- GOL commented that we should support the principle of the Thames Tideway Tunnel, ideally through policy. The core strategy recognises the importance of the Thames Tunnel, in the evidence base, supporting text to policy 13 and the infrastructure table to policy 14.
- Suggested we could include vision diagrams for the sub-areas. We have suggested to the Inspectorate that we insert vision diagrams for all our areas.
- We ensure is in general conformity with the adopted London Plan. We should also make reference the draft replacement London Plan. We have suggested to the Inspectorate that we include a table showing the
- Commented on the footnotes referring to the EIP and that they assume we mean the London Plan EIP. We have suggested to the Inspectorate that we amend these to make it clear that we are referring to the London Plan EIP.

3.4.11 Greater London Authority

- The GLA stated that the core strategy is, on the whole, broadly consistent with the London Plan.
- There are, however, some outstanding issues relating to the general conformity and soundness of some aspects. The detail is set out below.
- The GLA commented in relation to potential general conformity matters relating to housing targets and affordable housing.
- Their comments also consider matters relating to housing density, retail, and waste.
- The GLA commented that the approach taken forward through policy 5 for the overall housing target is in general conformity with the London

Plan. They also noted the footnote in the policy referring to the draft replacement London Plan target.

- The GLA commented that the approach to density in policy 5 is broadly consistent with the adopted and emerging London Plan.
- The GLA commented that policy 6 on affordable homes is in general conformity with the London Plan. The GLA also commented that the core strategy is not setting out a tenure split between intermediate and social rented housing. They are happy with this approach providing the housing development plan document is brought forward in a timely manner.
- The GLA have raised a general conformity issue concerning the approach to student housing being for a local need. The GLA commented that this issue could, however, be resolved through a minor change to the policy that removed the requirement for new student accommodation to solely meet the needs of 'local' universities. They have suggested that they could be discussed at the Examination in Public if the inspector sees fit. We consider that this policy is in general conformity with the adopted and emerging London plan and therefore no changes are proposed.
- The GLA comments that policy 3 proposes a town centre hierarchy that is inconsistent with that of the London Plan. The proposed town centre hierarchy does, however, reflect up-to-date local and strategic evidence and the draft replacement London Plan. That being the case the proposed policy is considered to be in general conformity with the London Plan.
- The GLA stated that our waste targets should reflect those in the draft replacement London Plan 2009. They also commented that it is expected that the proposed Development Management DPD will include detailed policies regarding waste management, including the designation of 'non-strategic' waste sites in the borough as necessary to be in general conformity with the London Plan. We have suggested this amendment through our table of changes to the Inspector and have also updated the Joint Waste Technical Paper.
- The GLA also refer to Transport for London's detailed comments that raise concerns on the soundness of some of the transport aspects of the core strategy. These comments are set out below under Transport for London.
- The GLA also comment that the core strategy does not currently acknowledge emerging strategic policy on the use of planning obligations in the funding of Crossrail. The proposed London Plan alteration is anticipated to be published by the time of the core strategy examination. We will update the core strategy if there are cross rail requirements.

3.4.12 Transport for London (through the GLA response)

- Transport for London raised some concerns relating to the soundness of some aspects of the core strategy and some other general comments.
- TfL proposed that the core strategy should clearly state the core strategy proposals for Elephant and Castle are based on the principles in the Elephant and Castle Development Framework SPG 2004. TfL also felt that this should be made clear in the sustainability appraisal. This change should not be made as the core strategy is not based on the Elephant and Castle SPG as quantum of development and legal processes have changed.
- TfL commented that section 2 of the core strategy should include reference to the underground stations. We have recommended to the Inspector that we insert wording to refer to the underground stations.
- They also commented that in neither the core strategy or the sustainability appraisal do we refer to the fact that some of the underground stations are beginning to experience congestion and/or there is currently a lack of transport capacity to accommodate the high levels of growth envisaged in the core strategy. We do not agree with this as a change. Southwark's research does not demonstrate that some of the underground stations are experiencing congestion or that they have capacity issues that would impact on the regeneration and development set out in the core strategy
- TfL comment that there is little consistency in the level of information provided for their different key proposals. There is little, if any information provided for the capacity constraints and improvements needed at the Elephant and Castle and the fundamental challenges in respect of the necessary underground station improvements. We do not agree with this as a change. Southwark's research does not demonstrate that some of the underground stations are experiencing congestion or that they have capacity issues that would impact on the regeneration and development set out in the core strategy
- TfL recommends that the Core Strategy should make cross-references to relevant sections of the Elephant and Castle Development Framework SPG (2004) and the principles set out in those sections to overcome the capacity constraints and other issues that are likely to arise as the redevelopment of the Opportunity Area proceeds. We do not agree with this as a change. Southwark's research does not demonstrate that some of the underground stations are experiencing congestion or that they have capacity issues that would impact on the regeneration and development set out in the core strategy
- The Core Strategy should also demonstrate that there is a credible and well-resourced basis for delivering the necessary improvements,

acknowledging the need for flexibility over delivery should these improvements fail to be forthcoming in a timely manner. We do not agree with this as a change. Southwark's research does not demonstrate that some of the underground stations are experiencing congestion or that they have capacity issues that would impact on the regeneration and development set out in the core strategy

- The Core Strategy (and any intermediate policy which is applied before the Core Strategy is adopted) will need to take account of the real likelihood that certain key transport infrastructure improvements, on which some of the Core Strategy policies depend, will not be capable of being funded by TfL. Otherwise the Core Strategy will lack coherence, consistency and effectiveness. This change should not be made. We are unclear which improvements and policies that TfL mention we need to address as they are not listed in the response. Therefore we can not provide a detailed response to this objection and which transport improvements that are suggested.
- TfL comment that the Core Strategy is scheduled to be adopted in February 2011 at the earliest. The Core Strategy does not address the implications of the new Community Infrastructure Levy under the Planning Act 2008 and the effect that this is likely to have on the funding of major infrastructure improvements and delivery. We set out that we will address the CIL when we are made aware of our obligations. Until then we will continue to apply our very successful section 106 tariff SPD which provides a very clear and coherent approach.
- TfL remain concerned about delivery issues, particularly in relation to the Elephant and Castle. They also commented that compared to other opportunity areas and action areas, there is very little detail on the public transport improvements required. We suggest that the change is not made as we have included information about working with TfL as they suggested at preferred options consultation on page 44. We also set out that we will work with our partners in strategic policy 14 and also that we will work with infrastructure providers to identify and deliver elements of infrastructure to support growth at the right time. There is also a section on the elephant and castle infrastructure from page 160 where we set out TfL as an important person to be involved.
- TfL welcomes Strategic Policy 2 and Southwark's commitment to promoting walking and cycling throughout the borough, and encouraging mode shift, as detailed in the approach to sustainable transport.
- TfL would welcome a comment in the core strategy on the requirement for travel plans to be submitted with applications. This is covered in our development management policy 5.2 in the Southwark Plan which is being saved along with our sustainability SPDs. This information is too detailed for the core strategy.

- TfL recommend that reference to the Cross River Tram is removed. There is strong support within Southwark for the tram. We set out that we support the tram if it can be delivered. The Mayor's business plan is only up to 2017/18 and this core strategy is for a longer time frame until 2026.

3.4.13 Environment Agency

- Environment Agency commented that the vast majority of their representations at preferred options have been dealt with.
- They advised that the location of sites for homes for travellers and gypsies take into account the groundwater levels. Package Treatment Plants can be used in this housing and there should be a sufficient unsaturated zone for their efficient operation. This is too detailed an issue to be addressed through the core strategy. We will consider a range of environmental issues when we select sites and these will be part of evidence base and detailed policies in the housing development and development management development plan document
- They also commented that groundwater and water quality has not been covered in enough detail in the core strategy policies. We are recommending that the Inspector change Policy 13 to include reference to water pollution which will cover both surface and ground water quality. This is set out in our table of changes.
- They also commented that reference should be made to the Thames River Basin Management Plan 2009. We are recommending the to inspector that he makes this change.
- We should clarify the purpose of the Thames Tidal Tunnel. We are recommending wording to the inspector to clarify the purpose of the Thames Tidal Tunnel.

3.4.14 Primary Care Trust

- At present page 14 does not fully explain the key health and demographic issues to fully justify and support Strategic Policy 4 and the cross cutting approach to health. The PCT suggested text to reflect this. We are proposing this as a recommended change to the Inspector as useful background information.
- Although key health issues are mentioned in the supporting text to Strategic Policy 4 (3rd paragraph, page 72) , the PCT suggest further wording. We are proposing this as a recommended change to the Inspector as useful background information.
- Replace the 4th paragraph with: "A major risk factor for long term health of local children is the continuing trend of obesity. Over a quarter (26%) of Year 6 children in the borough are obese, one of the highest rates in the country." Although the fact in the core strategy is correct, the target

used by the government to measure performance is based on the suggested change. We have suggested this change to the Inspector.

- Within the challenges and opportunities section, the following text should be inserted: Help tackle the major health issues and inequalities in Southwark, such as obesity and mental health by addressing the environmental, social and economic factors that can influence health.” We have suggested this change to the Inspector.
- The PCT felt that strategic objective does not fully reflect the cross-cutting approach to health and to be effective. The PCT suggested new wording. We feel that the themes already cover all these points and no change is needed.
- The PCT suggest adding wording into supporting text of policy 2 to read “Encouraging active travel and reducing traffic levels and speeds will have positive health impacts for improved air quality, safer roads and encouraging physical activity and successful communities.” We have suggested this change to the Inspector.
- The PCT suggest wording changes to policy 3 regarding fast food outlets. We have suggested this change to the Inspector.
- The PCT suggest change to the title of policy 4 to read: “Places for learning, enjoyment and healthy lifestyles”. We have suggested this change to the Inspector.
- The PCT suggest we insert another bullet point in policy 4 to read “Ensuring that development encourages healthy lifestyles and addresses negative impacts on physical and mental health” The core strategy addresses this partly in bullet 6 of the ‘we will do this by’ and partly in the strategic policy 1 sustainability assessment requirement. This level of further detail would be more appropriate in the sustainability assessment supplementary planning document
- The PCT have suggest wording to policy 4 bullet point 6 to include the wording “in partnership with NHS Southwark”. We have proposed this change to the Inspector.
- The PCT proposed changes to policy 13 to include health. This is already addressed through other policies.
- Under the monitoring table, the PCT suggested that new health facilities must be BREEAM “excellent” and any refurbishment should achieve BREEAM “very good”. We consider very good to be the most appropriate standard, If there is a corporate need for the primary care trust to achieve excellent this could be requested through their tendering and development process.

3.4.15 Metropolitan Police

- The Metropolitan Police stated that police facilities should be included as community facilities. National policy sets out the use classes order with groups of uses of buildings that can be permitted for development. D1 use covers a wide range of community facilities, this does not include facilities for police as set out in the fact box. As this is set by national policy we can not prepare a local policy that would allow new types of D community uses as it would not comply with national requirements.
- Within policy 10 police facilities should be included as a potential use on a site released from employment use. PILs will not normally be suitable for B1(a) and B1(b) uses, although some ancillary B1(a) use is acceptable and some transfer between these classes may be inevitable under the General Permitted Development Order. We have recognised within the supporting text to Policy 10 that new employment sectors are emerging, and that diversifying the range of job opportunities in the PILs would benefit local people. The Development Management Development Plan Document will set out further detailed policy for assessing developments and uses within the Preferred Industrial Locations and also criteria to be applied for proposals to change the use of non-designated industrial land which is being released to other uses.
- Policy 14 should refer to social infrastructure including police facilities. Policy 14 already refers to social infrastructure. It is not appropriate to list all types of social infrastructure. Police facilities are included in the glossary definition of social infrastructure.

3.4.16 Natural England

- Natural England felt that their previous comments had all been dealt with and were supportive of the proposal to designate further Sites of Importance for Nature Conservation.

3.4.17 English Heritage

- English Heritage welcomed Southwark's commitment to develop a policy framework for management of the historic environment and tall buildings.
- They suggested some minor changes to wording to make the core strategy more consistent with PPGs and avoid confusion in interpreting the policies. We are suggesting this change to the Inspector.
- They expressed concern that we need to provide a robust framework for detailed policies on protection and enhancement of the setting of all heritage assets and World Heritage site. The Southwark Plan contains policies for the World Heritage Site and these are to be saved pending the preparation of a development management DPD when they will be reviewed and updated.

- They suggested that we need to recognise opportunities for heritage-led regeneration and the significance of the historic environment in defining the character of areas. We are recommending to the Inspector a reference to the historic environment is added to bullet point three to further clarify that the historic environment is a consideration in determining appropriate heights.
- They felt that our evidence base should be more complete and accessible evidence base. The evidence base is set at the appropriate level of detail to justify the strategic approach of the core strategy, in particular the approach to tall buildings. More detailed evidence has been prepared to support the approach to planning of areas where greater change will take place including the planning of tall buildings. The council will work with English Heritage to make the evidence more easily accessible and referenced to the historic environment.
- They felt that we need to be more consistent in referring to where and when tall buildings may be appropriate, both in policy 12 and in the area visions. We are recommending this change to the Inspector.
- They felt that while we have followed the CABE/EH Guidance on Tall buildings we have applied the methodology in a different order. Our tall buildings study includes the full range of considerations set out in the EH/CABE guidance. The definition of tall buildings used is in accordance with the EH / CABE guidance. We are also recommending to the Inspector that changes are made to the supporting text to Policy 12 to clarify that the approach to tall buildings in the broad location identified will be subject to further more detailed guidance and policies to address any sensitivities in these area. We are also recommending that the supporting text is amended to make clear that in all other areas tall buildings are not considered appropriate.

3.4.18 Thames Water

- Thames Water support the requirements for developments to reduce water use and use local sources of water where possible and the requirement for developments to help reduce flood risk by reducing water run-off, using sustainable urban drainage systems and avoiding the paving over of gardens and creation of hardstanding areas.
- Thames Water object to the omission of a specific policy supporting the Thames Tidal Tunnel and they want explicit support for the Thames Tidal Tunnel to be shown in the core strategy. The core strategy recognises the importance of the Thames Tunnel, in the evidence base, supporting text to policy 13 and the infrastructure table to policy 14.
- Thames Water recommend that we provide clarification on the purpose of the Thames Tidal Tunnel. We are recommending amendment to the supporting text to Policy 13 to clarify the role and function of the

Thames Tunnel to reduce water pollution and refer to Water Framework Directive and Thames River Basin Management Plan.

3.4.19 Port of London Authority

- Port of London Authority commented that Jacob's Pier is a privately owned residential pier and should be removed from all maps showing the piers in the River Thames. We have put forward a recommended change to the planning inspectorate that we remove Jacob's Pier from our maps.
- They also commented that the council should make it more clear whether river transport includes freight transport as well as transporting people. We feel that it is already clear within the "we are doing this because" section of policy 2 that we encourage river transport for freight transport as well as transporting people.

3.4.20 Coal Authority

- The Coal Authority had no specific comments at this stage.

3.4.21 NON-STATUTORY CONSULTEES

The main issues raised by non-statutory consultees are set out below for each policy.

3.4.22 Canada Water

The main representations for Canada Water were:

- Canada Water should not be identified as being sequentially preferential to other suitable town centres within the borough for new retail development. Our retail study has informed this policy and has identified additional scope for retail at Canada Water.
- Make express mention of links to Canary Wharf via the proposed Thames crossing for pedestrians and cyclists. The proposed Thames crossing is already shown on figure 14 and the Canada Water area action plan [provides further detail on the proposal. It is not necessary to add further detail in the core strategy.
- There is no evidence for the assertion that office space for local occupiers is 'much needed' in Canada Water. The targets are based on evidence in our employment land review. The floorspace figures are therefore based on future job generation rates.
- It is wrongly assumed that simply developing new floorspace will generate new jobs. No evidence has been presented to demonstrate this. Our employment land review provides the evidence for this. In arriving at this figure, the ELR synthesises historic and future employment trends.
- The core strategy should also make clear that funding from the HCA may also be required on other sites if the Council is to achieve the

levels of affordable housing to which it aspires. The text on p. 125 refers to the fact that the HCA has a role to play in contributing to the delivery of Southwark's Housing targets generally.

- An additional source of funding for some of the commercial space will need to be identified, as developers are unlikely to provide space for which there is no market demand. It is not anticipated that business space would be reliant on external subsidy to help provide it.
- Strategic Targets Policy 2 in relation to the Canada Water Area vision. There is no robust evidence base to support the Council's aspiration for this form of development. The policy as written is too prescriptive, raises expectations and is therefore considered to be unsound. Our evidence base supports this policy.
- Information supplied by Southwark Council to draw up The London Plan has been substantially incomplete and overly selective. The London Plan therefore wrongly and unjustly seeks to change Rotherhithe area by contributing to 15,000+ more homes along the A200 and associated roads. We have recommended to the planning inspector that we insert a table showing the different Southwark targets to increase the clarity of the plan.

3.4.23 Peckham

- The vision should refer to the need to improving cycling routes and addressing problems caused by 1 way traffic system. The detailed policies for this area will be set out in the Peckham and Nunhead area action plan.
- A clear strategy and robust evidence base is needed to manage tall buildings and protect and enhance the historic environment. We have a robust evidence base as part of the core strategy through our tall buildings background paper.

3.4.24 Borough, Bankside and London Bridge

- Both support and concern for tall buildings, some wanted more clarity over the east boundary of the tall buildings area. We have been working the GLA on the Borough, Bankside and London Bridge SPD and they are happy with the boundary.

Elephant and Castle

- Detailed representations to improve specific walking and cycling routes. The appropriate amount of detail is already set out in the Elephant and Castle vision.
- The vision should refer to the adopted London Plan housing target. We are recommending to the inspector that we insert a table showing the different Southwark targets to increase the clarity of the plan.

3.4.25 Aylesbury

The representations on the Aylesbury were:

- Representation that improvements that were made to the Walworth Rd should be continued from where they currently end at Merrow St south to the Albany Rd as part of the regeneration of the Aylesbury Estate. This representation was taken into account by the inspector who examined the Aylesbury AAP. The inspector found the plan to be sound and did not require that any changes be made as a result of this representation.
- Representations that it is not clear from the Vision whether tall buildings would be supported in the Action Area Core of the Aylesbury Action Area, as stated in Strategic Policy 12. At present the Vision does not appear to address how tall building proposals will be managed. The vision for the Aylesbury AAP has been tested during the examination on the AAP. The inspector did not recommend any changes to the vision and considered the plan to be sound.

3.4.26 Camberwell

- There were many detailed representations on problems with transport in Camberwell. Policy 2 and area vision for Camberwell provide the overall strategic policy. More detailed policies will be set out in the development management development plan document and the Camberwell area action plan.
- Concern that there is not enough awareness of border issues and also support that we recognise the border issues.. We will work with Lambeth on the preparation of the Camberwell area action plan.
- Representations asking whether Camberwell is or isn't an action area. Camberwell is an area action plan. We have put forward a recommended change to the planning inspector that we amend the title of Camberwell's vision to read "Camberwell Action Area".
- Representations asking for a raised profile for Camberwell. More detailed policies on how we will achieve the vision will be set out in the area action plan.
- Concern that the core strategy does not protect artistic and creative industries in Camberwell. Policy 10 of the core strategy protects small businesses in Camberwell action area.

3.4.27 Policy 1

- Concern over reasonableness of requirement for sustainability assessment and for development to achieve best outcome and improve places, rather than not make them worse. We already require sustainability assessments and a key aim, of the core strategy is to improve places and so it is essential all development does this.
- The policy did not specify what was meant by "best possible development:" or "very high standard". The core strategy sets out the

strategic policy and further detail will be set out in the development management development plan document.

- Other representations wanted us to be stronger in ensuring new development improves places and responds to the needs of the local community. This is already set out in our sustainable design and construction supplementary planning document. Further detail will be set out in the development management development plan document.
- There was general support for the growth areas approach, though some concern that other areas do not miss out on improvements. The core strategy sets out visions for all areas of the borough, not just the growth areas.

3.4.28 Policy 2

- Objections were raised over the policy not setting out car parking standards. The standards within the Southwark Plan are being saved and will be replaced through the development management development plan document.
- There were many detailed representations made on the need to improve cycle lanes and cycle parking in the borough. This is too detailed an issue for the core strategy. It will be looked at through area action plans, areas supplementary planning documents and the development management development plan document.
- There were objections to the policy not setting out how it will minimise car ownership and use. This is too detailed an issue for the core strategy. It will be looked at through area action plans, areas supplementary planning documents and the development management development plan document.
- There were many representations on the core strategy not setting out detailed policies on improving transport in specific areas. This is too detailed an issue for the core strategy. It will be looked at through area action plans, areas supplementary planning documents and the development management development plan document.

3.4.29 Policy 3

- The draft Core Strategy recognises Camberwell's status as a retail centre, but includes insufficient measures to support and protect this status. We will be preparing an area action plan which will set out more detailed policies for Camberwell.
- The centres of Elephant and Castle, and Canada Water should not be identified as being sequentially preferential to other suitable town centres within the borough for new retail development PPS4 does not preclude out of centre retail development. There may be circumstances where out of centre development is appropriate subject to the tests of: need; impact; sequential approach; and scale, and this should be

reflected within Policy 3. Policy 3 includes the sequential test. Our evidence base identifies further retail capacity at Elephant and Castle and Canada Water.

- Policy 3 deals with shopping, leisure and entertainment with regard to town centres but the text mainly refers to retail matters and does not support any local cultural and entertainment facilities. The Policy promotes a network of successful town centres which have a wide range of shops, services and facilities, to help meet the needs of Southwark's population. The supporting text recognises that encouraging a mix of compatible uses in the centres will also provide a stronger economic environment and will help stimulate a greater diversity of entertainment and evening activities. Policy 10 provides protection to creative, cultural and tourism facilities and encourages new facilities, particularly in strategic cultural areas.
- Whilst the predominance of smaller retail outlets is acknowledged, there is no recognition of the potential role of the retail and leisure sector in stimulating economic and social improvements and there are opportunities to create new, more modern floorspace to assist the retention and enhancement of the retail and leisure offer available to local people and to ease levels of deprivation. We address this in Policy 10 which provides protection to small units and encourages provision of flexible space to help meet the needs of the local office market and independent retailers. Policy 10 also requires: Targeting new jobs and training opportunities which arise from development towards local people and Promoting supply chain opportunities for local businesses during and after construction of development.
- Protecting small units outside town centres – a blanket protection for all retail uses is not appropriate. There will be circumstances where changes may be justified and in the interests of the local community. It is important to provide protection to small retail facilities located outside of the town and local centres as these facilities provide a valuable resource to neighbourhoods in the borough, and reduce the need to travel. We are saving Policy 1.10 in the Southwark Plan until it is replaced by a policy within the forthcoming Development Management DPD which will provide criteria to assess the loss of small scale retail facilities.
- The Core Strategy is to promote the use of town, district and local centres which promote travel. Centres need to be less compact and more spread such as Lordship Lane. The town and local centre hierarchy and 'centre' boundaries do not make any provisions for a more realistic and more sustainable idea of 'neighbourhoods', which would enable the existing local resource (people, skills, retail etc) to really develop and continue growing. We are saving Policy 1.7 of the Southwark Plan until it is replaced by the Core Strategy and the forthcoming Development Management DPD, which will set out appropriate uses to be accommodated within town centres.

- The country's leading economic centre, the CAZ should be recognised as at the top of the hierarchy, above the Major Town Centres. The adopted London Plan does not categorise the CAZ within the town centre hierarchy.
- It states in 'Our approach is' that the Council will maintain a network of town centres which have a wide range of shops, services and facilities, to help meet the needs of Southwark's population. The Policy does not support social infrastructure despite the important contribution it has to the viability of town centres and suitability for locating in town centres. In order to achieve this objective, the policy should be flexible enough to allow a range of suitable facilities within centres. We are saving Policy 1.7 of the Southwark Plan until it is replaced by the Core Strategy and the forthcoming Development Management DPD, which will set out appropriate uses to be accommodated within town centres. Policy 14 also sets out our approach to implementation and delivery including infrastructure.

3.4.30 Policy 4

- There were concerns about the provision for places of worship. Policy 4 provides a strategic approach to guiding community facilities in the borough. We are saving Policies 2.1 and 2.2 of the Southwark Plan which provide support and protection of community facilities, until they are replaced by new policies within the Development Management DPD.
- There are concerns that the Council's Asset Management Strategy is very limited in scope, only covering 73 properties across the borough and looking to reduce this number. The strategy is clear that Southwark's scarce resources need to be channelled to create a strategically managed portfolio of appropriate assets. Therefore the strategy has set a framework for the development of an efficient portfolio rather than growth, nevertheless fully acknowledging the importance of the role played by the VCS
- A number of representations concerned with the definition of community facilities and there should be more of a distinction between those accessible to all members of the community and those for only some members of the community. National policy sets out the use classes order with groups of uses of buildings that can be permitted for development. D1 use covers a wide range of community facilities including places of worship as set out in the fact box. As this is set by national policy we can not prepare a local policy that would allow any of the different types of D community uses and not others as it would not comply with national requirements.
- Concerns of the policy wording asking for a local need to be identified. Local need must be considered when applications are determined and that this is not defined within policy 4. This differs greatly between area

and issue. There is no one definition of this that could be used and therefore a change can not be made to the core strategy.

3.4.31 Policy 5

- There were a number of objections to the policy not referring enough to housing development outside of the identified growth areas. Policy 5 sets out a housing target for the whole of Southwark. Whilst we are concentrating development in the growth areas there will be some housing development outside of the growth areas. This is set out in our evidence base.
- There was some support for the council's objective to build more housing. We are continuing to build more housing and our evidence base sets out where and how we will do this.
- There were objections to having a density policy and that instead density should be determined on a case by case basis. The density policy is in accordance with the London Plan and aims to ensure we can a build sufficient number of within attractive environments.
- There were a number of objections that the density policy is not flexible enough. The density policy is in accordance with the London Plan and aims to ensure we can a build sufficient number of within attractive environments. Further detailed policies will be set out in the development management development plan document or and housing development plan document.
- There were a number of comments asking why the draft replacement London Plan 2009 housing targets were used when the overall target is from the adopted London Plan 2008. We have recommended to the planning inspectorate that we insert a table into the core strategy setting out the different Southwark targets.
- There were objections to not stating in the policy that the housing targets were minimums to be exceeded. This is set out in the housing background papers.
- There were some objections to the density policies setting out that certain areas may be of higher density if they are of an exemplary design. Some objectors felt this was not flexible enough whilst other objectors felt that this too easily allows high density development. Policy 5 is in conformity with the London Plan density policies. We will set out further detailed policies on what we mean by exemplary design through the housing development management development document. This will review the criteria currently in the adopted residential design standards SPD.

3.4.32 Policy 6

- There were a number of objections to policy 6 not including reference to allowing developers to submit a financial viability appraisal if they

cannot deliver the policy requirements for affordable housing and to not taking into account site viability in the policy. We will continue to allow developers to submit a financial viability assessment if they cannot meet the policy requirements. This is set out in the housing background paper which provides further detail on how we will implement the policies.

- There were objections to the approach taken to affordable housing in the Elephant and Castle. The justification for the approach taken in Elephant and Castle is set out in the background paper. Our affordable housing viability assessment supports this approach.
- There were objections on the methodology of the council's Housing Requirements Study which has informed the policy. Our housing requirements study sets out the detail of the methodology followed.
- There were some objections that the policy should be for a higher level of affordable housing in accordance with the strategic 50% target in the adopted London Plan 2008. We want to create mixed and balanced communities, and meet the need for both affordable and market housing. PPS12 also requires us to have policies that we can implement and deliver. Our affordable housing viability study supports this policy. The background papers set out further detail on why we are taking forward the approach in policy 6.
- Policy 6 should acknowledge the importance of upgrading existing affordable housing stock. The housing background paper sets out the council's to upgrading and improving existing stock. The council's adopted Housing Strategy also provides further detail.

3.4.33 Policy 7

- Comments objecting to the council not using the minimum room sizes set out in the draft replacement London Plan 2009. Our minimum room sizes are based on those in the draft London Plan and both the GLA and GOL are happy with our approach.
- Objections to setting out minimum room sizes in the core strategy rather than in an SPD. We feel that minimum room sizes are a strategic issue to ensure we can reduce overcrowding in dwellings and build high quality new homes. Similarly the Mayor feels this is a strategic issue through the inclusion in the draft replacement London Plan.
- A number of objections to policy 7 not being flexible enough and that the dwelling mix should not be a requirement within the policy. PPS3 and the London Plan require us to provide for a range of different types of homes. Further detailed policies will be set out in the housing development plan document.

- Objections to applying the minimum room sizes to private housing. Our housing studies show that there is a need for family housing across all tenures and there is a need for good quality homes across all tenures.
- Objections to not requiring higher percentages of family housing. PPS12 requires us to have policies that we can implement and deliver. The family housing policy is an increase from the policy in the Southwark Plan and our evidence suggests that we can implement this policy. There is also a need for 1 and 2 bedroom dwellings in Southwark and so we feel that the policy provides the right balance.

3.4.34 Policy 8

- Objections to asking for an element of affordable housing within student schemes. We have identified all sites we expect to come forward for housing through our strategic housing land availability assessment and our development capacity assessment. If we allow these sites to come forward without student housing then we will not meet our affordable housing target and we will not meet the need for family housing. By requiring an element of affordable housing within student housing we will ensure we work towards meeting the needs of students and those needing affordable housing.
- Southwark has already exceeded its target for conventional housing, and is currently well under meeting its target for non-self contained housing. The targets in the London Plan are overall targets including conventional and non-self contained housing. We do not have separate targets. Furthermore our 2008-2009 Annual Monitoring Report shows that we did not meet our overall target of 1630, and in fact have only four times in 13 years met the target of 1630.
- Objections that the policy will have severe impact on delivering student housing. The policy sets out that we will meet the need for student accommodation for local universities and colleges. This need needs to be balanced against the need for conventional housing, specifically affordable and family housing.
- Objections to the policy wanting to meet the need of local universities. We already have the second highest amount of student housing in London and have a huge need for more affordable and family housing. We want to make sure we can work towards meeting that need whilst also meeting the needs of local universities.
- Various representations putting forward that providing student accommodation helps to free up existing private housing for families. As set out in the policy we will work with local universities to deliver student housing where it is required.
- A number of objections stating that policy 4.7 of the Southwark Plan should be retained. We are saving policy 4.7 of the Southwark Plan.

- Some support for setting out want to provide student homes to meet the needs of local universities.

3.4.35 Policy 9

- Objections were raised regarding that the core strategy is not designating Traveller and Gypsy sites. We will manage the need for further Traveller and Gypsy sites through the housing development plan document. This is in accordance with the London Plan.
- An objection were also raised that the site on Ilderton Road should not be protected or new sites be designated. The London Plan requires us to protect our existing sites and also requires us to set criteria for allocating new sites.
- An objection was also raised that the criteria should be more positive and in presumption of planning permission. The core strategy set out the strategic policy and more detail will be set out in the housing development plan document.
- Support was also shown for including criteria for sites and for protecting existing sites.

3.4.36 Policy 10

- Concern that policy 10 does not provide sufficient flexibility. Policy 10 protects existing business floorspace. We are saving policy 1.4 of the Southwark Plan until it is replaced by the Core Strategy and the forthcoming Development Management DPD which will set out more criteria for the loss of business floorspace.
- Representations saying that the council should not be resisting certain types development to certain areas, but instead should be encouraging differing types of development on a flexible site by site basis. The evidence base supports the policy. We recognise that many types of uses, can generate employment. However, our ELR also demonstrates that there is a need to provide B class business space. The policy therefore has elements which concentrate solely on B class space. The policy also states that we will protect and encourage arts, tourism and cultural uses. Other policies in the plan cover other employment generating uses, such as retail and leisure, education, health etc.
- Concerns over the evidence base. The evidence base has been prepared in accordance with government guidance.
- Representations that the Employment Land Review should assess each employment site in the borough or alternatively, assess differing parts of 'Employment Clusters' in the site appraisals and the results of this should be reflected in the Core Strategy. The employment clusters that were surveyed in the ELR are based upon Southwark's 2007 UDP proposals map, URS North East and South East Industrial Land

Baseline mapping (2006), aerial photography and the consultant's and the council's knowledge of employment areas within the borough. The 'cluster' approach for the ELR was adopted given that the ELR is a high-level assessment of the quantity, quality and viability of employment land in the borough. It would not be feasible to assess every individual employment site in the borough.

- A criteria based policy is required to assess sites on a site by site basis to provide suitable flexibility and ensure further surplus and inappropriate employment sites, whether allocated employment land or not, are not retained for longer than required. We are saving policy 1.4 of the Southwark Plan until it is replaced by the Core Strategy and the forthcoming Development Management DPD which will set out more criteria for the loss of business floorspace.
- Employment land designations should allow for the redevelopment of such sites with developments that cater for the needs of existing and future employment growth sectors such as the arts and culture enterprises. We recognise that many types of uses, can generate employment. However, our ELR also demonstrates that there is a need to provide B class business space. The policy therefore has elements which concentrate solely on B class space. The policy also states that we will protect and encourage arts, tourism and cultural uses. Other policies in the plan cover other employment generating uses, such as retail and leisure, education, health etc.
- There was some support for the development of hotels. Policy 10 allows the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character.
- Objections to targeting new jobs and training opportunities towards local people and promoting supply chain opportunities for local businesses during construction and development. This provides a strategic direction in which more detailed policies will be prepared. The mechanism for delivering this policy is currently provided by Policy 1.1 in the Southwark Plan. This policy will be replaced with a new policy within the Development Management DPD.
- Asking for a greater emphasis to be placed on the development of hotels in the SE1 area. The strategy is consistent with London Plan policy 3D.7 which seeks to ensure that boroughs focus provision for new visitor accommodation within the CAZ and town centres. It should also enable Southwark to meet estimates of hotel growth set out in the GLA hotel demand study. Of all of the hotel bedrooms which exist in Southwark, around 35% are located in the Bankside and Borough areas. Southwark's Tourism Strategy identifies the need to enable tourism dispersal, to increase the economic value of tourism and increase the spread of tourism and its benefits to other areas of the borough.

- Representing seeking the inclusion and recognition of employment-generating sui generis uses within the definition of 'Employment uses' and preferred uses in the 'Preferred Industrial Location (PIL)' definition provided within the glossary. By definition, sui generis uses have impacts which are difficult to predict. For this reason they should be treated on their merits and it would not be appropriate to have a blanket policy which seeks to allow them. This approach is consistent with the advice in paragraph 4.3 (1) of the Mayor's Industrial Capacity SPG.

3.4.37 Policy 11

- There was concern we did not fully recognise and promote the different role open spaces play, including heritage, food growing, estate land. Policy 11 does recognise food growing. We are proposing a change to the inspector to policy 12 to include heritage assets as something development should protect.
- Concern over the soundness of evidence base. We have an up to date audit of open spaces and assessment of deficiency, this is enough for a strategic policy.
- Some objections wanted us to go further and be more prescriptive and set out provision standards and a target for providing more open space to deal with a growing population. We set out the strategic framework, more detail will be in development management DPD and AAPs, we will have a detailed open space strategy to inform these.
- Other objections felt the policy was too prescriptive and wanted more flexibility for developments in terms of contributing to open space provision. The policy is strategic and does not have specific standards, further guidance will be in development management DPD and area action plans
- There were calls for more green links to be identified and for local groups involved in promoting green links to be identified. We will look at this in the development management DPD and area actions plans. We have proposed to the Inspectorate that we identify local green link groups.
- There were some objections concerning specific designations - against Crossbones designation, call for expansion of Nursery Row Park and Brayards Green designations and the call for Carter Place to be designated open space. We are proposed to the Planning Inspectorate that we amend Crossbones designation to reflect the known boundary of the burial ground.

3.4.38 Policy 12

- There was general support for a policy framework for design and conservation.

- There were some concerns that it did not go far enough to protect and enhance the environment and some concerns over allowing tall buildings in some area and the impact this could have. We have a robust evidence base to support our approach to tall buildings and will provide further detail in our area actions plans, supplementary planning documents and development management development plan document.
- Others were concerned that the policy did not provide enough flexibility, some wanted to see a more relaxed approach to tall buildings and assurances that CA would not preclude development. We have a robust evidence base to support our approach to tall buildings and will provide further detail in our area actions plans, supplementary planning documents and development management development plan document.
- Some concern policy wording was too vague or did not provide enough clarity on things like where tall buildings should go. The core strategy policies are strategic and further detail will be set out in the development management development plan document.
- Some concern over the definition for tall building being used. The definition of tall building is in accordance with CABE and English Heritage Guidance. Further detail will be set out in the development management development plan document.

3.4.39 Policy 13

- The targets are onerous and not justified and would make development unviable. We have a strong evidence base demonstrating that the targets are justified given the environmental issues we face, and also that they are viable within the Southwark context. Many of the targets, such as 20% renewable reflect those in the London Plan.
- Some objectors felt that the targets should not be presented as requirements, but as targets that development should aim for. We feel we have the right targets the evidence base the support them.
- Some respondents wanted to see higher targets or more detailed design requirements. We feel we have the right balance and more detail will be in the development management development plan document.

3.4.40 Policy_14

- There was a suggestion that the voluntary and community sector should be involved in monitoring the core strategy. It is a legal requirement that we produce an Annual Monitoring Report each year. Policy 14 addresses the issues of implementation while section 7 addresses the issues of monitoring the policies to ensure the outcomes of the policies are in line with our ambitions.

- There were representations asking for the core strategy to explicitly state that where the core strategy policies are met, planning permission will be granted. The core strategy is one of the documents within the local development framework that will be used in making decisions on planning applications. Further detail on how this is used in determining planning applications is set out in appendix A of the core strategy.
- There was support of the inclusion of the full implementation and delivery plan and also concern that this was not fully available at preferred options stage.. This has been developed through the core strategy preparation and is being taken forward as part of the publication core strategy. There is also further detail in the infrastructure background paper.
- There were a number of representations asking for specific organisations or types of infrastructure to be set out in the policy. These organisations and/or types of infrastructure are already covered within policy 14 under more generic headings. It is not possible to list everyone that we work with.

3.4.41 Consultation

- There were concerns raised that the community had not been consulted enough on the core strategy and that the commitments set out in the statement of community involvement have not been met.. We consider that we have consulted fully on the core strategy and we have met and exceeded the requirements in our statement of community involvement.
- Some objections raised that the formal consultation period was too short. The consultation period was in accordance with the regulations and as set out in the statement of community involvement.

3.4.42 Other

- Overall support for our objectives. These objectives have been taken forward in the publication core strategy.
- There was a representation that we do not support the objectives of the community strategy. Our objectives are based on the themes and priorities in the community strategy
- Concern that the core strategy is seeking to create mixed communities. This is a priority of PPS1 and PPS3.
- Representations re lack of consistency in referring to the adopted and draft London Plans. We have put forward through out table of changes to the Planning Inspectorate that we insert a table into the core strategy showing all the Southwark targets to provide more clarity.

4. MONITORING THE CONSULTATION

4.1 Why we monitor consultation

- 4.1.1 Our statement of community involvement indicates that the success of consultation can be measured by the numbers and diversity of consultees and respondees. As a result we have tried to engage with as many different groups as possible.
- 4.1.2 We monitor our consultation at every stage so that we can see where we need to engage more with certain groups at the next stage of consultation.

4.2 How we monitored the consultation

- 4.2.1 After each stage of consultation we carried out a review of the consultation to see how we could improve the next stage of consultation. This included reviewing the consultation against the requirements of our statement of community involvement. Section 3 above sets out how we met and exceeded our statement of community involvement requirements.
- 4.2.2 Where possible we tried to monitor event attendance and monitor attendees age, gender and ethnicity. However, in most cases this was very difficult to do as many of the events we attended were run by other people and we did not have control over the monitoring.
- 4.2.3 We also included a monitoring form within our consultation questionnaires so that we could monitor the range of people from our communities that responded to the consultation. In most cases, representations were received without the monitoring form making it difficult for us to get a full picture of the different groups commenting on the document. This was frequently because many of our representations were from businesses who had agents acting on their behalf who may not have felt it was appropriate to submit monitoring forms.
- 4.2.4 The table below sets out the monitoring information we collected at each stage of consultation of those who put in their representations.

Ethnicity

	Issues and options	Preferred options	Publications/ submission
Any other mixed	1	0	0
British	35	5	2
Caribbean	1	0	0
Irish	1	0	0
Other white	4	0	0
White and black	1	0	0

Left form blank	19	2	3
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Gender

	Issues options	and Preferred options	Publication/ Submission
Male	27	3	1
Female	14	1	0
Left form blank	21	3	4

Age group

	Issues options	and Preferred options	Publication/ Submission
16-24	3	0	0
25-35	12	2	0
36-55	17	1	0
50 and other	10	0	1
Left form blank	20	4	4

4.2.5 We also monitored and reviewed the types of groups putting in representations at each stage of the core strategy. The tables below show how this was broken down at each stage.

Issues and options

Businesses	15
Community organisation	18
Developer	13
Educational	2
Government organisation	7
Resident	18
Statutory consultee	8

Preferred options

Businesses	22
Community organisation	7
Developer	26
Educational	2
Government organisation	3
Resident	17
Statutory consultee	15

Publication/submission

Community group	14
Business	39
Councillors	1
Government agency	7
Statutory consultee	5
Neighbourhood group	2
Resident	10
Other	1
NGO	1

4.3 How this changed our consultation

- 4.3.1 At each stage we then reviewed where we could try to engage more groups where we had the information and we amended the next stage of consultation accordingly where possible.
- 4.3.2 We identified after the issues and options consultation that we had not engaged enough with young people. At the preferred options stage we attended a green fair for school children where we engaged with young people through encouraging them to draw their routes to school and to think about things they would like to change in our borough.
- 4.3.3 We also decided to attend a wider range of events at preferred options to get a wider range of people being involved in the consultation. This included targeting more specific groups including giving presentations to Southwark Travellers and Gypsies Group, Southwark's LGBT group and a religious group called Southwark for Jesus. It also included attending a wider range of meetings/events including festivals in parks, shopping centres, an event at the British Film Institute, in addition to more formal meetings.
- 4.3.4 We also continued to consult in ways which were effective at the first stage of consultation. For example the breakfast meeting for developers and landowners was very successful at issues and options and we subsequently received many responses from these groups. As a result we ran another similar session at preferred options.

4.4 Equalities impact assessment

- 4.4.1 Our equalities impact assessment also provides further information on the impact of the core strategy on the equalities target groups and it also fed into the consultation reviewing process. We carried out an equalities impact assessment on the issues and options, preferred options and publication/submission core strategy. The equalities impact assessment looks at the impact of the core strategy on certain groups and whether there will be negative impacts on these groups and whether the core strategy will improve community cohesion and

promote equality of opportunity. We looked at both the impacts of the core strategy consultation and the impacts of implementing the core strategy. As part of this we have attended the Equalities and Diversity Panel at issues and options, preferred options stage and publication/submission stage. This gives the panel, which consists of representatives from all our equality target groups, an opportunity to comment on both the equalities impact assessment and the core strategy. It also gives them an opportunity to suggest ways in which we could improve our consultation process. The comments we received at each equalities and diversity panel have fed into the next stage of the equalities impact assessment and preparation of the core strategy. Summaries of how this has informed the core strategy are set out in our background papers, with more detail in the equalities impact assessment.

Appendix E

Core Strategy publication/submission version sustainability appraisal (available in the members' offices and on the internet)

Appendix E for Planning Committee Report and Cabinet Report:
Core Strategy

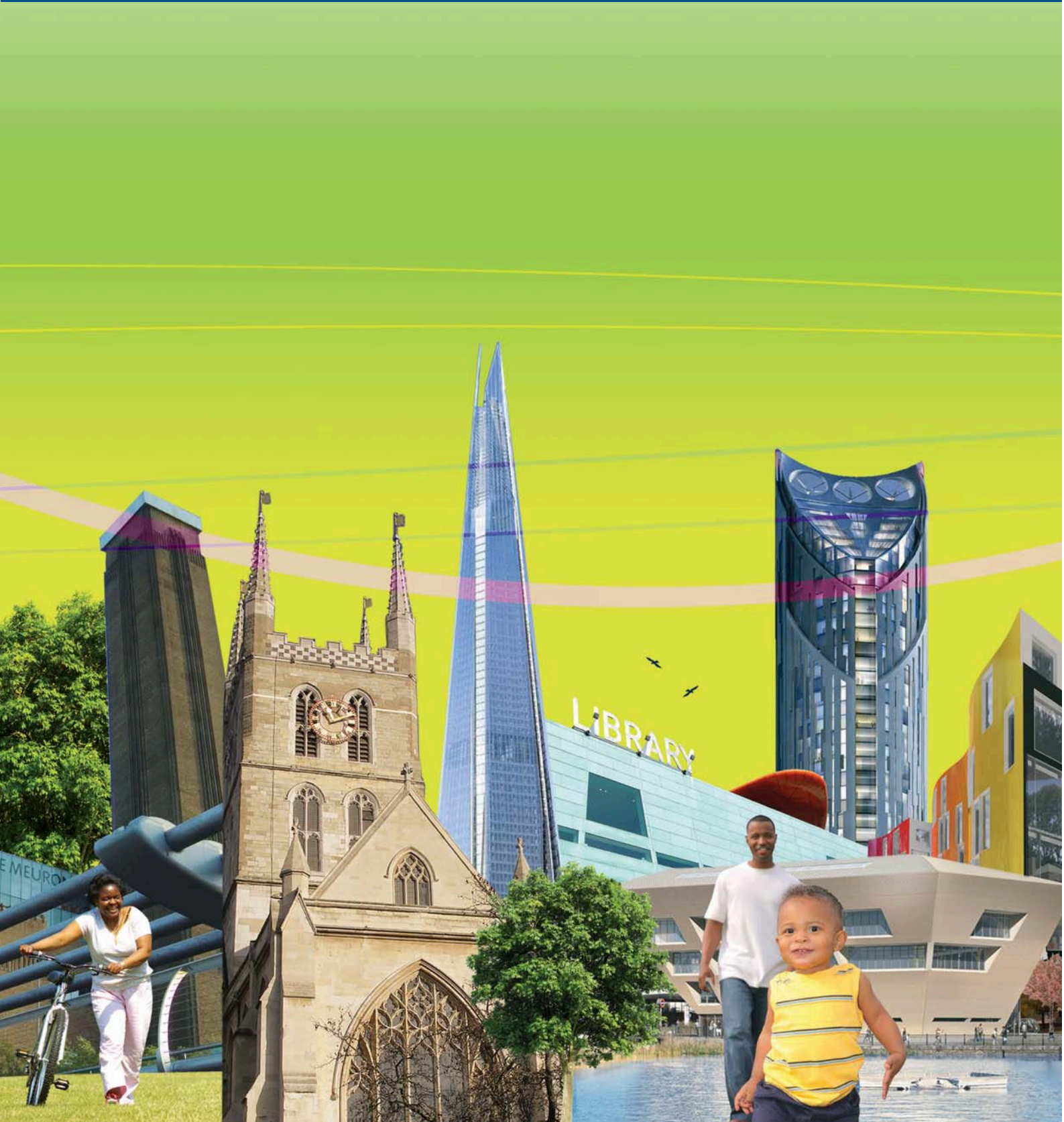
Planning Committee: 21 March 2011
Cabinet: 22 March 2011

Appendix A	Core strategy final version and proposals map changes (available on the internet and with report)
Appendix B	Inspector's report on the Core Strategy (available in the members offices and on the internet)
Appendix C	Consultation and sustainability statement (available in the members offices and on the internet)
Appendix D	Core strategy publication/submission version consultation report (available in the members offices and on the internet)
Appendix E	Core strategy publication/submission version sustainability appraisal (available in the members offices and on the internet)
Appendix F	Core Strategy publication/submission version equalities impact assessment (available in the members offices and on the internet)
Appendix G	Core Strategy publication/ submission version appropriate assessment (available in the members offices and on the internet)

Core strategy

CDCS14 Sustainability Appraisal

March 2010



TIMETABLE FOR CONSULTATION AND HOW TO COMMENT

SUSTAINABILITY APPRAISAL PRODUCTION STAGE	TIMETABLE
Consultation on Core Strategy Sustainability Appraisal Scoping Report.	28 July 2008 to 1 September 2008
Consultation on Core Strategy Issues and Options report accompanied by an Interim Sustainability Appraisal report of the Issues and Options report and Equalities Impact Assessment	1 September 2008 to 15 December 2008
Consultation on Core Strategy Preferred Option report and draft Sustainability Appraisal of Preferred Option report and Equalities Impact Assessment	28 April 2009 to 23 July 2009
Consultation on the publication version of the Core Strategy and SA Report	29 September 2009 to 5 March 2010
Publish final version of the Core Strategy accompanied by a final Sustainability Statement	January 2011

HOW TO COMMENT ON THIS REPORT

If you have any queries regarding this sustainability report, please contact the Planning Policy and Research Team: Email: corestrategy@southwark.gov.uk Tel: 020 7525 5471

Comments can be returned by post, fax or email to:

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Consultation on this report begins 29 September 2009.
 All comments must be received by 5pm on **5 March 2010**

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NON-TECHNICAL SUMMARY

Background

Section 19 (5) of the Planning and Compulsory Purchase Act 2004, requires Sustainability Appraisals of plans to be carried out. Under the requirements of the act, Sustainability Appraisal (SA) of all Local Development Documents is now mandatory. A Sustainability Appraisal has, therefore, been carried out as part of preparing the Core Strategy. The appraisal tests how well the planning document considers social, economic and environmental issues in order to achieve sustainable development.

In addition, the SEA Directive (2001/42/EC), implemented in the UK by the SEA Regulations 2004, requires Strategic Environmental Assessment or 'SEA' to be undertaken on all plans and programmes where they are likely to have significant environmental impacts. A Sustainability Appraisal (SA) has been carried out to predict the likely social, economic and environmental impacts of different planning options for Southwark (including the requirements of the SEA Directive). The appraisal has assessed the extent to which different planning options will contribute towards the borough's objectives for achieving a sustainable community.

What planning document is being appraised?

The council is preparing a Core Strategy for the borough as part of the Local Development Framework (LDF). The Local Development Framework is made up of a collection of Development Plan Documents (DPDs), which will be used to guide development in the area, including Area Action Plans and Supplementary Planning Documents. The Core Strategy will set out the strategic vision and overall spatial policies that will guide all the other documents in the LDF.

The aim of the SA, as summarised within this report, is to ensure sustainable development is fully integrated within the Core Strategy and forms a key part of evaluation of the sustainability issues that relate to the planning policies for the borough.

A copy of the Submission Version of the Core Strategy DPD can be downloaded from council's website: www.southwark.gov.uk/corestrategy
You can also request a paper copy from the Planning Policy team.

The Process

The process so far has included:

- Collection of baseline information on the environmental, social and economic characteristics of the borough and its context;
- Identification of sustainability issues, objectives and indicators to be used in the SA to assess the likely impacts of the policies and to enable monitoring of progress in the future
- The preparation of a Scoping report, which set out the proposed method of assessment for the SA, issued for consultation from 28 July 2008 to 1 September 2008.
- An Interim SA of the Issues and Options for growth in the borough, issued for consultation from 1 September 2008 to 15 December 2008
- A draft SA that tested the likely impacts of the Preferred Options policies for development. The report was issued for consultation from May-July 2009.
- The Sustainability Appraisal Report of the Submission Version (this document).

The Sustainability Issues

The SA scoping report and subsequent consultation identified a range of significant sustainability issues for Southwark, based on a review of relevant policies, strategies and programmes and a survey of baseline data. The key social, economic and environmental issues faced in Southwark that need to be taken into consideration by the Core Strategy are:

- Relatively high levels of deprivation
- Employment inequalities and employment opportunities
- Education, skills and training deprivation
- Health inequalities and noise nuisances
- Need to promote equality, diversity and social cohesion
- High levels of crime and fear of crime
- Energy efficiency and use of renewables
- Poor air quality
- Need to minimise waste arisings and increase recycling rates
- Need for sustainable use of water resources
- Protection of landscape features and designated sites and need to address contaminated land issues
- Ensuring a high quality of design in new developments
- Need to preserve and enhance built heritage and the archaeological environment
- Minimising flood risk and improve the quality of controlled waters within the borough
- Protecting and enhancing biodiversity
- Providing everyone with a decent and affordable home to live in
- Need to improve accessibility by public transport and minimise the need to travel by car
- Need to ensure that there is social, physical and green infrastructure capacity for existing and future needs

The Sustainability Objectives

The likely impacts of the Core Strategy were identified using a set of sustainability objectives, which relate to the strategic vision for the Borough. The objectives reflect the current social, economic and environmental issues affecting the borough and are linked with the aims of Southwark 2016 (Community Strategy).

The objectives set out below were presented in the Scoping Report (stage one of the SA process). Comments were received on the objectives during the consultation process, which have been taken into account and as a result an additional objective, number 17, has been added.

Sustainable Development Objectives (SDOs)

- SDO 1 To tackle poverty and encourage wealth creation
- SDO 2 To improve the education and skill of the population
- SDO 3 To improve the health of the population
- SDO 4 To reduce the incidence of crime and the fear of crime
- SDO 5 To promote social inclusion, equality, diversity and community cohesion
- SDO 6 To reduce contributions to climate change
- SDO 7 To improve the air quality in Southwark
- SDO 8 To reduce waste and maximise use of waste arising as a resource
- SDO 9 To encourage sustainable use of water resources
- SDO10 To maintain and enhance the quality of land and soils
- SDO11 To protect and enhance the quality of landscape and townscape
- SDO12 To conserve and enhance that quality of landscape and townscape
- SDO13 To protect and improve open spaces, green corridors and biodiversity
- SDO14 To reduce vulnerability to flooding
- SDO15 To provide everyone with the opportunity to live in a decent home
- SDO16 To promote sustainable transport and minimise the need to travel by car
- SDO17 To provide the necessary infrastructure to support existing and future development

Section 1.5 of this report sets out the stages in the development of the Core Strategy including details on the different steps of the SA process.

Key Findings of the Sustainability Appraisals

Issues and Options

The Core Strategy Issues and Options paper set out two different options for growth in the borough.

- Option 1 proposed the concentration of growth in identified 'Growth Areas'.
 Option 2 proposed Housing led growth.

Both options were appraised separately under the five topic headings given below, which were subject to consultation in September-December 2008.

1. Living in Southwark
2. Working in Southwark
3. Community Facilities
4. Sustainable Southwark
5. What will happen to different areas in Southwark

The key findings of the Interim Sustainability Appraisal on the Issues and Options are set out below.

Sustainability Objective	1	2
SDO1 To tackle poverty and encourage wealth creation	✓✓	?
SDO2 To improve the education and skill of the population	✓	✓?
SDO3 To improve the health of the population	✓	✓?
SDO4 To reduce the incidence of crime and the fear of crime	✓	?
SDO5 To promote social inclusion, equality, diversity and community cohesion	✓✓	?
SDO6 To reduce contributions to climate change	?	X
SDO7 To improve the air quality in Southwark	?	X
SDO8 To reduce waste and maximise use of waste arising as a resource	?	X
SDO9 To encourage sustainable use of water resources	?	?
SDO10 To maintain and enhance the quality of land and soils	✓	✓
SDO11 To protect and enhance the quality of landscape and townscape	✓?	?
SDO12 To conserve and enhance the historic environment and cultural assets	✓?	?
SDO13 To protect and enhance open spaces, green corridors and biodiversity	✓?	?
SDO14 To reduce vulnerability to flooding	X	?
SDO15 To provide everyone with the opportunity to live in a decent home	✓✓	✓
SDO16 To promote sustainable transport and minimise the need to travel by car.	✓✓	X

Key	Symbol	Meaning
	✓	positive
	X	negative
	?	uncertain
	0	no significant impact

Option 1 scored a negative result against 1 objective and an uncertain result against 4 objectives. Option 2 scored a negative result against 4 of the objectives and an uncertain outcome against 8 objectives.

The detailed results can be found in [Appendix 5](#). As a result of the findings, it was decided that Option 1 should be taken forward as the Preferred Option for the Core Strategy with some amendments to take into account the findings of the SA.

The detailed results of the Issues and Options appraisal can be found in Appendix 5 of this report and the Interim SA which is available from the Planning Policy team

The Preferred Options

The results of the Issues and Options appraisal showed that the overall impact of Option 1 was more positive than for Option 2. Whilst there were uncertain impacts identified, overall, the appraisal indicated that Option 1 – Growth Areas, is likely to make more of a positive contribution to directing new spatial growth within the borough.

The SA of the Preferred Options revealed a predominantly positive impact of the policies in relation to the sustainability objectives. Where negative impacts were identified there were, in general, obvious mitigation measures which could be put in place. Overall, the appraisal indicated that the draft Core Strategy Preferred Options policies would be likely to make a positive contribution to directing new spatial growth within the borough.

The detailed results of the Preferred Options appraisal can be found in Appendix 6 of this report and the Draft SA which is available from the Planning Policy team

Response to consultation

Responses from the following organisations were received on the Interim Sustainability Appraisal of the Issues and Options.

1. The Environment Agency
2. English Heritage
3. Southwark PCT

In summary, the responses suggested additional indicators and baseline data should be included within the SA. Recommendations were also made for the inclusion of additional plans and strategies within the list of documents that have been referenced for information in the preparation of the Core Strategy. Further details can be found in [Appendix 2](#)

In response to the consultation the sustainability objectives and indicators have been reviewed and amended as shown in the Sustainability Appraisal Framework in section 6.2. In particular, a new SDO 17 was added - '*To provide the necessary infrastructure to support existing and future development*'. New indicators have also been added on the historic environment.

SA of the Submission Version of the Core Strategy

As a result of the consultation process changes have been made to the sustainability objectives and indicators as well as the Core Strategy policies. A further iteration of the SA has therefore been undertaken on the Draft Submission Version to ensure that sustainability has been addressed appropriately and to identify any further mitigation measures that may be necessary.

The SA has been carried out against the Sustainability Framework set out in Section 6 of the Sustainability Report.

Policies Assessed

Strategic Policy 1	Sustainability Assessment
Strategic Policy 2	Sustainable Transport
Strategic Policy 3	Shopping, leisure and entertainment
Strategic Policy 4	Place to learn and enjoy
Strategic Policy 5	Providing new homes
Strategic Policy 6	Homes for people on different incomes
Strategic Policy 7	Family homes
Strategic Policy 8	Student homes
Strategic Policy 9	Homes for Gypsies and Travellers
Strategic Policy 10	Numbers and places for people to work
Strategic Policy 11	Open spaces and wildlife
Strategic Policy 12	Design and Conservation
Strategic Policy 13	High environmental standards
Strategic Policy 14	Implementing the Core Strategy
Strategic Targets Policy 1	Achieving Growth
Strategic Targets Policy 2	Improving Places

The principal findings of the appraisal of each policy are summarised below.

The results of the submission version appraisal showed that the overall impact was positive especially for Policy 1: Sustainable Development and Policy 13: High Environmental standards. Whilst there were uncertain impacts identified, overall, the appraisal indicated that the policies are likely to have a positive contribution to directing new spatial growth within the borough. In particular, the Core Strategy policies will help to achieve sustainable development objectives:

- SDO 1 To tackle poverty and encourage wealth creation
- SDO 5 To promote social inclusion, equality, diversity and community cohesion
- SDO 15 To provide everyone with the opportunity to live in a decent home

Some negative impacts were identified in relation to policies S1, S2, 5 and 10, however these were in relation to the environmental impacts owing to the quantum of new development. Mitigation measures have been identified which will need to be put in place to minimise impacts. Overall, the appraisal indicated that the Submission Version policies would be likely to make a positive contribution to directing new spatial growth within the borough.

A summary table is provided below.

Summary of Results

Sustainability Objectives		Core Strategy Strategic Policies																		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	S1	S2			
SDO 1	To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	1	Sustainable Development
SDO 2	To improve the education and skill of the population	✓	-	✓	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	2	Sustainable Transport
SDO 3	To improve the health of the population	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	3	Shopping, leisure & entertainment
SDO 4	To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	-	✓	✓	✓	✓	✓	-	-	✓	✓	✓	4	Places to learn & enjoy	
SDO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	5	Providing new homes	
SDO 6	To reduce contributions to climate change	✓	✓	✓	?	-	-	?	?	-	-	?	✓	✓	✓	✓	✓	6	Homes for people on different incomes	
SDO 7	To improve the air quality in Southwark	✓	✓	✓	?	-	-	?	?	-	-	?	✓	✓	✓	✓	✓	7	Family homes	
SDO 8	To reduce waste and maximise use of waste arising as a resource	✓	-	?	?	-	-	?	?	✓	?	?	✓	✓	✓	✓	?	8	Student homes	
SDO 9	To encourage sustainable use of water resources	✓	-	?	?	-	-	?	?	✓	?	?	✓	✓	✓	✓	?	9	Homes for gypsies & travellers	
SDO 10	To maintain and enhance the quality of land and soils	✓	-	✓	✓	-	-	✓	?	-	✓	✓	✓	✓	✓	?	✓	10	Jobs and businesses	
SDO 11	To protect and enhance the quality of landscape and townscape	✓	✓	✓	✓	?	?	?	?	✓	?	?	?	?	?	?	?	11	Open spaces and wildlife	
SDO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	-	-	-	?	?	✓	?	?	✓	✓	✓	?	?	12	Design and Conservation	
SDO 13	To protect & improve open spaces, green corridors & biodiversity	✓	✓	✓	?	-	-	?	?	✓	?	?	✓	✓	✓	?	?	13	High environmental standards	
SDO 14	To reduce vulnerability to flooding	✓	-	?	?	-	-	?	?	✓	?	?	✓	✓	✓	?	?	14	Implementation & delivery	
SDO 15	To provide everyone with the opportunity to live in a decent home	✓	-	?	-	✓	✓	✓	?	✓	?	?	✓	✓	✓	?	?	S1	Achieving growth	
SDO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	?	✓	✓	✓	✓	✓	S2	Improving Places	
SDO 17	To provide the necessary infrastructure to support existing and future development	✓	?	✓	✓	?	?	✓	?	✓	?	?	✓	✓	?	?	?	Key	major positive	
		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		major positive	
		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		major positive	
		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		major negative	
		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		minor negative	
		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		uncertain	
		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		no significant impact	

What difference has the appraisal process made?

The sustainability appraisal process has helped to identify the environmental, social and economic issues that the Core Strategy needs to address and any links between the issues. The core strategy addresses all these issues through its policies, implementation and monitoring. This is very important, as the most effective approach will be one that can address the issues in a coordinated way. The preparation of the sustainability appraisal has been carried out alongside the preparation of the Core Strategy as part of an iterative process. This has helped to inform decisions to ensure that the Core Strategy policies contribute effectively to achieving sustainable development.

The sustainability appraisal has also performed a key role in providing a sound evidence base for the core strategy. As part of the sustainability appraisal we have reviewed the evidence informing the decisions made in the core strategy. This has included looking at both statistics and factual evidence about the borough, and also our many studies that underpin our core strategy. Our background papers provides more information on the studies undertaken.

The sustainability appraisal has informed the decision making process to facilitate the evaluation of alternatives and has helped to demonstrate that the plan is the most appropriate given the reasonable alternatives. At each stage of plan preparation we have appraised the options to ensure that the approach taken forward has the most positive impact; environmentally, socially and economically. The final approach taken forward through the core strategy is considered to be the most effective at achieving sustainable development.

The appraisal process has also provided the opportunity to consider how the Core Strategy should be monitored to keep track of how well it performs after it is adopted. The sustainability indicators identified through the sustainability appraisal have been incorporated into the monitoring framework set out in section 7 of the core strategy. This will make sure that as part of our monitoring process through the annual monitoring report we also review the impact of the core strategy policies on these sustainability indicators.

Next Steps

The final SA report and submission version of the Core Strategy will be submitted to an Inspector for independent examination. Monitoring of the Core Strategy will take place following its adoption and will be reported on in the Annual Monitoring Report.

The AMR reports on whether Southwark's planning policies are achieving what they set out to do. It is a legal requirement that local planning authorities produce an Annual Monitoring Report (AMR) every year. The AMR sets out in more detail the social, environmental and economic context of the borough within which our planning policies operate. It also includes an overview of what progress the council is making in preparing new planning documents against the timetable set out in the Local Development Scheme.

The AMR acts as an important check to show whether our planning policies are achieving the objectives of the Local Development Framework and what sort of impact they are having on the community and the environment; and how we can improve our planning policies and the way we monitor them in the future.

It is important that the council regularly monitors new development that takes place to help identify;

- If planning policies in the Local Development Framework are having the outcomes intended, and if not the reasons why.
- The changes taking place in Southwark and how planning policies may need to respond to these changes. It may be that we need new policies.
- Whether the council's consultation practices (as set out in the Statement of Community Involvement) are improving the amount and quality of community engagement in planning decisions.

Core Strategy Development Plan Document:
Submission Version

Sustainability Report

March 2010

1 INTRODUCTION

1.1 What is this document?

- 1.1.1 This report provides the findings of the Sustainability Appraisal of the Core Strategy Submission Version. This report is the final stage of the Sustainability Appraisal (SA) for Southwark's Core Strategy. The purpose of an SA is to promote sustainable development through the integration of social, economic and environmental considerations in the preparation of new or revised Development Plan Documents (DPDs).
- 1.1.2 The council is preparing a Core Strategy for the borough as part of the Local Development Framework (LDF). The Local Development Framework is made up of a collection of DPDs, including Area Action Plans (AAPs), a Development Control DPD and Supplementary Planning Documents (SPDs), which will be used to guide development in the area. Further explanation of the LDF documents is set out below.
- Local Development Scheme – this is a timetable for the preparation of the LDF, setting out what documents will be produced and when the key stages will take place.
 - Statement of Community Involvement (SCI) – this sets out how interested people and organisations can be involved in preparation of the LDF and in future planning decisions.
 - Core Strategy – this is a key element of the LDF, setting out the spatial vision for the borough and including a set of key strategic policies from which all other documents flow. Together with the other DPDs, it will replace the Southwark Plan 2007. Southwark's Core Strategy will also identify particular locations in the borough and outline what types of development would be appropriate there in the future.
 - Area Action Plans (AAPs) – these provide spatial strategies for key areas of the borough. AAPs for Canada Water, Aylesbury and Peckham are being prepared and consulted upon.
 - Development Management Policies - this document will build upon the Core Strategy setting out specific policies to manage development across the borough and ensuring it contributes to the overall aims of the council.
 - Supplementary Planning Documents (SPDs) – provide additional detail around particular priority policies such as affordable housing and sustainable construction.

More information on Southwark's Local Development Framework and Development Plan Documents can be obtained on the council's website
<http://www.southwark.gov.uk>

- 1.1.3 This report does the following:
- Sets out the background to the requirement for the SA for the documents and plans within the LDF
 - Identifies plans and policies that will be relevant to undertaking the SA
 - Identifies relevant baseline data and any data gaps
 - Sets out key sustainability issues in Southwark
 - Provides the SA framework
 - Addresses the range of comments made during the consultation on the Sustainability Appraisal Scoping Report
 - Tests the Core Strategy objectives against the SA framework
 - Predicts and evaluates the likely significant effects of the options set out within the Core Strategy Preferred Options
 - Identifies potential mitigation measures or ways in which positive impacts can be maximised.

1.2 Why do we need to carry out a Sustainability Appraisal?

- 1.2.1 Section 19 (5) of the Planning and Compulsory Purchase Act 2004, requires Sustainability Appraisals of plans to be carried out. Under the requirements of the act, Sustainability Appraisal (SA) of all Local Development Documents is now mandatory. A Sustainability Appraisal has, therefore, been carried out as part of preparing the Core Strategy. The appraisal tests how well the planning document considers social, economic and environmental issues in order to achieve sustainable development.

“Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular, they should carefully consider the inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development.”

PPS1: Delivering Sustainable Development (paragraph 24)

1.3 Strategic Environmental Assessment

- 1.3.1 Sustainability Appraisals also need to satisfy the requirements of the European Directive 2001/42/EC. The Directive requires a formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. An SEA is required when preparing new or revised DPDs.
- 1.3.2 The Government guidance on sustainability appraisal set out in Planning Policy Statement 12: Local Spatial Planning, 2008 and the Plan Making Manual, incorporates the requirements of the SEA Directive within the SA process. For the purposes of simplicity, the term sustainability appraisal (SA) is used throughout this document to include both the SA and SEA processes. Further details on the legislative and policy background to sustainability appraisal are set out in [Appendix 1](#).

1.4 Why is the Core Strategy needed?

- 1.4.1 The Core Strategy sets out the spatial vision and strategic objectives for the borough including the planning policies. The council will use the planning policies to make decisions on individual planning applications. All new development must be in line with the planning policies for the area. The plan will also identify areas of the borough where significant changes are expected and will explain how these changes will take place.

1.5 What are the stages of the Core Strategy production?

- 1.5.1 The table below sets out the different stages involved in the preparation of the Core Strategy and SA

Stages in Preparing Core Strategy	
Evidence Gathering (Scoping Report)	<p>July - September 2008 Gathering information and understanding the key social, economic and environmental issues that affect Southwark's future.</p> <p>Public Consultation 5 Weeks formal consultation 28 July - 1 September 2008</p>
Issues & Options (Interim SA)	<p>September –December 2008 Using the information gathered on issues to identify a vision for Southwark in the future and different ways (options) this vision could be achieved.</p> <p>Public Consultation 9 weeks informal consultation 1 Sept – 2 November 2008</p> <p>Followed by 6 weeks formal consultation: November– 15 December 2008</p>
Preferred Option (Draft SA)	<p>May – July 2009 Identifying the best option for achieving the vision for Southwark in the future, based on an assessment of the positive and negative impacts of each option and incorporating feedback received during previous consultation</p> <p>Public Consultation 6 weeks informal consultation followed by 6 weeks formal consultation. 28 April – 21 July 2009</p>

<p>Draft Core Strategy sent to the Government for approval (Final SA Report)</p>	<p>February 2010 The Submission Version will be submitted to the Secretary of State and will be examined by an independent inspector who will decide whether or not we can adopt the Core Strategy and if any changes need to be made</p> <p>Public consultation 15 weeks informal consultation 29 Sept 2009 – 14 January 2010</p> <p>Followed by 6 weeks formal consultation: 15 January – 5 March 2010 We will hold 6 weeks formal consultation</p>
<p>Adoption</p>	<p>January 2011 Once the Secretary of State has approved the core strategy the council will adopt the document and start implementation.</p>

1.6 Structure of the Report

This report is divided into nine sections.

- Section 1 Explains why a sustainability appraisal has been prepared and provides an overview of the Core Strategy and preparation process
- Section 2 Sets out the methodology used to undertake the SA including the consultation that has been carried out
- Section 3 Describes the purpose of the Core Strategy and the plan's objectives and policies
- Section 4 Provides information on: the context, other policies, plans and programmes and a summary of the baseline information
- Section 5 Presents the sustainability issues and objectives relevant to the Core Strategy
- Section 6 Explains the Sustainability Appraisal Framework
- Section 7 Examines the issues and options of the Core Strategy that have been considered and compares the plan's objectives against the sustainability objectives
- Section 8 The effects of the plan policies are described, including how sustainability has been addressed in the development of the plan, any significant positive or negative effects, cumulative impacts, proposed mitigation, uncertainties and risks
- Section 9 The next stages in the plan preparation, implementation and future monitoring are explained.

2 Sustainability Appraisal Methodology

2.1 Purpose of the Sustainability Appraisal

2.1.1 The purpose of Sustainability Appraisal (SA) is to ensure that sustainable development has been integrated in the formulation of development plans and to verify that due consideration has been given to social, economic and environmental factors. The SA must also show how the requirements of the Strategic Environmental Assessment (SEA) Directive have been met.

2.2 Planning Policy and Sustainable Development

2.2.1 Planning Policy Statement (PPS) 1: Delivering Sustainable Development; provides the over-arching policy to deliver sustainable development through the planning process. The guidance suggests that planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:

- making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life
- contributing to sustainable economic development
- protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities
- ensuring high quality development through good and inclusive design, and the efficient use of resources
- ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

2.2.2 Planning Policy Statement 12: Local Spatial Planning; sets out the Government's policy on local spatial planning including the need to undertake a sustainability appraisal of the plan. The guidance states:

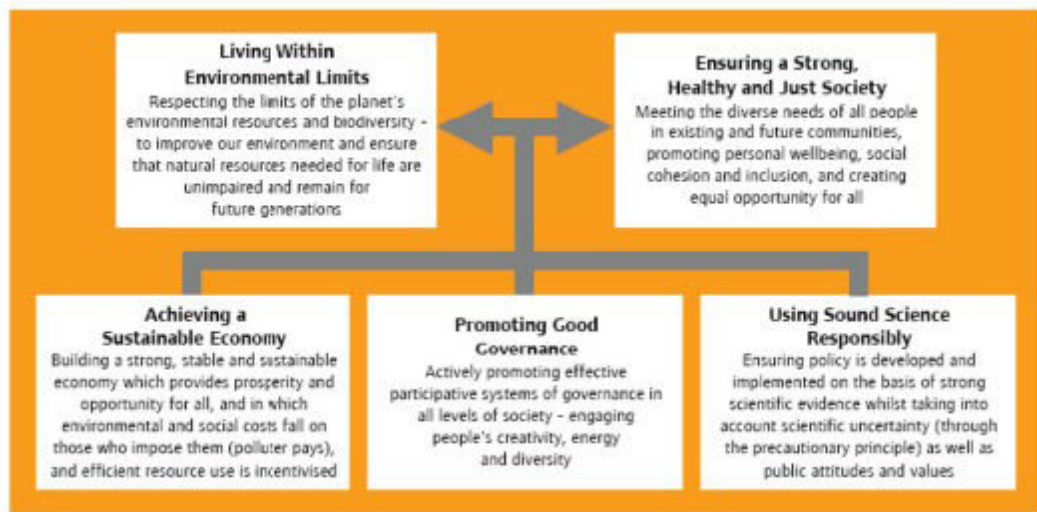
'SA should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process.' PPS12 para. 4.43

It is also stated in the guidance that provided the sustainability appraisal is carried out following the guidelines in the *A Practical Guide to the Strategic Environmental Assessment Directive, 2005* and the *Plan-Making Manual* there will be no need to carry out a separate SEA.

2.2.3 The Government has also published a Sustainable Development Strategy 'Securing the future - delivering the UK Sustainable Development Strategy, 2005'. A revision of the 1999 strategy, the document sets out the guiding principles for sustainable development and priorities for action. The strategy sets out five guiding principles to achieve sustainable development.

- Living within environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting good governance
- Using sound science responsibly

Illustration of the Government's Definition of Sustainable Development



The Strategy also gives the following priorities for action:

- Sustainable consumption and production
- Climate Change and Energy
- Natural Resource Protection and Environmental Enhancement
- Sustainable Communities.

2.3 Sustainability Appraisal Process

2.3.1 The Sustainability Appraisal of the Core Strategy has been carried out by council officers in accordance with Government guidance:

- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM 2005
- Planning Policy Statement 12: Local Spatial Planning, 2008.
- A Practical Guide to the Strategic Environmental Assessment Directive, 2005
- Plan-Making Manual

The stages of the SA process are set out below. Stages A, B and C are the subject of previous reports. This report provides the results from [Stage D](#).

Sustainability Appraisal Stages	Timetable
Stage A	
Setting the context and objectives, establishing the baseline and deciding on the scope	Consultation on the scoping report took place from 28 July 2008 until 1 September 2008
Stage B	
Developing and refining options and assessing effects against the SA framework. A draft sustainability appraisal report is prepared for consultation with the public along with the issues and options paper	Consultation on the issues and options document and draft sustainability appraisal took place between 1 September 2008 and 15 December 2008
Stage C	
Prepare the draft SA report. This stage involves testing in detail the impacts of the preferred option. A draft sustainability appraisal report is prepared for consultation with the public along with the preferred option paper.	28 April 2009 to 23 July 2009
Stage D	
Consult on the publication version of the Core Strategy and the final SA report.	Consultation on the publication version document and sustainability appraisal report will take place from 29 Sept 2009 to 5 March 2010
Stage E	
Once the Core Strategy has been agreed by the council, its social, economic and environmental impacts will then be monitored through the council's annual monitoring report.	Monitoring the Core Strategy will take place once it has been adopted.

Further information regarding the stages of the SA process, and the way in which they correspond with the preparation of the Core Strategy, is given in [Appendix 1](#)

2.4 Consultation

- 2.4.1 As part of the preparation of the Core Strategy, community consultation is being carried out to make sure that local residents and stakeholders are informed of the future plans for the borough. The council has prepared a consultation strategy for the Core Strategy setting out how consultation will take place and showing how this relates to the council's Statement of Community Involvement.
- 2.4.2 Consultation on the Core Strategy is being carried out in accordance with the SCI (2008). This sets out how individuals, community groups, developers and anyone else who may have an interest in the Local Development Framework should be consulted on planning documents.
- 2.4.3 Planning Policy Statement 1: Delivering Sustainable Development sets out the principles that the Government believes should underpin community involvement in the planning process. SEA guidance requires that the contents of the scoping report must be consulted on with the following 'authorities with environmental responsibility':
- Natural England
 - Environment Agency
 - English Heritage.
- 2.4.4 Government guidance also recommends that additional bodies can be consulted in order to represent the social and economic aspects of sustainability. The following additional bodies were consulted, in addition to an extensive list of local consultees:
- British Telecommunications
 - Bromley Council
 - Corporation of London
 - Government Office for London
 - Greater London Authority
 - Lambeth Council
 - Lewisham Council
 - LFEDA
 - London Development Agency
 - Secretary of State
 - Secretary of State for Transport
 - Thames Water Property Services
 - The Coal Authority
 - Southwark Primary Care Trust
 - Any of the bodies from the following list who are exercising functions or a function in the borough:
 1. Person to whom a licence has been granted under section 7 (2) of the Gas Act 1986
 2. Sewage undertakers
 3. Water undertakers.
 - Any person to whom the electronic communalisation code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003
 - Any person who owns or controls electronic communications apparatus situated in any part of the borough.
- 2.4.5 Consultation has been carried out on the Scoping Report, Interim SA (Issues and Options) and Draft SA (Preferred Options). The responses from the consultation have been used to inform this Sustainability Appraisal Report and ensure that the key local and wider environmental, social and economic issues relevant to the plan have been fully considered.

2.4.6 The consultation responses on the Draft Sustainability Appraisal Report were generally positive, although a range of minor amendments were suggested and incorporated within this report. These included:

- Comments on additional plans, programmes or strategies that should have been considered
- Suggestions of other sustainability issues for Southwark that should have been considered.
- Comments on the proposed objectives and indicators in the Sustainability Appraisal Framework.
- Proposed additional indicators.
- Iteration of the need to consider cross-borough issues and to work with adjoining boroughs. We work closely with our neighbours to ensure that our policies take into account the changes other boroughs are making through their planning documents. We will continue to work closely with them including producing joint evidence documents such as our Strategic Housing Market Assessment, our Strategic Flood Risk Assessment and our Joint Waste Technical Plan. Within section 2 of the core strategy publication/submission we have inserted a section on how we work with our neighbouring boroughs to show our key cross boundary issues.

Further details of the consultation responses can be found in Appendix 2.

2.5 Any difficulties undertaking the SA

2.5.1 The identification of suitable sustainability indicators within the Sustainability Appraisal Framework to ensure issues can be effectively measured and monitored has been an iterative process.

2.5.2 We have borne in mind that the indicators need to satisfy the following characteristics since only these are suitable for monitoring purposes:

a. Important:

Indicators should measure something significant to the achievement of the sustainable development aims of the Plan. These are translated into the main policy areas of the Plan and must fit within the main policy framework. Indicators should assist in the identification of the need to review a strategy, policy or proposal.

b. Supported by readily available information:

The data necessary to support the use of the indicator must be available. This may be of a technical nature.

c. Capable of showing trends over time:

Data over a reasonable time scale is required (e.g. 5 - 10 years) to enable trends to be identified. Data must be available during the Plan period.

d. Easy to understand and communicate:

Any indicator should be readily understood by non-specialists so that the wider community can understand it's relevance to sustainable development and the Local Development Framework.

As a result the indicators in the sustainability appraisal framework have been modified and refined in response to comments received in the consultation process.

2.6 Compliance with the SEA Directive

2.6.1 [Appendix 1](#) explains the SEA directive and signposts where the relevant information can be found within the SA report.

3.0 Core Strategy Objectives and Policies

3.1 The Purpose of the Core Strategy

3.1.1 Planning Policy Statement 12 (2008) explains the purpose of the Core Strategy:

“Every local planning authority should produce a Core Strategy which includes:

- (1) An overall vision which sets out how the area and the places within it should develop;*
- (2) Strategic objectives for the area focussing on the key issues to be addressed;*
- (3) A delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when, and by what means it will be delivered. Locations for strategic development should be indicated on a key diagram; and*
- (4) Clear arrangements for managing and monitoring the delivery of the strategy”*

PPS12 paragraph 4.1

3.1.2 The Core Strategy sets out the spatial vision and strategic objectives for the borough, which are derived from the vision in Southwark’s Sustainable Community Strategy: Southwark 2016. Issues that the Core Strategy considers are the delivery of new housing, creating new jobs, protecting and enhancing the environment and dealing with climate change. The plan identifies areas of the borough where significant changes are expected, such as at the Elephant and Castle and Canada Water, and explains how these changes will take place.

3.1.3 The Core Strategy includes the strategic planning policies for the borough. The Council will use the planning policies to make decisions on individual planning applications. All new development must be in line with the planning policies for the borough as well as the more specific policies given in the other DPDs and SPDs, which will form part of the Local Development Framework.

3.2 Core Strategy Vision and Objectives

3.2.1 The Core Strategy vision is:

‘We will make sure that Southwark improves as a place where local facilities, the transport network and infrastructure is supporting the fast pace of change in growth areas such as Bankside, Borough and London Bridge, Elephant and Castle, Canada Water, Peckham and Nunhead and Aylesbury, where we are increasing homes by around 10% from 123,945 to 148,398, office space by around 30% from 1,255,000spm to 1,674,885sqm and people working by around 15% from 165,800 to 190,800 between 2009 and 2026.

We will make sure that this regeneration is as sustainable as possible by setting high environmental and design standards along with protecting and improving a network of open space and heritage throughout the borough.

Set beside the River Thames, Southwark is made up of a diverse group of places with distinct identities where people who live, learn, work and have fun here can benefit from the vibrancy of our cultures and communities. We have set out unique visions to show the successful places that we want them to be.

3.2.2 The Core Strategy seeks to meet the following objectives which are based on those set out in the Southwark 2016: Sustainable Community Strategy:

Theme: Improve individual life chances

Strategic Objective 1A. Create employment and link local people to jobs

Southwark will be a prosperous borough providing a wide range of employment opportunities that facilitate regeneration. The Central Activities Zone will contain a mix of tourism, cultural and creative industries, finance and office jobs. Local centres will provide retail, services and local employment whilst preferred industrial locations provide places for small businesses and industry. Southwark will be without concentrations of poverty and with good opportunities because there is good access to jobs and residents will have the training and skills needed by businesses. The policies related to this theme are STP 1, STP 2, SP1, SP 3, SP 10 and SP14.

Strategic Objective 1B. Achieve educational potential

Southwark schools, universities, pre-schools and colleges will be places where children and young people can achieve and gain the knowledge and skills to get a job. Southwark will be a place that creates positive futures by building, redeveloping and improving educational facilities ensuring good access for everyone. Improving Southwark will help to attract good teachers to work in the borough. The policies related to this theme are STP1, STP 2, SP 1, SP4, SP8 , SP 10 and SP 14.

Strategic Objective 1C. Be healthy and active

Southwark's community will be healthy and active. High quality sports and leisure centres will be located across the whole borough and everyone will have access to them. Open spaces will be protected and the local community will be able to enjoy using these spaces, including parks, nature reserves and the River Thames. Good quality and accessible health facilities will be located across the whole borough. Southwark will be without concentrations of people with poor health because everyone has access to good health, sports and leisure facilities, and open spaces. The policies related to this theme are STP 1, STP 2, SP1, SP 4 SP 5 and SP14.

Strategic Objective 1D. Culture, creativity and diversity

Southwark will be a prosperous borough providing a wide range of activities and facilities for the diverse community. Successful creative industries will thrive. There will be a wide range of arts and cultural facilities for Southwark's multicultural and very diverse community. The policies related to this theme are STP 1, STP 2, SP 1, SP 3, SP 4, SP 5 SP 10 and SP 14.

Strategic Objective 1E. Be safe

Southwark will be a safe place for people to live, visit and work. The policies related to this theme are STP 1, STP 2, SP 1, SP 4, SP 12 and SP 14.

Theme: Make the borough a better place for people**Strategic Objective 2A. Create mixed communities**

People will choose to live in Southwark because we will have a mixture of different types of housing, jobs, shops, schools, community facilities, health centres, libraries, religious centres and leisure facilities needed by a diverse community. The policies related to this theme are STP 1, STP 2, SP 1, SP2, SP 3, SP , SP 6, SP 7, SP 8, SP 9 and SP 14.

Strategic Objective 2B. Promote sustainable use of resources

Southwark will be a green and environmentally sustainable borough. New developments will be built to high environmental standards to reduce the impact on the environment and adapt to climate change, focussing on flood risk, waste management, biodiversity and water quality. New housing will be located near to community facilities, shops, offices and leisure facilities. This encourages walking, cycling and public transport and restricts parking to reduce pollution and congestion, and the need to travel far. The policies related to this theme are STP 1, STP 2, SP 1, SP 2, SP 11, SP12 SP13 and SP 14.

Strategic Objective 2C. Provide more and better homes

The whole of the borough will offer more housing of a range of different types to meet the needs of the community. All the housing will be built to a high quality of design. There will be a choice of housing types including more family housing, housing for students and more affordable housing. The policies related to this theme are STP 1, STP 2, SP1, SP 5, SP 6, SP 7, SP 8, SP 9, SP 12 and SP13.

Strategic Objective 2D. Create a vibrant economy

Southwark will be a successful and profitable place. The town centres will offer a range of shops and services, along with offices, tourism and cultural facilities. The Central Activities Zone, opportunity areas and action areas will have lots of different activities as well as housing. The policies related to this theme are STP1, STP 2, SP 1, SP 3, SP 4, SP 8, SP 10 and SP 14.

Strategic Objective 2E. A liveable public realm

It will be easy to get to and around places on foot and by bike with excellent public transport links, including water transport. The policies related to this theme are STP 1, STP 2, SP 1, SP 2, SP11 and SP 14.

Strategic Objective 2F. Conserve and protect historic and natural places

Southwark's historic buildings will be protected and improved particularly in conservation areas and listed buildings. Open spaces and biodiversity will be protected, made more accessible and improved. The policies related to this theme are STP 1, STP 2, SP1, SP 11, SP 12 and SP 14.

Theme 3: Deliver quality public services**Strategic Objective 3A. Accessible, customer focused, efficient and modern public services**

Public services will be effective and easily accessible by all members of the community. The policies related to this theme are STP 1, STP 2, SP 1, SP 3, SP 4 and SP 14.

Theme 4: Making sure positive change happens**Strategic Objective 4A. Provide enough funding for regeneration to positively transform the image of Southwark**

We will work with landowners and developers to achieve regeneration, continuing to make Southwark a place that people aspire to be and that developers and landowners want to invest in. We will have a clear and flexible plan to make sure the right investment decisions are made and that regeneration happens on time. The policy related to this theme is STP 1, STP 2, SP 1, SP 16 and SP14.

Strategic Objective 4B. Make sure that we consult effectively

We will work with local communities, organisations, community groups, developers, businesses and land owners to make sure that we consult effectively on planning policies and development management decisions. We will make sure that we provide people with the opportunity to participate meaningfully in the preparation of local development framework documents as set out in our statement of community involvement. The policy related to this theme is STP 1, STP 2, SP 1, SP 6 and SP 14.

Theme 5: Planning for development in growth areas

Strategic Objective 5A Developing in growth areas

We have a growth areas approach to achieving the vision to improve places prioritising development in the:

- Central activities zone.
- Elephant and Castle opportunity area.
- Borough, Bankside and London Bridge opportunity area.
- Peckham and Nunhead action area.
- Canada Water action area.
- Aylesbury action area.
- West Camberwell regeneration area.
- Old Kent Road regeneration area.

The policies related to this theme are STP 1, STP 2, SP 1, SP 2 and SP5.

3.3 Core Strategy Policies

The Core Strategy strategic policies and strategic targets policies are set out below:

Strategic Policy 1	Sustainability Assessment
Strategic Policy 2	Sustainable Transport
Strategic Policy 3	Shopping, leisure and entertainment
Strategic Policy 4	Place to learn and enjoy
Strategic Policy 5	Providing new homes
Strategic Policy 6	Homes for people on different incomes
Strategic Policy 7	Family homes
Strategic Policy 8	Student homes
Strategic Policy 9	Homes for Gypsies and Travellers
Strategic Policy 10	Numbers and places for people to work
Strategic Policy 11	Open spaces and wildlife
Strategic Policy 12	Design and Conservation
Strategic Policy 13	High environmental standards
Strategic Policy 14	Implementation and Delivery
Strategic Targets Policy 1	Achieving Growth
Strategic Targets Policy 2	Improving Places

4 Context and Baseline Information

4.1 Links to other policies, plans and programmes

- 4.1.1 A number of plans and programmes of relevance to the Core Strategy have been reviewed to ensure that the messages from the policies are taken into account and to enable a robust appraisal of the impacts of the policies. A full list is set out in [Appendix 3](#).

Further details on the objectives and requirements of other relevant Policies, Plans and Programmes are contained within the Background Paper to the Core Strategy, which can be found on the Council's website <http://www.southwark.gov.uk>

4.2 Summary Baseline Information

- 4.2.1 Baseline information has been used to measure the current characteristics of the area, to enable an assessment of how it is likely to change in the future and to monitor future implementation. The data that has been collected describes the social, environmental and economic characteristics of the borough. The background paper to the Core Strategy Submission Version sets out the baseline data in further detail. A summary of the data is given below:

4.2.2 Socio-Economic Characteristics

The population of Southwark has risen to 274,400 since the census in 2001, which showed the population to be 256,700, an increase of 6.5%. The government has projected the population to rise to 305,600 by 2016 and 329,300 by 2026. Population density across the borough as a whole averages around 84 persons per hectare. This figure is nearly double the Greater London average of 46.

The age breakdowns from the mid-year estimate are 48,900 people aged between 0-15 years, 195,700 people of working age, and 29,400 older people (65+ for men/60+ for women). There are far more adults aged 25-44 years in the area than in England and Wales as a whole, but the population share for children is around the national average. Southwark also has proportionally fewer older persons compared to England and Wales. Older people comprise 10% of Southwark's population compared to 18% of the population within England and Wales.

Southwark is ranked as the 26th most deprived local authority area (1 being the most deprived) in England out of a total of 354 Local Authorities. Levels of deprivation in the borough vary significantly between areas with Peckham, Walworth and Camberwell being among the most deprived areas. The least deprived areas tend to be in the north and south of the borough such as Bankside and Dulwich.

The working age employment rate for Southwark is 73%, lower than both the London and UK averages with 75% for London and 79% for the UK. The employment rate also varies by area generally being lowest in the more deprived areas of the borough. In terms of Southwark's employed residents, the proportion is broken down into the following sectors:

- a) Manufacturing 5.7%
- b) Construction 3.7%
- c) Distribution, hotel and restaurants 14.6%
- d) Transport and communications 5.5%
- e) Business, finance, IT 42.4%
- f) Public admin, education, health 21.2%
- g) Other 6.9%

63% of residents are White, 3.7% Mixed, 4.1% Asia or Asian British, 25.8% Black or Black British and 3.2% Chinese or other ethnic group. In terms of faith groups, 61.6% of residents are Christian, 0.4% are Jewish, 6.9% are Muslim, 1.1% are Hindu, 0.2% are Sikh, 1.1% are Buddhist, 0.4% as Other, 18.5% No religion and 9.9% as religion not stated in the Census

4.2.3 Employment

Southwark has a wide mix of industries and types of employment. The types of employment vary between different areas for example Borough, Bankside and London Bridge (SE1 market) is characterised by large office developments for multi-national corporations. Several large office developments are in the pipeline including the Shard of Glass, whilst offices located elsewhere in the borough serve the local market. The northern area also has the majority of tourist and cultural attractions in the borough due to its location in the Strategic Cultural Zone and the proliferation of tourist attractions in this area. The North West of the borough at Elephant and Castle, Borough and Bankside and London Bridge is in the Central Activities Zone, this is an area where large-scale office development is encouraged and promoted.

There are also clusters of creative industries in certain areas in the borough; Peckham and Camberwell in particular are growth areas for these types of industries. This area of industry has seen a growth from 2,430 in 1998 to 2,978 in 2007.

The majority of residents in Southwark are employed in the business and service sectors although a higher proportion of people in the borough are employed in the manufacturing and construction industries than the London average. Compared to the London figure, there are a higher proportion of people in elementary occupations in Southwark

The Employment Land Review, Employment Strategy and Enterprise strategy show that there is currently 1,255,000sqm of office space in Southwark and around 165,800 people employed. The Employment Land Review shows we have the capacity to increase the amount of office space to 1,674,885sqm and create an additional 32,000 new jobs to 190,800 new jobs between now and 2026. This is in line with the current London Plan targets for the borough.

4.2.4 Education

There are 9 early years' centres in the borough providing childcare and education for children aged from birth to five years old. There are 19,949 pupils on the primary roll at January 2008, of which nearly two-thirds are from black or minority ethnic (BME), a proportion higher than in the adult population. In 2007, a little over one-third, 33.9%, qualified for a free school meal, which was more than double the national average of 15.9%.

As at January 2008, there was capacity for 23,730 primary places, with a surplus of 3,781 places or 15.9%. Thirteen primary schools had surplus capacity above 25%. Of these, two are artificially high after increasing their roll in 2007 and two are due to reduce their roll in September 2008. It is predicted the primary population will rise to 22,067 by 2018 – a figure that is less than 10% below our current capacity.

The borough currently has a range of secondary schools including:

- 1 City Technology College
- 2 Academies
- 5 Community schools (4 to become academies)
- 5 voluntary aided schools (1 to become an academy)
- 1 foundation school
- 4 secondary special schools

Through the Building Schools for the Future and the Academies programme, every secondary school will be refurbished or re-built by 2012. Due to population growth, there is also a need for a new secondary school. As at January 2007, 27% of pupils had a special educational need (SEN). There are two special schools proposed for redevelopment

Southwark has a university and colleges offering a range of higher education courses including Southwark College, London South Bank University, Camberwell College of Arts, London College of Communication, Morley College. Southbank University is expected to grow as is Southwark College.

Over a third (35%) of working age residents in 2001 had higher education qualifications, which is nearly double the national norm. However the proportion of those with no qualifications (24%) was above the London average. In 2001, around 12% of residents were managers or senior professionals. This is 50% above the national figure but less than in inner London. In 2001, Southwark was also home to 18,800 full time students. This is almost double the national average and the third highest in London. 18,500 unpaid carers live in the borough.

4.2.5 Community Facilities

There are currently:

- 210 Council owned community buildings of which approximately 110 are Tenants and Residents association halls (TRA). The remainder are in predominantly VCS occupation;
- 25 non-school buildings currently managed by Children's services (youth buildings, play rooms/one o'clock clubs, adventure playgrounds, sports sites), which are currently used or have the potential to be used by the Voluntary and Community Sector (VCS).

It is estimated that there are around 360 faith groups within Southwark comprising a mixture of religions including Christian, Jewish, Bahai, Coptic, Hindus, Buddhists, Sikhs, Muslims and Rastafarian. A total of 112 faith groups have been identified in the borough. 77 (or 69%) of the 112 places of worship investigated were unauthorised, the majority of which are Pentecostal/evangelical faith groups serving a mostly BME congregation.

Our 2009 Retail Study provides an assessment of the existing shopping provision within the centres around the borough, and the scope to improve shopping functions. It suggests that although Southwark residents generally do their food shopping in the borough, most people do not shop for things like clothes, shoes, music and books (comparison goods) in Southwark.

The 2009 retail study suggests that we can expand retail floor space, particularly for comparison goods, without harming the vitality of centres outside the borough. Our strategy is to improve the choice available in our centres, particularly at Elephant and Castle/Walworth Road, Canada Water and Peckham which have the most capacity for growth. As well as improving choice, this should reduce the number of trips made to places further away outside the borough and also boost the local economy.

Southwark's public leisure centres and the Southwark Park Sports Centre are managed by Fusion Leisure Trust, a non-profit and community based organisation. Other facilities of Borough importance include:

- Surrey Docks Watersports Centre
- Burgess Park Tennis Centre
- Herne Hill Community Velodrome
- South Dock Marina

There are also leisure facilities run by private companies across the borough that provide for the needs of the community.

A range of facilities are available for children and young people in Southwark parks including 40 fixed play sites, 6 enclosed children's play areas catering for 2–14 year olds, informal games areas and a variety of sports facilities. There are also 200 play areas on housing estates comprising fixed metal play equipment, many of which are in need of upgrading and replacing.

In addition, there are:

- 33 school based clubs for 5 – 11 year olds. Users mainly reflect the ethnic population but there is an under-representation of white and Asian children and young people in some areas.
- 10 adventure playgrounds, 7 managed by the council and 3 by voluntary management committees.

The north of the borough and the wider South Bank area provide a world-class cultural quarter with the Tate modern and Shakespeare's Globe. Other cultural facilities in the borough include the Imperial War Museum, Design Museum, Dulwich Picture Gallery, South London Gallery, Café Gallery, Southwark Playhouse, Unicorn Theatre for Children and other galleries, theatres, orchestras, music and dance organisations of national and regional importance.

4.2.6 Health and Safety

Southwark's Primary Care Trust (PCT) is continuously improving and helping to improve health across the whole borough. The 2006/2007 Health Care Commission Annual Health Check gave Southwark PCT a rating of 'good' for both service quality and use of resources. Only four other London PCTs achieved a similar rating.

The prevalence of drug misuse is a significant issue for Southwark, the rate in 2004/05 was one of the highest across London and this was more than double the England average. The rate of teenage pregnancy is a particular concern for Southwark, in 2005/06 Southwark had the second highest rate in London after Lambeth, with figures of 85 per 1000 15-17 year olds conceiving in 2004. This was also significantly higher than the national average. Another concern is the proportion of total birth weights less than 2500grams which was higher than the national average and slightly higher than the average recorded across the London boroughs. This was also reflected in a higher than average infant mortality rate in 2005/06.

Southwark has a high rate of people claiming incapacity benefit with mental or behavioural problems and a high mortality rate from suicide and undetermined injury. The rate of persons admitted to hospital with conditions directly related to the consumption of alcohol in 2005/06 was considerably higher than the average across England and one of the highest rates seen across the London boroughs. Another issue of concern was the rate of deaths attributable to smoking in people aged 35 and over. In 2004 the rate in Southwark was one of the highest across London and higher than the national average.

4.2.7 Climate Change and Sustainability

- **Energy and Carbon**

Increasingly we need to consider the way we utilise our resources and how we can minimise impact on the environment as a result of new development. It will be crucial that new development constructed over the next 15 years is built following sustainable design principles in order to reduce the impact on the environment, adapt to climate change and also to enable the creation of sustainable communities.

Energy use in buildings is responsible for around 85% of the CO₂ emissions across Southwark, mostly from housing, businesses and industry. In 2006, Southwark adopted a climate change strategy that aims to reduce CO₂ emissions across the borough by 80% by 2050 and to pursue a decentralised energy strategy for the borough.

The government has set a target for all new homes to be carbon neutral by the year 2016. Carbon neutrality is defined as emitting no net carbon emissions from all the energy used over the course of the year. To achieve carbon neutral buildings, the design must incorporate elements that conserve energy and water use, include renewable energy technologies and also sustainable construction techniques must be employed. The Code for Sustainable Homes sets out the national standard for developing homes in accordance with sustainability principles. The Government requires all new dwellings to be rated in accordance with the requirements set out in the Code for Sustainable Homes.

The scale of regeneration and estate renewal planned across the borough means that housing and commercial uses in particular can make a very large contribution to achieving our climate change targets. Very high targets have therefore been set for housing and commercial development based on the Code for Sustainable Homes and BREEAM. These targets will also help achieve Government targets to reduce CO₂ emissions from new homes by 44% from 2014 and 100% by 2016 through changes to the Building Regulations.

Elephant and Castle is set to establish new standards of environmental responsibility in urban redevelopment, by undertaking the entire regeneration with a zero increase in carbon emissions. This includes higher targets for energy efficiency, the introduction of renewable energy technology, and a move towards a decentralised low carbon energy supply (in the form of a Multi Utility Services Company - MUSCo), capable of delivering heat and power to 6.5 million square feet of mixed-use development. The sustainable community energy system will connect individual sites to a community heating network, compatible with many forms of renewable energy (including locally derived sources of renewable fuel), and capable of being extended to serve the wider community. There will also be an area-wide, integrated water management system that will cut water consumption and significantly reduce the requirement for a fully treated potable supply. This is achieved through two groundwater abstraction wells at opposite ends of the core development area which can be used for construction, toilet flushing, public area cleansing, landscape establishment and street cleaning. (CDSPD10 E&C Development Framework SPG, CDSPD11 E&C Enterprise Quarter SPD and CDSPD12 Walworth Road SPD)

National Grid's high voltage electricity overhead transmission lines / underground cables within Southwark Council's administrative area that form an essential part of the electricity transmission network in England and Wales including a 275kV underground cable from Newcross substation (on the Old Kent Road) in Southwark to Wimbledon substation in Wandsworth as well as existing gas holders on the same site on the Old Kent Road.

- **Waste and Recycling**

National Government has set targets for Southwark Council to increase recycling rates and reduce the amount of waste going to landfill. The Mayor has also set waste targets for boroughs through the London Plan including the need to allocate enough land to process at 323,000 tonnes of waste per year by 2015 and 379,000 tonnes per year by 2020. This will help meet the London-wide target of processing at least 85% of the city's waste within London by 2020.

A Joint Waste Technical Paper with Bromley, Bexley, Greenwich and Lewisham has been prepared to ensure that the waste targets are met. This technical paper provides detail of how working together we will meet our apportionment target. It demonstrates that there is enough combined capacity across these boroughs to meet the Mayor's target for these boroughs. As part of this approach we have safeguarded 11ha of land

at Old Kent Road for waste management, providing enough land to meet the Mayor's waste processing target. A new state of the art facility is being built on part of this land by Veolia Environmental Services, the Council's waste management partners, in order to help meet the targets by processing 111,940 tonnes of waste per annum with the potential to treat further waste by converting it into biomass fuel.

Southwark's Waste Management Strategy, 2003-2021 (CDEN7) sets out the council's proposals for moving Southwark towards more sustainable waste management. The key features include:

- a reduction in the amount of municipal solid waste generated in Southwark to below 3% by 2005, and below 2% by 2010. In real terms, due to population growth (estimated at a further 27,000 residents by 2021) the absolute amount of waste will rise but the strategy aims to deliver a decrease in the actual rate of growth
- achievement of 30% recycling and composting standards for household waste by 2010-11 and 40% by 2015-16 and 50% standards by 2020-21
- recovery of value from 45% of municipal solid waste by 2010-11, 67% by 2015-16 and 75% by 2020-21.

Southwark's Waste Minimisation Strategy, 2007 – 2010 (CDEN8) sets out the council's proposals for addressing waste growth by minimising household waste. The Strategy identifies a number of policies, initiatives and projects that can help achieve a reduction in waste growth to 2% or less by 2010, a major element being through engendering behavioural change in Southwark. Veolia Environmental Services will assume responsibility for the implementation and monitoring of the Strategy in the medium and longer term.

- **Flood Risk**

A Strategic Flood Risk Assessment has been prepared to understand flood risk in Southwark. The northern half of the borough is within the Thames flood plain, which contains over two thirds of Southwark's properties in well established communities. The area also contains major regeneration and growth areas of importance to Southwark and London including: the Central Activities Zone; Elephant and Castle Opportunity Area; Borough, Bankside and London Bridge Opportunity Area; and Canada Water Action Area.

Two thirds of the sites identified in the Strategic Housing Land Availability Survey are located in this area. These sites are needed to meet our housing targets as they are able to deliver 75% of our housing capacity. In the southern parts of the borough, where flood risk from the Thames is low, there are limited sites available for development. It is, therefore, not realistic to expect new development to occur outside the flood risk area.

The Thames Catchment Flood Management Plan and Thames Estuary 2100 Project being prepared by the Environment Agency will help manage flood risk from the Thames over then next 50 to 100 years. Whilst the Thames Barrier and flood walls along the riverside provide a degree of protection, consideration needs to be given to their potential failure or inability to contain very high floods as a result of climate change. It is important that new buildings are designed to be safe in the event of a flood and easily repairable afterwards.

The Environment Agency has identified areas that are particularly vulnerable to localised flooding in heavy rainfall as a result of old water mains; poorly designed and maintained drainage; and too many hard surfaces. The areas include Herne Hill, Camberwell, Peckham and pockets in the north of the borough. Thames Water has a programme to replace old Victorian Water mains and they are planning to build the Thames Tunnel which will help stop sewerage overflowing into the River.

- **Pollution**

Southwark has particularly high levels of air pollution, mainly caused by traffic. As a result, the entire borough north of the A205 has been declared an Air Quality Management Area. Vehicle emissions are the cause of 50% of air pollution and estimated to cause 24,000 deaths per year in the UK. (CDEN10 Southwark Air Quality Management and Improvement Plan)

- **Water**

Southwark is also within an area of serious water stress - the amount of water being used is close to the total amount of water available, and demand for water is rising. Climate change will result in hotter, drier summers, which could reduce the amount of water available. In the short-term there could be an increase in water restrictions. Longer-term consequences could include water shortages and rising water prices. Currently, all mains water is treated to drinking standard. This is an expensive and energy intensive process, particularly considering that at least 50% of water consumed in homes and workplaces does not need to be of drinkable quality (for example water used for flushing toilets, washing laundry and watering parks and gardens). It is important that new development reduces our reliance on mains treated water.

Southwark Council is working with Thames Water and other stakeholders to enable the implementation of the implementation of the Thames Tunnel and deal with, collect and forward sewage to the treatment plant. We will, in line with Thames Water advice require all new dwellings to meet the water usage targets set out in the Code for Sustainable Homes and agree that the new dwellings should comply with the Code 3 rating as a minimum.

Unfortunately Thames Water are unable to determine the amount of infrastructure require for the development of new housing sites in terms of the sewerage and clean water networks due to the complexity of the network and neighbouring boroughs ambitions. However in line with their advice we are providing, as identified in the SHLAA, a small number of larger sites as it is generally easier to provide for in terms of infrastructure.

- **Historic Buildings and Conservation Areas**

Throughout the borough there are many attractive and historic buildings, monuments and sites that reflect Southwark's rich history and add to the unique character and identity of places. We currently have 40 conservation areas covering 686ha (23% of the borough) and around 2,500 listed buildings and monuments. Conservation area and character area appraisals have therefore been undertaken. (see appendix 10)

The Tower of London, a World Heritage Site, is located across the River from London Bridge. There are also archaeological remains that cannot be seen that provide important evidence of our past. We have identified 9 Archaeological Priority Zones (APZs) covering 679ha (23% of the borough).

Southwark has many places with their own unique character. The central activities zone is a setting for activity and large scale development including tall buildings which give Southwark and London a distinct skyline. There are fewer and smaller open spaces and fewer trees and gardens, but there is a close relationship with the River Thames. Areas such as London Bridge and Elephant and Castle will be transformed by regeneration programmes and major new development.

Areas in the middle of the borough around Bermondsey, Walworth, Camberwell and Peckham are characterised by lower-scale development, with a mixture of Victorian and Edwardian terraces, broken up by post-war estates, town centres and some newer housing development.

The southern part of Southwark around Nunhead, Peckham Rye and Dulwich has very leafy and green residential neighbourhoods with large open spaces, gardens and tree-lined streets of houses and terraces rather than flats. Areas such as Aylesbury Estate and Peckham are being regenerated and improved.

Rotherhithe also has a suburban character with mostly low scale housing close to large open spaces. There is also a maritime character reflected in and around the docks and River frontage. Canada Water town centre will be transformed by regeneration and new development.

There are a number of views to and across Southwark that are important to both local people and all Londoners. These include views of landmarks and panoramas that make Southwark and London distinctive. It is important that new buildings do not block these views or make them less attractive.

- **Open Space and Biodiversity**

About 20% of Southwark is made up of open spaces that are protected by the planning system. The open spaces are of various sizes and include parks, sports grounds, nature reserves, allotments and woodlands. There is around 660ha of open space in Southwark, covering a fifth of the borough. Most of the open space is parkland, commons and playing fields, but there are a range of other types of spaces including cemeteries, allotments, housing estate grounds and civic squares.

In Southwark formal protection has been given to over 599ha of open space. The design of new development is also controlled to make sure enough open space is provided. The greenness of areas is also protected and improved through conservation areas and tree preservation and by new landscaping and planting schemes.

There are large open spaces which are important to all of London. These are protected by the Mayor and are called Metropolitan Open Land (MOL). These have the highest level of protection and must be kept open in nature with development only in exceptional cases. These include Burgess Park, Southwark Park, Dulwich Park and Peckham Rye Common and Park.

Southwark's Open Spaces Strategy, 2010 (CDEN3) looks at the supply of open spaces in the borough. The strategy has identified that there is not an even supply of open spaces across Southwark. Half of our open space is focussed in the south of the borough in the Dulwich, Nunhead and Peckham Rye community council areas. Whilst the north of the borough has access to major parks including Burgess Park and Southwark Park, smaller spaces are particularly important to local people. The areas in the north also have fewer trees and gardens.

In Southwark, most play spaces are within estates, close to housing. Southwark's Open Space Strategy and Play Strategy have identified a lack of open spaces in the south of the borough. While there is currently a good supply of play spaces in the north of the borough, the housing growth expected here will put pressure on supply and it is important that the quality of spaces is improved as well as making sure they are located close to homes.

Birds, stag beetles, bats and amphibians are particularly at risk in Southwark. Many species of plants and animals are protected under European and national laws, including the Habitats Regulations 1994 and The Wildlife and Countryside Act 1981. The London Biodiversity Action Plan and Southwark Biodiversity Action Plan identify additional species that are important.

- **Housing**

Housing is a key issue in Southwark, as it is across London. The London Borough of Southwark aims to ensure that there is sufficient housing available to meet the required provision so that everyone may have the opportunity for a decent home. Over the period 1997-2006, the Borough achieved an average annual net dwelling completion rate of 1,125 dwellings. Between 2007/08 and 2016/17, Southwark had an annual dwelling requirement of 1,630 in order to meet the target set in the London Plan of 16,300 new homes by 2016/17. Since 2003, completion rates have increased and have averaged 1,337 per annum between 2003 and 2006/07. In the year 2006/2007 a total net gain of 2,602 dwellings was achieved. This comprised 2,137 self-contained dwellings, 318 non-self-contained dwellings and 147 long-term vacant dwellings brought back into occupation. We have only met our current annual housing target of 1630 new units twice in recent years.

In terms of affordable housing, 743 net completions were achieved in the year April 2006 - March 2007, which accounts for 40% of all homes built over this period. This figure is below the London Plan's 50% target for affordable housing provision however dwellings that were built during the last monitoring period may have been approved under the last UDP's affordable housing policy which set a target for 25%. Therefore, improved affordable housing results will not be seen for a few years, in relation to the London Plan's increased affordable housing target for the Borough.

Of the 50% target for the provision of affordable housing, the London Plan sets a target of 35% of affordable housing as social tenure, and 15% as intermediate tenure. The UDP has set target tenures for designated areas around the Borough, in order to achieve the objective of creating mixed and balanced communities.

In the year 2006/2007, 16% of completed affordable housing units were intermediate tenure and 24% were social tenure. However, in relation to the UDP's target split of tenures, some areas of the Borough have experienced a larger proportion of social rented housing being built and this has created a disproportionate tenure mix. For example, Peckham has received a large percentage of social rented housing (85% of 89 net units built). The target within the UDP for this area of the Borough is 30% social rented and 70% intermediate.

In terms of accommodation type, the size of new dwellings has seen an increase in the percentage of one and two bedroom dwellings from 30% in 2005/06 to 40% in 2006/07. This trend conflicts with the Council's target of increasing the number of three or more bedroom dwellings. In the past three years we have delivered between 8 and 12% of all new homes as family housing. There is a London-wide shortage of larger family homes, and future housing provision will need to address this issue. Our Strategic Housing Market Assessment and Housing Requirement Study identify that there is a need for more family housing in the borough across all tenures. Of the borough's existing households 34% are 3 bedroom plus, 35% are 2 bedrooms, 26% are 1 bedrooms and 5% are bedsits. As a result of this mix many families are forced to line in overcrowded, unsuitable homes.

Residential density is the number of habitable rooms divided by the site area i.e. habitable rooms per hectare (hr/ha). The UDP set four residential density standards in areas of the borough based upon of the general character of the area and its accessibility to public transport. These are: Central Activities Zone; Urban Zone; Suburban Zone and Public Transport Accessibility Zone (*higher density than Urban Zone where increased development is appropriate in terms of design and scale*). In 2006/07, the majority of development was built within the Urban Density Zone.

We have rolled forward our current London Plan target of 1,630 net new homes up to 2026 to cover the 15 years timeframe of the Core Strategy to give ourselves a target of 24,450 net new homes between 2011 and 2026. Since then the consultation draft replacement

London Plan 2009 has set us a target of 2005 units per year. We will work with officers in the GLA to reach a common view on the most appropriate target.

Through our housing trajectory and our Strategic Housing Land Availability Assessment we have identified sites where we think we can deliver 20,115 net new homes between 2011 and 2026 on sites of over 0.25. The take up of current allocations, commitments and windfalls suggests that completion rates will continue, and the target of 24,450 dwellings will be met by 2026. The average number of dwellings that will be required to be built, taking into account housing completions between 2008 and 2026 is 1,630.

The London Plan also sets minimum targets for homes and jobs to be achieved up to 2026 in identified 'Opportunity Areas and Areas of Intensification'. In Southwark, these areas are Elephant and Castle (including Walworth Road), Canada Water and Borough, Bankside and London Bridge. For the Elephant and Castle, the minimum target for homes is 4,000; Borough, Bankside and London Bridge has a target of 1900 net new homes and Canada Water has a target of 2,500 net new homes.

We currently have one of the highest amounts of affordable housing in the whole country, with 45% of our 123,948 dwellings being affordable. However, there still is a shortage of affordable homes in Southwark as identified by our Strategic Housing Market Assessment and our Housing Requirement Study. The need is for both social rented and intermediate housing. Based on the amount of housing we expect to deliver between 2011 and 2026, new development will provide 8,558 net new affordable homes which equates to 35% affordable housing on all sites over 10 units. Our Affordable Housing Viability Study shows that this an achievable amount of affordable housing to build across the borough.

We have the second largest number of student homes in London with a further 979 new student bedrooms in the pipeline. However there is still a need for student accommodation across the whole of London and Southwark. This need should be balanced against the need for more family and affordable housing need set out above.

There are four existing gypsy and traveller sites in Southwark which contain 38 pitches altogether. These sites, Bridale Close, Burnhill Close, Ilderton Road and Springtide will be safeguarded. The GLA are currently completing a study on the number of additional sites which may be needed in London.

- **Transport**

The 2001 census showed that 29% of people's journeys were made by car, 35% were made by public transport and 36% by bicycle and walking. Other surveys show that over three quarters of the population who have a job travel to work by public transport, walking and cycling. The main transport document for the council is the Local Implementation Plan (CDEN6).

- **Rail**

There are 11 surface rail stations in the borough including London Bridge, the Elephant and Castle, South Bermondsey, Queens Road Peckham, Peckham Rye, Denmark Hill, Nunhead, East Dulwich, North Dulwich, West Dulwich and Sydenham Hill. Whilst there is a good network of stations, there are two major gaps in Southwark. One is centred on the Burgess Park area (from Camberwell to Bermondsey) and the other is centred on the area between Peckham Rye Park and Dulwich Park.

- **Underground**

The underground network is concentrated in the north of the borough where there are nine underground stations including London Bridge, Borough, Elephant and Castle, Kennington, Surrey Quays, Rotherhithe, Southwark, Bermondsey and Canada Water. Four different lines including the Northern, Bakerloo, Jubilee and East London lines service these stations.

- **Bus**

The London Bus Priority Network (LBPN) covers a large part of the borough and provides the main public transport provision in areas away from rail stations. The network is particularly extensive in the northern half of the borough, which is served by approximately 50 high frequency and 12 low frequency bus services as well as 16 night bus services. The Elephant and Castle is a major transport interchange and has more bus routes passing through it than anywhere else in Southwark.

- **Cycle**

The number of cycle trips made by Southwark residents increased by 27% between 1991 and 2001 compared to a London wide average of 2.8%. The Thames cycle route, which is route 4 of the national cycle network, travels through along the Thames River from the Rotherhithe peninsula through Bermondsey and London Bridge to Lambeth.

The London cycle network plus (LCN+) is a London wide 900km formal network, which is being implemented incrementally across London. Implementation of the whole network should be completed by 2009/10. There are 5 proposed LCN+ routes in Southwark:

- Route 0 Southwark Bridge - Imperial War Museum
- Route 2 Lambeth (Imperial War Museum) - Deptford
- Route 22 London Bridge – Brockley
- Route 23 Southwark Bridge – Crystal Palace
- Route 25 Herne Hill - Nunhead

- **Pedestrians**

Walking accounts for the second highest proportion of all trips made in London after driving at 49%. However, the past decade has seen a marked decline in the number of walking trips in greater and inner London, which have decreased by 13% and 20% respectively. Currently, 12% of Southwark residents walk to work, which is similar to other inner London boroughs. The northern part of the borough has a high proportion of commuting walking as well as multi modal trips, which incorporate walking.

- **Roads**

Southwark's road network comprises approximately 23km of principal roads and 336km of non principal or borough roads. Southwark's road network can generally be characterised by the main east west and north south routes that are utilised, not only by local traffic, but a high level of through traffic, seeking access to central London and ways along the south side of the river. Car ownership levels in Southwark have traditionally been low with 48% of households owning a car in 2001. However, the national trend is that growth will be the highest for those areas with a current low base level.

- **River**

There are eight piers on the south bank of the Thames, within Southwark's boundaries. These piers serve varying functions including public passenger transfer, private passenger trips and waste transport.

5 Sustainability Issues and Objectives

5.1 Sustainability Issues

5.1.1 This section sets out the main sustainability issues that need to be taken into consideration. These issues have been identified by considering the baseline information as well as the messages from related plans, policies and programmes.

- Relatively high levels of deprivation
- Employment inequalities and employment opportunities
- Education, skills and training deprivation
- Health inequalities and noise nuisances
- Need to promote equality, diversity and social cohesion
- High levels of crime and fear of crime
- Energy efficiency and use of renewables
- Poor air quality
- Need to minimise waste arisings and increase recycling rates
- Need for sustainable use of water resources
- Protection of landscape features and designated sites and need to address contaminated land issues
- Ensuring a high quality of design in new developments
- Need to preserve and enhance built heritage and the archaeological environment
- Minimising flood risk and improve the quality of controlled waters within the borough
- Protecting and enhancing biodiversity
- Providing everyone with a decent and affordable home to live in
- Need to improve accessibility by public transport and minimise the need to travel by car
- Need to ensure that there is social, physical and green infrastructure capacity for existing and future needs

5.2 Sustainability Objectives

5.2.1 Seventeen Sustainability Objectives have been identified, which are set out below. The objectives reflect the current social, economic and environmental issues affecting the area and were consulted on as part of the scoping report:

SDO 1	To tackle poverty and encourage wealth creation
SDO 2	To improve the education and skill of the population
SDO 3	To improve the health of the population
SDO 4	To reduce the incidence of crime and the fear of crime
SDO 5	To promote social inclusion, equality, diversity and community cohesion
SDO 6	To reduce contributions to climate change
SDO 7	To improve the air quality in Southwark
SDO 8	To reduce waste and maximise use of waste arising as a resource
SDO 9	To encourage sustainable use of water resources
SDO10	To maintain and enhance the quality of land and soils
SDO11	To protect and enhance the quality of landscape and townscape
SDO12	To conserve and enhance that quality of landscape and townscape
SDO13	To protect and improve open spaces, green corridors and biodiversity
SDO14	To reduce vulnerability to flooding
SDO15	To provide everyone with the opportunity to live in a decent home
SDO16	To promote sustainable transport and minimise the need to travel by car
SDO17	To provide the necessary infrastructure to support existing and future development

6 The Sustainability Appraisal Framework

6.1 What is the SA Framework?

6.1.1 The Sustainability Appraisal Framework provides a way in which the sustainability effects of the plan can be described, analysed and compared. The framework provides a set of sustainability objectives and indicators to be used when undertaking the appraisal. The indicators should be measurable to provide a way of checking whether the objectives are being met, for example, the number of jobs created.

6.2 The SA Framework

Sustainability Issue	Sustainability Objective and questions	Sustainability Indicators	
Economy, Regeneration and Employment Opportunities	SDO 1: To tackle poverty and encourage wealth creation Will it improve the range of job opportunities? Will it help to diversify the economy? Will it encourage the retention and /or growth of local employment? Will it close the gaps between equalities target groups compared with the National average? Will it encourage business start-ups and support the growth of businesses?	1.1 1.2 1.3 1.4	Employment land available Change in VAT registered businesses Numbers and % jobs in Southwark by sector Southwark compared to London (broken down by micro, small and medium sized businesses)
Education	SDO2: To improve the education and skill of the population Will it provide opportunities to improve the skills and qualifications of the population, particularly for young people and adults? Will it help improve employee education/training programmes? Will it help reduce skills shortages? Will it help to reduce the disparity in educational achievement between different ethnic groups?	2.1 2.2 2.3 2.4	Indices of multiple deprivation; Education deprivation % of the population with higher education qualifications % of population with no qualifications Proportion of resident pupils attending Southwark schools achieving 5+ A-Cs including English and Maths split by equality group

Sustainability Issue	Sustainability Objective and questions	Indicators	
Health	<p>SDO3: To improve the health of the population</p> <p>Will it promote and facilitate healthy living and active lifestyles? Will it reduce health inequalities? Will it promote non-polluting forms of transport? Will it improve access to health and social care/treatment?</p>	<p>3.1 3.2 3.3 3.4 3.5 3.6 3.7</p>	<p>Health life expectancy at age 65 by equality group Indices of multiple deprivation: Health deprivation Rate of obesity in children Mortality from cancer, heart disease and stroke Incapacity benefit for mental illness Distance to GP premises from home Admissions to hospital per 1,000 people</p>
Crime and Community Safety	<p>SDO4: To reduce the incidence of crime and the fear of crime</p> <p>Will it improve safety and security? Will it incorporate measures to reduce crime and the fear of crime, including anti-social behaviour?</p>	<p>4.1 4.2 4.3 4.4</p>	<p>Indices of multiple deprivation: Crime deprivation Numbers of crime per annum Percentage of residents who feel fairly safe or very safe outside during the day/night Reports of anti-social behaviour</p>
Social Inclusion and Community Cohesion	<p>SDO5: To promote social inclusion, equality, diversity and community cohesion</p> <p>Will it help support voluntary sector and promote volunteering? Will it support active community engagement? Will it support a diversity of lifestyles? Will it address equality's groups?</p>	<p>5.1 5.2 5.3</p>	<p>Proportion of people who think they can influence decision-making in their locality Employment/Skills/Health/Homelessness waiting list by equality group Satisfaction with area</p>

Sustainability Issue	Sustainability Objective and questions	Indicators	
Mitigation of and adaption to climate change	<p>SDO6: To reduce contributions to climate change</p> <p>Will it reduce consumption of energy? Will it use renewable sources of energy? Will it help local people cope with hotter drier summers and warmer wetter winters? Will it mitigate against the urban heat island effect?</p>	6.1 6.2 6.3 6.4	<p>CO2 emissions and energy consumption (break down by source/type)</p> <p>No. of extreme weather events by type</p> <p>No. of hospital admissions as a result of extreme weather</p> <p>SAP rating of borough's housing stock</p>
Air Quality	<p>SDO7: To improve the air quality in Southwark</p> <p>Will it help to reduce emissions of PM10, NO2? Will it encourage a reduction in amount and length of journeys made by car?</p>	7.1 7.2 7.3	<p>Number of days of high pollution</p> <p>Annual average concentrations and number of hourly exceedences of nitrogen dioxide in air</p> <p>Annual average concentrations and number of daily exceedences of PM10 in air</p>
Waste Management	<p>SDO8: To reduce waste and maximise use of waste arising as a resource</p> <p>Will it promote the reduction of waste during construction / operation? Will it minimise the production of household and commercial waste? Will it promote sustainable processing of waste?</p>	8.1 8.2 8.3	<p>Municipal waste land-filled (tonnes)</p> <p>Residual household waste per household (tonnes)</p> <p>Percentage of municipal waste sent for reuse, recycling and composting</p>
Water Resources	<p>SDO9: To encourage sustainable use of water resources</p> <p>Will it encourage reuse of water? Will it maximise use of rainwater or other local water supplies? Will it reduce discharges to surface and groundwater?</p>	9.1 9.2	<p>Average domestic and commercial potable water consumption (l/head/day)</p> <p>Water quality measure</p>

Sustainability Issue	Sustainability Objective and questions	Indicators	
Soil and Land Quality	<p>SDO10: To maintain and enhance the quality of land and soils</p> <p>Will it encourage the remediation of land identified as potentially contaminated? Will it prevent further contamination of soils?</p>	10.1	Number of contaminated sites not remediated
Quality in Design	<p>SDO11: To protect and enhance the quality of landscape and townscape</p> <p>Will it have a negative impact on important strategic/local views? Will it improve the quality of public spaces and street? Will it improve the relationship between different buildings, streets, squares, parks and waterways and other spaces that make up the public domain?</p>	11.1 11.2 11.3	Satisfaction with local area People who can identify with their local area Building for Life Assessments
Conservation of the Historic Environment	<p>SDO12: To conserve and enhance the historic environment and cultural assets</p> <p>Will it involve the loss or damage to historic buildings and remains and their setting? Will it improve the historic value of places? Will it promote the historic environment and also contribute to better understanding of the historic environment?</p>	12.1 12.2 12.3 12.4 12.5 12.6	Amount of Southwark covered by Conservation Area or APZ Numbers of heritage assets in the borough on the English Heritage at Risk Register Changes in numbers of listed buildings Number of scheduled ancient monuments at risk Number of conservation areas at risk Number of conservation areas with up-to-date appraisal/management plans
Open Space and Biodiversity	<p>SDO13: To protect and improve open spaces, green corridors and biodiversity</p> <p>Will it encourage development on previously developed land? Will it improve the quality and range of open spaces? Will it improve access to open space and nature? Will it improve the quality and range of habitat for wildlife? Will it avoid harm to protected and priority species?</p>	13.1 13.2 13.3 13.4 13.5 13.6	Change in quantity of open space (ha) Resident satisfaction with open space Change in SINCS and LNPS Change in quality of open space (ha) Open space deficiency Deficiency in access to nature

Sustainability Issue	Sustainability Objective and questions	Indicators	
Flood Risk	<p>SDO14: To reduce vulnerability to flooding</p> <p>Will it minimise the risk of and from flooding? Will it protect and improve flood defences and allow them to be maintained?</p>	14.1 14.2	<p>Number of flooding incidents (including sewer flooding)</p> <p>Condition of flood defences</p>
Housing	<p>SDO15: To provide everyone with the opportunity to live in a decent home</p> <p>Will it contribute towards meeting housing need, in particular affordable housing and family homes? Will it improve the supply and range of housing? Will it contribute towards improving the quality of homes and the living environment? Will it reduce overcrowding?</p>	15.1 15.2 15.3 15.4 15.5 15.6	<p>Amount of homes in the borough</p> <p>Percentage of households living in temporary accommodation</p> <p>Households in housing need</p> <p>Households on housing register</p> <p>Households unintentionally homeless and in priority need</p> <p>Income to average house price ratio</p>
Sustainable Transport	<p>SDO16: To increase walking, cycling, public transport and reduce car journeys</p> <p>Will it reduce car use? Will it promote walking and cycling? Will it reduce the number and length of journeys? Will it improve public transport? Will it reduce road traffic accidents?</p>	16.1 16.2 16.3	<p>Estimated traffic flows per annum (mil.vehicle km)</p> <p>The number of people killed or seriously injured in road traffic collisions</p> <p>Proportion of personal travel made on each mode of transport overall and by equalities groups</p>
Infrastructure	<p>SDO17: To provide the necessary infrastructure to support existing and future development</p> <p>Will it provide enough social infrastructure ? Will it provide enough physical infrastructure? Will it provide enough green infrastructure?</p>	17.1 17.2	<p>Capacity of existing infrastructure (social, physical and green)</p> <p>Capacity of future infrastructure (social, physical and green)</p>

6.3 Comparison of the SA Objectives

- 6.3.1 As part of the sustainability appraisal, a comparison of the sustainability objectives was undertaken to check if the objectives are compatible with one another.

Compatibility of SA Objectives

Objective	SDO1	SDO2	SDO3	SDO4	SDO5	SDO6	SDO7	SDO8	SDO9	SDO10	SDO11	SDO12	SDO13	SDO14	SDO15	SDO16	SDO17	
SDO2	✓																	
SDO3	✓	0																
SDO4	✓	0	✓															
SDO5	✓	✓	✓	✓														
SDO6	✓	0	✓	0	0													
SDO7	✓	0	✓	0	0	✓												
SDO8	✓	0	0	0	0	✓	0											
SDO9	✓	0	✓	0	0	✓	0	0										
SDO10	✓	0	✓	0	0	0	0	✓	0	0								
SDO11	✓	0	0	0	0	?	0	?	0	0	0							
SDO12	✓	0	0	0	0	?	0	?	0	0	0	0						
SDO13	✓	0	✓	0	0	✓	✓	0	✓	✓	✓	✓						
SDO14	✓	0	✓	0	0	✓	0	0	✓	0	0	0	✓					
SDO15	✓	0	✓	0	✓	✓	✓	0	✓	0	✓	✓	✓	✓				
SDO16	✓	✓	✓	0	✓	✓	✓	✓	0	0	✓	0	✓	✓	✓	✓	✓	✓
SDO17	✓	0	✓	0	0	✓	✓	0	✓	0	0	0	✓	✓	✓	✓	✓	✓

✓ Compatible

0 No significant link

? Depends on implementation

The compatibility of SDO 6: Mitigation of and Adaption to Climate Change and SDO 8: Waste Management with SDO11: Quality in Design and SDO12 Conservation of the Historic Environment will depend upon implementation.

Careful application of renewable technologies and waste provision will be needed to ensure that quality in design or the setting of historic environment is not compromised.

7 Plan Issues and Options

7.1 Compatibility of the SA Objectives against the Core Strategy Objectives

- 7.1.1 An assessment of the compatibility of the SA objectives against the Core Strategy objectives has been carried out. The results show that the objectives are largely compatible with each other. Some uncertainties do occur in a few of the policies, which will be dependent on the implementation of the policies. The full results can be found at [Appendix 4](#).

7.2 Why do we need a plan for development?

- 7.2.1 Southwark is a rapidly changing, diverse borough with inequalities of wealth. This means that some areas are deprived whilst others gain affluence and continue to thrive. We need to build on each area's strengths and unique identities and address these issues of inequality. By doing this we will ensure that we have accessible, locally distinctive, well designed places which interconnect and link to the rest of London. Improving the quality of places will improve peoples quality of life. Our themes and objectives set the platform for the way we plan, build and design places.
- 7.2.2 This complex place making process is continuous and needs to involve the diverse range of people to create places that people find successful to live in and use. Collectively we need to work together to improve each place through tackling the challenges and maximising our strengths.
- 7.2.3 Doing nothing is not an option. We need to make sure we plan for sustainable growth in the borough so that everyone in the community can benefit from new homes, jobs and an improved quality of life. We have targets of 80,000 sqm net new shopping and leisure floorspace, 24,450 net new homes between 2011 and 2026, 8558 net new affordable homes between 2011 and 20206 and 32,000 net new jobs. In order to meet these targets considerable development in the borough will take place. We need to ensure this growth happens along side the necessary infrastructure improvements, in a way that is least harmful to the environment and that meets the needs of our local communities.
- 7.2.4 Public sector agencies on their own will not have sufficient resources to improve the borough. We have to work with private sector partners to find creative solutions to regeneration. Our biggest challenge is to build a consensus of citizens and agencies about how we influence the future development of our borough and balance competing pressures.
- 7.2.5 In order to accommodate this future growth, a number of possible options have been considered and these are discussed in more detail in the following section.

7.3 What options have been considered and why?

- 7.3.1 Two options were considered at the Issues and Options stage of the development of the Core Strategy. These were
 Option 1: Growth Areas
 Option 2: Housing Led Growth.

In summary, these options were based on:

- Agreed future development in the borough such as regeneration areas
- The London Plan targets to deliver new homes and jobs in areas such as Canada Water and Borough and Bankside

- The amount of affordable housing and types of affordable housing to be delivered in the borough
- The amount of family housing to be built in the borough
- Provision of offices, industrial, tourism, cultural and community facilities
- The quality of public transport links in different parts of the borough.
- Environmental standards

Option 1: Growth Areas

7.3.2 Option 1 prioritised the regeneration of places by creating Growth Areas at the Central Activities Zone, Elephant and Castle, Peckham, Canada Water, Bankside and London Bridge and Camberwell. This option aims to meet the London Plan housing target of 1630 homes per year by focusing housing growth in these areas. A provision of 30% minimum affordable housing would be achieved. The strengths of each area would be built upon, particularly the good public transport links, so that more jobs, shops, community facilities and environmentally friendly buildings are provided. This option would involve setting different housing policies from those set out in the London Plan.

Key Elements

- Create Growth Areas for new housing, shops, offices, community, tourist and cultural facilities.
- The Growth Areas will be the Central Activities Zone, Elephant and Castle, London Bridge and Bankside, Peckham, Canada Water and Camberwell. These are areas with good public transport links.
- Allow larger developments with a lot of housing and some community facilities in Bermondsey Spa and the Aylesbury.
- Restrict large developments outside of these areas
- Protect employment areas and increase offices in the Central Activities Zone.
- Prioritise transport projects, community facilities and employment funding in the Growth Areas.
- Requiring different amounts of affordable, family, social and intermediate housing in different places.
- Increase the protection of employment land in Southwark

Option 2: Housing Led Growth

7.3.3 Option 2 would permit new housing throughout the borough rather than focussing it in specific areas. This option would result in more housing than the 1630 homes per year target in the London Plan and achieve 50% minimum affordable housing. Housing would take priority with less land available for other land uses such as offices, industrial, tourism, culture and community facilities. The housing development would occur outside the main regeneration areas such as Elephant, Bankside, Canada Water, Peckham and Aylesbury, which could result in these areas being less developed or not as quickly as planned.

Key Elements

- Allow housing in all areas of the borough; do not direct it to specific places.
- Require 50% affordable housing;
- There would be less office, industrial, tourism, culture, shops and community facilities.

7.4 What have the options identified?

- 7.4.1 The two options for growth, identified above, were subject to detailed testing against the sustainability framework. The results of the appraisal showed that the overall impact of Option 1 was more positive than for Option 2.

Summary of Results

Sustainability Objective	1	2
SDO1 To tackle poverty and encourage wealth creation	✓✓	?
SDO2 To improve the education and skill of the population	✓	✓?
SDO3 To improve the health of the population	✓	✓?
SDO4 To reduce the incidence of crime and the fear of crime	✓	?
SDO5 To promote social inclusion, equality, diversity and community cohesion	✓✓	?
SDO6 To reduce contributions to climate change	?	X
SDO7 To improve the air quality in Southwark	?	X
SDO8 To reduce waste and maximise use of waste arising as a resource	?	X
SDO9 To encourage sustainable use of water resources	?	?
SDO10 To maintain and enhance the quality of land and soils	✓	✓
SDO11 To protect and enhance the quality of landscape and townscape	✓?	?
SDO12 To conserve and enhance the historic environment and cultural assets	✓?	?
SDO13 To protect and enhance open spaces, green corridors and biodiversity	✓?	?
SDO14 To reduce vulnerability to flooding	X	?
SDO15 To provide everyone with the opportunity to live in a decent home	✓✓	✓
SDO16 To promote sustainable transport and minimise the need to travel by car.	✓✓	X

Key	✓✓	major positive	XX	major negative	?	uncertain
	✓	minor positive	X	minor negative	-	no significant impact

Option 1 scored a negative result against 1 objective and an uncertain result against 4 objectives.

Option 2 scored a negative result against 4 of the objectives and an uncertain outcome against 8 objectives.

The detailed results can be found in [Appendix 5](#). As a result of the findings, it was decided that Option 1 should be taken forward as the Preferred Option for the Core Strategy with some amendments to take into account the findings of the SA.

8 Effects of the Core Strategy Policies

8.1 How has sustainability been considered in developing the plan?

- 8.1.1 The Sustainability Appraisal has helped to identify the preferred options for the Core Strategy and areas of concern to be addressed through the refinement of policies or through the use of mitigation measures, to help avoid potential conflicts. The appraisal has involved making a certain amount of subjective judgements of the likely sustainability impacts of options over the short, medium and long term. The judgement has been made by reference to what the sustainability objective is trying to achieve and the possible impact a proposed action may have on the borough. Impacts of strategic options may be hard to predict at the local level but once site specific information is available it will be easier to establish mitigation measures.
- 8.1.2 Areas of concern identified at the Issues and Options and Preferred Options stages have led to a refinement of the policies, objectives and indicators to address areas that had not been covered in sufficient detail. A final appraisal of the amended Core Strategy has subsequently been undertaken ([see section 8.3](#)).

8.2 The Preferred Option

- 8.2.1 The Growth Areas led option has generally been taken forward, with some ideas from the Housing led approach, following the sustainability appraisal at the Issues and Options stage of the Core Strategy. The results of the Issues and Options SA showed that the overall impact of Option 1 was more positive in terms of social, economic and environmental impacts than for Option 2. Whilst there were a few uncertain impacts identified, overall, the appraisal indicated that Option 1 – Growth Areas would be likely to make more of a positive contribution to directing new spatial growth within the borough and would advance the principles of sustainability in a more comprehensive manner. Consequently, this option was taken forward in the preparation of the Preferred Options report.
- 8.2.2 The Preferred Option seeks to direct growth towards particular areas and focus on balancing housing growth, with growth in other areas such as employment, leisure provision, arts and culture and social and community infrastructure. The option focuses on the elements that make the different areas of the borough distinctive and through the set of policies, seeks to draw on the strengths of these areas.
- 8.2.3 The Preferred Option would result in larger developments incorporating housing, shopping, offices, community facilities, tourism and culture being focussed within the Central Activities Zone (including Elephant and Castle, London Bridge and Bankside) and Peckham which are areas of the borough with good public transport. It would also encourage large developments, including housing and community facilities into the areas of Bermondsey Spa, West Camberwell and Aylesbury Estate. The sustainability of locating larger developments outside of the Growth Areas was negatively appraised in the SA process, and therefore the Preferred Option focuses larger development to several of the Growth Areas. Overall, most new development will be prioritised in the following areas:
- Central Activities Zone
 - Elephant and Castle opportunity area
 - Peckham action area
 - Canada Water action area
 - Bankside, Borough and London Bridge opportunity area
 - Aylesbury action area
 - West Camberwell housing regeneration area
 - Old Kent Road regeneration area

- 8.2.4 The appraisal showed a minor negative impact with regard to flooding as the majority of the growth areas identified are within Flood Zones 2 and 3. Where the development is located in an area with a high or medium risk of flooding (flood zones 2 and 3) or in all cases where the development site is larger than 1 hectare, a site specific flood risk assessment must be submitted with the application which demonstrates that:
- suitable sites are not available in an area with a lower risk of flooding (i.e. that the development meets the “sequential test” set out in Planning Policy Statement 25 Development and Flood Risk)
 - that the development will be safe for future users
 - that the development will reduce the risk of flooding elsewhere.
- 8.2.5 In the southern parts of the borough, where flood risk from the Thames is low, there are limited sites available for development. It is, therefore, not realistic to expect all new development to occur outside the flood risk area. Further guidance on the location of different types of development is set out in PPS25: Development and Flood Risk. The issues to be addressed in a site specific flood risk assessment are set out in the Sustainable Design and Construction SPD.

8.3 The Submission Version

- 8.3.1 A final appraisal of the Submission Version of the Core Strategy has been carried out to check that the revised policies have addressed sustainable development appropriately. Fourteen planning policies and two Strategic Target Policies have been produced to seek to achieve sustainable development and direct spatial growth within the borough. These are set out below:

Strategic Policy 1	Sustainability Assessment
Strategic Policy 2	Sustainable Transport
Strategic Policy 3	Shopping, leisure and entertainment
Strategic Policy 4	Place to learn and enjoy
Strategic Policy 5	Providing new homes
Strategic Policy 6	Homes for people on different incomes
Strategic Policy 7	Family homes
Strategic Policy 8	Student homes
Strategic Policy 9	Homes for Gypsies and Travellers
Strategic Policy 10	Numbers and places for people to work
Strategic Policy 11	Open spaces and wildlife
Strategic Policy 12	Design and Conservation
Strategic Policy 13	High environmental standards
Strategic Policy 14	Implementation and delivery
Strategic Targets Policy 1	Achieving growth
Strategic Targets Policy 2	Improving places

8.4 What are the significant positive effects of the plan?

8.4.1 The appraisal found that overwhelmingly the policies in the Submission Version of the Core Strategy document will have a positive impact upon sustainability. For each policy the number of positive impacts identified outweighed the negative impacts, when taken across the whole range of sustainable objectives.

8.4.2 The results of the appraisal showed a major positive impact for the following policies:

Strategic Policy 1: Sustainable Development
Strategic Policy 13: High Environmental Standards

- **Strategic Policy 1** has the highest number of positive impacts which are largely attributable to the need for proposals to produce a Sustainability Assessment as part of the planning application. The need for a Sustainability Assessment will ensure that developers consider the social, economic and environmental impacts of their schemes and identify the measures that are proposed to provide a positive impact as well any necessary mitigation. The Sustainable Design and Construction SPD and Sustainability Assessment SPDs provide further details to applicants on the type of measures that should be introduced and the targets that need to be achieved.
- **Strategic Policy 13** scores a very positive impact against seven of the Sustainability Objectives and a minor positive impact against a further eight. The policy on high environmental standards sets the targets that the Council wish developers to achieve for new development, however, the level of achievement will in part be dependent upon implementation.

8.4.3 The majority of the other policies scored a minor positive impact. Whilst there were some uncertain impacts identified, overall, the appraisal indicated the policies are likely to have a positive contribution to directing new spatial growth within the borough. In particular, the Core Strategy policies will help to meet the following sustainable development objectives:

- SDO 1 To tackle poverty and encourage wealth creation
- SDO 5 To promote social inclusion, equality, diversity and community cohesion
- SDO 15 To provide everyone with the opportunity to live in a decent home.

8.5 What are the significant negative effects of the plan?

8.5.1 Minor negative impacts were identified in relation to the following policies:

Strategic Policy 2:	Sustainable Transport
Strategic Policy 5:	Providing New Homes
Strategic Policy 8:	Student Homes
Strategic Policy 10:	Jobs and Businesses
Strategic Targets Policy 1:	Achieving Growth
Strategic Targets Policy 2:	Improving Places

8.5.2 **Strategic Policy 2: Sustainable Transport** scored one minor negative impact in relation to SDO17 - to provide the necessary infrastructure to support existing and future development. The policy encourages development which, minimises the use of the private car and improves accessibility to public transport, placing increased demands upon the existing transport infrastructure. Improvements to the infrastructure will, therefore, need to be identified to ensure that the existing transport network can cope with the additional demands of new development. The infrastructure plan, which supports the Core Strategy, identifies the necessary transport requirements, phasing and costs.

- 8.5.3 **Strategic Policy 5: Providing New Homes** scored five minor negative impacts. The reason for the negative impacts is that the quantum of new development is likely to have negative impacts upon climate change, air quality, waste, areas vulnerable to flooding and infrastructure capacity. However, it is felt that the negative impacts can be resolved through appropriate mitigation measures, in particular the application of Policies 1, 13 and 14.
- 8.5.4 **Strategic Policy 8: Student Homes** scored one minor negative impact in relation to development in areas that are vulnerable to flooding. The amount of development that is needed to cope with the growth in population and their future needs necessitates the need to develop land that it is in the flood zone. Policies 1 and 13 will ensure that development is designed appropriately to include flood resistant design and adequate set backs from the river edges.
- 8.5.5 **Strategic Policy 10: Jobs and Businesses** scored a minor negative impact against three objectives in relation to climate change, air quality and waste. As in policy 5 the reason for the negative impacts is because of the quantum of development proposed in the Borough. Policies 1,13 and 14 will be used to mitigate any negative impacts.
- 8.5.6 **Strategic Targets Policy 1: Achieving Growth** scored a minor negative impact against three objectives in relation to climate change, air quality and waste. As in policies 5 and 8 the reason for the negative impacts is because of the quantum of development proposed in the Borough. Policies 1,13 and 14 will be used to mitigate any negative impacts.
- 8.5.7 **Strategic Targets Policy 2: Improving places** scored a minor negative in relation to climate change and air quality as CO₂ emissions and energy consumption and demand will increase as a result of construction and operation. Policies 1,13 and 14 will be used to mitigate any negative impacts.

8.6 Cumulative Impacts

The SEA Directive requires an assessment of secondary, cumulative, and synergistic effects, which should be incorporated in the SA. Collectively these effects are called cumulative impacts. Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects (e.g. noise, dust and visual) have a combined effect.

Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.

In assessing the cumulative impacts of the Core Strategy the policies had a minor negative impact upon only one of the sustainability objectives – SDO6: To reduce contributions to climate change. The cumulative impact of the policies is considered to be negative owing to the quantum of development that is required to support the level of growth in the borough. The development will cause an increase in the amount of CO₂ emissions as a result of activities in both construction and operation. Whilst mitigation measures have been put in place to reduce CO₂ emissions through the policies that specifically address sustainability (SP1, SP2, SP13, AAPs and Sustainability SPDs) the amount of CO₂ emissions are unlikely to reduce. However, the development of new technologies could have a beneficial effect in the future but the impact of such technologies is unknown at this stage. Future monitoring of the impacts of the policies will provide further data on the success of the policies in addressing climate change.

An uncertain impact is also shown for the following sustainability objectives:

SDO 7: To improve air quality in Southwark

SDO 8: To reduce waste and maximise use of waste arising as a resource

SDO 14: To reduce vulnerability to flooding

Again mitigation measures should succeed in addressing potential negative impacts but the quantum of development could result in a synergistic effect from individual sites. The impacts on these issues will need to be carefully considered when monitoring the effectiveness of the policies. [\(Please see Appendix 7 for the detailed results\)](#)

8.7 Proposed mitigation

- 8.7.1 Where the SA identified potential shortcomings of particular policies, mitigation measures are proposed to help off-set the negative impacts. For example, the adoption of technologies and construction practices to minimise energy consumption and waste production. Also the facilitation of measures to encourage and increase recycling rates will help mitigate any negative impacts associated with new development in the borough. In addition, the requirement for new developments to adhere to minimum standards in design and construction will ensure greater energy, water and waste efficiency over time.
- 8.7.2 Some of the negative impacts will be mitigated through other planning policies which deal with such matters, in particular Strategic Policies 1: Sustainability Assessment, 13: High Environmental Standards and 14: Implementation. These policies reflect the guidance set out in national and regional guidance to ensure development meets the required sustainability and environmental standards.
- 8.7.3 Strategic Policy 1 deals with the assessment of development in terms of its social, economic and environmental impacts. This policy sets out the requirement for a sustainability assessment to be submitted with applications. The impact of development plan documents will also be tested through sustainability appraisals and equalities impact assessments. This policy meets the requirements set out in London Plan policies 2A.1 Sustainability criteria and 3A.17 Addressing the needs of London's diverse population. The Sustainability Assessment and Sustainable Construction and Design SPD's offer further guidance to applicants on how to comply with the policies and meet the council's targets.
- 8.7.4 Strategic Policies 13 sets out how we will make sure development helps us live and work in a way that respects the limits of the planet's natural resources, reduces pollution and damage to the environment and helps us adapt to climate change. This policy sets out a number of targets for development including:
- requiring development to meet Code for Sustainable homes level 4 and BREEAM standard "excellent"
 - Achieving a 44% saving in carbon dioxide emissions above the building regulations
 - Achieving a reduction in carbon dioxide of 20% from using on-site or local low and zero carbon sources of energy.
 - Achieving a potable water use target of 105 litres per person per day.
- These targets are in general conformity with London Plan targets and we set out more evidence to demonstrate how we can meet these targets in the background paper and evidence based studies. The Sustainability Assessment and Sustainable Construction and Design SPD's offer further guidance to applicants on how to comply with the policies and meet the council's targets.
- 8.7.5 Strategic policy 14 identifies how we will implement and deliver our vision and objectives for the borough. This policy sets out how we will use S106 planning obligations to overcome negative impacts of development and to make sure that infrastructure needed to support development is provided. The S106 Planning obligations SPD explains our policies in more detail and sets out a series of standard charges to be applied to development. An infrastructure plan has also been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

- 8.7.6 We have also carried out a number of studies to help inform the approaches set out through these policies. These include
- a Joint Waste Technical Paper 2009
 - a Strategic Flood Risk Assessment 2008
 - an infrastructure plan 2009
 - a Retail Study 2009
 - a Strategic Housing Market Assessment 2009
 - a Strategic Housing Land Availability Study 2009
 - a Housing Requirement Study 2009
 - an Affordable Housing Viability Study 2009
 - an Employment Land Review 2009
 - Southwark Open Spaces Strategy 2009
- 8.7.7 We will consider more locally specific issues including the mitigation of negative impacts through our Area Action Plans (AAPs) and Supplementary Planning Documents. We are preparing plans for:
- Aylesbury AAP
 - Peckham and Nunhead AAP
 - Canada Water AAP
 - Old Kent Road AAP
 - Bankside, Borough and London Bridge SPD
 - Dulwich SPD
 - Aylesbury AAP Public Realm SPD
 - Camberwell SPD
 - Tower Bridge Workshops SPD
- 8.7.8 The AAPs and SPDs can also set out guidance on more topic based issues. The following guidance has already been adopted:
- Sustainable Design and Construction SPD (February 2009)
 - Sustainability Assessment SPD (February 2009)
 - Affordable Housing SPD (September 2008)
 - Sustainable Transport SPD (September 2008)
 - Residential Design Standards SPD (January 2008)
 - Design and Access Statements SPD (September 2007)
 - Section 106 SPD (July 2007)

We are also proposing to set out additional policies to guide development across the borough in a Development Management DPD and a Housing DPD.

8.8 Uncertainties and risks

- 8.8.1 The conclusions that were reached in undertaking the SA of the Core Strategy policies were a result of qualitative (i.e. subjective) judgement, albeit by planning professionals within the Council. In addition, predicting the outcome of a potentially complex mix of social, economic and environmental factors is an inherently difficult task to undertake, and can only be undertaken on the basis of the background data that is available.
- 8.8.2 Consequently, there may be some questions about the way some policies were ranked against particular sustainability objectives. However, whilst some individual rankings may possibly be challenged at this level, it is the overall performance of a policy against the Sustainability Framework taken as a whole, which is the most important element to consider.

Please see Appendix 7 for the detailed results

9 IMPLEMENTATION

9.1 What are the next stages in the plan preparation?

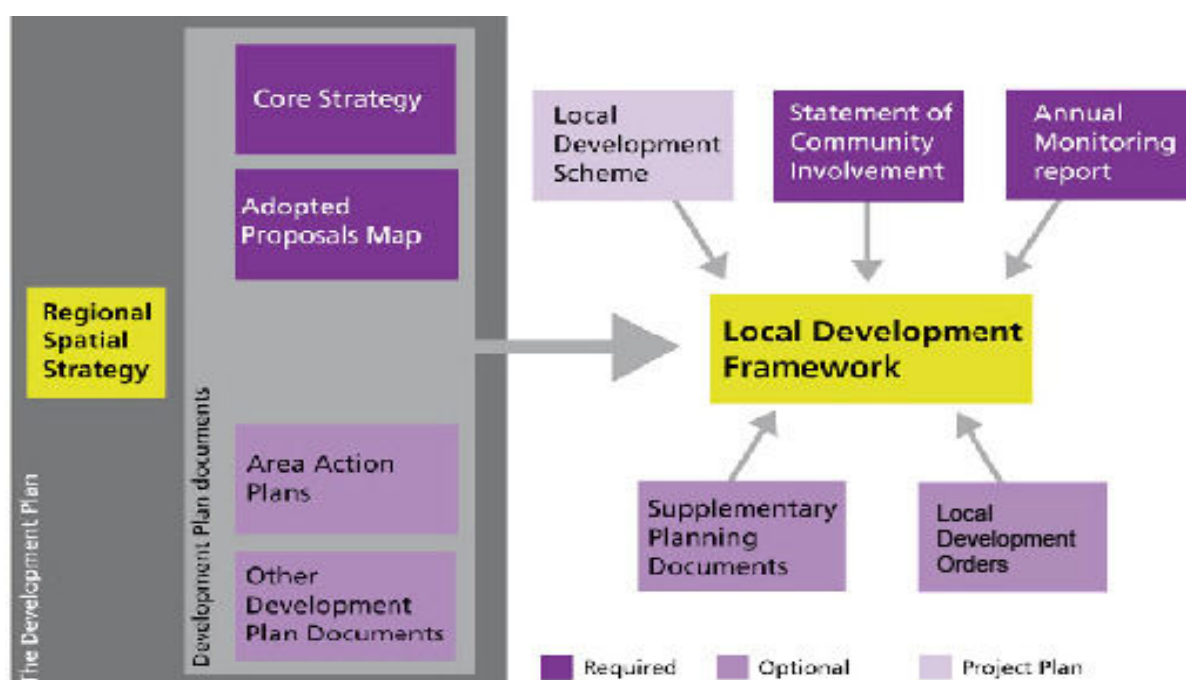
SA PRODUCTION STAGE	TIMETABLE
Submission of the Final Sustainability Appraisal Report to accompany the publication version of the Core Strategy	March 2010
Adoption of the Core Strategy and publication of the final sustainability appraisal report.	January 2011

9.2 How will the plan be implemented?

- 9.2.1 The Core Strategy sets out the vision for the type of place Southwark should be in the future. The Core Strategy will shape the development of the borough up to the year 2026 by providing a list of clear objectives and a delivery plan to make development happen in the right place at the right time. The plan sets out what should be achieved in different places in the borough and directs development to shape these areas.
- 9.2.2 Implementation of the core policies will be achieved through our development management function when we make decisions on planning applications and also through the development of more focused policies for areas and sites of significant growth, regeneration or change. We are preparing development management policies, area action plans and supplementary planning documents that will explain Core Strategy policies and provide more detail.
- 9.2.3 Our Statement of Community Involvement (SCI) sets out how and when we will involve the community in preparing planning policy documents and in making decisions on planning applications. We developed our SCI by working with many local people, businesses, voluntary and community organisations, councillors and statutory organisations. The SCI includes: information on different consultation methods; how to overcome barriers to involve different groups and; the consultation process for both planning policy documents and planning applications. Involving the community at the earliest stage possible in the planning process helps us to implement development that is wanted and needed by the community.
- 9.2.4 New development in the borough also needs to be supported by adequate social, physical and green infrastructure. This includes: social infrastructure such as schools, health and other community facilities; physical infrastructure such as transport and utilities; green infrastructure such as parks and open spaces. Where infrastructure is needed to support development, it should be provided along side it. Development should not be permitted unless essential infrastructure can be completed prior to occupation of the new development.
- 9.2.5 We have worked in partnership with infrastructure providers, including both internal council departments and external agencies, throughout the development of the Core Strategy to identify infrastructure required to facilitate the development set out in the Core Strategy.
- 9.2.6 We will use s106 planning obligations to overcome negative impacts of development and to make sure that infrastructure needed to support development is provided. We will use planning obligations in accordance with government guidance, set out Circular 2005/05. We have an approved Planning Obligations supplementary planning document which explains our policies in more detail and sets out a series of standard charges to be applied to development. Through implementing this SPD we will secure financial contributions to mitigate the impacts of development.

9.3 Links to other tiers of plans, programmes and other guidance

- 9.3.1 The LDF for Southwark will guide development in the future and is made up of a series of documents, prepared in stages. More information on the LDF can be viewed on the Council's website. This includes the Local Development scheme which sets out the programme for the production of documents.
- 9.3.2 It should be noted that local planning policy is produced within a framework set by national and regional government planning guidance. This guidance indicates the broad principles that local policy should adopt. For example, the need to provide further housing as established in guidance means that it would not be possible to have an option of no further housing provision.



The Development Plan process

9.4 Area Action Plans and Supplementary Planning Guidance

- 9.4.1 Further guidance is also being produced for specific areas of growth within the Borough in the form of Area Action Plans (AAPs) and Supplementary Planning Documents (SPDs), which are also subject to the SA process. These documents will enable further assessment and refinement of issues to be made at the local level. The areas include:

- Elephant & Castle Opportunity Area
- Aylesbury Action Area
- Canada Water (and Rotherhithe) Action Area
- Peckham and Nunhead Action Area
- Bankside, Borough and London Bridge Opportunity Area
- Dulwich Village and West Dulwich

9.5 Proposals for monitoring

- 9.5.1 It is important that the plan is monitored to keep track of whether it is working in the way it should. This report has identified indicators that should be used to monitor the Core Strategy. The most appropriate way to monitor the Core Strategy is through the Local Development Framework Annual Monitoring Report (AMR). The AMR monitors the type of development that is occurring as a result of all of the council's planning policies and guidance and what effects this development is having in terms of sustainability. Where new indicators have been identified, through the SA process, these will be added to the AMR.

APPENDICES

Appendix 1	The SEA Directive Requirements
Appendix 2	Consultation Responses
Appendix 3	Relevant Plans, Strategies and Programmes
Appendix 4	Compatibility Assessment
Appendix 5	Issues and Options Summary of Results
Appendix 6	Preferred Options Summary of Results
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APPENDIX 1 Legal and Policy Background for Sustainability Appraisal and Development Plan Documents

Strategic Environmental Assessment and Sustainability Appraisal

The Core Strategy falls within the definition of a 'plan or programme' under European Directive 2001/42 (the SEA Directive). As it is likely to have significant environmental effects, it must also undergo a Strategic Environmental Assessment (SEA), as part of the sustainability appraisal.

The SEA directive is transposed (made) into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004. Guidance on the implementation of the 2004 Regulations and the Planning and Compulsory Purchase Act is set out in the ODPM's Practical Guide to the Strategic Environmental Assessment Directive (September 2005) and Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (November 2005) respectively. Further guidance is also provided in PPS12: Local Spatial Planning, 2008 and the Plan Making Manual.

These guidance documents set out a similar methodology to be used in the preparation of both SAs and SEAs. The government guidance on SA incorporates the requirements of the SEA Directive within the SA process. In the case of the Core Strategy, all reference to SA should be understood as referring to both the SA and SEA process. The components of the SA and its relationship to the information required within the SEA report is set out below.

Components of the SA Report which make up the Environmental Report for the purposes of the Strategic Environmental Assessment

Information Required in Environment Report	Section in SA Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I)	The SA report
a An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plan and programmes	Sections 1, 3 and 4 Appendix 3
b The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Sections 4 and 5
c The environmental characteristics of areas likely to be significantly affected	Sections 4 and 5
d Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Section 4
e The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 4 Appendix 3
f The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Sections 7 and 8 Appendices 4,5, 6 and 7
g The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Sections 8 and 9
h An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Section 6, 7 and 8 Appendix 5 and 6
i A description of measures envisaged concerning monitoring in accordance with Article 10	Sections 2 and 9
j A non-technical summary of the information provided under the above headings.	Non-technical summary

	<p>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).</p>	Sections 2, 3 and 9
	<p>Consultation:</p> <ul style="list-style-type: none"> • authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4). • authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6. 1, 6.2). • other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7). <p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)</p> <p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> • the plan or programme as adopted; • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9 and 10) 	Section 2 Appendix 2
	<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p> <p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA checklist Directive (Art. 12).</p>	Section 9
		Section 9
		The Quality Assurance Checklist has been followed

APPENDIX 2 RESPONSES TO CONSULTATION

Scoping Opinion Responses

Name	Section of Reports	Comment	Officer response
<p>The Environment Agency</p>	<p>Preferred Options Report section 8 Background paper to the Preferred Options report SA Section 6 SA: Relevant Plans, strategies and programmes (Appendix 3)</p>	<p>We would wish to comment on the following:</p> <ul style="list-style-type: none"> • Development and flood risk • Surface Water Flooding • Climate Change • Open Space and Biodiversity • Energy Efficiency and Renewables • Waste Management • Policy Context <p>Development and flood risk We are pleased to note that flood risk has been identified as one of the key sustainability objective in Southwark. However, there is little mention of SFRA which should provide a framework at local/strategic level to help apply the sequential test and inform site allocations. It is also used to identify sustainability objectives and test policy options in SA/SEA. The SFRA should analyse the likely locations, depths and speed of flood water in the event of overtopping or breach of the existing river defences. It should also provide information to show how any environmental objectives relating to flooding that have been mentioned in the Sustainability Appraisal are affected by additional development. Once levels of risk have been determined, they can be balanced against the other key issues covering the environmental and social economic issues. All reference to PPG25 should change to PPS25.</p> <p>We appreciate the impact of flooding in the borough has been understood and hope the risks will be appropriately managed. The borough wide SFRA should identify the actual and residual flood risks, as required by PPS25. This information will need to inform the borough's spatial plan and policies. Development proposals within the defended tidal flood plain must consider the residual risks that are present, i.e., increasing risks from rising flood water and sea levels due to climate change and the risks resulting from a</p>	<p>Comments noted.</p> <p>Development and Flood Risk PPS 25 has been referred to within the Draft Sustainability Assessment. It is acknowledged that planning policy needs to take into account the risk posed by flooding. The Preferred Options Report sets out our approach to reducing flooding. A Strategic Flood Risk Assessment (February 2008) has been prepared for the borough and it is used by the council to inform the application of the Exceptions and Sequential Tests. The SFRA forms part of the evidence base to inform the preparation of the Core Strategy and the policy relating to development and flood risk. We have included additional indicators within the Sustainability Framework of the Draft Sustainability Appraisal</p>

Name	Section of Reports	Comment	Officer response
		<p>failure or overtopping of a section of defence protecting the area under consideration. This may lead to reallocating some of the more vulnerable uses to areas with lower residual risks as well as designing new development in a more flood resilient manner.</p> <p>The emerging policies should focus on reducing flood risk through appropriate location, layout and design of development as set out in PPS25 and Thames CFMP. In particular, opportunities should be sought to:</p> <ul style="list-style-type: none"> • Set back development from the river edge to enable sustainable and cost effective flood risk management options • Ensure that the buildings with residual flood risk are designed to be flood compatible or flood resilient • Use open spaces within developments which have a residual flood risk to act as flood storage areas. <p>Flood risk management planning needs to be linked closely with regeneration and redevelopment so that the location of development can help to reduce flood risk. There is need to incorporate long-term policies in the Core Strategy that outline protecting and recreating river corridors and areas where flooding can happen naturally. These policies will support the objectives of Thames Estuary 2100 (TE2100) and the London Plan Blue Ribbon Network</p> <p><i>(Policy eC.3 The natural value of the Blue Ribbon Network , Policy 4C.6 Sustainable growth priorities for the Blue Ribbon Network and Policy 5D.1 The strategic priorities for South East London).</i></p> <p>Flood resilience must be built into buildings and other infrastructure, such as transport in areas currently at residual risk. Emergency Planning and evacuation procedures are required that fully understand current and future risk. Defra's Policy to achieve <i>Making Space for Water</i> must be delivered in the short and long term to enable us to maintain existing defences and plan for future land use. If developments are set back from existing defences we retain the option of future upgrades, as well as making space for flood storage. This will require land allocation many years in advance, which needs to occur through current spatial planning. The protection of floodplains from the physical threats posed by development is dependent on the powers exercised by local planning authorities. The Environment Agency would therefore support any Council's proposal to safeguard areas of currently undeveloped land such as marshes as Strategic Flood Storage areas to use as emergency flood storage.</p>	<p>The Preferred Options report sets out our approach to flood resilience. The Sustainable Design and Construction SPD sets out our minimum standards for maximising the flood resilience of new development.</p> <p>Southwark is an inner city London borough currently under going or planning significant levels of regeneration development, some of which located will be located within floodplains. The majority of the borough is developed, and therefore the suggestion to consider safeguarding areas of currently undeveloped land for Strategic Flood Storage areas is not feasible.</p> <p>We need to ensure the land is developed as efficiently as possible, whilst also having appropriate policies to manage flood risk. In accordance with PPS25, we require the application of the sequential and exceptions tests as pre-requisites when development is proposed within the floodplains.</p> <p>We have reviewed the criteria questions and indicators of the Sustainability Framework of the Draft Sustainability Appraisal, in relation to achieving the objective for addressing flood risk.</p>

Name	Section of Reports	Comment	Officer response
		<p>More criteria questions for table 5-SD014</p> <ul style="list-style-type: none"> • Are the sites riparian? • Will any proposed development impact on the structural integrity of the defences? • Are the defences appropriate for the lifetime of any proposed development? • Will any work be required to bring them up to this standard? • Will sites be drained in a sustainable manner (i.e. no pumping will be required)? 	
	<p>Preferred Options Report Section 8 Background Paper to Preferred Options Report SA: Section 6</p>	<p>Appendix 4: Baseline data for Southwark Baseline data needs to be compiled for flood risk issues. This is needed to allow the assessment of change and policy performance against key indicators. Examples include: -the number of dwellings in Flood Zone 3, the number of new or replacement dwellings permitted in Flood Zone 3 and the number of highly vulnerable premises within flood Zone 3 (as per PPS25 Annex D). The SFRA should be the key source of data.</p>	<p>A Strategic Flood Risk Assessment (February 2008) has been prepared for the borough. The report will form part of the evidence base to inform the preparation of the Core Strategy. We have reviewed the key indicators to address Flood Risk</p>
	<p>SA: Section 6</p>	<p>Surface Water Flooding The Water Strategy, published in February 2008, sets out the Government's preferred approach to managing surface water drainage. It also advocates local authorities having a lead role. The SFRA recognises that within the urban centres of the Borough, it is inevitable that localised flooding problems arising from under capacity drainage and/or sewer systems will occur. With increasingly intense downpours the risks would increase due to climate change and it is imperative that provisions are made to manage and address this risk. At present there is little information on surface water flood risk. To understand the level and nature of risk it would be necessary to prepare a Surface Water Management Plan (SWMP) or Integrated Urban Drainage Plan (IUDP) that would help to define the future approach. These can guide your local area policy direction in terms of risk or consequence reduction and management. This would be an action plan, agreed by all local stakeholders with drainage responsibilities, to clarify responsibilities and manage these risks. For flood risk reduction it would be necessary to reduce surface water runoff and have provision of open spaces that can function as flood conveyance and storage for surface water flooding. For reducing the consequences it would be necessary to adapt existing (through retrofitting) and new houses to be more flood resilient.</p>	<p>Comment noted. <u>Surface Water Flooding</u> The preparation of further studies and plans will be considered. We will continue to consult with stakeholders with drainage responsibilities We address surface water flood risk within the Sustainability Framework of the Draft Sustainability Appraisal.</p>

Name	Section of Reports	Comment	Officer response
		<p>Surface water drainage networks are normally designed to cope with storms of a 1 in 20 year intensity. It is therefore to be expected that events above this intensity will occur from time to time. Many areas with large roof areas, at low points in the drainage network or have suffered blockages in the surface water system may experience surface water flooding. Surface water should generally be managed at source. Large developments locations offer particular opportunities to make significant changes to surface water management so that it becomes more sustainable.</p>	
	<p>Preferred Options Report Section 8</p>	<p>Sustainable Drainage Systems (SUDS) We appreciate the inclusion of SUDs in the draft Sustainability Appraisal Report. PPS1 and PPS25 directly mention SUDS and the opportunity to promote SUDS. It is hoped that there will be a readiness to secure SUDS for many developments of all scales in the achievement of sustainable development. New development will be expected to include a provision for the adequate environmentally acceptable measures to deal with surface water run-off or discharge. Planning permission for development that includes non –sustainable methods of surface water drainage should not be granted unless it can be demonstrated that sustainable techniques are not feasible on the grounds of practicability.</p> <p>As well as controlling surface water run-off at source to reduce the risk of flooding, SUDS can protect and improve water quality in receiving water courses, provide habitat creation opportunities, enhance the design of the development by providing amenity areas and landscape settings, and encourage natural groundwater recharge. For technical guidance you are referred to The SUDS manual, CIRIA C697. Box 2.1, on page 2-15, Chapter 2 of the CIRIA C697 document provides a comprehensive list entitled "Basic requirements of drainage assessments". The CIRIA document can also be downloaded freely at http://www.ciria.org/suds/publications.htm. The C697 document provides advice on:</p> <ul style="list-style-type: none"> • SUDS techniques: their principles and benefits and compares them to conventional drainage systems • Design requirements for SUDS systems and their appropriateness for site conditions • Maintenance and adoption of SUDS • Regulation and responsibilities for SUDS <p>Construction of SUDS and the requirements to protect the SUDS features and watercourses during the construction process</p>	<p>SUDS Comments noted. The adopted Sustainable Design and Construction SPD require minimum standards for drainage requirements and sets out our Preferred Standards in order to achieve an excellent standard of design and construction. Applicants therefore need to robustly justify why they cannot meet the minimum standards as set out in the SPD.</p> <p>The Preferred Options report sets out our preferred approach to address flood risk and sustainability measures within development.</p>

Name	Section of Reports	Comment	Officer response
	<p>Preferred Options Report Section 8</p> <p>Background paper to Preferred Options report</p> <p>SA: Section 6</p>	<p>Climate change</p> <p>Climate change considerations should be integrated into all spatial planning concerns, including transport, housing, economic growth and regeneration, water supply and waste management. It should be viewed from the wider sustainability objectives and not only reducing the impacts of carbon emissions. Mitigation and adaptation should not be considered in isolation of each other, and opportunities for their integration in the development of spatial strategies, and their delivery, should be maximised. Consideration should be accorded to the area's vulnerability to climate change, using the most recent scenarios available from UKCIP and TE2100, and specifically the implications for built development, infrastructure, services and biodiversity.</p> <p>There is need to identify how sustainable flood risk management can be best aligned to redevelopment plans and how it can apply policies associated with Blue Ribbon Network. This will define the combination of river and river corridor restoration, attenuation and conveyance that can best offset the impacts of climate change and complements the redevelopment plans within this catchment. The rising sea level will steadily reduce the level of protection that defences offer. The predictions for how quickly sea level will rise vary considerably depending on the assumptions used about emissions and climate modelling.</p> <p>The TE2100 project has considered a range of climate change derived sea level rises from 0.9m (Defra 2006 Climate Change Scenario) to 4m (High++ Level where all conceivable sea level rise contributions up to 2100 occur). The Environment Agency Thames Catchment Flood Management Plan (Thames CFMP) (September 2006) confirms the above and sets out some main messages:-</p> <ul style="list-style-type: none"> a) Flood defences cannot be built to protect everything. b) The ongoing cycle of development and urban regeneration is a crucial opportunity to manage flood risk. c) Land for future flood risk management will be identified and protected by authorities. <p>Work undertaken so far by Thames Estuary 2100 (TE2100) indicates that the present system of flood risk management for the tidal flooding can continue to provide an acceptable level of risk management up to 2030. Beyond 2030 more actions will be needed. These actions would be easier and more affordable and sustainably delivered if they are planned now. The London Plan, <i>Spatial Development Strategy for Greater London</i> - consolidated with Alterations since 2004 was published in February 2008. It states inter alia that "<i>The Mayor will, and boroughs and other agencies should, take</i></p>	<p>Comments noted.</p> <p><u>Climate Change</u></p> <p>The Preferred Options report sets out the approach to integrating climate change considerations into the development process. The Draft Sustainability Report also sets out objectives and indicators to help monitor the achievement of the objectives.</p> <p>The adopted Sustainable Design and Construction SPD sets out detailed planning and design guidance for development in flood risk areas.</p>

Name	Section of Reports	Comment	Officer response
		<p><i>fully into account the emerging findings of the Thames Estuary 2100 Study, the Regional Flood Risk Appraisal and the Thames Catchment Flood Management Plan" page 211</i></p> <p>New development should be avoided in those areas with likely increased vulnerability to climate change, particularly where it is not viable to manage likely risks through suitable measures to provide resilience; and bring forward adaptation options for existing development in likely vulnerable areas.</p> <p>The council should require development proposals to take account of the expected changes in local climate conditions, throughout the proposed lifetime of the development, by adaptation or flexibility to allow future adaptation. Information on these measures must be submitted with an application. Specifically, the council should require major developments to:</p> <ul style="list-style-type: none"> • identify the type of and extent of the main changes expected in the local climate throughout the lifetime of the proposed development; • identify the potential impacts of these changes on the proposed development and its neighbours, • indicate the ways in which the proposed development design overcomes the hazards and exploits the opportunities associated with these impacts whilst meeting other sustainable development criteria, particularly the need to achieve overall reductions in greenhouse. <p>Climate Change Baseline and indicators Suggested baseline data sources and indicators to address climate change are included in the response for inclusion within the SA.</p>	<p>The Preferred Options Report sets out our approach on the expectations and requirements for environmental standards.</p> <p>The Sustainable Design and Construction SPD sets out guidance on how new developments should be designed to adapt to climate change.</p> <p>We have considered the suggested baseline data and indicators and included, where appropriate, additional information into the Draft Sustainability Appraisal</p>
SA: Section 6 Background Paper to Preferred Options Report		<p>Appendix 4:SD09 Water Resources</p> <p>Under the 'Water Resources' Objective: we suggest that this be strengthened to read 'to improve the quality of controlled waters within the borough'. Controlled waters include surface and groundwater, as defined by S.104 of the Water Resources Act 1991. Other objectives would include meeting requirements of the Water Framework Directive, maintaining and enhancing riverside and water based recreational activities (including navigation, angling, canoeing)</p> <p>Additional Indicators for baseline data should include number of water efficient developments, use of water saving technology and number of new or improved sites. Targets should include the following: reduce water use, reduce demand for water, increase/create riverside and water based opportunities for activities.</p>	<p>Comments noted.</p> <p>We consider the accompanying criteria questions to the Sustainability objectives appropriately cover the suggestions. We have reviewed the indicators within the Draft Sustainability Appraisal</p>

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	SA: Section 6 Preferred Options Report Section 8	<p>Open Space and Biodiversity</p> <p>Appendix 4: <u>SDO13 Open Space and Biodiversity</u></p> <p>The key issues we have identified for this objective relate to:</p> <ul style="list-style-type: none"> Improving and linking open spaces to local residents and wider population and visitors. Providing new and attractive green grid style development Improving entrance ways and knowledge of open spaces Increased environmental recreation in and around parks e.g. increased access to fishing and environmental education. A more informal / softer landscape that connects to the water edge would add a quality of life value for visitor enjoyment and could be an environmental and economic benefit to new development in the area. Improved environmental links (e.g. cycle ways, walkways, extensions and links to existing green space areas). <p>Objectives, indicators and targets to be included on Appendix 4 are recommended.</p>	<p>Comments noted</p> <p><u>Open Space and Biodiversity</u></p> <p>We have reviewed the indicators within the Draft Sustainability Appraisal</p> <p>We have included reference to the importance and benefits of biodiversity within the Preferred Options Report</p>
		<p><u>Green Roofs: Benefits</u></p> <p>Living roofs and walls can enhance biodiversity, reduce the risk of flooding (by absorbing rainfall), improve a building's thermal performance, thus reducing associated energy costs, help counter the Urban Heat Island Effect, support higher density more sustainable development and improve the appearance of the urban areas.</p>	<p>Comments noted</p>
Preferred Options report Section 8	SA: Section 6 Background Paper of the Preferred Options Report	<p>Energy efficiency and Renewable Energy</p> <p>Appendix 4: <u>SDO6</u></p> <p>The Core Strategy should ensure that a significant proportion of the energy supply of substantial new development is gained on-site and renewably, and/or from decentralised, renewable or low carbon energy supply and support the use of renewables, CHP and biofuels. It should promote the use of recycled building materials and materials that have low embodied energy and also promote retrofitting existing buildings to make them more energy efficient</p> <p>We recommend inclusion of the following additional indicators- total electricity and gas use, electricity generated from renewable energy sources and CHP located in the area, embodied energy in new buildings and percentage of new homes conforming to recognised codes for sustainable buildings. This information would be obtained from the following sources: -</p>	<p>Comments noted</p> <p>The Preferred Options report sets out our preferred approach to energy efficiency and renewable energy.</p> <p>The adopted Sustainable Design and Construction SPD also sets out our minimum requirements for development and our Preferred Standards</p> <p>We have reviewed the indicators and updated the baseline data</p>

Name	Section of Reports	Comment	Officer response
		<ul style="list-style-type: none"> • Audit Commission Area Profiles-household and individual energy use, by local authority • Department of trade and Industry(Currently Department for Business and Enterprise)- energy trends • Environment Change Institute-emissions from buildings, appliances • Renewable Energy Statistics Database- renewable energy 	
	<p>Preferred Options Report Section 8</p> <p>Background paper to Preferred Options report</p>	<p>Waste Management</p> <p>We support the target Southwark council has set for recycling of 50% of household waste. This is 5% higher than the target set by both the Mayor of London in the London Plan and DEFRA, but is not as high as the 60% aspirational target the Mayor set in his Municipal Waste Management Strategy. (s2.3.1) As a London borough which performs highly on waste management we would wish for the 50% target the borough has set itself to be seen as a minimum, with the ambition to achieve a recycling rate closer to the 60% advocated by the Mayor.</p>	<p>Comments noted</p> <p>The London Plan policy 4A.21 requires all London Boroughs have sufficient capacity to manage 75% of waste arising within London by 2010, rising to 80% by 2015 and 85% by 2020. To this end the GLA have apportioned 133,000 Municipal waste and 246,000 Commercial and Industrial waste to be managed by Southwark by 2020. This is a target which we are required to meet and are doing so jointly by the planning team and the Council's waste department by allocating a site. It should be noted that this is not a forecast of waste arising in the Borough rather it is an apportionment figure of the amount of waste we should deal with in the Borough. Clearly this site, half of the designated site, is not expected to meet the entire apportionment target and is considered by Southwark Council to simply contribute towards meeting our Council's target.. In addition to this Southwark is also required to minimise the levels of waste generated, and exceed levels of recycling and composting in</p>
		<p><u>Residential Recycling</u></p> <p>We would support the council's strategy of providing a range of services to enable residents to recycle their waste in a way which is convenient to them. One of the aims of the core strategy is to increase the amount of waste that is recycled by residents. Households will recycle more if the services that they are provided with are easy to understand and easy to use.</p> <p>Recycling containers which are not sufficiently large to store all of the materials which residents wish to recycle can undermine efforts to increase recycling and result in materials entering the residual waste stream. As part of the on going dialogue with residents, the council should canvass residents opinion about what may be limiting the amount of material that residents recycle, and whether the recycling containers themselves play any part in this. The move from fortnightly to weekly collection of recyclables should improve recycling rates if container size is a problem.</p>	
		<p><u>Business Waste Recycling</u></p> <p>One area of sustainability that is receiving increasing regulatory scrutiny is material waste. The Government is currently consulting on making Site Waste Management Plans compulsory this year (2008). With landfills closing at a rapid rate and the landfill tax set to triple within the next decade, the construction industry is under extreme pressure to minimise its waste sent to landfill.</p> <p>The proposed mandatory waste management plans are designed to encourage the better use of resources and to minimise waste taken from construction sites for</p>	

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		<p>disposal. Construction projects with a value greater than £250,000 will have to produce a management plan that details the volume of waste produced and outlines how it will be handled. Projects with a value of greater than £500,000 will be subject to more stringent and detailed accounting requirements.</p> <p><u>Management of Street Litter</u> Recycling of materials should be extended to include street litter and waste and introduce a scheme to try and recycle the growing quantities of waste arising from the distribution of free newspapers.</p> <p>We could appreciate if the sustainability Appraisal Report of the Core Strategy considers the following issues:</p> <ul style="list-style-type: none"> - How to retro fit existing developments to improve recycling rates even further in Southwark. - Ensuring the Waste Management addresses climate change issues within Southwark. - Maximising the use of the River Thames as a transport route for waste. - Consider ways new development can make space for management of domestic waste e.g. using Supplementary planning documents, validation checklists, promoting good practice. - Consider how waste trends will change within Southwark as the regeneration of Thames Gateway continues. - Consider how a changing population in Southwark may require different service levels, e.g. opening hours of waste management facilities, ensuring waste management facilities are accessible to all e.g. people without access to cars. - Ways to change attitudes that waste can be a valuable resource not just "rubbish" - Ways to minimise illegal waste activities and unlicensed waste activities. 	<p>municipal waste of 35% by 2010 and 45% by 2015; and 70% for commercial and industrial waste by 2020.</p> <p>The proposed waste facility, which is only half of the allocated site, will deal with municipal solid wastes comprising household waste along with non-household waste including commercial waste, street cleaning waste, bulky waste and waste from community groups and schools. It proposes to recycle 30% of municipal waste arising in Southwark by 2010, 40% by 2015, and 50% from 2020 onwards</p> <p>The Council's Waste Management Strategy sets out our approach to the management of waste in the borough.</p> <p>The Preferred Options report sets out the overall strategy for addressing waste and recycling and further detail is contained within adopted supplementary documents.</p> <p>The Sustainable Design and Construction SPD sets out our standards for avoiding waste and minimising landfill. It also includes our standards for waste capacity requirements for residential development.</p> <p>The annual monitoring process of the LDF will assess how well the recycling targets are being met and whether we need to review our minimum standards.</p>

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			<p>Business Waste Recycling The Sustainable Design and Construction SPD requires Site Waste Management Plans to be submitted for building construction.</p>
		<p><u>Waste Water Treatment</u> Although the draft Sustainability Appraisal mentions waste management and water resources as part of the key sustainability issues, it would be preferable to have a separate waste water treatment objective. More new development will create higher volumes of sewage to be transported from houses to sewage treatment works, and additional treated effluent to discharge to surface and ground waters. The combined drainage system of London has limited capacity. Moderate rainfall (as low as 2 mm per hour) frequently overloads the system resulting in 50-60 days per year when sewer overflows operate. Therefore the infrastructure should be sufficient to guarantee both surface and ground water quality would not be detrimentally affected, and avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property and pollution of land and watercourses The Water Framework Directive sets ecological standards in addition to chemical standards for rivers. This is likely to place greater demands on Sewage Treatment Works to achieve cleaner effluents. In preparing the Core Strategy, the council must: i) ensure that the rate of development broadly accords with the capacity of existing water supply, sewage treatment and discharge systems, particularly in connection with major new development ii) require development to incorporate measures to enhance water efficiency, and sustainable drainage solutions iii) work with the Environment Agency and water companies to identify infrastructure needs and allocate areas for and permit necessary infrastructure</p>	<p>We consider the number of key sustainability issues identified is sufficient. We continue to liaise with local stakeholders in relation to the capacity of the system and infrastructure requirements. We will be preparing an Implementation Plan which will set out how we will deliver The Preferred Option report sets out our broad approach to sustainability and environmental standards. Detail is currently set out in our adopted Sustainable Design and Construction SPD</p>
SA: Relevant Plans, strategies and programmes (Appendix 3)		<p>Additional Plans and Programmes <u>Table 3 and Appendix 3</u> Adapting to Climate Change: A checklist for development This guidance on designing developments in a changing climate was published by the Greater London Authority in November 2005. The main actions are summarised in a simple to use checklist, however, it is not intended to be a design manual, although it does contain signposts to more detailed guidance.</p>	<p>Comments noted We have incorporated these documents into the list of relevant Plans and Strategies which inform the Core Strategy</p>

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		<p>Thames Region Catchment Flood Management Plan This plan presents what the Environment Agency considers the most sustainable direction for the management of fluvial flood risk within the region for the next 50 to 100 years. It is based on extensive research into the catchment characteristics of the region and the options available for managing the risk to people, properties and the environment. It takes into account the likely impacts of climate change and the plans for future development.</p>	
		<p>Thames River Basin Management Plan - due to be completed 2009. The EU Water Framework Directive requires the Environment Agency to prepare and publish 10 River Basin Management Plans (RBMP) by 2009 to promote the concept of sustainable water management. Their aims are:</p> <ul style="list-style-type: none"> - To safeguard the sustainable use of water - To protect and restore the status of aquatic ecosystems - To improve aquatic environments by the reduction of hazardous substances - To reduce groundwater pollution; and - To help mitigate the effects of flood and droughts 	
		<p>Thames Corridor Catchment Abstraction Management Strategy (CAMS) Produced by the Environment Agency June 2004 - looks at water resources management and the implications for the River Thames. CAMS are strategies for management of water resources at a local level. They make available information on water resources and licensing practice publicly available and allow the balance between the needs of the water abstractors, other water users and the aquatic environment to be considered in consultation with the local community and interested parties.</p>	<p>We will look at the possibility of the implementation of CAMS in consultation with Thames Water and local commercial ratepayers.</p>
<p>SA: Relevant Plans, strategies and programmes (Appendix 3)</p>		<p>Planning Policy Statement 12 (PPS12) - Local Spatial Planning <u>Para.1.2</u> All reference to PPS12-Local Development Framework (2004) should be replaced by the new PPS12- Local Spatial Planning (2008). This new policy statement sets out what the key ingredients of local spatial planning are and how they should be prepared. It should therefore be included on Table 3 and Appendix 3 as the key reference to the preparation of the Core Strategy. PPS 12 (2008) paragraph 4.1 states inter alia that 'every local planning authority should produce a core strategy which includes:</p> <ol style="list-style-type: none"> (1) an overall vision which sets out how the area and the places within it should develop; (2) strategic objectives for the area focussing on the key issues to be addressed; 	<p>Comments noted PPS 12 – Local Spatial Planning is referenced within the list of relevant Plans and Strategies in the Draft Sustainability Assessment We are preparing an Implementation Plan to set out how we intend to deliver the policies in the Core Strategy. We have an evidence base, which is</p>

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	Background paper to Preferred Options report	<p>(3) <i>a delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when, and by what means it will be delivered. Locations for strategic development should be indicated on a key diagram; and</i></p> <p>(4) <i>clear arrangements for managing and monitoring the delivery of the strategy'</i></p> <p>The delivery strategy is central. The core strategy needs to set out in practical terms when, where and by whom the objectives will be delivered. To be 'sound' a core strategy should be justified, effective and consistent with national policy</p>	continuing to evolve, which will provide the justification for the policies in the Core Strategy.
English Heritage	<p>SA: Relevant Plans, strategies and programmes (Appendix 3)</p> <p>SA: Section 6</p> <p>Background Paper to Preferred Options report</p>	<p>As the Government's statutory adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. English Heritage therefore welcomes the opportunity to comment on the Sustainability Appraisal (SA) Scoping Report for London Borough of Southwark's Local Development Framework (LDF) Core Strategy.</p> <p>Overall English Heritage supports the approach taken in this consultation; however we would like to highlight areas where greater consideration of the historic environment is needed to inform the LB Southwark LDF. Our recommendations are set out below and we hope our advice will help to ensure your LDF is technically sound in accordance with government planning policy, such as PPG15 and 16, and the assessment is based on robust evidence. The policies set out in the LDF Core Strategy should aim to protect and enhance the historic environment, helping achieve genuinely sustainable development, as set out in Planning Policy Statement 1 paragraph 5.</p> <p>Relationship to Other Plans and Programmes (Chapter 3)</p> <p>English Heritage notes that PPG16: <i>Archaeology and Planning</i> and PPG15: <i>Planning and the Historic Environment</i> are identified in Table 3 and Appendix 3 as key documents to be taken into account in the preparation of the LDF Core Strategy. In addition, English Heritage recommends the European Landscape Convention, which was ratified by the United Kingdom government in 2006, also be included. It is the first international convention for the management and protection of landscapes and the text is available at: http://conventions.coe.int/Treaty/en/Treaties/Html/176.htm.</p> <p>We welcome reference to Local plans relating to the historic environment in Table 3, for example adopted Conservation Area Appraisals, and would like to see these plans referenced in Appendix 3. Archaeology Priority Areas are also set out in the existing</p>	<p>Comments noted</p> <p>Noted. The document 'European Landscape Convention' has been considered and included in the Draft Sustainability Appraisal section on Relevant Plans and Strategies.</p> <p>The Archaeology Priority Areas are listed within the Southwark Plan which is included within the section on Relevant Plans and Strategies</p>

Name	Section of Reports	Comment	Officer response
		<p>Southwark Plan (UDP) and we would like to see these referenced in Appendix 3. In particular we welcome inclusion of the CABE and English Heritage Tall Building Guidance to create high quality and safe urban environments.</p> <p>The reference to English Heritage's 2007 Buildings at Risk report in Appendix 3 needs to be updated to include the latest 2008 version, now called 'Heritage At Risk' and available at www.english-heritage.org.uk/BAR. Please note in the commentary on 'relevant objectives and targets' that this currently refers to an AAP area and this should be amended for Southwark as a whole (there are currently 36 assets on the <i>Heritage At Risk</i> register).</p> <p>Social, Economic and Environmental Context (Chapter 4)</p> <p>The baseline data for the historic environment presented in Appendix 4 requires further expansion. Currently the only data included is the number of listed buildings at risk and extent of conservation areas, which does not reflect the full wealth of historic assets in Southwark and associated sustainability issues. The appropriate information sources that should be consulted, in respect of the historic environment, are as follows:</p> <ul style="list-style-type: none"> • Greater London Sites and Monuments Record (archaeology, including Scheduled Ancient Monuments and Archaeology Priority Areas) http://www.english-heritage.org.uk/server/show/nav.8900; • The Schedule of Buildings of Architectural and Historic Interest (listed buildings); • The borough's conservation area records and adopted guidance (including conservation area designation reports, statements, appraisals and design guidance); • The borough's list of Locally Listed Buildings (or equivalent); • The Register of Historic Parks and Gardens • The London Buildings at Risk Register www.english-heritage.org.uk/BAR; • The HELM website www.helm.org.uk; and • The Heritage Counts website www.heritagecounts.org.uk 	<p>Noted. We have updated the section to include the latest version.</p> <p>Comments noted The list of baseline information has been reviewed</p>
	SA: Section 6	<p>We welcome inclusion of the number of Listed Buildings at risk in the Borough as an indicator and we would also suggest this includes the number of Scheduled Ancient Monuments at risk as well.</p> <p>Similarly, maintaining the extent of Archaeology Priority Areas would be a useful indicator for archaeology. The extent of Conservation Areas as an indicator is also welcomed, however LB Southwark could consider including the number of conservation areas, the number with an up-to-date management plan and appraisal as well. If data exists, the number of museums, heritage/ local history centres or other relevant heritage attractions open to the public could be an indicator.</p>	<p>Comments noted</p> <p>We have considered the suggestions and reviewed the relevant sections of the Draft Sustainability Appraisal</p>

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		<p>It is also worth noting that English Heritage's 'Heritage At Risk' register and will include broader data on heritage assets at risk in the future. For example, conservation areas; historic parks and gardens; and heritage landscapes and LB of Southwark may wish to consider these as indicators in the future.</p>	
		<p>Finally, English Heritage would also encourage LB of Southwark to undertake historic 'characterisation' of regeneration areas in the Borough as part of the character assessment, and to inform how future change can be managed in the historic environment. Your in-house conservation staff would be able to advise you on this, as well as the Greater London Sites and Monuments Record (http://www.english-heritage.org.uk/server/show/nav.8900).</p>	<p>Noted. We will keep the Council's Conservation officer's appraisal of the preparation of this document and also request feedback of how we can incorporate the suggested historic 'characterisation' of the Growth Areas.</p>
	SA Section 6	<p>The Sustainability Appraisal Framework (Chapter 5) English Heritage notes and welcomes that a specific sustainability objective on the historic environment has been included in Table 5. The criteria set out in Table 5 could include a question as to whether it will enhance access to the historic environment and also contribute to better understanding of the historic environment. There should also be a reference to sustaining the setting of heritage assets (in addition to the assets themselves).</p>	<p>Comments noted We have considered the suggestions and reviewed the relevant sections of the Draft Sustainability Appraisal</p>
	SA: Section 6	<p>Main Sustainability Issues Relevant to the Core Strategy (Chapter 6) English Heritage welcomes that management of the historic environment has been identified as a sustainability issue that needs to be taken into consideration when preparing the LDF Core Strategy in Table 6. The historic environment is a component of the existing urban environment and enhancement of this resource should be identified as a means to improve quality and local distinctiveness of the area. However, the description of the issue only mentions a select number of assets, and does not capture archaeological and landscape issues. It is important LB of Southwark manages change through the LDF Core Strategy in a way that sustains, reveals or reinforces the historic environment in its broadest sense (see English Heritage <i>Conservation Principles, Policies and Guidance: for the sustainable management of the historic environment</i> at http://www.english-heritage.org.uk/server/show/nav.9181). This includes historic buildings, areas and their setting; archaeology; historic parks and gardens; heritage landscapes and the wider historic environment, such as those elements that may not be statutorily protected, yet help define the areas local distinctiveness.</p>	<p>Comments noted The reference to the historic environment within the Sustainability Objective 13 is intended to also encompass landscape and archaeological assets. The criteria questions appropriately address landscape and archaeological assets</p>

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Natural England	SA: Relevant Plans, strategies and programmes (Appendix 3)	<p>Finally, English Heritage would strongly advise that the local authority's conservation staff are involved throughout the preparation and implementation of the LDF, as they are often best placed to advise on local historic environment issues and priorities; sources of data; and, consideration of options relating to the historic environment.</p> <p>English Heritage has also recently published <i>Conservation Principles</i>, containing policies and guidance for the sustainable management of the historic environment (see http://www.english-heritage.org.uk/server/show/nav.9181). We recommend use of this document when considering heritage values, how to assess their significance and manage successful change in the historic environment.</p> <p>This advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the Southwark LDF and its Sustainability Appraisal, and which may have adverse effects on the historic environment.</p>	<p>The council's Design and Conservation officers are consulted in the preparation of the LDF documents.</p> <p>We have considered the document and have included reference to it within the section Relevant Plans and Strategies of the Draft Sustainability Appraisal.</p>
		<p>Paragraph 1.2 (page 60 covers the issues to be considered by the document and includes "...protecting and enhancing the environment and dealing with Climate Change," which is both welcomed and supported.</p> <p><u>Chapter 3 – Relationship to other Plans and Programmes</u></p> <p>The Plans and Programmes identified are appropriate and acceptable and will cover the issues and areas of interest for natural England; we therefore have no other Plans or Programmes to add to this section.</p> <p><u>Chapter 4 – Social, Economic and Environmental Context</u></p> <p>Baseline Topics identified and listed in Table 4 are again considered to be appropriate and cover the areas that Natural England would wish to see considered/covered by such a document, especially issues relating to Open Space, Biodiversity and Sustainable Transport.</p> <p><u>Chapter 5 – Sustainability Appraisal Framework</u></p> <p>Table 5 provides a list of 16 objectives which can be broadly supported, especially the following;</p> <p>SDO 6: To reduce contributions to Climate Change.</p> <p>SDO 13: To protect and enhance open spaces, green corridors and biodiversity.</p>	<p>Comments noted</p>

Name	Section of Reports	Comment	Officer response
Southwark Public Health	Preferred Options Report Section 5 SA: Relevant Plans, strategies and programmes (Appendix 3) Background Paper to Preferred Options report	<p>The inclusion of green corridors is especially welcomed and supported, the Council should also give consideration on how the provision of new or enhanced green spaces can be used to alleviate and compensate for areas of deprivation.</p> <p>Consultation Question 1 Would suggest that Health is given its own line in the table as it is an important area. Obviously merges into the larger social determinants that are dealt with elsewhere. (transport, education, housing, leisure and recreation, employment, access to services, community safety, built environment and parks/open space) Some major recent relevant plans and programmes are: National: Dept of Health: <i>Next Step Review: High Quality Care For All</i>: final report at http://www.ourhhs.nhs.uk/2008/06/30/high-quality-care-for-all-nsr-final-report-launched/ In the light of local circumstances also include: <i>Health inequalities: progress and next steps</i> at http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_085307 and <i>Healthy Weight Healthy Lives</i> which is a cross government strategy with considerable relevance for planning and regeneration and can be found at http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_082378 Regional: You may wish to take note of the Mayor's Inequalities Strategy once it is published. Further information can be found at: http://www.london.gov.uk/mayor/health/index.jsp NHS London also has a strategy: http://www.london.nhs.uk/webfiles/Corporate/NHSL_Strategic_Plan.pdf There has also been a review of Healthcare in London by Lord Darzi – further information at: http://www.healthcareforlondon.nhs.uk/background.asp Local: <i>Southwark PCT Commissioning Strategy Plan 2007-2012</i> available at http://www.southwarkpct.nhs.uk/index.php?assetId=2638&assetGroupId=1402 http://www.southwarkpct.nhs.uk/a/1400 has other strategy documents and explains the planning framework. (This strategy is currently being refreshed – for further information contact Kathryn McDermott The Joint Strategic Needs Assessment (JSNA) will be an important resource in terms of data about population health and social care needs. Will soon be available electronically from the Public Health Dept. The core data set for it can be found at http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_086676</p>	<p>Health is considered in the Preferred Options Report</p> <p>We have considered the suggested plans and programmes and have included them into the Relevant Plans and Strategies section of the Draft Sustainability Appraisal</p> <p>We have noted the JSNA and will have reviewed the core data set to inform the Preferred Options Report</p>

Name	Section of Reports	Comment	Officer response
	SA: Section 6	<p>Consultation Question 2</p> <p>Good to see health has its own section. The issue of measurement is a complicated one and if quantifiable data is required, it is important to choose indicators that are significantly affected by planning and land use (as opposed, say, to how services are run and delivered.) One source of indicators to consider is the local area action plan which will run until 31 March 2011. This is expected to contain 35 indicators chosen from a new national indicator set plus 16 Mandatory Education and Early Years indicators. The LAA can also include local indicators, agreed by partners, which address Southwark 2016 / LAA priorities that are not covered by national indicators. (Jonathan Horne - Principal corporate planning and performance officer Tel: 020 7525 7251)</p> <p>With respect to health, using the IMD Health Deprivation and Disability Domain looks fine and it's good that we can have the data at neighbourhood level. The Census data is fine except we only get it every 10 years – it will have the benefit of being comparable with past data and other parts of the country.</p> <p>Other indicators are possible which act on the determinants of health – e.g increasing physical activity, such as walking and cycling; increasing public use of open spaces; improving air quality; reducing traffic accidents resulting in serious injury/death amongst adults and children; homelessness and number of people in temporary housing; proportion of homes judged unfit to live in; access to services, work and shops by walking; well-insulated homes that are cool in summer and warm in winter with minimal fuel costs; avoidance of 'food deserts' and concentrations of fast food outlets and improved access to fresh food; reduced food miles; provision of allotments, community gardens and 'living roofs'; adequate provision of children's play space; preservation and enhancement of local shopping facilities; promotion of the flexibilities contained within planning regulations, so that local authorities are able to manage the proliferation of fast food outlets in particular areas, e.g. near parks or schools; reduction in unemployment etc are also relevant to health but I guess may well be measured in categories other than health.</p> <p>If it is possible to tweak the other categories so as to highlight the health improving aspects are highlighted that would be great in Southwark, as well as mental disorders, depression and anxiety, obesity, cardiovascular disease (CVD) is also a major issue and linked to deprivation. As are other long term conditions such as diabetes and respiratory disease. Obesity, diabetes and CVD are all linked to, and exacerbated by lack of physical activity.(And there is also good evidence to show that depression/anxiety can be helped by physical activity)</p>	<p>Comments noted We have considered the suggestions and reviewed the list of indicators. We have kept these to a manageable number</p>

Name	Section of Reports	Comment	Officer response
	SA: Section 6	<p>The big challenges for behaviour change are: smoking cessation; better diet; increased physical activity of all kinds; reduction in substance misuse (drugs and alcohol), reducing obesity and improving mental and sexual health.</p> <p>Consultation Question 3 You might be interested in having a look at <i>Indicators for Sustainable Communities</i>. This is produced at national level and mainly covers poverty, health, crime, access, mobility, and local and domestic environments. This seems a useful resource generally and can be found at : http://www.sustainable-development.gov.uk/progress/data-resources/sdiyp.htm and you might want to consult it to see how they think about sustainable communities and see if any of it can be applied at local level. One problem though to note with some of the health indicators is that at local there can be problems in using mortality data in that the time scale from an intervention to a benefit may be very long. Also rate of death not a relevant indicator of the incidence and prevalence of many of the common chronic conditions in a community. There are some big questions to ask around population health impacts of the strategy and perhaps to bear in mind when writing it. I don't know if this is the place but wanted you to be aware of them. What is its impact on the most vulnerable groups? Will it meet the objectives of care closer to home and the shift from acute to community care? Will it promote and facilitate healthy lifestyle choices? Will it reduce the burden on the NHS by reducing the prevalence of ill health and preventing illness? Will it encourage partnership working to reduce inequalities in health? Have housing plans considered local need for social care or supported/extra care housing for older/disabled people? These seem to me the big sustainability issues. Finally, I would suggest that Leisure and Recreation is added as a Baseline topic/SDO.</p>	<p>Comments noted</p> <p>We have considered the suggested questions and reviewed the Sustainability Framework of the Draft Sustainability Appraisal</p> <p>To keep the Sustainability objectives to a manageable number leisure and recreation facilities are covered within the following Sustainability Objectives with accompanying criteria questions:</p> <p><u>Health</u>: To improve the health of the population</p> <p><u>Social inclusion and Community Cohesion</u>: To promote social inclusion, equality, diversity and community cohesion</p> <p><u>Open Space and Biodiversity</u>: To protect and enhance open spaces, green corridors and biodiversity</p>
	SA: Section 6	<p>Consultation Question 4 You might find it useful to refresh some aspects of this with the JSNA which is good on demographics as well as health. E.g. where population is concerned, note Southwark's young population (e.g. 0-4s) and the substantial rate of growth forecast which is likely to put stress on the social, economic infrastructure and environment unless well-handled. Where health is concerned, I think you need to note that in Southwark, as well as mental illness and obesity, cardiovascular disease (CVD) is also a major issue and linked to deprivation. Also other long term conditions such as diabetes and COPD, and</p>	<p>Comments noted</p> <p>We have considered the suggestions reviewed the Sustainability Framework of the Draft Sustainability Appraisal</p>

Name	Section of Reports	Comment	Officer response
		improvements in mortality mean there will be more people living longer with age associated problems.	
		<p>General comments:</p> <p>1. I have not yet got to grips with the issue of Strategic Environment Assessment! I see that this sustainability appraisal is intended to encompass it which is fine as a proliferation of documents is unhelpful. One thing I think we need to do though is have a look at the DH guidance that was produced on SEA as it was clearly seen as a vehicle for incorporating health issues into planning and is also a statutory obligation under a EU directive. Perhaps I can work with Kate to do this during September to ensure that anything important from there is captured in the sustainability appraisal and that we use anything that is helpful in it to continue to build the links between health and planning.</p> <p>2. I felt that Children were a bit invisible – do you have anyone from Children’s Services listed as a consultee? Spatial considerations very relevant to obesity issues</p>	<p>Comments noted</p> <p>We consult with the Council’s Children’s services department</p>

Name	Section of Reports	Comment	Officer response
Thames Water		<p>A key sustainability objective for the preparation of the new Local Development Framework should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 4.8 of the new PPS12, 2008 states:</p> <p><i>“The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations.”</i></p> <p>Paragraphs 4.10 of PPS12 place goes on provide advice on the need for infrastructure to support housing growth and states: <i>“The outcome of the infrastructure planning process should inform the core strategy and should be part of a robust evidence base. It will greatly assist the overall planning process for all participants if the agencies responsible for infrastructure delivery and the local authority producing the core strategy were to align their planning processes. Local authorities should undertake timely, effective and conclusive discussion with key infrastructure providers when preparing a core strategy.”</i></p>	<p>Comments noted</p> <p>We will be preparing an Implementation Plan to set out the delivery mechanisms for the preferred approach to development.</p> <p>We will continue to liaise with local stakeholders to understand the requisite infrastructure requirements that will be required to enable development to occur.</p>

Name	Section of Reports	Comment	Officer response
		<p>The water companies' investment programmes are based on a 5-year cycle known as the Asset Management Plan (AMP) process. We are currently in the AMP4 period, which runs from 1st April 2005 to 31st March 2010 and does not therefore cover the whole LDF period. AMP5 will cover the period from 1st April 2010 to 31st March 2015 and we are currently preparing our business plan submission to OFWAT.</p> <p>As part of our five year business plan Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result we base our investment programmes on development plan allocations, which form the clearest picture of the shape of the community. Where the infrastructure is not available we may require an 18-month to three-year lead in time for provision of extra capacity to drain new development sites. If any large engineering works are needed to upgrade infrastructure the lead in time could be up to five years. Implementing new technologies and the construction of new treatment works could take up to ten years.</p> <p>In view of the advice contained in PPS12 Thames Water has the following comments in response to the consultation questions set out in the draft document.</p>	<p>Comments noted and will be taken into consideration in the preparation of the Sustainability Appraisal for the Core Strategy</p>

Name	Section of Reports	Comment	Officer response
	SA section 6	<p><u>Consultation Question 2 – Baseline Topics</u></p> <p>The inclusion of Water Resources as a baseline topic is supported however, it is considered that the topic should be widened or a separate topic should be included to relate to the provision of new water and sewerage infrastructure.</p> <p><u>Consultation Question 3 – Sustainability Objectives</u></p> <p>The list of sustainability objectives should make reference to the provision of water and sewerage infrastructure to service development. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low-pressure water supply problems. Whilst the water resources objective is supported it is considered that the objective should either go further, or that a separate objective should be inserted in relation to the satisfactory provision of water and sewerage infrastructure.</p> <p><u>Consultation Question 4 – Sustainability Issues</u></p> <p>The capacity of the existing water and sewerage infrastructure should be included as a sustainability issue. Where possible new development should be located where there is sufficient capacity within the existing infrastructure. However, where this is not the case infrastructure upgrades will be required which could affect the overall sustainability of a development and impact on its</p>	<p>Comments noted</p> <p><u>Baseline Topics</u></p> <p>Sustainability objective 9: Water resources - includes reference to the provision of water and sewer infrastructure</p> <p><u>Sustainability Issues</u></p> <p>We are preparing an Implementation Plan to accompany the next stage of the Core Strategy. This will address capacity and infrastructure</p>

Name	Section of Reports	Comment	Officer response
	<p>Preferred Options report Section 8</p> <p>SA: Relevant Plans, strategies and programmes (Appendix 3)</p>	<p>delivery as any upgrades should be provided ahead of development in order to avoid unacceptable impacts such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low-pressure water supply problems.</p> <p>The sustainable use of water is listed as a sustainability objective within Table 5 on page 14, however Table 6 on page 21 which relates to sustainability issues makes no reference to water efficiency within the water resources section.</p> <p><u>Further Comments</u></p> <p>Renewable Energy – Page 46</p> <p>Climate Change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water firmly supports the objective to make London an exemplar world city in mitigating and adapting to climate change.</p> <p>PPS22 provides guidance on renewable energy and encourages opportunities for incorporating renewable energy projects in all new developments. However, PPS22 also states that policies supporting such developments should be framed in such a way not to provide an undue burden on developers. Therefore any renewable energy provision policy should have an element of flexibility to allow for consideration of other factors.</p> <p>Thames Water is statutorily required by OFWAT and the EA to maintain an efficient and economical system of water supply and wastewater treatment within strict regulatory timescales. Due to the predicted increases in demand for potable water (taking into account water efficient new development) and the increased levels of wastewater requiring treatment, Thames Water will be required to continually develop and invest in our infrastructure over the life time of the LDF. However, on many of our sites it will not be feasible to provide 20% renewable energy for technical, planning and land ownership reasons. This is why it is essential that any renewable energy provision policy should have an element of flexibility to allow for consideration of other factors.</p> <p><u>Appendix 3: Relevant Plans, Programmes and Environmental Objectives</u></p> <p>The table within Appendix 3 makes no reference to any documents produced by Thames Water. It is considered that the contents of the following documents would be relevant to the Core Strategy:</p> <p>Taking Care of Water - Our Plan for the Next 25 Years – Thames Water 2007 Draft Water Resource Management Plan – Thames Water 2008 Draft Strategic Proposals for Sludge Management – Thames Water 2008 Our Plans for Water – Thames Water 2008</p>	<p><u>Comments noted</u></p> <p>The Preferred Options report sets out our approach to renewable energy. Developers would need to justify reasons why the minimum requirements cannot be met.</p> <p>We have considered the suggested documents and included them into the section on Relevant Plans and Strategies within the Draft Sustainability Appraisal</p>

Name	Section of Reports	Comment	Officer response
	SA Section 6	<p>Copies of all of these documents can be obtained from Thames Waters' website at www.thameswater.co.uk</p> <p>Appendix 4: Baseline Data for Southwark</p> <p>It is considered that the number of developments granted planning permission against the recommendation of Thames Water on sewer/surface water flooding grounds should be an indicator in relation to the Flood Risk Sustainable Development Objective.</p>	<p>Comments noted</p> <p>We have reviewed the Sustainability Framework indicators and amended it where appropriate.</p>
The Coal Authority		<p>Thank you for consulting The Coal Authority on your SA Scoping Report. Just to confirm that The Coal Authority has no specific comments to make.</p>	<p>Noted.</p>
Indigo Planning Limited		<p>CORE STRATEGY – SUSTAINABILITY APPRAISAL SCOPING REPORT, JULY 2008</p> <p>We write on behalf of our client, Threadneedle Property Investments Ltd, who own Beckett House, St Thomas Street, Southwark to make representations to the Southwark Core Strategy Sustainability Appraisal Scoping Report. As such, we set out our comments below:</p> <p>Chapter 5 – Sustainability Appraisal Framework</p> <p>We recognise the importance of the <i>Regeneration and Employment Opportunities</i> objective and fully support the aims outlined in Chapter 5. We especially welcome the desire to reduce the disparity between areas in the borough, through economic investment, and the increase in opportunities available. We support the stated objectives and the importance of economic investment in employment to allow regeneration of more deprived areas and increase access to employment availability for residents of different skill levels.</p> <p>We welcome the <i>Quality in Design</i> objectives criteria for safeguarding views and the high standards of design desired. We also encourage the pursuance of a quality built environment and investment into creating a desirable public realm. In addition, the <i>Housing</i> objectives outlined are important in providing quality homes for all residents, and we support the general rejuvenation of the borough and provision of much needed housing.</p>	<p>Comments noted. No change required.</p>

Name	Section of Reports	Comment	Officer response
	Preferred Options Report section 6	<p>Chapter 6 – Main Sustainability Issues Relevant to the Core Strategy</p> <p>We would like to reiterate the importance of locating businesses and services with a high level of trip generation and areas of high employment activity near to a range of public transport opportunities. This should also be the case with high density residential development which should be located in areas of high public transport accessibility.</p> <p>Accordingly, we welcome the planned improvements to transport infrastructure in the borough and the addition of the Cross River Tram and Thameslink extension, which will further improve the accessibility of the borough. The location of improved transport links is important in serving employment and high density residential development, and we therefore consider there should be continued development of transport infrastructure to support the planned development and regeneration of the borough.</p> <p>We hope you give consideration to these comments and we look forward to seeing how the Core Strategy and Sustainability Appraisal progresses.</p>	<p>Comments noted. The Preferred Option is a 'Growth Areas' approach, which will encourage major development to be located in these areas with good public transport accessibility.</p> <p>Some areas within the borough are more suitable for major housing developments than others. By directing larger housing developments to Growth Areas we ensure sustainable development as these areas have good public transport accessibility and lots of opportunities for new housing.</p> <p>We agree that it is important to improve transport infrastructure where they will serve new employment and housing development. We continue to work with transport infrastructure providers to plan for future growth.</p>
Richard Lee	SA: Relevant Plans, strategies and programmes (Appendix 3) SELHP- referenced within the Consultation Strategy report	<p><u>Consultation Question 1 – Relationship to other plans and strategies</u></p> <p>Table 3 and appendix 3 are rather dated. This is particularly so regarding regional policy, with no documents cited that are more recent than 2004. I would suggest that for London's SPG's you consult Annex 6 of the Consolidated London Plan (2008) and for the Mayor's strategies and other reasonably up to date national, regional and local policies see Chapter 6A.4 of the London Plan (2008), pages 385-388.</p> <p>Another significant gap is the work of the South-East London sub-regional partnership, which should also be a good source of data.</p>	<p>Comments noted. We have updated Appendix 3 of the Draft Sustainability Appraisal of the Core Strategy Preferred Options report. We will also be referencing the revised list of relevant plans and documents in the Background Paper which will accompany the Preferred Options Report. We are a member of the South East London Housing Partnership (SELHP) and provide input into the work that is being undertaken i.e. Strategic Housing Market Assessments</p>

Name	Section of Reports	Comment	Officer response
	<p>Preferred Option Report sections 5 & 7</p> <p>Background Paper to Preferred Options Report</p>	<p>Consultation Question 2 – Data sources and data</p> <p>In table 4, there are no baseline topics on the economy (industrial locations, SME's, growth sectors) and on social infrastructure. The latter should include lifetime neighbourhoods, in which local shops, community premises and facilities and green open spaces are within easy walking distance and accessible to everyone.</p> <p>In Appendix 4, much of the data is a recycling of existing policy in the UDP, instead of fresh thinking about new needs and emerging policies. The Core Strategy can set new policy, but this does not seem to be the mindset. Where it says that data is not currently collected, it would be useful to have an indication of what new data will be collected to inform the Core Strategy.</p>	<p>Comments noted. The Preferred Options report addresses the topics of the economy and social infrastructure.</p> <p>An appraisal of the impact of the Preferred Options policies for the economy and social infrastructure is included in the Draft Sustainability Appraisal</p> <p>The Baseline Data of the Draft Sustainability Appraisal has been reviewed and updated</p>
	<p>Core Strategy Equalities Impact Assessment</p> <p>Background Paper to Preferred Options Report</p> <p>Annual Monitoring Report</p>	<p>There are the following gaps where data should be collected:-</p> <p>Social inclusion – only refers to 4 of the equality target groups. Under faith, there is a major issue about the needs of Black Christian Churches, especially in the new migrant communities and particularly needing places of worship.</p>	<p>Comment noted.</p> <p>It is acknowledged that the needs of all of the different equality groups must be taken into account when preparing the Core Strategy and assessing its long term impacts on these target groups</p> <p>The Annual Monitoring Report also sets out information collected on equalities groups. The AMR forms part of the evidence base for the Core Strategy.</p>
	<p>Background Paper to Preferred Options Report</p>	<p>Open space – should make reference to the deficiency maps (appendix 13) and to the data on other open spaces as covered in Southwark's Open Space Strategy.</p>	<p>Comment noted. Baseline data on open space is included in the Draft Sustainability Appraisal of the Preferred Options report.</p> <p>Information on open spaces data will also be included in Background Paper.</p>

Name	Section of Reports	Comment	Officer response
	Background Paper to Preferred Options Report	Housing – the needs based information has to be up to date, not from 2003. There is much useful data in the London Housing Strategy and the draft Mayor’s Housing Strategy 2007,	<p>Comments noted. A Housing Requirements Study for Southwark has been prepared. The study will form part of the evidence base for the Core Strategy policies.</p> <p>We have referenced the Mayor’s Housing Strategy within the Draft Sustainability Appraisal and the strategy has informed the preparation of the Preferred Options policies.</p>
	Preferred Option Report – Section 5 SA: Appraisal of the Preferred Option (Appendix 6)	An assessment of the need for social infrastructure and community facilities in the borough, and to ensure that they are capable of being met wherever possible, as required by the London Plan (Policy 3A.18).	<p>Comment noted.</p> <p>We have included a policy within the Preferred Options report on community facilities. We have assessed the impact of the Preferred Option on community facilities within the Draft Sustainability Appraisal. We are continuing to consult with infrastructure providers and will set out delivery mechanisms in an Implementation Plan</p>
	Background Paper to Preferred Options Report	A comprehensive assessment of the need for extra care housing sheltered housing and other appropriate specialist housing for older and disabled persons in accordance with the London Plan (paragraph 3.68).	<p>Comment noted</p> <p>We have undertaken a Housing Requirements Study which forms part of our evidence base.</p>
	Preferred Options Report sections 6, 7,8 Background Paper to	<p>Consultation Question 4 – sustainability issues</p> <p>The following issues should all be turned into options as part of the Options and Issues. Regeneration and employment – add the need to increase the number of jobs, increase the available workspace, more support for SME’s, including social enterprises, green and creative industries and to provide affordable small shop units in all major developments.</p>	<p>Comments noted. The Preferred Option Report sets out the approach to employment, energy efficiency, open spaces and housing. We have taken into account background data, evidence, plans and strategies to inform our preferred approach.</p>

Name	Section of Reports	Comment	Officer response
	Preferred Options Report	<p>Social inclusion and community cohesion – add that diversity is a major asset to be supported and sustained, that Southwark is experiencing an increase in poverty and social exclusion, that the BME communities will become the majority community during the lifetime of the Core Strategy and that there is a particular issue about the growth in the Black elderly population.</p> <p>Energy efficiency – add the option for new developments to be zero carbon and to make use of decentralised energy systems.</p> <p>Open space – An option that any new development in the north west of the borough must not result in the loss of existing green open space and should provide increased green amenity space and play areas.</p> <p>Housing – The issues refer to the need for more social rented housing and how too many are living in overcrowded or unsuitable housing conditions. The options to include the following alternatives:-</p> <ul style="list-style-type: none"> • 50% of new housing to be social rented housing in those parts of the borough where there is support from local residents and cllrs. • To remove the 35% affordable housing target for parts of the borough. • The target of 50% affordable housing to apply to schemes of 10 or more units. • To change the balance of housing tenure in Dulwich where the majority of housing is private. • To support applications for public subsidy from the HCA • Lifts to be installed in all flatted developments 	<p>The objective of achieving social inclusion and community cohesion are embedded in the objectives of Southwark's Sustainable Community Strategy (Southwark 2016). The Core Strategy has the same objectives as Southwark 2016, and the Preferred Option sets out the preferred approach to contribute to the achievement of these objectives.</p> <p>In relation to the comment on public subsidy and lifts:</p> <p>We set out our approach to support for applications for public subsidy in our adopted Affordable Housing SPD. This is not for the Core Strategy to address.</p> <p>We set out guidance in our adopted Residential Design Standards SPD on incorporation of lifts for Wheelchair accessible units. Building Regulations also deal with the inclusion of lifts within developments. This is not for the Core Strategy to address.</p>

Name	Section of Reports	Comment	Officer response
<p>Home Builder's Federation Ltd</p>	<p>Background Paper to Preferred Options report</p>	<p>Question 1 An important source of information and evidence to inform policy formulation relating to housing supply and affordability will be the Strategic Housing Market Assessment (SHMA) – both the GLA sponsored study (the GLA SHMA 2009) and any sub-regional or local study that the council participates in. The information from these studies should inform in the sustainability appraisal since it will provide information on market and social housing need and demand, and the size of dwellings that may be required. We would also strongly urge the council to open a dialogue with house builders operating in the borough who will have information on market drivers that can be used to inform the SA.</p> <p>Also of great importance will be Southwark's Strategic Housing Land Availability Assessment (SHLAA) as well as the data from the GLA Housing Capacity Study and SHLAA 2009. This will indicate where adequate supplies of suitable, developable and deliverable land for housing will be available in the borough, and this will have an important bearing on the development of the SA, the council's community engagement strategy (the SCI), and the development of core strategy policies. For example, if the costs of remediation or regeneration are very high within the identified opportunity areas, or if development is heavily reliant upon the delivery of new key infrastructure, then it may be a while before the development sites concerned begin to generate any net housing additions. It is vital, therefore, for the council to identify as many suitable sites for residential development as possible (so that housing can come forward on less-constrained sites), and not overly rely on one of two opportunity areas in order to meet its annual monitoring targets.</p> <p>In terms of other baseline data the council should also be drawing upon information it has on the total number of residents on the council waiting list; in temporary accommodation; and those who are homeless. It might also consider the need for additional student housing if college numbers are expected to rise over the plan period. Non-self contained dwellings, however, should not be included in net housing additions target. Although we recognise that the GLA does count these towards the London Plan target we continue to dispute this with the GLA as no other region of the country does and neither does the CLG.</p> <p>To enable the council to respond to the social dimension of the sustainability agenda the council as part of its SHMA should also try to assess how many people would remain in the borough if they could secure a larger or a different type of home. It might consider how many households aspire to move out of the social rented sector into owner occupation and information on net in-migration into the borough into market</p>	<p>Comments noted.</p> <p>The GLA are in the process of preparing the London-wide Housing Capacity and SHLAA, with input from London Boroughs. Sites over 0.25 ha within Southwark have been assessed for their capacity and availability for housing. Sites will be identified within on a series of maps.</p> <p>The GLA have recently published the London-wide SHMA. These two assessments will be part of the evidence base.</p> <p>A Housing Requirements Study has been prepared and is part of the evidence base to inform the preferred approach. A sub-regional SHMA is being prepared to set further context to the housing market in South East London.</p> <p>We are also in the process of preparing other studies to further inform the preparation of the Core Strategy policies.</p> <p>In relation to the proposed exclusion of non-self contained dwellings within the net housing additions target, this is an issue for the GLA in its preparation of the London-wide Housing Capacity and SHLAA and the revisions to the London Plan.</p>

Name	Section of Reports	Comment	Officer response
		housing. This would help provide the council with a picture and possible indicators of likely levels of market demand as much as absolute housing need.	
	Preferred Option Report - all sections Equalities Impact Assessment	<p>Question 3</p> <p>The council should aim to promote social inclusion, equality and diversity in all areas of the borough, not only in those areas of relative social deprivation. It can achieve this by identifying small as well as large sites suitable for residential development in all areas of the borough including those in the south. The south benefits from good public transport connections, in over-ground rail and bus services, so the council should take advantage of these. The higher land values in these areas should also make it easier to secure higher percentages of affordable housing.</p>	<p>Comments noted.</p> <p>The objective of achieving social inclusion and community cohesion are embedded in the objectives of Southwark's Sustainable Community Strategy (Southwark 2016). The Core Strategy has the same objectives as Southwark 2016, and the Preferred Option sets out the preferred approach to contribute to the achievement of these objectives.</p> <p>The London-wide Housing Capacity SHLAA will assess sites over 0.25 ha for housing capacity and availability and this data will inform the preparation of the Core Strategy and allocation of sites for development.</p> <p>We are undertaking an affordable housing viability study to further inform the preferred approach for the Core Strategy and provide further evidence for the policies.</p>
The Theatres Trust	Preferred Options Report Section 4 & 5	<p>The Theatres Trust is the national advisory public body for theatres and a statutory consultee on planning applications affecting land on which there is a theatre. This applies to all theatre buildings, old and new, in current use, in other uses, or disused. Established by The Theatres Trust Act 1976 'to promote the better protection of theatres', our main objective is to safeguard theatre use, or the potential for such use but we also provide expert advice on design, conservation, property and planning matters to theatre operators, local authorities and official bodies.</p> <p>Consultation Question 3 - Objectives</p> <p>We have examined the objectives, each chapter and the appendices and can find no reference to tourism or leisure and cultural facilities. The use of sustainability appraisal encourages the creation of policies linked to clear objectives which means that</p>	<p>Comments noted</p> <p>To keep the Sustainability objectives to a manageable number Tourism, leisure and cultural facilities are covered within the following Sustainability Objectives with accompanying criteria questions:</p> <p><u>Health</u>: To improve the health of the population</p> <p><u>Social Inclusion and Community</u></p>

Name	Section of Reports	Comment	Officer response
		<p>progress towards those objectives can be monitored. The Theatres Trust wishes to be assured that the Local Development Documents are robust enough to include specific guidance on protecting and encouraging arts and cultural provision, especially for Southwark.</p> <p>The Foreword of your Community Strategy states that <i>We want Southwark to become a world class quarter of a world class city</i>. We have noted the objectives and priorities of your Community Strategy where one of the goals on page 15 of this document is to <i>Enjoy cultural and leisure opportunities</i>, and one of the key actions on page 23 is to <i>Encourage active participation in local arts, heritage and cultural events</i> The SA Scoping Report has not included these aspirations as an objective to maintain and improve cultural, social and leisure provision which would make a significant contribution towards Southwark becoming 'a world class quarter of a world class city'.</p> <p>Policy 3D.4 of The London Plan states that LDF policies should <i>identify, protect and enhance Strategic Cultural Areas and their settings; designate and develop Cultural Quarters; where appropriate, support evening and night-time entertainment activities in central London, City fringe areas and town centres</i>. Item 3.235 of the same policy states that <i>Cultural facilities such as local theatres, tourist attractions and libraries are vitally important to all London's town centres and central London. They are particularly valuable as a means of engaging younger people in wider community activity</i>.</p> <p>The promotion of cultural facilities are also included within the Mayor's cultural strategy - <i>London: Cultural Capital - Realising the potential of a world-class city</i>, published in June 2004. Policy 1 states: <i>"London needs to ensure its cultural institutions and events are of a high quality, world class status."</i> In the following paragraph it continues: <i>"By any standards, London's cultural facilities and institutions offer unparalleled range, quality and diversity. These cultural assets are central to London's identity, heritage and standing in the world and have provided the foundations for the growth of a vast range of contemporary activity. This value needs to be protected and enhanced."</i></p> <p>Southwark has a rich and varied cultural offer including Tate Modern, The Globe, The Old Vic, Southwark Playhouse, Blue Elephant Theatre, The Coronet Theatre, Unicorn Children's Theatre, The Oval House, The Young Vic, Menier Chocolate Factory and many more, and we therefore expect to see specific guidance on protecting and encouraging arts and cultural provision in the Core Strategy.</p>	<p><u>Cohesion</u>: To promote social inclusion, equality, diversity and community cohesion</p> <p><u>Conservation of Historic Environment</u>: To protect and improve the historic nature of places</p> <p>The Preferred Options Report sets out our preferred approach to addressing the protection and provision of tourism, leisure and cultural facilities.</p>

Name	Section of Reports	Comment	Officer response
South Bank Employers' Group	SA: Relevant Plans, strategies and programmes (Appendix 3)	<p>Consultation Question 1</p> <p>We feel it is important that the Core Strategy should take account of visions and plans for particular neighbourhoods within Southwark. We would therefore recommend reference to the South Bank Partnership Manifesto, "Under pressure and on the edge: London's South Bank – a Manifesto for Action". There may well be equivalent material relating to other neighbourhoods in the Borough. It is also important to take into account important cross-borough issues, so in the case of Lambeth, there should be reference to Lambeth's Sustainable Community Strategy and other key documents, and similarly for other neighbouring boroughs.</p>	<p>Comments noted</p> <p>We have considered the suggested documents, and updated the section on Relevant Plans and Strategies of the Draft Sustainability Appraisal</p>
	Preferred Options report Section 5 and 8	<p>Consultation Question 2</p> <p>There is no data/data sources relating to tourism, culture or the relationship to neighbouring boroughs, which we believe should be included.</p>	<p>Comments noted</p> <p>The Preferred Options Report sets out our preferred approach to addressing the protection and provision of tourism, leisure and cultural facilities.</p>
		<p>Consultation Question 3</p> <p>It is important to recognise and pre-empt radicalism in the area and therefore we recommend that this should be included in some form of criteria question in 'Social inclusion and Community Cohesion'.</p> <p>A critical route to improving energy efficiency ('Energy Efficiency and Renewable Energy' is undoubtedly decentralised energy and therefore we would advise that this is specifically referenced. There is much work going on in this field with South Bank Employers' Group and London South Bank University and further information can be provided.</p>	<p>Comments noted</p>
	SA: Section 6 Preferred Options Report Section 8	<p>Consultation Question 4</p> <p>In 'Energy Efficiency and renewable energy', the Core Strategy should encourage decentralised energy systems in the borough.</p>	<p>Comments noted</p> <p>We encourage renewable sources of energy (i.e. combined heat and power systems) within the Sustainability Framework in the Draft Sustainability Appraisal</p> <p>The Preferred Options report sets out our approach to sustainability</p>

Name	Section of Reports	Comment	Officer response
Highways Agency		The HA, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) (i.e. the Trunk Road and Motorway network) in England as laid down in Department for Transport (DfT) Circular 02/2007 (Planning and the Strategic Road Network). The HA do not wish to comment on the Sustainability Scoping Report	Comments noted
Southwark Chamber of Commerce	SA: Relevant Plans, strategies and programmes (Appendix 3)	<p>Question 1 Other policies to be taken into account:</p> <ol style="list-style-type: none"> 1. Policy papers on places of worship – national and regional government. 2. Policy papers on the sustainability of SME's from Bolton (c.1970) onwards 3. Business crime 4. Business community 	Comments noted. We have reviewed the section on Relevant Plans and Strategies and included additional references where appropriate, to inform the preparation of the Core Strategy
	SA Section 6	<p>Question 2 Other data to be taken into account.</p> <ol style="list-style-type: none"> 1. Regeneration and Employment- Employment by Industry: number and % of jobs in London by sector. SME employment rate (new indicator) Southwark compared to London (broken down by micro, small and medium sized businesses). Total business growth rate (new indicator). Unfilled vacancy rate. Childcare sufficiency throughout the borough 2. Crime and the community- business crime all indicators and comparators 3. Health- life expectancy data (age at death by ethnic group and geographic location) 4. Social cohesion – number of new places of worship built and/or brought back into use 5. Housing- number people working in Southwark living in Southwark 6. Waste- amount of waste created in the borough 7. Transport- number of car parking spaces; number of free car parking spaces; Does it support local shopping within walking distance of all homes? 	Comments noted We have reviewed the Sustainability Framework and amended it where appropriate
	SA Section 6	<p>Question 3</p> <ol style="list-style-type: none"> 1. Regeneration- will it provide sustainable business growth? Will it provide for sustainable knowledge industry growth? Will it provide more opportunities for the long term unemployed? Will it help local people set up sustainable businesses in their own borough? Will it provide sufficient opportunities to help local people set up sustainable businesses in the borough? Will it enable existing local businesses to sustain themselves in the borough? 	Comments noted We have considered the additional criteria questions for the Sustainability Framework and added additional questions where appropriate into the Draft Sustainability Appraisal

Name	Section of Reports	Comment	Officer response
		<p>2. Education: Will it provide local employers with people who have the necessary level of education and skills to fill vacancies in the borough and elsewhere in London?</p> <p>3. Crime: Will it help to reduce business crime and encourage more business crime to be officially reported?</p> <p>4. Health: Will it improve life expectancy?</p> <p>5. Social Inclusion and Community: Will it improve quality of life (UNDP standard indicators). Will it provide sufficient places of worship for new faiths and churches reflecting the needs of Southwark's diverse population?</p> <p>6. Energy: Will energy efficiency measures damage the sustainability SMEs in the borough?</p> <p>7. Sustainable Transport: Will it enable SME growth to take place, particularly in the retail sector?</p>	
		<p>Question 4 There are insufficient open spaces for leisure and recreation in many areas of Southwark- more space less building (except high rise) should be encouraged.</p>	Comments noted

Issues and Options Responses

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<p>The Environment Agency</p>	<p>Background Paper to Preferred Options Report Preferred Options report Section 8 SA Section 6</p>	<p>Evidence Base There is little connection between the evidence in the Sustainability Appraisal Report and the content of the Core Strategy Issues and Options Report. For instance the report does not mention the findings of the SFRA. This is notwithstanding the fact that some of the growth areas identified for development lie in areas at risk of flooding. The use of the SFRA findings would identify what needs to be done, and form the basis for understanding what happens, testing the effectiveness of the plan and enabling it to be reviewed. Some action plan areas lie within an area that would flood if it were not for the River Thames Tidal Defences, including the Thames Barrier and the river walls. There remains a residual risk of the river walls failing, breaching or being over topped in severe weather. The SFRA assesses this risk in more detail.</p> <p>Objective 2B The sustainability Appraisal Report recognises the magnitude of flood risk in the borough. This therefore would warrant a stand alone objective on flood risk management which should be informed by the SFRA recommendations. Southwark SFRA has delineated areas of “flood hazard” through more detailed flood mapping and modelling. Areas are categorised according to “flood hazard” and depicted on a drawing. The Core Strategy must refer to the Southwark SFRA as part of the evidence base to ensure that development is located and designed appropriately taking into account flood risk issues. All development adjacent to flood defences must submit appropriate detail with the development proposals to demonstrate the potential impact of the development on the integrity of the defences. The flood defences must be appropriate for the lifetime of the development. Design drawings and calculations may be required to support a development proposal.</p> <p>Environmental Infrastructure Delivery</p> <p>The key areas to address are:</p> <ul style="list-style-type: none"> - Getting Location Right: Of particular concern is the location of housing in areas of flood risk and where water quality and water resources are already at or approaching environmental limits. - Long Term Planning Framework: To ensure a long term planning framework exists for all types of environmental infrastructure. - Demand Management: To promote more ways of managing and reducing the demand for new environmental infrastructure. - Funding Delivery Systems and incentives: Clear funding streams, with costs allocated to polluters, developers, consumers and the taxpayer on clear and defensible principles. 	<p>Comments noted</p> <p>Reference to the significance of the SFRA and its findings is included within the background paper.</p> <p>The SFRA is part of the evidence base to inform the preparation of the Core Strategy and provide guidance to developers when preparing their proposals.</p> <p>We opted to keep the Sustainability objectives to a manageable and appropriate number. For each objective, we recognise that within that objective there are sub-objectives. We have taken these into account in the appraisal process of the Preferred Option policies</p> <p>The Preferred Options Report sets out our preferred approach to addressing flood risk and flood risk management.</p> <p>We have noted the comments in relation to Environmental Infrastructure Delivery and the recommendations for further consideration of the scope of environmental infrastructure.</p>

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		<p>Properties and infrastructure within the London Borough of Southwark are also at risk of flooding from other sources. These include surcharging of the underground sewer system, the blockage of culverts and gullies (which results in overland flow), and surface water flooding. We consider that where new developments place extra pressure on capacity of strategic environmental infrastructure for the wider area, then a deliverable infrastructure plan should be in place. The scope of environmental infrastructure should include surface water management / drainage, flood risk management, waste infrastructure, water resources. Funds should be targeted towards improving capacity of existing infrastructure, new infrastructure, or other mitigation measures. All environmental infrastructure programmes will need to be climate proofed to ensure infrastructure will have capacity to deal with any additional pressures from climate change, for example, modifications to existing flood management measures to adapt to climate change within the lifetime of the development. Early investment and careful planning may be required to ensure expanded or improved infrastructure will have the capacity to cope with additional demands, particularly with climate change.</p> <p>See our report 'Hidden Infrastructure: The Pressures on Environmental Infrastructure. The report can be downloaded at http://publications.environment-agency.gov.uk/pdf/GEHO0307BMCD-E-E.pdf. The borough's infrastructure for flood protection (tidal defences, river flood defences) must be considered. Climate change could exacerbate the impacts of growth on environmental infrastructure. In accordance with PPS12. Paragraph 4.9 of the Core Strategy should be enhanced to ensure 'the infrastructure planning process should identify, as far as possible: infrastructure needs and costs; phasing of development; funding sources; and responsibilities for delivery.</p> <p>Developers should be encouraged to demonstrate that their proposal will deliver a positive reduction in flood risk to the borough, whether that be by reducing the frequency or severity of flooding (for example, through the introduction of SuDS), or by reducing the impact that flooding may have on the community (for example, through a reduction in the number of people within the site that may be at risk). This should be reflected through the inclusion of a positive statement within the detailed FRA that clearly and concisely summarised how this reduction in flood risk will be delivered. The services and infrastructure necessary to support development, substations, telephone exchanges, emergency services, etc. should also be located away from areas of flood risk to ensure they are available in an emergency. Any infrastructure in place to reduce the risk of flooding must provide an acceptable level of risk for the lifetime of the development, taking on board the residual risks.</p>	<p>We are preparing an Implementation Plan to accompany the Core Strategy in order to set out the mechanisms for delivery of the policies. We continue to liaise with local stakeholders in relation to infrastructure capacity and requirements.</p> <p>We note the recommended report and consideration of it will contribute to our Implementation Plan preparation.</p> <p>Our adopted Sustainable Design and Construction SPD sets out our requirements for new development in relation to reducing flood risk. The SPD sets out that new development should be located, designed, built and operated in ways that reduce the risks from flooding as much as possible.</p>

Name	Section of Reports	Comment	Officer response
		<p>Sustainable drainage systems (SUDS)</p> <p>SUDS are of particular importance within national planning policy (including Planning Policy Statement 25: Development & Flood Risk). Annex F, (Paragraph F6) states “Surface water arising from a developed site should, as far as is practicable, be managed in a sustainable manner to mimic surface water flows arising from the site prior to the proposed development...”. SUDS are promoted as the preferred drainage option by other National planning policy statements. These include: PPS1, PPS3, PPS9, PPS23 and the London Plan (February 2008) - Policy 4A.3 Sustainable design and construction Policy 4A.9 Adaptation to Climate Change Policy 4A.11 Living Roofs and Walls Policy 4A.14 Sustainable drainage Policy 4A.17 Water quality Throughout the London Plan SUDS is cited as one of the most effective means of reducing flood risk. A drainage impact assessment / surface water management plan is to be submitted as part of development proposals, demonstrating how the rates and volumes of surface water runoff from sites will be reduced in accordance with the London Plan, using the most sustainable methods and techniques. Developers should aim to achieve greenfield run off from their site through incorporating rainwater harvesting and sustainable drainage. Surface water drainage The management of the drainage systems and associated flooding is the responsibility of several bodies, making the risks of flooding even more complex.</p> <p>With increasingly intense downpours the risks would increase due to climate change and it is imperative that provisions are made to manage and address this risk. To understand the level and nature of risk it would be necessary to prepare a Surface Water Management Plan (SWMP) or Integrated Urban Drainage Plan (IUDP) that would help to define the future approach. These can guide your local area policy direction in terms of risk or consequence reduction and management.</p> <p>This plan should consider increased risk to the drainage system from future development and climate change. Southwark has a significant amount of green space. This may provide an opportunity to design in some storage/retention of surface water into green spaces, in the form of small detention basins or wetlands.</p> <p>Surface water from development could drain to these storage and/or wetland areas and they would also be valuable amenity for local residents as well as improving habitat.</p>	<p>The SFRA is referenced within the SPD, and we advise developers to review the SFRA in preparing their proposals.</p> <p>The Preferred Options Report sets out our approach to flood risk and flood risk management, including reference to SUDS. The SPD is part of the LDF and will be reviewed again once the Core Strategy is adopted, to reflect any changes required.</p> <p>We note the recommendation to prepare additional plans and will give this further consideration.</p>

Name	Section of Reports	Comment	Officer response
		<p>Waste Water Treatment</p> <p>Core Strategy Issue 18 and Sustainability Appraisal Report Issue 8: Environment Agency supports environmental standards set out in issue 18 but notes with concern that waste water treatment is not included. It would be preferable to have a separate waste water treatment objective taking into account the Water Framework Directive and the need for any further operational development at the existing Sewage Treatment Works. More new development will create higher volumes of sewage to be transported from houses to sewage treatment works, and additional treated effluent to discharge to surface and ground waters. Therefore the infrastructure should be sufficient to guarantee both surface and ground water quality would not be detrimentally affected, and avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property and pollution of land and watercourses. The Water Framework Directive sets ecological standards in addition to chemical standards for rivers. This is likely to place greater demands on Sewage Treatment Works to achieve cleaner effluents. In preparing the Core Strategy, the council must:</p> <ul style="list-style-type: none"> - ensure that the rate of development broadly accords with the capacity of existing water supply, sewage treatment and discharge systems, particularly in connection with major new development - require development to incorporate measures to enhance water efficiency, and sustainable drainage solutions - work with the Environment Agency and water companies to identify infrastructure needs and allocate areas for and permit necessary infrastructure Water Resources <p>Water resource is a key strategic issue for Southwark. The projected increase in housing numbers in the borough requires management for the increase in demand. As a result we would ask for strong environmental standards to be in place to promote the efficient use of water resources.</p> <p>The London Catchment Management Strategy has recently determined the Thames Catchment as having a status of 'no water available'. This means that no further water is available for consumptive abstraction during low flows. We would recommend a specific core policy to address this issue.</p> <p>Land Contamination Soil and Land Quality SAR issue 10</p> <p>Core Strategy issues 18: Sustainability Issue 10 appears to contain misleading information on the key baseline data column on page 22. It would be preferable to shift this information to issue 13 on open space and biodiversity. We note that land contamination has been included as one of the key environmental objective for the core strategy to respond to. We however note that Core strategy objective 2B does not address land contamination. We strongly recommend that if potentially</p>	<p>We are preparing an Implementation Plan for the Core Strategy policies, to set out how we plan to deliver the strategy. We will continue to liaise with local stakeholders to assess the capacity of the existing systems and consider the measures that will be required.</p> <p>The Preferred Option report sets out the preferred approach to addressing water efficiency.</p> <p>The Preferred Options report sets out our approach to addressing water resources. We consider that the issue is sufficiently addressed through this policy approach.</p> <p>We note the comment on Sustainability Issue 10: Soil and Land Quality and the correlation with the Core Strategy Objective 2B: Encourage environmentally sustainable buildings by setting high environmental and transport standards to reduce the impact of development. Helping to tackle climate change, congestion, pollution, waste, flood risk and other</p>

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		<p>contaminating activities have previously been conducted at a site, such as chemical or fuel storage, manufacturing or other industrial processes, an assessment of risk of potential contamination to controlled waters should be carried out. This work should follow 'Environment Agency guidance on requirements for land contamination reports' and the 'Model Procedures for the Management of Contaminated Land' (CLR11). These documents can be down loaded from our website at http://www.environment-agency.gov.uk/subjects/landquality/113813/887579/1101611</p> <p>Most of the redevelopment in the regeneration areas will occur on previously developed land. PPS23: Planning and Pollution Control, (Nov 2004) has changed the basis for dealing with land affected by contamination. It rests firmly on the precautionary principle. Where development is proposed on or near a site known or reasonably believed to be contaminated a site assessment will be required to establish the nature and extent of the contamination prior to determining the application. If potential for significant contamination is identified, the Environment Agency and the Local Authority Contaminated Land Officer should be consulted for advice prior to work commencing on site. Responsibility for the safe development and secure occupancy of the sites rest with the developer/landowner. Should contamination on the sites be found to be affecting controlled waters subsequent to the redevelopment, the sites may be determined as contaminated land under Part IIA of the Environmental Protection Act 1990 and cost for remedial action sought from the developers.</p> <p>Green Roofs Living roofs and walls can enhance biodiversity, reduce the risk of flooding (by absorbing rainfall), improve a building's thermal performance, thus reducing associated energy costs, help counter the Urban Heat Island Effect, support higher density more sustainable development and improve the appearance of the urban areas. For more information please use the link below: http://www.london.gov.uk/mayor/strategies/sds/docs/living-roofs.pdf</p> <p>Regeneration Areas SFRA states that Southwark is the largest housing landlord in London and the sixth largest in the country with 40,000 homes. These homes are concentrated in the north of the borough, primarily on very large estates where regeneration is earmarked. They include the Heygate Estate at the Elephant and Castle, the Aylesbury estate, the north Peckham estates, the Neckinger Estate in Bermondsey, The Tustin Estate on the Old Kent Road and the Canada Estate in Rotherhithe. Most of these estates are within areas of deprivation, measured against a range of indicators including quality of the environment, pollution and health.</p>	<p>important issues'. Land contamination is considered to be included within this objective as it is a form of pollution.</p> <p>We have noted the references to the contaminated land guidance documents, and will take these into account. The Preferred Option report sets out our approach to environmental standards, including pollution.</p> <p>We have adopted a Sustainable Design and Construction SPD which is part of the LDF. This SPD sets out our minimum requirements in terms of avoiding pollution and environmental nuisance (including land contamination).</p> <p>We have noted the reference to Green Roofs/Living Roofs and walls. The Preferred Option report sets out our approach to environmental standards and further information is set out in our adopted Sustainable Design and Construction SPD which recommends the incorporation of Green Roofs/Living Roofs etc in the design of buildings to enhance biodiversity</p>

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		<p>Although most of these areas are susceptible to flooding, it's disappointing to note that flood risk is not included as a constraint. Depending on where it is located and the standards to which it is built, planned new housing has implications for water resources, water quality, and flood risk, as well as waste management and air quality. It should not be assumed that it is always possible to manage the environmental impacts of housing growth through investment in new or expanded environmental infrastructure. Where growth threatens to exceed absolute environmental limits there may be barriers, in terms of cost effectiveness or the limits of current technology, which mean that growth is impossible to accommodate.</p> <p>Rigorous assessment of the environmental impacts and the viability of infrastructure dependent solutions is essential before plans for growth are adopted. Where development is necessary in areas of higher flood risk, the new exception test aims to ensure that development and its occupants will be safe for the lifetime of development taking account of climate change.</p> <p>The exception test enables some development in flood zone 3 but only when no suitable alternative site is available in a lower flood risk zone. The test makes it clear that these wider arguments justifying development have to be very powerful - underlining that building in high risk flood zones is very rarely going to be the best option. Of particular concern is the location of housing (and the infrastructure and services supporting housing) in areas of flood risk and where water quality and water resources are already fully committed. We however recognise the necessity of redevelopment to sustain and regenerate communities. This approach is also supported by the London Plan Opportunity Areas and Areas for Intensification.</p> <p>The north of the borough contains development areas of London-wide importance, as identified in the London Plan. These include the Elephant and Castle and London Bridge Opportunity Areas, part of the Central Activities Zone. The London Plan also extends the London Bridge Opportunity Area westwards to cover Borough and Bankside and designates Canada Water and Surrey Quays as an Area for Intensification. Where there are exceptional circumstances for building in the floodplain, the ongoing cycle of redevelopment and urban regeneration is the crucial opportunity to reduce the risk. Development should be located and designed so it is safe, with adequate escape and evacuation routes, allows its occupants to recover quickly, does not increase risk elsewhere, and where possible contributes to reducing flood risk overall.</p>	<p>The Sustainability Framework set of criteria questions and indicators address the incorporation of environmental design measures.</p> <p>The SA provides an assessment of the environmental, social and physical impacts of the preferred option. We acknowledge that a rigorous assessment is required and the viability of the provision of infrastructure to facilitate and help deliver new development.</p>

Name	Section of Reports	Comment	Officer response
		<p>The borough should consider how to apply Annexe G of PPS25 (managing residual flood risk within redevelopment plans) and link to SFRA recommendations and policies within the plan.</p> <p>Waterfront development Key issues to consider: Will the proposed development impact on the structural integrity of the defences? Are the defences appropriate for the lifetime of the development? Will any work be required to bring them up to this standard? Will there be appropriate set-back between the defences and the proposed development? Can the site be drained in a sustainable manner (i.e. no pumping will be required?)</p> <p>All River Thames walls have a statutory flood defence level, and the crest of these river walls must remain at this height, during and after any works to the river walls. Consent is required for any work on the river walls. Access to the river is not only required for social reasons but for flood risk management reasons, in general all development should be set back at least 16 metres from the River Thames and/or any flood defences associated with the River. Setting back development will allow for access and maintenance to the defences and provide adequate space should the defences need to be improved in the future. Any projects within 16m of flood defences require consent from Environment Agency.</p> <p>Statutory Flood Defence level is 5.41m AOD in this area. Flood risk management planning needs to be linked closely with regeneration and redevelopment so that the location of development can help to reduce flood risk. There is need to incorporate long-term policies in the Core Strategy that outline protecting and recreating river corridors and areas where flooding can happen naturally. These policies will support the objectives of Thames Estuary 2100 (TE2100) and the London Plan Blue Ribbon Network (Policy eC.3 The natural value of the Blue Ribbon Network , Policy 4C.6 Sustainable growth priorities for the Blue Ribbon Network and Policy 5D.1</p> <p>The strategic priorities for South East London Development proposals within the defended tidal flood plain must consider the residual risks that are present, i.e., increasing risks from rising flood water and sea levels due to climate change and the risks resulting from a failure or overtopping of a section of defence protecting the area under consideration. This may lead to reallocating some of the more vulnerable uses to areas with lower residual risks as well as designing new development in a more flood resilient manner.</p>	<p>We have considered PPS25 and the borough's SFRA in preparing the Preferred Options report and the Draft Sustainability Appraisal</p> <p>Waterfront development We have considered the suggestions and updated the Sustainability Framework accordingly</p> <p>We have included appropriate reference to flood risk for Southwark within the Preferred Options report</p> <p>Comments noted</p>

Name	Section of Reports	Comment	Officer response
		<p>Flood resilience must be built into buildings and other infrastructure, such as transport in areas currently at residual risk. Emergency Planning and evacuation procedures are required that fully understand current and future risk. Defra's Policy to achieve Making Space for Water must be delivered in the short and long term to enable us to maintain existing defences and plan for future land use. If developments are set back from existing defences we retain the option of future upgrades, as well as making space for flood storage. This will require land allocation many years in advance, which needs to occur through current spatial planning.</p> <p>The Council should seek to maintain and look for opportunities to enhance the setting of and increase space for the River Thames and its tributaries. In considering development proposals it will:</p> <ol style="list-style-type: none"> Ensure the protection of landscape features that contribute to the setting of the rivers Seek to protect and enhance existing views of the rivers Pay special attention to the design of development located in riverside settings to ensure that it respects and makes a positive contribution to the setting of the rivers Ensure that the quality of the water environment is maintained Seek opportunities to improve public access to and alongside the rivers and ensure that existing public access is maintained <p>Sequential Test & Exception Test Paragraphs 8 and D.5 of PPS25 require decision-makers to steer new development to areas at the lowest probability of flooding by applying a 'Sequential Test'. Only if the council can demonstrate through the sequential process that a site with a lower probability of flood risk is not reasonably available can a case be put forward as to why a site could be considered as an exception. If this can be achieved, then, in accordance with PPS25, for the exception test to be passed it must be demonstrated that the development provides wider benefits to the community that outweigh flood risk, the site is previously-developed land, and a Flood Risk Assessment must demonstrate that the development will be safe without increasing flood risk elsewhere. PPS25 states in paragraph 14 that: 'A sequential risk-based approach to determining the suitability of land for development in flood risk areas is central to the policy statement and should be applied at all levels of the planning process'. It goes on to state in paragraph 16 that: LPAs allocating land in LDDs for development should apply the Sequential Test (see Annex D and Table D.1) to demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed. A sequential approach should be used in areas known to be at risk from other forms of flooding.</p>	<p>Comments noted. The SFRA has informed the site selection process for the Core Strategy. The Sequential Test of PPS25 has been applied.</p>

Name	Section of Reports	Comment	Officer response
		<p>The Southwark SFRA has been developed to inform the Sequential Test. It will be the responsibility of the Council to carry out the Sequential Test on the basis of this information, allocating potential sites for future development accordingly. Furthermore, the developer will be required to demonstrate within the detailed Flood Risk Assessment that the Sequential Test has been applied, and (where appropriate) that the risk of flooding has been adequately addressed in accordance with PPS25. Climate change The Planning Act 2008 introduces an amendment to Section 19 of the Planning and Compulsory Purchase Act 2004 on the requirement of climate change policies. It states '(1A) Development Plan Documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contributes to the mitigation of, and adaptation to, climate change' The rising sea level will steadily reduce the level of protection that defences offer. The predictions for how quickly sea level will rise vary considerably depending on the assumptions used about emissions and climate modelling. The TE2100 project has considered a range of climate change derived sea level rises from 0.9m (Defra 2006 Climate Change Scenario) to 4m (High++ Level where all conceivable sea level rise contributions up to 2100 occur).</p> <p>The Environment Agency Thames Catchment Flood Management Plan (Thames CFMP) (September 2006) confirms the above and sets out some main messages:-</p> <ol style="list-style-type: none"> Flood defences cannot be built to protect everything. The ongoing cycle of development and urban regeneration is a crucial opportunity to manage flood risk. Land for future flood risk management will be identified and protected by authorities. <p>Work undertaken so far by Thames Estuary 2100 (TE2100) indicates that the present system of flood risk management for the tidal flooding can continue to provide an acceptable level of risk management up to 2030. Beyond 2030 more actions will be needed. These actions would be easier and more affordable and sustainably delivered if they are planned now. The London Plan states inter alia that "The Mayor will, and boroughs and other agencies should, take fully into account the emerging findings of the Thames Estuary 2100 Study, the Regional Flood Risk Appraisal and the Thames Catchment Flood Management Plan" page 211</p> <p>New development should be avoided in those areas with likely increased vulnerability to climate change, particularly where it is not viable to manage likely risks through suitable measures to provide resilience; and bring forward adaptation options for existing development in likely vulnerable areas. The council should require</p>	<p>The Preferred Option report includes a policy relating to environmental standards</p>

Name	Section of Reports	Comment	Officer response
		<p>development proposals to take account of the expected changes in local climate conditions, throughout the proposed lifetime of the development, by adaptation or flexibility to allow future adaptation.</p> <p>Information on these measures must be submitted with an application. Specifically, the council should require major developments to:</p> <ul style="list-style-type: none"> - identify the type of and extent of the main changes expected in the local climate throughout the lifetime of the proposed development, - identify the potential impacts of these changes on the proposed development and its neighbours indicate the ways in which the proposed development design overcomes the hazards and exploits the opportunities associated with these impacts whilst meeting other sustainable development criteria, particularly the need to achieve overall reductions in greenhouse gases 	<p>Comments noted. Flood Risk Assessments must be submitted with all major planning applications, within Flood Zones.</p>
<p>English Heritage</p>	<p>SA section 6</p>	<p>Interim Sustainability Report Initial comments were provided by English Heritage at scoping stage on the 1st September 2008, however although these have been noted in Appendix 2 of the Interim SA Report, it is disappointing that some of these points have not been acted upon.</p> <p>Relationship to Other Plans and Programmes (Chapter 3) English Heritage notes that PPG16: Archaeology and Planning, PPG15: Planning and the Historic Environment and the draft Heritage Protection Bill are identified in Table 3 as key documents to be taken into account in the preparation of the LDF Core Strategy. In addition, English Heritage recommends the European Landscape Convention, which was ratified by the United Kingdom government in 2006, also be included.</p> <p>We welcome reference to Adopted Conservation Area Appraisals in Table 3, however Archaeology Priority Areas are also set out in the existing Southwark Plan (UDP) and we would like to see these referenced also. In particular we welcome inclusion of the CABE and English Heritage Tall Building Guidance to create high quality and safe urban environments. Social, Economic and Environmental Context and Key Sustainability Issues (Chapter 4 and 5)</p> <p>The baseline data for the historic environment presented in Table 5 requires further expansion. Currently the only data included is the number of listed buildings, listed buildings at risk and the number of conservation areas, which does not reflect the full wealth of historic assets in Southwark and associated sustainability issues. The appropriate information sources that should be consulted, in respect of the historic environment, are as follows:</p>	<p>Please see our comments to English Heritage's earlier response, as their earlier response has been repeated here.</p>

Name	Section of Reports	Comment	Officer response
		<ul style="list-style-type: none"> - Greater London Sites and Monuments Record (archaeology, including Scheduled Ancient Monuments and Archaeology Priority Areas) http://www.english-heritage.org.uk/server/show/nav.8900; - The Schedule of Buildings of Architectural and Historic Interest (listed buildings); The borough's conservation area records and adopted guidance (including conservation area designation reports, statements, appraisals and design guidance); - The borough's list of Locally Listed Buildings (or equivalent); - The Register of Historic Parks and Gardens - The London Buildings at Risk Register www.english-heritage.org.uk/BAR - The HELM website www.helm.org.uk and The Heritage Counts website www.heritagecounts.org.uk <p>We welcome inclusion of the number of Listed Buildings at risk in the Borough as an indicator and we would also suggest this includes the number of Scheduled Ancient Monuments at risk as well. Similarly, maintaining the extent of Archaeology Priority Areas would be a useful indicator for archaeology. The number of Conservation Areas as an indicator is also welcomed, however LB Southwark could consider including the number of conservation areas with an up-to-date management plan and appraisal as well. If data exists, the number of museums, heritage/ local history centres or other relevant heritage attractions open to the public could be an indicator.</p> <p>It is also worth noting that English Heritage's 'Heritage At Risk' register and will include broader data on heritage assets at risk in the future. For example, conservation areas; historic parks and gardens; and heritage landscapes and LB of Southwark may wish to consider these as indicators in the future. Finally, English Heritage would also encourage LB of Southwark to undertake historic 'characterisation' of regeneration areas in the Borough as part of the character assessment, and to inform how future change can be managed in the historic environment. Your in-house conservation staff would be able to advise you on this, as well as the Greater London Sites and Monuments Record (http://www.english-heritage.org.uk/server/show/nav.8900).</p>	

Name	Section of Reports	Comment	Officer response
		<p>Outcomes of the Sustainability Appraisal (Chapter 6) English Heritage notes and welcomes that a specific sustainability objective on the historic environment has been included in Table 6. The criteria set out in Table 6 could include a question as to whether it will enhance access to the historic environment and also contribute to better understanding of the historic environment. Appendix 5 claims that most objectives have no significant link or depend on implementation with SDO12.. We agree SD1, 11, 13 and 15 should be compatible. However, the relationships between SD12 and SDO5, 6, 8, 14 and 16, need to be explored further. For example, how improving the quality of public spaces and streetscapes can encourage alternative modes of transport (objective 16). The role of cultural facilities, including access to museums, heritage/ local history centres or other relevant heritage attractions are currently not considered as part of social infrastructure provision or education/ training/ community facilities (objective 5). The role of the historic environment in achieving greater energy efficiency (objective 6) and the implications of managing flood risk should also be considered (objective 14). Para. 6.6 states that the Core Strategy is not likely to have any major negative sustainability impacts, and in Appendix 5 (appraisal matrixes) there are no negative impacts identified for the historic environment to be mitigated or minimised with each option.</p> <p>Most of the comments refer to the impact being dependant on the quality of the design of new buildings and improvements to their setting. We agree this is a key consideration; however the appraisal appears to be heavily biased towards aesthetic considerations. Overall, we would urge LB of Southwark to give further thought to the complexity of the sustainability issues associated with the historic environment to assist in the drafting of the preferred options.</p>	<p>We have further considered the inter-relationships between objectives and reviewed the Sustainability Framework of the Draft Sustainability Appraisal accordingly</p> <p>Comments noted</p>

Name	Section of Reports	Comment	Officer response
Southwark PCT	Background paper to Preferred Options Report Preferred Options Report Section 5	<p>In making our response to this we have used the appraisal framework offered by the Healthy Urban Development unit as a starting point. We do appreciate that this checklist is designed for evaluating draft versions of the Core Strategy rather than the Issues and Options consultation. We hope, however, that introducing these considerations at an early stage will enable stronger coverage of health issues within the Core Strategy and ensure its soundness when it comes to examination.</p> <p>We recognise that there are a number of frameworks that the Core Strategy will need to conform to. The London Plan in particular sets a clear and helpful framework for considering health. The key policies for health it sets out are: London Plan Policy 3A.17 Health objectives London Plan Policy 3A.18 Locations for healthcare London Plan Policy 3A.19 Medical Excellence London Plan Policy 3A.20 Health impacts. Other key London Plan Policies with health impacts are: London Plan Policy 3A.5 Large residential developments London Plan Policy 3A.7 Affordable housing targets London Plan Policy 3A.8 Negotiating affordable housing in individual private residential and mixed-use schemes London Plan Policy 3A.14 Addressing the needs of London's diverse population London Plan Policy 3A.15 Protection and enhancement of social infrastructure and community London Plan Policy 3B.1 Developing London's Economy London Plan Policy 3B.12. Improving the skills and employment opportunities for Londoners, London Plan Policy 4A.15 Climate Change London Plan Policy 6A.4 Priorities in planning obligations. It was difficult to see if these policies had been expressed and met within the Core Issues and Options paper.</p> <p>We would argue that the planning objectives around health in the London Plan are not negotiable at local level and should be more clearly stated. Further detail is available in Health Issues in Planning: Best Practice Guidance.</p> <p>In general within this paper, health and social care seems to be sparsely treated and this is something of a surprise as the evidence base paper refers to many relevant sources which do not seem to have been tapped in the writing of this paper. One surprising gap was the PCT Asset Management Strategy 2006) There was no mapping of existing/proposed health facilities which really need to be read in tandem with plans for the two options. As well as the lack of evidence, there was little explanation/discussion of key issues arising from policy drivers and challenges. A more detailed spatial portrait incorporating information about health/health inequalities would have been useful. Some information around the demographics of the growth of the population would also have been useful. Although mention is made of new homes, there is no indication of what this may mean in population numbers and this clearly has</p>	<p>Comments noted</p> <p>We note the references to the London Plan Policies on Health.</p> <p>We have provided an overview of our evidence and policies which have informed the preparation of the Preferred Option, in a background paper</p> <p>Health and social care are addressed in the Sustainability Framework</p> <p>We will be undertaking a Health Impact Assessment which will include this information.</p> <p>Our background paper to the Issues and Options sets out population projections for the borough. The background paper has been reviewed to accompany the</p>

Name	Section of Reports	Comment	Officer response
		<p>implications for health and other public services. As noted on the checklist, the bundling together of 'Be healthy, safe and active' rather precluded specific treatment of these aspirations.</p> <p>Is it not the function to the plan to indicate in spatial terms how these aspirations can be achieved? Good planning will promote health, however that does not mean that health can be left implicit within the strategy, particularly given the health inequalities within the borough. Two options are presented - the first seems to repeat the existing UDP strategy and the second seems to be a more market led one of housing growth across the borough. It is concerning that this one seems to preclude any kind of planning for community facilities - surely this would not be an acceptable approach as it would be in breach of a number of national policies?</p> <p>Documents attached:</p> <ul style="list-style-type: none"> - Completed Health Check for PCTs and Boroughs; is the core strategy ready for examination? - Integrating health into the Core Strategy: a guide for Primary Care Trusts in London. This provides helpful guidance for PCTs unfamiliar with planning issues - in particular we recommend pp 27-27 and 36-37 as this links significant health issues to policy actions on the part of planning and regeneration. - Southwark PCT Asset Management Strategy There was no reference to existing or proposed PCT estate. (See checklist section Healthcare facilities) so this should be helpful in improving coverage showing how services will be configured in order to meet health needs especially where areas become more densely occupied. - Summary of Health Inequalities: progress and next steps (Department of Health 2008) providing some indication of the future direction of travel in terms of seeking to reduce health inequalities - Maps from the Southwark Atlas of Health (http://www.spatial-literacy.org/health/) indicating the spatial distribution of some significant illnesses and other health conditions. Also showing the current locations of GPs and Dentists. - Matrix showing how the major health related policies in the London Plan relate to the cross cutting theme of health and equalities. 	<p>Preferred Options Report and will address population changes</p> <p>The Preferred Options report has a policy for community facilities.</p> <p>We will be undertaking a Health Impact Assessment as part of the evidence base for the Core Strategy.</p> <p>We have noted the documents that have been recommended and have considered the policy response for the issues identified, within community facilities policy within the Preferred Options report.</p>

Name	Section of Reports	Comment	Officer response
Thames Water		<p>Vision and Objectives – Objection to Omission of Reference to Water & Sewerage Infrastructure</p> <p>While the vision and objectives refer to the provision of community facilities and transport infrastructure there is no reference to the provision of water and sewerage infrastructure. The provision of water and sewerage infrastructure is essential to support growth within the Borough and ensure sustainable development and needs to be provided ahead of development in order to avoid sewer flooding and problems of low/no water pressure. As such the provision of the water and sewerage infrastructure required to support growth within the Borough should be included as an objective.</p> <p>A key sustainability objective for the preparation of the new Local Development Framework should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 4.8 of the new PPS12, 2008 states: “The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations.”</p> <p>Paragraphs 4.10 of PPS12 place goes on provide advice on the need for infrastructure to support housing growth and states: “The outcome of the infrastructure planning process should inform the core strategy and should be part of a robust evidence base. It will greatly assist the overall planning process for all participants if the agencies responsible for infrastructure delivery and the local authority producing the core strategy were to align their planning processes. Local authorities should undertake timely, effective and conclusive discussion with key infrastructure providers when preparing a core strategy.”</p> <p>Paragraph 5.1 of PPS12 states: “LPAs should consider the following criteria when determining which DPDs other than the core strategy they produce:.....In considering these questions, the following issues should be considered:</p> <p>- the requirements of utilities/infrastructure providers.....”</p>	<p>The Core Strategy will be accompanied by an Infrastructure Plan which will set out the infrastructure required to support the planned growth in the Core Strategy, including water and sewerage requirements. This will take into account planned projects, such as the Thames Tunnel, and any additional infrastructure needed including who will deliver this.</p>

Name	Section of Reports	Comment	Officer response
		<p>There are also relevant key sources of evidence identified in answering Coherence Test number (vii). The sources of evidence include: “If the DPD is a Core Strategy, the following documents, amongst other evidence, may be relevant:infrastructure providers’ investment programmes and strategies; environmental programmes etc.”</p> <p>The water companies’ investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. We are currently in the AMP4 period which runs from 1st April 2005 to 31st March 2010 and does not therefore cover the whole LDF period. AMP5 will cover the period from 1st April 2010 to 31st March 2015 and we have recently submitted our business plan to OFWAT for approval.</p> <p>As part of our five year business plan Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result we base our investment programmes on development plan allocations which form the clearest picture of the shape of the community. Where the infrastructure is not available we may require an 18-month to three-year lead in time for provision of extra capacity to drain new development sites. If any large engineering works are needed to upgrade infrastructure the lead in time could be up to five years. Implementing new technologies and the construction of new treatment works could take up to ten years.</p> <p>It is essential that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.</p> <p>It will therefore be essential that the Core Strategy makes reference to the provision of adequate water and sewerage infrastructure to service development to avoid unacceptable impacts on the environment (such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems).</p>	

Name	Section of Reports	Comment	Officer response
		<p>Specific Sewerage Infrastructure Project - Thames Tunnel Thames Water consider that there should be a specific policy on the proposed Thames Tunnel which will provide significant water quality improvements to the Tidal River Thames. As set out below, this should be addressed in the submission version of the Core Strategy. Development will be required within the London Borough of Southwark to enable the construction of the Thames Tunnel.</p> <p>Thames Water therefore considers that there should be Policy support in the Core Strategy for the Thames Tunnel development to help facilitate its approval and construction.</p> <p>Growth Options In general terms it is easier to provide infrastructure for a small number of large clearly defined sites than a large number of smaller less well defined sites. Consequently, in terms of water and sewerage infrastructure provision, the concentration of growth within specific growth areas would be preferable.</p> <p>Sustainable Southwark Thames Water supports the promotion and use of systems to reduce water consumption within new development including those in the Code for Sustainable Homes and the BREEAM ratings. Any policy should require Developers to achieve Code for Sustainable Homes Level 3 as a minimum for water efficient measures in new homes. However, the application of such codes and ratings needs to be carefully applied. For example, the Code for Sustainable Homes could allow for a less water efficient property to be found acceptable as it scores highly on other criteria. In addition, developments that are shown to have high water efficiency ratings can subsequently be retrofitted with appliances and fittings with higher water consumption rates upon their occupation.</p> <p>It is also considered any policy should require the use of SUDs in new development. We would also recommend that the Core Strategy include a future drainage hierarchy as set out in the London Plan (Consolidated with Alterations, 2008).</p>	

Preferred Options Responses

Name	Comment	Officer response
<p>English Heritage</p>	<p>Comments on this SA were provided by English Heritage at scoping stage on the 10/09/08 and issues and options stage on the 15/12/08.</p> <p>Links to other policies, plans and programmes (Para 4.1) We welcome that our previous comments on relevant plans and programmes have been considered and incorporated into the SA.</p> <p>Summary Baseline Information (Para 4.2) We note this is just a summary of baseline data gathered and Appendix 2 indicates that our previous comments in relation to heritage have been considered. The reference to the Buildings at Risk Register in para 4.2.1, should however be updated to include the <u>Heritage at Risk Register</u>. The latest report was published in 2009 and also includes scheduled monuments; conservation areas; and, historic parks and gardens at risk (see www.english-heritage.org.uk/BAR).</p> <p>Sustainability Issues (Para 5.1) We note and welcome that conservation of the historic environment has been considered as a sustainability issue.</p> <p>The SA Framework (Para 6.2) English Heritage notes that a specific sustainability objective on the historic environment has been included (SDO 12). We welcome that our previous comments on questions have been incorporated. In terms of indicators, the number of conservation areas at risk and the number of conservation areas with up-to-date appraisals/ management plans would be recommended.</p> <p>Internal Comparison of the SA Objectives (Para 6.3) We welcome that the SA has identified the need for careful application of renewable technologies and waste provision to ensure the setting of the historic environment is not compromised.</p> <p>Compatibility of the SA Objectives against the Core Strategy Objectives (Para 7.1) As set out in Appendix 4, the majority of the Core Strategy Objectives are considered to be compatible with the historic environment (SDO 12) and none are considered to be incompatible. The SA identifies that the impact of objective 1A (creating employment) and objective 2C (providing more homes) on the historic environment will depend on implementation. This highlights the need for careful consideration of this issue in the Core Strategy objectives. Objective 1C (be healthy and active) is assessed as having no significant link to the historic environment. LB of Southwark should be bear in mind that many open spaces in the Borough are of historic value, including Registered Historic Parks and Gardens. These heritage assets provide the local community with attractive places for enjoyment, leisure and exercise.</p>	<p>Noted</p> <p>Support noted</p> <p>Noted and amended</p> <p>Support noted</p> <p>Support noted We have included these indicators into the SA Framework</p> <p>Support noted</p> <p>Noted and addressed in the final SA of the Core Strategy</p>

Name	Comment	Officer response
	<p>What Options are Considered and Why? (Para 7.2) We note that Option 1 (growth areas) and 2 (housing led growth) have been assessed as compatible with the historic environment (SD0 12), however no detail is provided on why this is deemed to be so. Considering both options promote a high amount of development in the Borough we would expect some adverse environmental effects to be identified in the SA and that impact would be heavily dependant on implementation of the Options.</p>	<p>Noted and addressed in the final SA of the Core Strategy</p>
	<p>Effects of the Core Strategy Policies (Section 8) As set out in Appendix 5, the majority of the Core Strategy Policies are considered to have a minor positive impact on the historic environment (SD0 12) and none are considered to be negative. As one would expect, the policy on design and conservation (12) is assessed as having a major positive impact. Upon reviewing the assessment results, there are some useful commentary notes, for example in relation to policy 5. We do however question some of the assessments, which are based upon the presumption that focusing on growth areas somehow protects the historic environment. Areas such as Bankside, Borough, London Bridge, Camberwell and Peckham have a wealth of heritage that contributes to the distinctive identity of these places today. Although focusing development to the north/ central area of the Borough does alleviate pressure in the south, it is important to recognise that these areas have heritage value also and high levels of growth will have an impact on their character. We hope proposals for mitigation and monitoring in the SA will consider the effects of this Plan on the historic environment.</p>	<p>Noted and addressed in the final SA of the Core Strategy</p>
	<p>Evidence Base Background Paper The evidence base background paper is disappointing with respects to the historic environment (under the 'sustainability issues' section pg 80). The publications section refers to just one document – PPS 9 on biodiversity and geological conservation, which must be an error. Although there is reference to the Boroughs conservation area appraisals and archaeology priority zone, there does not appear to be anything with respects to locally listed buildings, views, heritage at risk etc. It is important the Core Strategy draws on the broader historic environment to ensure the local distinctiveness and character of places is sustained and enhanced through placemaking. Again, we would reiterate the importance of a characterisation study (incorporating the historic environment) to inform how future change can be managed. In addition, we cannot find evidence for an urban design/tall building study, which provides the justification for the Core Strategy tall building locations. We would encourage LB of Southwark to refer to the English Heritage and CABE joint <i>Guidance on Tall Buildings</i> (July, 2007), which has been endorsed by Government as capable of being a material consideration in the determination of planning applications. Paragraph 2.7 advises local planning authorities to carry out a detailed urban design study to identify where tall buildings would and would not be appropriate in their development plan documents.</p>	<p>We have updated our background papers to the core strategy and these will incorporate a characterisation study and a tall buildings study. The guidance documents are noted and will be referred to in the studies.</p>

Name	Comment	Officer response
	<p>Finally, English Heritage would strongly advise that the local authority's conservation staff are involved throughout the preparation and implementation of the LDF, as they are often best placed to advise on local historic environment issues and priorities; sources of data; and, consideration of options relating to the historic environment.</p> <p>English Heritages has also recently published Conservation Principles, containing policies and guidance for the sustainable management of the historic environment (see http://www.english-heritage.org.uk/server/show/nav.9181). We recommend use of this document when considering heritage values, how to assess their significance and manage successful change in the historic environment.</p> <p>You will also be aware that the Government has launched a consultation on PPS 15: Planning for the Historic Environment. It reflects a more modern, integrated approach which defines the historic environment in terms of heritage assets to be conserved in accordance with a set of principles and in proportion to their significance. http://www.communities.gov.uk/publications/planningandbuilding/consultationhistoricpps.</p> <p>This advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the Southwark LDF and its Sustainability Appraisal, and which may have adverse effects on the historic environment.</p>	<p>These documents have informed the preparation of the core strategy and SA</p>

Name	Comment	Officer response
<p>Environment Agency</p>	<p>It is good to see that the draft Sustainability Appraisal contains a Sustainability Objective (SDO14) "to reduce vulnerability to flooding" but it is concerning to see that both of the Growth Options put forward in the Issues and Options report scored negatively in relation to this objective.</p> <p>Also, given that the vast majority of housing sites that were proposed by Option 1 lie within Flood Zone 3, as indicated by the Southwark Strategic Flood Risk Assessment (SFFRA), it is hard to envisage that Option 2 would have resulted in more housing being developed within this Flood Zone. However, we are aware of the wider sustainability issues affecting the central and northern parts of the Borough and the fact that the decision has already been made to regenerate certain parts of the Borough, which lie in Flood Zone 3.</p>	<p>The appraisal of the options has been revisited in the light of the comments on flooding and amended results are now included in the final SA. Further guidance on building in flood risk areas is included within the Sustainable Design and Construction and Sustainability Assessment SPDs.</p>
	<p>Water Quality – Sustainability Appraisal</p> <p>We advise that SD09 should be re-worded to include protection "and enhancement" of water quality. This is important in order to maintain groundwater as a useful resource for drinking water. In addition, given the emphasis upon use of renewable energies within the core strategy objectives, it is important to protect water quality from the effects of thermal pollution associated with ground source heat pumps.</p> <p>Similarly, we recommend the inclusion of groundwater to SDO10 to recognise the impact that contamination can have on this resource, as follows: "To maintain and enhance soil and groundwater quality"</p>	<p>Whilst the wording of the objectives has not changed the issues raised are dealt with in the sustainability questions and indicators that are used in the sustainability appraisal process.</p>
	<p>Plans and strategies, reports & datasets that should be included: Environment Agency Adapting to Climate Change strategy http://publications.environment-agency.gov.uk/pdf/GEHO0709BQBW-e-e.pdf State of the Environment Report for London www.environment-agency.gov.uk/londonsoe Southwark State of the Environment Fact Sheet http://www.environment-agency.gov.uk/static/documents/Research/SOUTHWARK_factsheet.pdf Link to Environment Agency Strategies, Plans and Reports http://www.environment-agency.gov.uk/research/policy/32981.aspx Environment Agency baseline information/datasets available for Strategic Environmental Assessment & Sustainability Appraisal The Environment Agency holds information on the following environmental issues: (see email for table attached)</p>	<p>Noted</p>

Name	Comment	Officer response
	<p>Please be aware that the information provided in these datasets is likely to be in a raw state and may not have been interpreted. The list has been compiled from a nationally agreed list of EA datasets available for the production of SEAs and SAs. This information is available (subject to the appropriate legal checks, e.g. information that we are unable to provide due to the Data Protection Act, National Security, etc) to external parties as required under the SEA Directive. Please refer to Government guidance, A Practical Guide to the SEA Directive for other lead organisations who are able to provide alternative and additional datasets. The following links take you to the English and Welsh Standards of Service.</p> <p>Obtaining the information</p> <p>To obtain a licence for any of the above datasets please contact the National Customer Contact Centre (NCCC) on 08708 500250. The licensing fee will be waived if requested by, and licensed to, a Local Authority for the production of a plan. This allows Local Authorities to pass the information to contractors working on their behalf. All other parties will be licensed as per the Environment Agency's charging policy and procedures. Follow the link to find out more information about the Environment Agency's charging for information policy.</p>	Noted
Southwark PCT	<p>As I understand it, health is meant to be comprehensively considered in a SEA, I understand that the SEA has been subsumed into a broader sustainability assessment in developing the Core Strategy. The DH has issued guidance on the use of SEA for looking at health in Draft Guidance on Health in Strategic Environmental Assessment Consultation Document which I attach. Annex D: SEA topics and health evidence gives a useful checklist of what needs to be included. I'd like to be sure that you are aware of this guidance and that it has been taken note of in the writing of the core strategy and accompanying documents</p>	This document has been taken into account when writing the core strategy

Name	Comment	Officer response
Richard Lee	<p>At the moment, Southwark's sustainability assessments are based on presumption and not evidence. This is unsound. There should be a requirement that local residents are involved in the sustainability assessment process. This will check that the adverse impacts and remedies are real. Without this reality check the process is meaningless and in breach of the European Directive for SEAs. There should be health impact assessments for all major applications and Habitats Regulation Assessments where there are impacts on sites of importance for nature conservation.</p>	<p>The Sustainability Assessment process is set out in the adopted SA SPD. We also consult on Sustainability Appraisal Scoping and Appraisal reports as part of the preparation of planning policy documents, which incorporates the requirements of the SEA Directive (as set out in Government guidance on undertaking Sustainability Appraisals 2005). The SEA requirements apply to certain plans and programmes that have likely significant impacts upon the environment. The Sustainability Assessment SPD sets out measures relating to health in line with London Plan Policy. The Development Management DPD will provide further detail to the Core Strategy policies and considered of the requirement of submitting Health Impact Assessments will be undertaken during the preparation of this DPD. The Habitat Assessment Regulations relate to Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites – collectively known as Natura 2000 sites or 'European' designations. Southwark has no sites with a European habitat designation. We have also carried out an Appropriate Assessment which demonstrated that development in our borough would not have a detrimental impact on these sites. The SDC SPD sets out the requirements for developers to comply with protected species legislation that is applicable at the local level.</p>

Name	Comment	Officer response
<p>Thames Water</p>	<p>The Core Strategy. Within the supporting documentation for the Preferred Options there are Officers Comments responding to Thames Waters consultation response.</p> <p>The Officers Comments state that "The Core Strategy will be accompanied by an Infrastructure Plan which will set out infrastructure required to support the planned growth in the Core Strategy, including water and sewerage requirements. This will take into account planned projects, such as the Thames Tunnel, and any additional infrastructure needed including who will deliver this."</p> <p>The Thames Tunnel is required in order to comply with the European Union Waste Water Treatment Directive. The purpose of the Thames Tunnel is to substantially reduce the level of overflows of untreated sewage from Combined Sewer Overflows (CSO's) into the River Thames and not to support growth set out within the Core Strategy. As such the Thames Tunnel should be considered separately from other sewerage infrastructure that may be required in order to support growth within Southwark.</p> <p>As stated in our previous comments, a key sustainability objective for the preparation of the new Local Development Framework should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 4.8 of the new PPS12, 2008 states: "The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations."</p> <p>Paragraph 4.10 of PPS12 goes on to provide advice on the need for infrastructure to support housing growth and states: "The outcome of the infrastructure planning process should inform the core strategy and should be part of a robust evidence base. It will greatly assist the overall planning process for all participants if the agencies responsible for infrastructure delivery and the local authority producing the core strategy were to align their planning processes. Local authorities should undertake timely, effective and conclusive discussion with key infrastructure providers when preparing a core strategy."</p> <p>To meet the test of "soundness" as set out in PPS 12 it is essential that the Core Strategy does consider such water and sewerage infrastructure. In July 2008 The Planning Inspectorate published "Examination of Development Plan Documents: Soundness Guidance". The Guide sets out a series of 'key questions' that should be convincingly answered which aim to provide a framework for the assessment of soundness of DPDs.</p>	<p>The justification text for Policy 13 discusses the Thames water projects and specifically the Thames Tunnel. We will work with the Environment Agency, Thames Water, Transport for London, developers and emergency services to manage and reduce flood risk.</p> <p>We have identified this project in our implementation table in Policy 14 - Implementation and delivery.</p> <p>We have addressed this comment through the introduction of Policy 14- Implementation and Delivery</p> <p>This policy sets out tables showing the physical, social and green infrastructure, required, including costs, sources of funding, agency responsible, timing and any contingency plans. Detailed infrastructure studies have also been undertaken for the strategic sites in the borough to inform the Development Plan Documents. The relevant infrastructure providers have been consulted as part of the plan making process.</p> <p>Water and sewerage infrastructure has been considered as part of this process. The representations from authorities on the draft policies have also been reviewed and, as a result, the policy wording has now been amended to include specific reference to infrastructure within Policy 14.</p> <p>Reference has been made to the investment programmes and business plan in the production of the infrastructure plan. In addition to the inclusion of Policy 14 - Implementation and delivery - further guidance on the provision of infrastructure will be included in the Development Management DPD.</p>

Name	Comment	Officer response
	<p>Section 5 of the Preferred Options document relates to delivery and implementation. It is stated that at the next stage of consultation in November a delivery and implementation plan will be included. In relation to infrastructure it is stated that "This will include information on how we will make sure the supporting infrastructure is in place for the scale of development proposed in the Core Strategy, such as waste, water and energy infrastructure."</p> <p>It is considered that any delivery and implementation plan will need to include policies on the provision of wastewater infrastructure in addition to waste, water and energy infrastructure. Furthermore, in order to be in line with national policy and the London Plan, and therefore considered sound, the Core Strategy will need to contain policies on water and sewerage infrastructure.</p>	<p>We have addressed this comment in the new Policy 14- Implementation and Delivery, which includes information on all infrastructure including wastewater.</p>
	<p>Key questions set out in the Inspectorates guide to the Examination of DPDs include "Have the infrastructure implications of the strategy/policies clearly been identified?" and "Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?". Regarding the funding of water and sewerage infrastructure, it is our understanding that Section 106 Agreements can not be used to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.</p> <p>Water and sewerage undertakers also have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.</p>	<p>We have addressed this comment in the new Policy 14, Implementation and Delivery, which includes information on all infrastructure including wastewater.</p>
	<p>As detailed above the purpose of the Thames Tunnel is not to support growth promoted through the Core Strategy and as such the project relates to a different type of infrastructure to the water and wastewater infrastructure requirements set out above.</p> <p>Thames Water consider that there should be a specific policy on the proposed Thames Tunnel which will provide significant water quality improvements to the Tidal River Thames. As set out below, this should be addressed in the submission version of the Core Strategy.</p>	<p>We have included reference to the Thames Tunnel in the supporting text to Policy 13 and also Policy 14 – Implementation and Delivery</p>
	<p>Thames Water support the requirement for all new dwellings to meet the water usage targets set out in the Code for Sustainable Homes and agree that the new dwellings should comply with the Code 3 rating as a minimum.</p>	<p>Thames Water support the requirement for all new dwellings to meet the water usage targets set out in the Code for Sustainable Homes and agree that the new dwellings should comply with the Code 3 rating as a minimum.</p>

Name	Comment	Officer response
	<p>With respect to potential housing sites, due to the limited information on the size of proposed developments and the complexities of sewerage and clean water networks, Thames Water are unable to determine the infrastructure needs at this stage. Drainage areas do not fit neatly over local authority boundaries and therefore we also need to consider neighbouring boroughs ambitions as well.</p> <p>In very general terms it is easier to provide infrastructure for a small number of large clearly defined sites than a large number of smaller less well defined sites.</p>	<p>Noted. This approach to infrastructure provision is in line with our policies concentrating development in growth areas.</p>

Submission Version Responses to Consultation ending 5th March 2010

Name	Comment	Officer response
English Heritage	<p>In general English Heritage welcomes the Borough's commitment to develop a policy framework for the management of the historic environment and tall buildings. We also welcome the Borough's undertaking of a Borough-wide study as supporting evidence to these policy areas. However on considering the details of the submitted documents we have following concerns which we believe should be addressed. These issues relate to the management of the historic environment, tall buildings issues and the robustness of the evidence base.</p>	<p>Noted.</p> <p>Detailed comments addressed in Core Strategy responses to representations</p>
	<p>We would advise that the target to increase the number of listed items and reduce number of buildings at risk should be amended to increase the number of designated heritage assets and reduce the number of heritage assets at risk. This change in emphasis reflects the emerging PPS on the historic environment and English Heritage's expansion of the Buildings at Risk Register to include all heritage assets.</p>	<p>Noted. Indicator 12.2 has been amended and 'buildings' has been replaced with 'heritage assets'</p>
	<p>Sustainability Appraisal Report Appendix 3 - Relevant Plans, Strategies and Programmes</p> <p>National The 2003 version of EH/CABE Guidance on Tall Buildings has been replaced by a July 2007 revision. This should be used for the SA.</p> <p>Appendix 7 - appraisal of Submission Version Sustainability Objective 12 – Core Strategy Policy 12 – Page 50</p> <p>It is noted that the scoring across all three timescale a 'major positive'. However the Core Strategy Policy 12 contains two key potentially conflicting issues of protecting and enhancing the historic environment, and promoting tall buildings. The relationship between these two issues should be recognised in the commentary and possibly reflected in the scoring.</p>	<p>Noted and amended</p> <p>The commentary recognises that there is potential conflict that can be managed through the need to meet the high standards in design for buildings and public spaces, as stated below: <i>'The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.'</i></p> <p>The score given is therefore considered to be appropriate</p>

Name	Comment	Officer response
Environment Agency	<p>Since our response to the Preferred Options consultation, in July 2009, Southwark have incorporated the vast majority of our recommendations. The submission version of the Core Strategy contains objectives and policies that comprehensively reflect the environmental challenges and opportunities present in the Borough. These are</p> <ol style="list-style-type: none"> 1. Adapting to climate change, 2. Managing and minimising waste, and 3. Managing flood risk. 	
	<p>However, we do advise amendments to ensure all aspects of the environment are protected sufficiently and to reflect recent events in terms of plans and projects. We recommend that water quality is included in this policy. It is listed as a factor in achieving "Sustainability Objective 2B. Promote sustainable use of resources" but is not mentioned within Strategic Policy 13, which is where this issue should be included. Without a policy to deliver the protection and enhancement of water quality it is not obvious how Sustainability Objective 2B will be fully achieved.</p> <p>The Borough also contains locations where the groundwater is sensitive to pollution. A minor aquifer is present in the north eastern part of the Borough and the area south of Peckham is within a Source Protection Zone, which is an area close to a point where drinking water is abstracted (the Honor Oak Pumping Station). These locations are particularly vulnerable to pollution and should be protected.</p>	<p>We are recommending that the Inspector change Policy 13 to include reference to water pollution which will cover both surface and ground water quality. This is set out in our table of changes. Policy 13 provides the strategic hook for more detailed policies in the development management DPD.</p>

Name	Comment	Officer response
	<p>There have also been developments since the Preferred Options stage in relation to various plans and projects, namely the adoption of the Thames River Basin Management Plan (December 2009) and the progression of Thames Tideway Tunnel Project.</p> <p>Thames Tideway Tunnel</p> <p>We are pleased to see the Thames Tunnel, also called the Thames Tideway Tunnel, mentioned in this Section because it is essential infrastructure that will help deliver Sustainability Objective 2B. The Thames Tideway Tunnel is being designed to stop untreated sewage flowing in to the Thames in times of high surface water flows. It is, therefore, designed to improve water quality in the River Thames, rather than specifically reduce flooding, which its positioning this Section implies.</p> <p>Thames River Basin Management Plan</p> <p>Adopted in December 2009, the Thames River Basin Management Plan, is a result of the implementation of the "EU Water Framework Directive". As a result, the UK has to meet certain standards for the water quality for both surface and ground waters. A number of bodies will be responsible for the implementation of the recommendations of this plan, including Local Authorities.</p>	<p>The document has been reviewed and added to the list of reference documents</p>

Name	Comment	Officer response
<p>Thames Water</p>	<p>Policy 13</p> <p>Thames Water supports the requirements for developments to reduce water use and use local sources of water where possible and the requirement for developments to help reduce flood risk by reducing water run-off, using sustainable urban drainage systems and avoiding the paving over of gardens and creation of hard-standing areas.</p> <p>However, Thames Water objects to the omission of a specific policy supporting the Thames Tunnel which will make the Core Strategy not properly justified, ineffective and inconsistent with national policy.</p> <p>Policy 14 states that the approach will be achieved by "Working with infrastructure providers to identify and deliver elements of infrastructure to support growth at the right time."</p> <p>Thames Water supports this statement in that water and sewerage infrastructure needs to be provided ahead of development where upgrades to existing infrastructure or new infrastructure are necessary. However, the provision of new water and sewerage infrastructure is not solely related to supporting growth, in the absence of support for non-growth related infrastructure the Core Strategy is unsound.</p>	<p>The Core Strategy recognises the importance of the Thames Tunnel, in the evidence base, supporting text to policy 13 and the infrastructure table to policy 14. This provides a sufficient strategic hook for delivery of the project without duplicating national and regional policy and guidance. Policy 13 states that we will set high standards for reducing pollution. We are recommending including a reference to supporting measures to reduce water pollution as a proposed change, which provides flexibility to cover a range of projects including the Thames Tidal Tunnel. This is set out in our table of changes.</p> <p>We are working with Thames Water to identify potential locations for delivery of the tunnel within Southwark. We can include more detailed policies on the Thames Tidal Tunnel in the development management DPD, including site allocations where necessary.</p> <p>We are recommending amendment to the supporting text to Policy 13 to clarify the role and function of the Thames Tunnel to reduce water pollution and refer to Water Framework Directive and Thames River Basin Management Plan.</p>

Name	Comment	Officer response
<p>Natural England</p>	<p>After careful consideration of the information provided it is our opinion that the document has altered to include the changes and recommendations proposed by Natural England, strengthening and ensuring that the document is compliant with relevant legislation and has a credible evidence base. Natural England has previously commented on the ability of the document to be monitored and measured and this was and is deemed acceptable.</p> <p>Overall Natural England has no further comments to add to the Core Strategy Consultation, but we would offer our support to the intention of the Council to designate eleven additional sites within the Borough as Sites of Interest for Nature Conservation (SINC's) – the SINC's Evidence Base document page 2 refers. The document is acceptable to Natural England, compliant with relevant legislation and is in line with the approach adopted by other London Boroughs, however, if you are aware of any reason why Natural England should comment further on this application please let us know as soon as possible.</p>	<p>Support Noted</p>

Name	Comment	Officer response
<p>Transport for London</p> <p>The Core Strategy provides strategic guidance for other documents in the LDF. The Elephant and Castle Opportunity Area is an important strategic proposal and the Elephant and Castle Development Framework SPG (2004) contains important detailed guidance that forms the basis of the Elephant and Castle regeneration project.</p> <p>The Core Strategy should clearly state that the Core Strategy proposals in respect of this key strategic regeneration project are based on the Elephant and Castle Development Framework SPG (2004) and will be guided by the principles contained therein. This would be consistent with paragraph 5.110 of the London Plan, which sets out strategic guidance for the Elephant & Castle Opportunity Area. This should also be made clear in the Core Strategy Sustainability Appraisal Report (SAR) in order to clearly state the basis on which the SAR has been conducted.</p> <p>This is important to satisfy the requirement of soundness as outlined in paragraph 4.52 of PPS12.</p>	<p>This change should not be made as the core strategy is not based on the E+C SPG as the quantum of development and legal processes have changed. The SPG provides useful additional information however the principles do not set out the basis for the core strategy for a number of reasons.</p> <ul style="list-style-type: none"> •The core strategy has set out 2 approaches for informal consultation at issues and options, has taken forward a preferred option and now has a strategy for development at the Elephant and Castle which has been subject to formal consultation. These will now be examined at an Examination in Public. <p>An SPG is not subject to public examination.</p> <p>E+C SPG was adopted in 2004 and is therefore not up to date. More recent evidence is now available</p> <p>TfL have been consulted at each stage of this process and have not raised these issues for inclusion at these earlier stages in the core strategy. Therefore these issues have not been included in our reporting to date.</p> <p>The consideration of issues raised through evidence and consultation are set out in our sustainability appraisal and consultation report.</p> <p>These processes are in line with the current planning and London acts, regulations and guidance. Basing a core strategy on an SPG prepared for adoption in 2004 would not be in line with this guidance.</p> <p>The SPG will be reviewed after the core strategy to establish whether it needs to be redrafted to provide further guidance to the core strategy as set out in the Local Development Scheme. Furthermore the information in the SPG does not accord with the core strategy. The SPG is based on strategy, targets and policies in the Draft London Plan 2002, 1995 Southwark Plan and emerging Southwark Plan 2002/2004. These are different due to changing evidence, national and regional guidance. This change should not be made. The SPG provides useful additional information however the principles do not set out the basis for the core strategy for a number of reasons.</p>	

Name	Comment	Officer response
	<p>There is no mention (either in the Core Strategy or the SAR) of the fact that some of the Underground stations (in particular the Elephant and Castle Bakerloo and Northern Line station) are beginning to experience congestion and/or that there is currently a lack of transport capacity at these stations to accommodate the high levels of growth envisaged in the Core Strategy. These issues are addressed in the Elephant and Castle Development Framework SPG (2004) and this should also be identified in the Core Strategy and the SAR, which will provide the strategic framework for LDF policies and development control decisions. This omission substantially undermines the credibility of the Core Strategy in relation to both Core Strategy Strategic Policy 2 and the deliverability of comprehensive regeneration in this Opportunity Area, and thus undermines the deliverability of the Core Strategy vision as a whole.</p>	<p>This change should not be made. Our research does not demonstrate that some of the underground stations are experiencing congestion or that they have capacity issues that would impact on the regeneration and development set out in the core strategy.</p> <p>All developments are required to provide a transport assessment in line with policies 3.3 and 5.2 of the Southwark Plan which are being saved. We require a strategic transport contribution and we make provision for additional Transport for London contributions in our section 106 SPD. Therefore there is no evidence to suggest that this detail should be added. We will be updating this SPD as set out in our Local Development Scheme, we will change the contributions if there is evidence and if the 4 tests of circular 5/05 are met.</p>

Name	Comment	Officer response
	<p>Elephant and Castle Opportunity Area – Vision Pages 44-45</p> <p>Paragraph 1 of page 44 states that: “<i>Elephant and Castle will continue to be highly accessible from other places in Southwark and London</i>” and in paragraph 3 that “<i>Public transport will become more accessible</i>”.</p> <p>In earlier Core Strategy representations, TfL has raised concerns about delivery issues and it remains concerned that the Core Strategy needs effectively to address the challenges to sustainable delivery of this regeneration scheme, particularly by reference to the transport constraints and challenges as detailed in the Elephant and Castle Development Framework SPG (2004). These are not adequately addressed in the Core Strategy or in the Core Strategy Sustainability Appraisal Report (SAR). Though this section says that public transport will become more accessible and that the existing subways will be replaced by surface crossings, there is no mention of the capacity issues related to access to the Northern line via the associated ticket hall or the method of their being addressed. This issue is also overlooked in the SAR.</p> <p>The need for securing the delivery of medium-term transport infrastructure improvements to deliver the vision set out on this page for the Elephant and Castle Opportunity Area is seriously understated in the Core Strategy and it is not addressed in the SAR, the Local Implementation Plan or any other documents that form part of the evidence base for the Core Strategy.</p> <p>There are indications in the SAR that the Council recognises that there are risks of delay in the delivery of the necessary transport interchange improvements (for example, see Tables on pages 29, 56 and 58 of the SAR). There is no statement or assessment of how any delay in the delivery of such improvements will be addressed by the Core Strategy, either in terms of intermediate mitigation measures or the restraint on further development until the necessary mitigation has been provided.</p>	<p>We suggest that the change is not made as we have included information about working with TfL as they suggested at preferred options consultation on page 44. We also set out that we will work with our partners on strategic policy 14 and also that we will work with infrastructure providers to identify and deliver elements of infrastructure to support growth at the right time. There is also a section on the elephant and castle infrastructure from page 160 where we set out TfL as an important person to be involved.</p>

Name	Comment	Officer response
	<p>Strategic Policy 2 Paragraphs 7 and 8 of page 60 set out that <i>“It is important that we increase the capacity, quality and integration of public transport as a co-ordinated network...Our support of public transport improvements is important for current residents and businesses and also to ensure that provision is made for new development. There are a number of transport schemes that could improve Southwark.”</i></p> <p>TfL fully supports this statement but there appears to be a failure of the Core Strategy and the Core Strategy Sustainability Appraisal Report (SAR) to explain what the key improvements are in relation to the Elephant and Castle Opportunity Area (see point 6 above). This may be achieved by a simple cross-reference to the Elephant and Castle Development Framework.</p>	<p>This change should not be made. Core strategy policy 2 sets out the strategy for maintaining and improving the road network. This strategic policy sets out the framework to overcome vehicle congestion within Southwark including the Elephant and Castle. The purpose of the core strategy is to set out strategic policies. Additional detail can be provided in other documents within the Local Development Framework.</p>
	<p>Paragraph 2 of page 62 sets out that <i>“It is important that the existing road network is properly maintained and improved to ensure that these roads allow vehicles to pass through Southwark with minimum delay and keep congestion and pollution as low as possible.”</i></p> <p>The Elephant and Castle regeneration will also need to resolve the pedestrian capacity, safety and amenity issues that could arise from the closure of the subways and from other impacts of the regeneration proposals where pedestrian space may be constrained. TfL’s feasibility study demonstrates that the proposed subway replacement with surface pedestrian crossings and associated traffic signal introduction at the northern roundabout will inevitably result in some, possibly significant, delay to traffic through the local area. In light of this TfL considers that progressive phasing and monitoring of changes to the surface layout offers the most pragmatic means of delivery at this critical part of the TfL Road Network. These possible significant impacts (and the mitigation measures to address them) are not addressed in the Core Strategy Sustainability Appraisal Report (SAR).</p>	<p>This change should not be made. Core strategy policy 2 sets out the strategy for maintaining and improving the road network. This strategic policy sets out the framework to overcome vehicle congestion within Southwark including the Elephant and Castle. The purpose of the core strategy is to set out strategic policies. Additional detail can be provided in other documents within the Local Development Framework.</p>

The full set of representations on the Core Strategy are available to view on our website at www.southwark.gov.uk/corestrategy

APPENDIX 3 RELEVANT PLANS, STRATEGIES AND PROGRAMMES

POLICY OR PLAN
International
Kyoto Protocol to the United Nations framework convention on climate change (1997)
Johannesburg Declaration on Sustainable Development (2002)
European
EU Sixth Action Plan (SD Strategy) (2002)
Council Directive 79/409/EEC on conservation of wild birds
Council Directive 92/43/EEC on conservation of natural habitats and of wild fauna and flora
EU Water Framework Directive (2000/60/EC)
EU Directive 2002/91/EC on the energy performance of buildings
Air Quality Framework Directive 96/62/EC and daughter directives (99/30/EC), (2000/69/EC), (2002/3/EC)
European Spatial Development Strategy (1999)
European Landscape Convention (ratified by the UK government in 2006)
European transport policy for 2010: time to decide (EC, 2001)
European Directive 2003/30/EC on the promotion of the use of biofuels or other renewable fuels for transport
Waste Framework Directive 75/442/EEC Landfill Directive (99/31/WC)
The Water Framework Directive (2000) Put into UK law (transposed) in 2003.

POLICY OR PLAN
National
PPS 1: <u>Delivering Sustainable Development (2005)</u>
<u>Planning and Climate Change: Supplement to PPS1(2007)</u>
PPS 3: <u>Housing (2006)</u>
<u>Draft PPS4: Planning for Sustainable Economic Development (2008)</u>
PPS 6: <u>Planning for Town Centres (2005)</u>
PPS 9: <u>Biodiversity and Geological Conservation (2005)</u>
PPS 10: <u>Planning for Waste Management (2005)</u>
PPS 12: <u>Local Spatial Planning (2008)</u>
PPG 13: <u>Transport (2001)</u>
PPG 15: <u>Planning and the Historic Environment (1994)</u>
<u>Draft PPS15: Planning for the Historic Environment (2009)</u>
PPG 16: <u>Archaeology and Planning (1990)</u>
PPG 17: <u>Planning for Open Space, Sport and Recreation (2002)</u>
PPS 22: <u>Renewable Energy (2004)</u>
PPS 23: <u>Planning and Pollution Control (2004)</u>
PPG 24: <u>Planning and Noise (1994)</u>
PPS 25: <u>Development and Flood Risk (2006)</u>
<u>Biodiversity – The UK Action Plan (1994)</u>
<u>Biodiversity by Design</u>
<u>Biodiversity and the Built Environment. A report by the UK-GBC Task Group</u>
<u>Department for Transport 10 Year Transport Plan (2000)</u>
<u>By Design – Urban design in the planning system: towards better practice. DETR / CABE (2000)</u>
<u>Urban White Paper 2001</u>

POLICY OR PLAN
England Biodiversity (2002)
Communities Plan - Sustainable Communities: Building for the Future (2003)
Guidance on Tall Buildings CABE and English Heritage (2007)
Securing the Future – UK Sustainable Development Strategy (2005)
The UK Climate Change Programme (2006)
Air Quality Strategy (2007)
Waste Strategy (2007)
Planning for a Sustainable Future - White Paper (2007)
Future Water: The Government's Water Strategy for England (2008)
Sustainable Construction Strategy (2007)
Energy White Paper (2007)
UK Sustainable Procurement Action Plan (2007)
English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)
Department of Health: Next Step Review: High Quality Care for All (2008)
Department of Health: Draft Guidance on Strategic Environmental Assessment (2007)
Health inequalities: progress and next steps (2008)
Healthy Weight Healthy Lives: A Cross Government Strategy for England (2008)
Model Procedures for the Management of Contaminated Land- Environment Agency (2004)
Environment Agency: Adapting to Climate Change Strategy
Environment Agency Strategies, Plans and Reports

POLICY OR PLAN
London
The London Plan: Spatial Development Strategy for Greater London consolidated with alterations since 2004 (2008)
Draft Replacement London Plan 2009
A Sustainable Development Framework for London. London Sustainable Development Commission (June 2003)
Sustainable Communities Plan for London: Building for the Future (2003)
Sustaining Success: The Mayor's Economic Development Strategy (2004)
London: Cultural Capital – Realising the potential of a world-class city. The Mayor's Culture Strategy (2004)
Connecting with London's Nature. The Mayor's Biodiversity Strategy (2002)
Sounder City: The Mayors Ambient Noise Strategy (2004)
Cleaning London's Air, The Mayor's Air Quality Strategy (2002)
Green Light to Clean Power. The Mayor's Energy Strategy (2004)
Rethinking Rubbish in London. The Mayor's Waste Management Strategy (2003)
Accessible London: Achieving an Inclusive Environment. Mayor's Supplementary Planning Guidance (2004)
Industrial Capacity Mayor's Supplementary Planning Guidance (2003)
Providing for Children and Young People's Play and Informal Recreation. Mayor's Supplementary Planning Guidance (2008)
Planning for Equality and Diversity in London. Mayor's Supplementary Planning Guidance (2007)
London View Management Framework. Mayor's Supplementary Planning Guidance (2007)
Land for Transport Functions. Mayor's Supplementary Planning Guidance (2007)
London Plan Sustainable Design and Construction. Mayor's Supplementary Planning Guidance (2006)
Housing Mayor's Supplementary Planning Guidance (2005)
London Remade Demolition Protocol Report (2005)
English Heritage's Heritage at Risk- London 2008
Thames Region Catchment Flood Management Plan

POLICY OR PLAN
Thames River Basin Management Plan, 2009
Regional Flood Risk Appraisal
Taking Care of Water- Our Plan for the next 25 years (Thames Water Utilities 2007)
Draft Water Resource Management Plan (Thames Water Utilities) 2008
Our Plans for Water (Thames Water Utilities) 2008
Draft Strategic Proposals for Sludge Management (Thames Water Utilities) 2008
Thames Corridor Catchment Abstraction Management Strategy (CAMS)
Adapting to Climate Change: A checklist for development (2005)
Living Well in London: The Mayor's draft Health Inequalities Strategy (2008)
NHS London: Strategic Plan (2008)
Healthcare for London: A Framework for Action (2007)
State of the Environment Report for London
Thames Path National Trail – Management Strategy 2006-11
Improving Londoner's Access to Nature
The London Rivers Action Plan

POLICY OR PLAN
Local
London Borough of Southwark: Community Strategy 2006-16
Southwark's Unitary Development Plan (2007)
Southwark Local Implementation Plan (LIP)
Southwark Waste Management Strategy: 2003 – 2021
London Borough of Southwark: Enterprise Strategy: 2005 – 2016
London Borough of Southwark: Employment Strategy: 2005 – 2016
London Borough of Southwark Contaminated Land Strategy (2001)
London Borough of Southwark Biodiversity Action Plan
London Borough of Southwark Air Quality Management and Improvement Plan
Southwark Housing Strategy 2005- 2010
London Borough of Southwark Crime and Drugs Strategy 2005 - 2008
Southwark Climate Change and Sustainability Strategy (Emerging)
Southwark Open Spaces Strategy, 2003
Southwark Tourism Strategy 2005-2010
London Borough of Southwark, Children and Young People's Plan 2006/7- 2008/9
London Borough of Southwark School Organisation Plan and Education Development Plan
Southwark Alliance, Neighbourhood Renewal Strategy 2002 – 2004
Southwark Conservation Area Appraisals
Southwark Archaeology Priority Zones
Southwark State of the Environment Fact Sheet
Metropolitan Police Estate – Asset Management Plan, Southwark, 2007
Southwark Walking Plan, 2006

POLICY OR PLAN
Southwark PCT Commissioning Strategy Plan 2009-2012 (2007)
Southwark PCT Asset Management Strategy (2007)
South Bank Partnership Manifesto, "Under pressure and on the edge: London's South Bank – a Manifesto for Action" (2006)
Lambeth Council Sustainable Community Strategy (2008-2020)
Lewisham Council Sustainable Community Strategy (2008-2020)

Further details can be found in the [Background Paper that supports the Core Strategy](#)

APPENDIX 4 Comparison of Sustainability Objectives

Sustainability Objectives

- SDO 1 To tackle poverty and encourage wealth creation
- SDO 2 To improve the education and skill of the population
- SDO 3 To improve the health of the population
- SDO 4 To reduce the incidence of crime and the fear of crime
- SDO 5 To promote social inclusion, equality, diversity and community cohesion
- SDO 6 To reduce contributions to climate change
- SDO 7 To improve the air quality in Southwark
- SDO 8 To reduce waste and maximise use of waste arising as a resource
- SDO 9 To encourage sustainable use of water resources
- SDO10 To maintain and enhance the quality of land and soils
- SDO11 To protect and enhance the quality of landscape and townscape
- SDO12 To conserve and enhance that quality of landscape and townscape
- SDO13 To protect and improve open spaces, green corridors and biodiversity
- SDO14 To reduce vulnerability to flooding
- SDO15 To provide everyone with the opportunity to live in a decent home
- SDO16 To promote sustainable transport and minimise the need to travel by car
- SDO17 To provide the necessary infrastructure to support existing and future development

Core Strategy Objectives

Theme: Improve individual life chances

Objective 1A. Create employment and link local people to jobs Southwark will be a prosperous borough providing a wide range of employment opportunities that facilitate regeneration. The Central Activities Zone will contain a mix of tourism, cultural and creative industries, finance and office jobs. Local centres will provide retail, services and local employment whilst preferred industrial locations provide places for small businesses and industry. Southwark will be without concentrations of poverty and with good opportunities because there is good access to jobs and residents will have the training and skills needed by businesses. The policies related to this theme are Policy 1, Policy 3 and Policy 10.

Objective 1B. Achieve educational potential

Southwark schools, universities, pre-schools and colleges will be places where children and young people can achieve and gain the knowledge and skills to get a job. Southwark will be a place that creates positive futures by building, redeveloping and improving educational facilities ensuring good access for everyone. Improving Southwark will help to attract good teachers to work in the borough. The policies related to this theme are Policy 1, Policy 4 and Policy 10.

Objective 1C. Be healthy and active

Southwark's community will be healthy and active. High quality sports and leisure centres will be located across the whole borough and everyone will have access to them. Open spaces will be protected and the local community will be able to enjoy using these spaces, including parks, nature reserves and the River Thames. Good quality and accessible health facilities will be located across the whole borough. Southwark will be without concentrations of people with poor health because everyone has access to good health, sports and leisure facilities, and open spaces. The policies related to this theme are Policy 1 and Policy 4.

Objective 1D. Culture, creativity and diversity

Southwark will be a prosperous borough providing a wide range of activities and facilities for the diverse community. Successful creative industries will thrive. There will be a wide range of arts and cultural facilities for Southwark's multicultural and very diverse community. The policies related to this theme are Policy 1, Policy 3, Policy 4 and Policy 10.

Objective 1E. Be safe

Southwark will be a safe place for people to live, visit and work. The policies related to this theme are Policy 1, Policy 4 and Policy 12.

Theme: Make the borough a better place for people

Objective 2A. Create mixed communities

People will choose to live in Southwark because we will have a the mixture of different types of housing, jobs, shops, schools, community facilities, health centres, libraries, religious centres and leisure facilities needed by a diverse community. The policies related to this theme are Policy 1, Policy 2 and Policy 3.

Objective 2B. Promote sustainable use of resources

Southwark will be a green and environmentally sustainable borough. New developments will be built to high environmental standards to reduce the impact on the environment and adapt to climate change, focussing on flood risk, waste management, biodiversity and water quality. New housing will be located near to community facilities, shops, offices and leisure facilities. This encourages walking, cycling and public transport and restricts parking to reduce pollution and congestion, and the need to travel far. The policies related to this theme are Policy 1, Policy 2, Policy 11, Policy 12 and Policy 13.

Objective 2C. Provide more and better homes

The whole of the borough will offer more housing of a range of different types to meet the needs of the community. All the housing will be built to a high quality of design. There will be a choice of housing types including more family housing, housing for students and more affordable housing. The policies related to this theme are Policy 1, Policy 12 and Policy 13.

Objective 2D. Create a vibrant economy

Southwark will be a successful and profitable place. The town centres will offer a range of shops and services, along with offices, tourism and cultural facilities. The Central Activities Zone, opportunity areas and action areas will have lots of different activities as well as housing. The policies related to this theme are Policy 1, Policy 3, Policy 4 and Policy 10.

Objective 2E. A liveable public realm

It will be easy to get to and around places on foot and by bike with excellent public transport links, including water transport. The policies related to this theme are Policy 1, Policy 2 and Policy 11.

Objective 2F. Conserve and protect historic and natural places

Southwark's historic buildings will be protected and improved particularly in conservation areas and listed buildings. Open spaces and biodiversity will be protected, made more accessible and improved. The policies related to this theme are Policy 1, Policy 11 and Policy 12.

Theme 3: Deliver quality public services

Objective 3A. Accessible, customer focused, efficient and modern public services

Public services will be effective and easily accessible by all members of the community. The policies related to this theme are Policy 1, Policy 3 and Policy 4.

Theme 4: Making sure positive change happens

Objective 4A. Provide enough funding for regeneration to positively transform the image of Southwark

We will work with landowners and developers to achieve regeneration, continuing to make Southwark a place that people aspire to be and that developers and landowners want to invest in. We will have a clear and flexible plan to make sure the right investment decisions are made and that regeneration happens on time. The policy related to this theme is Policy 1 and Policy 14.

Objective 4B. Make sure that we consult effectively

We will work with local communities, organisations, community groups, developers, businesses and land owners to make sure that we consult effectively on planning policies and development management decisions. We will make sure that we provide people with the opportunity to participate meaningfully in the preparation of local development framework documents as set out in our statement of community involvement. The policy related to this theme is Policy 1 and Policy 14.

Theme 5: Planning for development in growth areas

Strategic Objective 5A Developing in growth areas

We have a growth areas approach to achieving the vision to improve places prioritising development in the:

- Central activities zone.
- Elephant and Castle opportunity area.
- Borough, Bankside and London Bridge opportunity area.
- Peckham and Nunhead action area.
- Canada Water action area.
- Aylesbury action area.
- West Camberwell regeneration area.
- Old Kent Road regeneration area.

Compatibility Matrix		Core Strategy Strategic Objectives														
		1a	1b	1c	1d	1e	2a	2b	2c	2d	2e	2f	3a	4a	4b	5a
Sustainability Objectives	SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	0	✓	✓	✓	✓
	SDO 2 To improve the education and skill of the population	✓	✓	0	✓	0	✓	0	0	✓	0	0	✓	✓	✓	0
	SDO 3 To improve the health of the population	0	0	✓	0	✓	0	✓	0	0	✓	0	✓	✓	0	0
	SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	0	✓	✓	0	✓
	SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	✓	0	✓	✓	0	0	✓	✓	✓	✓
	SDO 6 To reduce contributions to climate change	?	?	✓	0	0	✓	✓	?	✓	✓	0	0	✓	0	?
	SDO 7 To improve the air quality in Southwark	?	?	✓	0	0	✓	✓	?	✓	✓	0	0	✓	0	?
	SDO 8 To reduce waste and maximise use of waste arising as a resource	?	✓	0	0	0	0	✓	?	✓	0	0	0	✓	0	?
	SDO 9 To encourage sustainable use of water resources	✓	✓	0	0	0	0	✓	✓	✓	✓	0	0	✓	0	✓
	SDO 10 To maintain and enhance the quality of land and soils	?	0	✓	0	0	✓	✓	0	0	✓	0	0	✓	0	✓
	SDO 11 To protect and enhance the quality of landscape and townscape	✓	0	✓	✓	✓	✓	✓	?	✓	✓	✓	0	✓	✓	?
	SDO 12 To conserve and enhance the historic environment and cultural assets	?	✓	0	✓	✓	✓	✓	?	✓	✓	✓	✓	✓	✓	?
	SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓	✓	✓	✓	✓	✓	✓	?	✓	✓	✓	0	✓	✓	?
	SDO 14 To reduce vulnerability to flooding	?	?	0	0	0	0	0	?	✓	✓	✓	✓	✓	0	?
	SDO 15 To provide everyone with the opportunity to live in a decent home	?	0	✓	0	✓	✓	✓	✓	0	✓	✓	✓	✓	0	✓
	SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	✓	0	✓
	SDO 17 To provide the necessary infrastructure to support existing and future development	✓	0	0	0	0	✓	✓	✓	✓	✓	0	✓	✓	0	✓
Key	✓	compatible	compatible	?	dependent on implementation	0	no significant link	X	incompatible							

Commentary of results

1A	CREATING EMPLOYMENT AND LINKING LOCAL PEOPLE TO JOBS
SDO6	To reduce contributions to climate change
?	Some employment uses could increase contributions to climate change. However, new technologies could help reduce impacts and provide new opportunities for employment
SDO7	To improve the air quality in Southwark
?	Some employment uses could have an adverse impact upon air quality as a result of construction and operation
SDO8	To avoid waste and maximise use of waste arising as a resource
?	Creating employment will result in an increase in waste produced in both construction and operation
SDO10	To maintain and enhance quality of soils
?	Some employment uses could have a negative impact on the quality of land and soils
SDO12	To conserve and enhance the historic environment and cultural assets
?	The need to provide land for employment use could conflict with the need to conserve and enhance the historic environment
SDO15	To provide everyone with the opportunity to live in a decent home
?	The need to provide homes could conflict with the need to provide employment land
1B	ACHIEVE EDUCATIONAL POTENTIAL
SDO6	To reduce contributions to climate change
?	The process of building and redeveloping schools could increase contributions to climate change in the short term but, providing best practice methods are followed, could reduce contributions in the long term
SDO7	To improve the air quality in Southwark
?	Building and redeveloping schools could have a negative impact on air quality
SDO 14	To reduce vulnerability to flooding
?	Building and redeveloping schools located in the flood zone could increase those vulnerable to flooding
2C	PROVIDE MORE AND BETTER HOMES
SDO6	To reduce contributions to climate change and adapt to climate change that is already happening
?	The provision of more and better homes could increase contributions to climate change
SDO7	To improve the air quality in Southwark
?	The provision of new homes could have an adverse impact upon air quality both in construction and operation
SDO8	To avoid waste and maximise use of waste arising as a resource
	Creating new homes will result in an increase in waste produced in both construction and operation
SDO11	To protect and enhance the quality of landscape and townscape
?	The provision of more and better homes will not necessarily protect and enhance the look and character of places
SDO12	To conserve and enhance the historic environment and cultural assets
?	The provision of more and better homes will not necessarily protect and enhance the historic environment and cultural assets
SDO13	To protect and improve open spaces, green corridors and biodiversity
?	The need to provide more homes could put pressure on open space land to be developed
SDO14	To reduce vulnerability to flooding
?	Pressure for new homes could increase vulnerability to flooding

5A	DEVELOP IN GROWTH AREAS
SDO6	To reduce contributions to climate change and adapt to climate change that is already happening
?	Development in growth areas could increase contributions to climate change in construction and operation
SDO7	To improve the air quality in Southwark
?	Development in growth areas could have an adverse impact on air quality in construction and operation
SDO8	To avoid waste and maximise use of waste arising as a resource
?	Development in growth areas will result in an increase in waste produced in both construction and operation
SDO11	To protect and enhance the quality of landscape and townscape
?	Development in the growth areas will not necessarily protect and enhance the look and character of places
SDO12	To conserve and enhance the historic environment and cultural assets
?	Development in growth areas will not necessarily protect and enhance the historic environment and cultural assets
SDO13	To protect and improve open spaces, green corridors and biodiversity
?	Development in the growth areas could put pressure on open space land to be developed
SDO14	To reduce vulnerability to flooding
?	Development in the growth areas could increase vulnerability to flooding

Coverage of SA Objectives

Objective	Environmental	Social	Economic
SDO 1		✓	✓
SDO 2		✓	✓
SDO 3	✓	✓	✓
SDO 4	✓	✓	✓
SDO 5		✓	
SDO 6	✓	✓	✓
SDO 7	✓	✓	✓
SDO 8	✓		✓
SDO 9	✓	✓	✓
SDO 10	✓	✓	✓
SDO 11	✓	✓	✓
SDO 12	✓	✓	✓
SDO 13	✓	✓	✓
SDO 14	✓	✓	✓
SDO 15		✓	✓
SDO 16	✓	✓	✓
SDO17	✓	✓	✓

Most of the objectives cover environmental, social and economic issues, either directly or indirectly. For example, Sustainability Objective 6 (To **reduce contributions to climate change**) is directly aimed at reducing the impact of carbon dioxide emissions on the environment. However, there will also be social and economic benefits as more sustainable transport choices are being promoted to encourage energy efficiency which in turn can have a positive impact on the health and quality of life of residents.

APPENDIX 5 Sustainability Appraisal of Core Strategy Issues and Options

Summary of Results – OPTION 1: GROWTH AREAS

Sustainability Objectives	OPTION 1 - GROWTH AREAS																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 2 To improve the education and skill of the population	✓	✓	-	-	-	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 4 To reduce the incidence of crime and the fear of crime	-	✓	✓	✓	✓	-	-	✓	✓	✓	✓	✓	-	✓	✓	✓	✓	-	✓
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓
SDO 6 To reduce contributions to climate change	X	?	-	-	-	-	✓	-	?	?	-	?	?	✓	?	?	-	✓	✓
SDO 7 To improve the air quality in Southwark	X	?	-	-	-	-	✓	-	?	?	-	?	?	✓	?	?	-	✓	✓
SDO 8 To reduce waste and maximise use of waste arising as a resource	X	?	-	-	-	-	-	?	?	?	-	?	?	-	?	?	-	✓	-
SDO 9 To encourage sustainable use of water resources	?	?	-	?	-	-	-	?	?	?	-	?	?	-	?	?	-	✓	-
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	-	✓	-	-	-	-	?	✓	✓	-	-	-	✓	✓	-	✓	✓

- 1 Quantity of housing
- 2 Location of housing
- 3 Quantity of Affordable housing
- 4 Re provision of affordable housing
- 5 Split between affordable/intermediate
- 6 Family housing
- 7 Disabled provision
- 8 Student housing
- 9 Gypsies & travellers
- 10 Quantity of office space
- 11 Industrial land
- 12 Cultural/Creative industries
- 13 Tourist facilities
- 14 Small businesses
- 15 Shops
- 16 Bars/Cates/Restaurants
- 17 Community Facilities
- 18 Environmental Standards
- 19 Car Parking

Sustainability Objectives		OPTION 1 - GROWTH AREAS																		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
SDO 11 To protect and enhance the quality of landscape and townscape	?	✓	?	?	-	?	-	?	✓?	✓?	✓	✓?	✓?	✓	✓	✓	✓✓	✓?	?	✓
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	-	?	-	?	-	?	✓?	✓?	✓	✓?	✓?	✓	✓	✓	✓	✓?	?	✓
SDO 13 To protect and improve open spaces, green corridors and biodiversity	?	✓	-	?	-	?	-	-	✓?	✓?	✓	✓?	✓?	✓	✓	✓	✓	✓?	✓?	✓
SDO 14 To reduce vulnerability to flooding	X	X	-	-	-	-	-	X	-	?	?	?	?	?	✓?	✓	-	✓	-	-
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	-	?	?	-	-	-	-	-	-	✓	-	-
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	✓	✓	✓	-	✓	-	✓✓	-	✓	?	✓	✓	✓	✓	✓	✓	✓	✓	✓
Key		✓✓	✓	XX	X	?	-	?	?	?	?	?	?	?	?	?	?	?	?	?
		major positive	minor positive	major negative	minor negative	uncertain														
		no significant impact																		

Summary of Results – OPTION 2: HOUSING LED GROWTH

Sustainability Objectives		OPTION 2 - HOUSING LED GROWTH																		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	?	?	✓	?	✓	?	✓✓	?	X?	?	✓?	?	✓	✓✓	?	✓	✓	-
SDO 2 To improve the education and skill of the population	?	?	-	-	-	-	-	✓	✓	?	?	?	✓?	?	✓	✓	✓	✓	✓	-
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	?	?	✓?	?	✓	✓	?	✓	✓	✓
SDO 4 To reduce the incidence of crime and the fear of crime	-	?	?	✓	✓	-	-	?	✓	?	-	?	-	?	✓	✓	?	-	-	?
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	X?	✓	?	✓✓	✓	✓✓	?	?	?	?	?	✓	✓✓	?	?	-	-
SDO 6 To reduce contributions to climate change	X	X	-	X	-	-	-	?	-	?	?	-	-	?	X?	?	-	✓	✓	✓
SDO 7 To improve the air quality in Southwark	X	X	-	X	-	-	-	?	-	?	?	-	-	?	X?	?	-	✓	✓	✓
SDO 8 To reduce waste and maximise use of waste arising as a resource	X	X	-	X	-	-	-	-	-	?	?	-	-	?	X?	?	-	✓	✓	-
SDO 9 To encourage sustainable use of water resources	?	?	-	-	-	-	-	-	-	?	?	-	-	?	X?	?	-	✓	✓	-
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	-	✓	-	-	-	-	-	✓	X	-	-	?	✓	✓	-	✓	✓	✓

- 1 Quantity of housing
- 2 Location of housing
- 3 Quantity of Affordable housing
- 4 Re provision of affordable housing
- 5 Split between affordable/intermediate
- 6 Family housing
- 7 Disabled provision
- 8 Student housing
- 9 Gypsies & travellers
- 10 Quantity of office space
- 11 Industrial land
- 12 Cultural/Creative industries
- 13 Tourist facilities
- 14 Small businesses
- 15 Shops
- 16 Bars/Cafes/Restaurants
- 17 Community Facilities
- 18 Environmental Standards
- 19 Car Parking

Sustainability Objectives		OPTION 2 - HOUSING LED GROWTH																		Key		major positive	minor positive	major negative	minor negative	uncertain	no significant impact
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18								
SDO 11	To protect and enhance the quality of landscape and townscape	?	?	?	?	-	?	-	?	?	?	?	?	?	?	✓✓	?	?	?	✓	✓✓						
SDO 12	To conserve and enhance the historic environment and cultural assets	?	?	-	?	-	?	-	?	?	?	?	?	?	?	✓	?	?	?	✓	✓						
SDO 13	To protect and enhance open spaces, green corridors and biodiversity	?	?	-	?	-	?	-	?	?	?	-	?	-	?	-	?	?	?	✓	XX						
SDO 14	To reduce vulnerability to flooding	X	?	-	-	-	?	-	?	?	?	?	?	?	?	-	-	-	✓	-	X						
SDO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	?	✓	✓	✓	-	?	?	-	-	-	-	-	-	-	✓	-	?						
SDO 16	To promote sustainable transport and minimise the need to travel by car	?	?	✓	✓	-	?	-	X	X	X	?	?	?	?	✓	?	?	?	✓	-						

The detailed results can found in the Issues and Options SA report

APPENDIX 6

Appraisal of Preferred Options

The following summary appraises the sustainability of each spatial policy included in the Core Strategy Preferred Options paper, April 2009. This appraisal has assisted in drafting the publication/ submission version of the plan. The assessment involves the appraisal of the Core Strategy preferred options against the Sustainability Appraisal objectives developed in the scoping document.

Positive, negative, uncertain and insignificant effects are considered. Where potential sustainability issues arise these are discussed in more detail in the supporting table. This approach is designed to be iterative with the options refined following public consultation and through the Sustainability Appraisal of the Submission Version of the Core strategy.

Sustainability Appraisal of Preferred Option Core Strategy

Summary of Results – Preferred Option Policies

Sustainability Objectives	Core Strategy Policies												
	1	2	3	4	5	6	7	8	9	10	11	12	13
SDO 1 To tackle poverty and encourage wealth creation	?	✓	✓✓	✓	?	?	?	✓	-	✓✓	✓	✓	✓
SDO 2 To improve the education and skill of the population	✓	-	✓	✓✓	-	-	✓	✓	-	✓✓	-	-	-
SDO 3 To improve the health of the population	✓	✓✓	✓	✓✓	?	?	✓✓	-	✓✓	✓	✓✓	✓	✓
SDO 4 To reduce the incidence of crime and the fear of crime	?	✓	✓✓	✓	✓	✓	✓	-	-	✓	?	✓✓	?
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓✓	✓	✓✓	✓	✓
SDO 6 To reduce contributions to climate change	✓✓	✓✓	✓	✓	✓	✓	✓	✓	-	✓	✓	?	✓✓
SDO 7 To improve the air quality in Southwark	✓	✓✓	✓	✓	✓	✓	✓	-	-	✓	✓	✓	✓✓
SDO 8 To reduce waste and maximise use of waste arising as a resource	✓	-	-	?	X	X	X	X	-	X	-	?	✓✓
SDO 9 To encourage sustainable use of water resources	✓	-	-	?	X	X	X	X	-	X	?	?	✓✓
SDO 10 To maintain and enhance the quality of land and soils	✓	-	✓	✓	✓	✓	✓	✓	-	✓	✓✓	?	✓✓
SDO 11 To protect and enhance the quality of landscape and townscape	✓	-	✓✓	✓	✓	✓	✓	✓	-	✓	✓✓	✓	✓
SDO 12 To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	✓
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓	✓✓	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	✓✓
SDO 14 To reduce vulnerability to flooding	✓	-	?	?	?	?	?	?	-	?	✓	✓	✓✓
SDO 15 To provide everyone with the opportunity to live in a decent home	✓	-	-	-	✓✓	✓✓	✓	✓	✓	✓	-	✓	✓
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	-	✓	✓✓	✓	✓

Key	1 Sustainability Assessment
✓✓	major positive
✓	minor positive
XX	major negative
X	minor negative
?	uncertain
-	no significant impact

Summary of Findings

In total, there are two SDOs that show potential minor negative impacts in relation to the Preferred Options Policies. These are:

- SDO 8 To reduce waste and maximise use of waste arising as a resource
- SDO 9 To encourage sustainable use of water resources

In relation to Policies:

- Policy 5 Providing New Homes
- Policy 6 Homes for People on Different Incomes
- Policy 7 Family Homes
- Policy 8 Student Homes
- Policy 10 Numbers and Places for People to Work

SDO 8 To reduce waste and maximise use of waste arising as a resource

The provision of new homes in a range of tenures, the provision of more family homes and student homes and the provision of more employment will require the generation of more waste, however potential impacts can be mitigated over time through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse.

SDO 9 To encourage sustainable use of water resources

The provision of new homes, in a range of tenures, the provision of more family homes and student homes and the provision of more employment will result in additional water consumption; however potential impacts can be mitigated over time through the adoption of technologies and infrastructure that will encourage water efficiency.

The majority of other policies scored positively against the objectives however there were a few uncertainties identified. These were in relation to;

- SDO 1 To tackle poverty and encourage wealth creation
Policy 1 requires the assessment of social, environmental and economic impacts, however it is uncertain whether by undertaking a sustainability assessment, overall it would tackle poverty and encourage wealth creation as this will be dependent upon the nature of specific proposals. Policies 5, 6 and 7 include the provision of new homes, the different amounts of affordable and private homes and the amount of family housing which may have a positive impact on poverty and wealth creation, however this will need to be in tandem with other initiatives such as increased opportunities for employment training and education.
- SDO 3 To improve health
Policies 5 and 6 include the provision of new homes, the different amounts of affordable and private homes which may result in an improvement of health in the population as a result of improved quality of accommodation however this is likely to be affected by a number of other factors as well.
- SDO 4 To reduce the incidence of crime and fear of crime
Policy 1 (Assessing social, environmental and economic impacts) could lead to a reduction in crime and fear of crime but it will be dependent on implementation and whether this can be measured effectively. Policy 11 aims to protect and improve open spaces, green corridors and biodiversity in the borough, this could lead to a reduction in crime and fear of crime with improved local environments but this will be dependent on implementation. Policy 13 will require high design standards, which will encompass the incorporation of Secured by Design principles in new developments. However the impact on reducing the incidence and fear of crime will still be dependent upon implementation and long term monitoring.
- SDO 6 To reduce contributions to climate change
Policy 12 aims to achieve high standards of design that will reduce the need to travel and encourage people to live, work, study and relax in their local environment. The extent to which this reduces contributions to climate change will be dependent upon implementation.
- SDO 8 To reduce waste and maximise use of waste arising as a resource
The impact of Policy 4 (Places to learn and enjoy) on levels of waste in the borough is uncertain because this will depend on the type of community facilities that come forward as these can vary greatly and on the developments design and construction. As with Policy 12 which aims to achieve high standards of design whilst protecting and improving the historic environment, this will be dependent upon implementation.
- SDO 9 To encourage sustainable use of water resources
The impact of Policy 4 (Places to learn and enjoy) on water resources in the borough and water quality will depend on the type of community facilities that come forward as these can vary greatly and on the developments design and construction. As with Policy 12 which aims to achieve high standards of design whilst protecting and improving the historic environment, this will be dependant upon implementation. Policy 11 aims to protect and improve open spaces and wildlife in the borough, the impact upon water resources will be dependent on types of planting and management techniques such as irrigation.

- SDO 10 To maintain and enhance the quality of land and soils
Policy 12 aims to achieve high standards of design in the borough, the achievement of this against the need to maintain and enhance soil and land quality will be dependent upon implementation.
- SDO 12 To conserve and enhance the historic environment and cultural assets
Policy 13 aims to achieve high standards of design that will improve the environment and reduce the impacts on climate change. The impact of this on the historic environment will depend on the type and scale of development and the environmental measures that are put in place.
- SDO 14 To reduce vulnerability to flooding
Policies 3, 5, 6, 7, 8 and 10 set out how many new shops, homes and jobs should be provided in the borough and where they should go. It is not always possible to locate all new developments in areas of low flood risk. Any impacts could be mitigated through good design that incorporates flood resilient measures. Over time this would be a positive impact.

APPENDIX 7

Appraisal of Submission Version

The following matrices appraise the sustainability of each spatial policy included in the Core Strategy Submission Version October 2009. The assessment involves the appraisal of the Core Strategy policies against the Sustainability Appraisal objectives which were developed in the scoping document. Since the Preferred Options iteration further policies ST1, ST2 and 14 have been added as well as SDO 17 on Infrastructure in response to comments received in the consultation exercises. Positive, negative, uncertain and insignificant effects are considered, which are discussed in more detail in the supporting tables.

Detailed Core Strategy Policy Results

Sustainability Objectives		Timescale			Commentary on Results
		1	S	M	
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will ensure that change in the borough takes into account the social, economic and environmental impacts of new development. This will result in better places to live and work helping to reduce poverty and encourage wealth in the borough.
SDO 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will ensure that change in the borough takes into account the impacts on education in the borough. We will require major developments to make S106 contributions to help improve schools and employment training opportunities which will improve the education and skill of the population.
SDO 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will ensure that change in the borough takes into account the impacts on health in the borough. We will require major developments to make S106 contributions to help improve health facilities which will improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Encouraging more sustainable development will mean that everyone has better access to homes, employment and community facilities. This will help to address existing inequalities in the borough and help to reduce levels of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	✓✓	✓✓	Encouraging more sustainable development will mean that everyone has better access to homes, employment and community facilities. This will help to address existing inequalities in the borough which will promote social inclusion, equality, diversity and community cohesion.
SDO 6 To reduce contributions to climate change	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will help to ensure new development reduces contributions to climate change through good design. The Sustainable Design and Construction SPD and Sustainability Assessment SPD provide further guidance on energy efficient design and set out the targets for development.
SDO 7 To improve the air quality in Southwark	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will help to ensure new development contributes to improving air quality in the borough and includes appropriate mitigation measures where necessary. The Sustainable Design and Construction SPD and Sustainability Assessment SPD provide further guidance and set out the targets for development.
SDO 8 To reduce waste and maximise use of waste arising as a resource	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will help to ensure new development contributes to reducing the amount of waste in the borough and require appropriate mitigation measures where necessary. The Sustainable Design and Construction SPD and Sustainability Assessment SPD provide further guidance and set out the targets for development.
SDO 9 To encourage sustainable use of water resources	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will help to ensure new development includes design measures that allow for more sustainable water use. The Sustainable Design and Construction SPD and Sustainability Assessment SPD provide further guidance and set out the targets for development.
SDO 10 To maintain and enhance the quality of land and soils	✓✓	✓	✓✓	✓✓	New development will be provided on brownfield sites. Where land may have contamination as a result of previous uses, suitable remediation would be needed before development can proceed

Sustainability Objectives		Timescale				Commentary on Results
		1	S	M	L	
SDO 11 To protect and enhance the quality of landscape and townscape	✓✓	✓	✓✓	✓✓	✓✓	Regenerating areas that are most in need of physical improvements will help to improve the townscapes and protect other sensitive areas of the borough.
SDO 12 To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	✓✓	✓✓	✓✓	Focusing development in areas that are most in need of physical improvements will help to protect the historic environment and cultural assets in the borough.
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓✓	✓✓	✓✓	✓✓	✓✓	Focusing development in areas that are most in need of physical improvements will help to protect open spaces, green corridors and levels of biodiversity in the borough.
SDO 14 To reduce vulnerability to flooding	✓	✓	✓	✓	✓	A Flood Risk Assessment will need to accompany applications and suitable mitigation measures such as flood resilient design incorporated. Further guidance is set out in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	✓✓	Encouraging more sustainable development will mean that more housing is built to a higher design enabling people to have the opportunity to live in a decent home. New homes will need to be constructed to the Government's decent home standards, providing access to decent homes for increased numbers of the population
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓✓	✓✓	✓✓	Encouraging development in accessible locations should increase access to public transport and encourage alternative modes of transport to the car. Provision will need to be made for new development in terms of public transport capacity and other mitigation measures can be put in place such as travel plans and car parking restrictions. Improvements to public transport provision may not be realised in the short term.
SDO17 To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will ensure that change in the borough takes into account the social, economic and environmental impacts of new development. This will include how new development will impact on infrastructure capacity. Funding for infrastructure will be secured through s106 agreements where appropriate. Details of the infrastructure needs are set out in the infrastructure plan.

Sustainability Objectives		Timescale				Commentary on Results
		2	S	M	L	
SDO 1	To tackle poverty and encourage wealth creation	✓	-	✓	✓	Improving access to public transport and making it safer and easier to walk and cycle will enable greater access to jobs and services, thereby helping to reduce poverty and encourage wealth creation.
SDO 2	To improve the education and skill of the population	-	-	-	-	No significant impact.
SDO 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	Improving opportunities for cycling and walking will help improve people's quality of life and improve the health of the population by making it easier, safe and more enjoyable to walk and cycle.
SDO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Planning places with priority for walking, cycling and public transport will result in safer and more attractive places, which will encourage more people to use them and reduce crime and the fear of crime.
SDO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Improving access to public transport and making places safer and more attractive will enable greater access to jobs and community facilities helping to promote social inclusion, equality, diversity and community cohesion.
SDO 6	To reduce contributions to climate change	✓	✓	✓	✓	Encouraging developments that minimise car use and improving accessibility to public transport will help to reduce contributions to climate change. A transport assessment will be required with applications to show how schemes minimise their impacts
SDO 7	To improve the air quality in Southwark	✓	✓	✓	✓	Encouraging developments that minimise car use and improving accessibility to public transport will reduce emissions and improve air quality in the borough. A transport assessment will be required with applications to show how schemes minimise their impacts
SDO 8	To reduce waste and maximise use of waste arising as a resource	-	-	-	-	No significant impact.
SDO 9	To encourage sustainable use of water resources	-	-	-	-	No significant impact.
SDO 10	To maintain and enhance the quality of land and soils	-	-	-	-	No significant impact.
SDO 11	To protect and enhance the quality of landscape and townscape	✓	-	✓	✓	Improving accessibility to public transport and encouraging development that minimises car use will reduce the overall amount of parking in the borough which may improve the quality of landscape and townscapes. A transport assessment will be required with applications to show how schemes minimise their impacts
SDO 12	To conserve and enhance the historic environment and cultural assets	-	-	-	-	No significant impact.
SDO 13	To protect and improve open spaces, green corridors and biodiversity	✓	✓	✓	✓	Improving accessibility to public transport and encouraging development that minimises car use will reduce the overall amount of parking in the borough which will help to protect the existing open spaces, green corridors and biodiversity.
SDO 14	To reduce vulnerability to flooding	-	-	-	-	No significant impact.
SDO 15	To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact.

Sustainability Objectives		Timescale				Commentary on Results
		2	S	M	L	
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	✓✓	✓✓	✓✓	Improving accessibility to public transport and encouraging development that minimises car use, such as walking and cycling, will help to promote public transport and reduce car usage. The use of the River Thames will also be encouraged for transport and improving links between Southwark and north of the river
SDO17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	Improving accessibility to public transport and encouraging development that minimises car use will increase the demands on the existing transport infrastructure. Improvements will be required to ensure that the existing transport network can cope with the impact of new development especially in areas where large regeneration schemes are proposed. Land will be safeguarded for planned public transport improvements and where the need arises in the future. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives		Timescale				Commentary on Results
		3	S	M	L	
SDO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Maintaining a network of successful town centres will increase employment opportunities in the borough which will help to reduce poverty and encourage wealth creation.
SDO 2	To improve the education and skill of the population	✓	✓	✓	✓	Maintaining a network of successful town centres will increase employment opportunities which will help to improve the education and skills of the population.
SDO 3	To improve the health of the population	✓	-	✓	✓	Maintaining a network of successful town centres will increase employment opportunities which will improve the quality of life for residents in the borough and help to improve the health of the population.
SDO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Using the town centre hierarchy to direct new shops to appropriate locations will ensure town centres are viable and well used. This will help to reduce fear of crime and incidence of crime in the borough.
SDO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Maintaining a network of successful town centres will increase employment opportunities and improve the quality of life for residents. This will help to overcome issues of inequality in the borough and promote social inclusion, equality, diversity and social cohesion.
SDO 6	To reduce contributions to climate change	✓	-	✓	✓	Using the town centre hierarchy to direct new shops to appropriate locations will mean that people do not have to travel across the borough for a range of services. This will reduce the need to travel and therefore reduce contributions to climate change.
SDO 7	To improve the air quality in Southwark	✓	-	✓	✓	Using the town centre hierarchy to direct new shops to appropriate locations will mean that people do not have to travel across the borough for a range of services. This will reduce the need to travel and therefore reduce emissions helping to improve air quality.
SDO 8	To reduce waste and maximise use of waste arising as a resource	?	?	?	?	The provision of new shops in the borough is likely to increase the levels of waste, however, impacts can be mitigated through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 9	To encourage sustainable use of water resources	?	?	?	?	The provision of new shops is likely to increase water use in the borough, however, new development will be required to incorporate mitigation measures to help overcome this such as rainwater harvesting and efficient fixtures and fittings. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 10	To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will be provided on brownfield sites. Where land may have contamination as a result of previous uses, suitable remediation would be needed before development can proceed
SDO 11	To protect and enhance the quality of landscape and townscape	✓✓	✓	✓✓	✓✓	Using the town centre hierarchy to direct new shops to appropriate locations will ensure town centres are viable and well used. This will protect and enhance existing townscapes and protect more sensitive areas of the borough.
SDO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	Using the town centre hierarchy to direct new shops to appropriate locations will focus development in existing centres and protect the historic environment and cultural assets.
SDO 13	To protect and improve open spaces, green corridors and biodiversity	✓	✓	✓	✓	Using the town centre hierarchy to direct new shops to appropriate locations will focus development in existing centres and protect existing open spaces, green corridors and biodiversity.

Sustainability Objectives		Timescale				Core Strategy Policy 3: Shopping Leisure and Entertainment
		3	S	M	L	
SDO 14 To reduce vulnerability to flooding	?	?	?	?	?	Commentary on Results The provision of new shops in the borough could have a negative impact on vulnerability to flooding, especially as many of the town centres are located in flood risk areas. However, as set out in the Strategic Flood Risk Assessment, shops are considered to be less vulnerable uses than housing and therefore the overall impact on flood risk cannot be determined. Further guidance on mitigation measures such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	Maintaining a network of successful town centres will focus new development in the existing centres which are well served by public transport. This means that people can access local services by public transport reducing the need to travel by car.
SDO17 To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	✓	Maintaining a network of successful town centres that are easily accessible will help to ensure that more people have access to essential goods and services.

Sustainability Objectives		Timescale				Commentary on Results
		4	S	M	L	
SDO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Increasing the number of community facilities in the borough will increase employment opportunities helping to reduce poverty and encourage wealth creation.
SDO 2	To improve the education and skill of the population	✓✓	✓✓	✓✓	✓✓	New community facilities will increase employment opportunities and provide more educational facilities that will help to improve the education and skills of the population.
SDO 3	To improve the health of the population	✓✓	✓✓	✓✓	✓✓	Making community facilities more accessible to everyone will help improve quality of life for residents in the borough and provide more health facilities improving the health of the population.
SDO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Providing a network of well used community facilities will result in well located services that can be easily accessed improving the quality of life for residents and helping to reduce levels of crime.
SDO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Facilitating a network of well used community facilities will protect existing facilities and allow for new community facilities in areas where there is the greatest need. This will help to overcome issues of inequality in the borough and promote social inclusion, equality, diversity and social cohesion.
SDO 6	To reduce contributions to climate change	?	?	?	?	The impact of new community facilities on contributions to climate change is uncertain as this will be determined by the type and location of new facilities and the design measures incorporated within the new developments. Further guidance on energy efficient design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 7	To improve the air quality in Southwark	?	?	?	?	The impact of new community facilities on air quality in the borough is uncertain as this will be determined by the type and location of new facilities and the design measures incorporated within the new developments. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 8	To reduce waste and maximise use of waste arising as a resource	?	?	?	?	The impact of new community facilities on levels of waste in the borough is uncertain as this will be determined by the type and location of new facilities and the mitigation measures put in place to address increases in waste. Impacts can be mitigated through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 9	To encourage sustainable use of water resources	✓	?	✓	✓	The application of sustainable design and construction standards will encourage new development to adopt sustainable methods of water use through the use of systems such as Sustainable Urban Drainage, rainwater harvesting and recycling and greywater recycling. As new technologies become more readily available this is likely to improve
SDO 10	To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will be provided on brownfield sites. Where land may have contamination as a result of previous uses, suitable remediation would be needed before development can proceed
SDO 11	To protect and enhance the quality of landscape and townscape	✓	✓	✓	✓	New community facilities will be located in easily accessible locations, which will help to maintain and enhance existing townscapes and protect more sensitive areas of the borough.

Sustainability Objectives		Timescale				Core Strategy Policy 4: Places to Learn and Enjoy
		4	S	M	L	
SD0 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-	-	Commentary on Results No significant impact.
SD0 13 To protect and improve open spaces, green corridors and biodiversity	-	-	-	-	-	No significant impact.
SD0 14 To reduce vulnerability to flooding	?	?	?	?	?	The impact of new community facilities on vulnerability to flooding will depend on the type and location of new facilities and the mitigation measures incorporated in new developments to protect against flood risk. Further guidance on mitigation measures such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SD0 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact.
SD0 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	By locating new community facilities in accessible locations sustainable will be promoted and the need to travel by car minimised
SD017 To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	✓	Providing a network of well used community facilities that are easily accessible will help to ensure that more people have access to necessary social infrastructure such as schools and health facilities. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives		Timescale				Commentary on Results
		5	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	The Strategic Housing Market Assessment and Housing Requirement Study identified the number of new homes that are needed in the borough. Providing more housing in the borough and focusing this in the areas where there is the greatest need will allow for more regeneration which will help to tackle poverty and encourage wealth creation.
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	✓	Providing more housing in the borough and focusing this in the areas where there is the greatest need will mean that more funding for education will be secured through S106 agreements especially through regeneration schemes.
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	Providing more housing in the borough and focusing this in the areas where there is the greatest need will improve the health of the population as a result of improved quality of accommodation. More funding for health will be secured through S106 agreements especially through regeneration schemes brought forward in the borough.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	Providing more housing in the borough and focusing this in the areas where there is the greatest need will help to improve the quality of life for residents and make areas safer and more attractive. This will help to reduce levels of crime and reduce fear of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	✓✓	Providing more housing in the borough and focusing this in the areas where there is the greatest need will help to reduce inequalities and promote social inclusion, equality, diversity and community cohesion by improving the quality of accommodation for people in the borough and addressing existing inequalities.
SDO 6 To reduce contributions to climate change	X	X	X	X	X	Building more new homes will have a negative impact on climate change as CO ₂ emissions and energy consumption and demand will increase in construction and operation. Mitigation measures including energy efficient design will need to be taken to address this. Further guidance on energy efficient design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 7 To improve the air quality in Southwark	X	X	X	X	X	Building more new homes will have a negative impact on air quality. Construction and operation of new homes and increased vehicular traffic will cause an increase in emissions affecting air quality. Mitigation measures will need to be taken to address this. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 8 To reduce waste and maximise use of waste arising as a resource	X	X	X	X	X	Increasing the amount of housing will result in an increased amount of waste however impacts can be mitigated through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	✓	New development will encourage the sustainable use of water resources through the use of technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. As new technologies become more readily available this will improve.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	New development will be provided on brownfield sites. Where land may have contamination as a result of previous uses, suitable remediation would be needed before development can proceed

Sustainability Objectives		Timescale				Core Strategy Policy 5: Providing New homes	Commentary on Results
		5	S	M	L		
SDO 11 To protect and enhance the quality of landscape and townscape	✓✓	✓	✓✓	✓✓		Focusing new housing in areas where there is the greatest need will result in more regeneration schemes. This will protect the landscape in other sensitive areas and promote varied townscapes through mixed use developments. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.	
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?		The impact of building new homes on the historic environment and cultural assets will be determined by the location of developments and the type and quality of housing. New development will need to show the impacts upon the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs	
SDO 13 To protect and improve open spaces, green corridors and biodiversity	?	?	?	?		Building more housing in the borough may have a negative impact on open spaces and further mitigation measures to enhance biodiversity will need to be considered such as the greening of buildings in the design process including the use of green roofs and living walls. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs	
SDO 14 To reduce vulnerability to flooding	X	X	X	X		Building more new homes will have a negative impact on levels of flood risk in the borough and mitigation measures will need to be taken to address this in the design process. This will need to be set out in a Flood risk assessment that considers flood resistant design of buildings. The Strategic Flood Risk Assessment should be used when considering the location of vulnerable uses in the borough.	
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓		New housing will be built to a high design standard increasing the numbers of homes in the borough that meet the decent homes standards.	
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	?	✓	✓		Providing more new homes may increase the amount of car ownership in the borough however concentrating development in accessible locations should increase access to public transport. Provision will need to be made for new development in terms of public transport capacity and other mitigation measures can be put in place such as travel plans and car parking restrictions.	
SDO17 To provide the necessary infrastructure to support existing and future development	?	?	?	?		The quantum of new housing proposed in the borough will increase the demands on the existing infrastructure capacity. Improvements will be required to ensure that provision of infrastructure can meet the additional demands associated with new development especially in areas where large regeneration schemes are proposed. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.	

Sustainability Objectives		Timescale				Core Strategy Policy 6: Homes for People on Different Incomes	Commentary on Results
		6	S	M	L		
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓		Setting different requirements for social and intermediate housing in certain areas will help to address existing inequalities. Increasing the amount of affordable housing will mean that more people can afford to live in good accommodation helping to reduce poverty. Southwark currently has one of the highest amounts of affordable housing in the whole country with 45% of the 123,948 dwellings being affordable. However, there is still a shortage of affordable homes in Southwark as identified in the Strategic Housing Market Assessment and Housing requirement Study.	
SDO 2 To improve the education and skill of the population	-	-	-	-		No significant impact.	
SDO 3 To improve the health of the population	✓✓	✓	✓✓	✓✓		Providing more affordable homes in areas where there is the greatest need will result in an improvement in the health of the population as a result of improved quality of accommodation.	
SDO 4 To reduce the incidence of crime and the fear of crime	✓✓	✓	✓✓	✓✓		Providing more affordable homes in areas where there is the greatest need will help to reduce inequalities and reduce levels of crime.	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓		Providing more affordable housing, especially as part of regeneration schemes will result in more development in the areas of the borough that require regeneration and provide a focus for promoting social inclusion, equality, diversity and community cohesion by reducing existing inequalities. Based on the amount of housing that is expected to be delivered between 2011 and 2026, new development will provide 8,558 net new affordable homes which equates to 35% affordable housing on all sites over 10units. The Affordable Housing Viability Study shows that this amount of affordable housing is achievable.	
SDO 6 To reduce contributions to climate change	-	-	-	-		No significant impact.	
SDO 7 To improve the air quality in Southwark	-	-	-	-		No significant impact.	
SDO 8 To reduce waste and maximise use of waste arising as a resource	-	-	-	-		No significant impact.	
SDO 9 To encourage sustainable use of water resources	-	-	-	-		No significant impact.	
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-		No significant impact.	
SDO 11 To protect and enhance the quality of landscape and townscape	?	?	?	?		The type and quality of affordable housing will determine how development will impact on the landscape and townscape. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.	
SDO 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-		No significant impact.	
SDO 13 To protect and improve open spaces, green corridors and biodiversity	-	-	-	-		No significant impact.	

Sustainability Objectives		Timescale				Core Strategy Policy 6: Homes for People on Different Incomes
		6	S	M	L	
SDO 14 To reduce vulnerability to flooding	-	-	-	-	-	<p>Commentary on Results</p> <p>No significant impact.</p> <p>New affordable housing will be built to a high design standard increasing the numbers of homes in the borough that meet the decent homes standards.</p> <p>Providing more affordable housing may help to reduce the amount of cars and promote sustainable travel patterns as car ownership is generally lower amongst affordable housing occupants.</p> <p>The impact of providing a range of homes for people on different incomes on infrastructure will depend on the quantity and location of new housing. This will be determined by the individual schemes that are delivered and these will be subject to a sustainability assessment and other supporting studies which will need to demonstrate how the infrastructure demands of new development will be met. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.</p>
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓		
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	-	✓	✓		
SDO17 To provide the necessary infrastructure to support existing and future development	?	?	?	?		

Sustainability Objectives		Timescale				Commentary on Results
		7	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	The Strategic Housing Market Assessment and Housing Requirement Study identify that there is a need for more family housing in the borough across all tenures. Providing more family housing will help to meet the housing requirements of the local residents which will help to reduce poverty in the borough.
SDO 2 To improve the education and skill of the population	-	-	-	-	-	No significant impact.
SDO 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	✓✓	Providing more family housing will help reduce overcrowding in the borough and ensure more people have access to high quality accommodation which will help to improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	-	No significant impact.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	✓✓	Providing more family housing will promote social inclusion, equality, diversity and community cohesion, by developing more mixed and balanced communities.
SDO 6 To reduce contributions to climate change	-	-	-	-	-	No significant impact.
SDO 7 To improve the air quality in Southwark	-	-	-	-	-	No significant impact.
SDO 8 To reduce waste and maximise use of waste arising as a resource	-	-	-	-	-	No significant impact.
SDO 9 To encourage sustainable use of water resources	-	-	-	-	-	No significant impact.
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	-	No significant impact.
SDO 11 To protect and enhance the quality of landscape and townscape	?	?	?	?	?	The impact on the surrounding landscapes and townscapes will be determined by the location of new family housing and the type and quality of development. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	?	The impact on the historic environment and cultural assets will be determined by the location of new family housing and the type and quality of development. New development will need to show the impacts upon the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs
SDO 13 To protect and improve open spaces, green corridors and biodiversity	?	?	?	?	?	The impact on open spaces, green corridors and biodiversity will be determined by the location of new family housing and the type and quality of development. Development will be expected to preserve or enhance registered parks and gardens. The priorities for the borough are set out in the Open Space and Biodiversity strategies. Further guidance is provided in the Sustainability SPDs

Sustainability Objectives		Timescale				Commentary on Results
		7	S	M	L	
SDO 14 To reduce vulnerability to flooding	-	-	-	-	-	No significant impact.
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	✓✓	The provision of more family sized homes will provide a wider range of housing types in the borough helping to ensure everyone has the opportunity to live in a decent home.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	The provision of more family housing in accessible locations will help to reduce the need to travel by car.
SDO17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	The impact of providing more family housing on existing infrastructure will depend on the quantity and location of development. This will be determined by the individual schemes that are delivered and these will be subject to a sustainability assessment and other supporting studies which will need to demonstrate how the infrastructure demands of new development will be met. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives		Timescale				Commentary on Results
8	S	M	L			
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Providing more student housing and requiring student homes to have an affordable element will help ensure more people in the borough have access to suitable accommodation that is affordable.	
SDO 2 To improve the education and skill of the population	✓✓	✓✓	✓✓	✓✓	Providing more student housing in the borough will encourage more students to attend local universities and colleges which will raise levels of education and improve the skills of the population.	
SDO 3 To improve the health of the population	✓	-	✓	✓	Providing more student housing will mean more students have access to good quality accommodation improving health as a result of improved living conditions.	
SDO 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Building student housing in appropriate locations will help to make places safer and more attractive helping to reduce levels of crime and fear of crime.	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	Building student housing in appropriate locations will result in more mixed and balanced communities that will promote social inclusion, equality, diversity and community cohesion. Southwark has the second largest number of student homes in London with a further 979 new student bedrooms in the pipeline. However, there is still a need for student accommodation across the whole of London and Southwark, which should be balanced against the need for more family and affordable housing.	
SDO 6 To reduce contributions to climate change	?	?	?	?	Encouraging student housing in areas with good access to public transport will reduce the need to travel however the impact of construction and energy use associated with new developments will need to be mitigated against. Further guidance on energy efficient design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.	
SDO 7 To improve the air quality in Southwark	?	?	?	?	The location of student housing within growth areas may reduce the need to travel and improve air quality however the impact of construction and energy use associated with new developments will need to be mitigated against. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.	
SDO 8 To reduce waste and maximise use of waste arising as a resource	?	?	?	?	Increasing the amount of student housing will result in an increased amount of waste however impacts can be mitigated through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.	
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	New development will encourage the sustainable use of water resources through the use of technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. As new technologies become more readily available this will improve.	
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will be provided on brownfield sites. Where land may have contamination as a result of previous uses, suitable remediation would be needed before development can proceed	

Sustainability Objectives		Timescale				Core Strategy Policy 8: Student Homes	Commentary on Results
		8	S	M	L		
SDO 11	To protect and enhance the quality of landscape and townscape	?	?	?	?		The impact on the surrounding landscapes and townscapes will be determined by the location of new student housing and the type and quality of development. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.
SDO 12	To conserve and enhance the historic environment and cultural assets	?	?	?	?		The impact on the historic environment and cultural assets will be determined by the location of new student housing and the type and quality of development. New development will need to show the impacts upon the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs
SDO 13	To protect and improve open spaces, green corridors and biodiversity	?	?	?	?		The impact on open spaces, green corridors and biodiversity will be determined by the location of new student housing and the type and quality of development. Development will be expected to preserve or enhance registered parks and gardens. The priorities for the borough are set out in the Open Space and Biodiversity strategies. Further guidance is provided in the Sustainability SPDs
SDO 14	To reduce vulnerability to flooding	X	X	X	X		Focusing new student housing in accessible locations is likely to increase the amount of vulnerable people living in flood risk areas as the majority of developable land is within the flood zone. Flood Risk Assessments and suitable mitigation measures will need to be carried out as part of the planning application. Further guidance on mitigation measures, such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓		Providing more student housing and requiring student homes to have an affordable element will help to provide everyone with the opportunity to live in a decent home. The Strategic Housing Land Availability Assessment has identified sites that need to be developed so that housing targets can be met
SDO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	✓✓	✓✓		Student housing will only be allowed in town centres and areas with good public transport accessibility as these areas can accommodate growth. The provision of good public transport accessibility and pedestrian and cycling facilities will minimise the need to travel by car.
SDO17	To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓		The impact of providing more student housing on existing infrastructure will need to be assessed by the individual schemes. Proposals will be subject to a sustainability assessment and other supporting studies, which will need to demonstrate how the infrastructure demands of new development will be met. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives		Timescale				Core Strategy Policy 9: Homes for Gypsies and Travellers
		9	S	M	L	
SDO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Commentary on Results Providing more pitches in suitable locations in the borough for gypsies and travellers will help to reduce poverty for people in this group.
SDO 2	To improve the education and skill of the population	✓	-	✓	✓	Safeguarding existing sites and identifying new sites for gypsies and travellers will help to ensure that people in this group have access to education.
SDO 3	To improve the health of the population	✓	-	✓	✓	Safeguarding existing pitches and identifying new sites will help to meet the accommodation needs of gypsies and travellers. Evidence has shown that this leads to an improved quality of life for people in this group and improved health.
SDO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Safeguarding existing sites and identifying suitable new sites for the additional pitches will ensure that sites that have appropriate facilities and safe access, which will help to reduce crime and fear of crime.
SDO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Safeguarding existing sites and identifying new sites for gypsies and travellers will promote equality for all and increase social inclusion, diversity and community cohesion.
SDO 6	To reduce contributions to climate change	-	-	-	-	No significant impact.
SDO 7	To improve the air quality in Southwark	-	-	-	-	No significant impact.
SDO 8	To reduce waste and maximise use of waste arising as a resource	✓	-	✓	✓	Identifying new sites for gypsies and travellers with regard to the availability of essential services such as waste will help to reduce levels of waste in the borough.
SDO 9	To encourage sustainable use of water resources	✓	-	✓	✓	Identifying new sites for gypsies and travellers with regard to the availability of essential services such as water will help to promote more sustainable use of water in the borough.
SDO 10	To maintain and enhance the quality of land and soils	-	-	-	-	No significant impact.
SDO 11	To protect and enhance the quality of landscape and townscape	✓?	✓?	✓?	✓?	Safeguarding existing sites and identifying suitable sites for additional pitches may help to protect the quality of existing townscapes and landscapes. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD.
SDO 12	To conserve and enhance the historic environment and cultural assets	✓?	✓?	✓?	✓?	Designating suitable sites for additional pitches may help to protect the historic environment and cultural assets in the borough.
SDO 13	To protect and improve open spaces, green corridors and biodiversity	✓?	✓?	✓?	✓?	Designating a suitable site for additional pitches in the borough may help to protect the open spaces, green corridors and biodiversity in the borough.
SDO 14	To reduce vulnerability to flooding	✓	✓	✓	✓	Recognising the need to avoid areas at high risk of flooding for sites for gypsies and travellers will help to reduce vulnerability to flooding.
SDO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	Safeguarding existing sites and identifying suitable sites for additional pitches will help to ensure that people in this group have the opportunity to live in a decent home.
SDO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	New sites for gypsies and travellers will be selected with regard to access to proximity to services, which should help promote sustainable transport use and minimise the need to travel by car.
SDO17	To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	New sites will be selected on their availability of essential services such as water, sewerage, drainage and waste disposal as well the proximity to local facilities and services.

Sustainability Objectives		Timescale				Commentary on Results
		10	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Increasing employment opportunities and protecting existing business space in the borough will help to reduce poverty and encourage wealth creation. Southwark's Employment Land review suggests a need to provide up to 500,000 sqm of new business space to meet the demands of businesses which need to locate in central London.	
SDO 2 To improve the education and skill of the population	✓✓	✓✓	✓✓	✓✓	Increasing employment opportunities will raise education levels and improve the skills of the population. There will be more funding negotiated from development for skills and training. New jobs and training opportunities which arise from development will be targeted towards local people.	
SDO 3 To improve the health of the population	✓	-	✓	✓	Increasing employment opportunities will help to improve people's quality of life which will have a positive effect on the health of the population.	
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	Increasing employment opportunities will help to reduce inequalities and regenerate deprived areas in the borough which will help to reduce levels of crime.	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Increasing employment opportunities in accessible locations especially through mixed use developments will help to reduce social inequalities and promote social inclusion, equality, diversity and community cohesion.	
SDO 6 To reduce contributions to climate change	X	X	X	X	The quantum of development is likely to have a negative impact on climate change however this can be mitigated through sustainable design and construction. Further guidance on energy efficient design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.	
SDO 7 To improve the air quality in Southwark	X	X	X	X	The quantum of development is likely to have a negative impact on air quality however focusing new employment opportunities in accessible locations will reduce reliance on the car and promote more sustainable travel patterns. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.	
SDO 8 To reduce waste and maximise use of waste arising as a resource	X	X	X	X	The quantum of development is likely to have a negative impact on levels of waste however this can be mitigated through sustainable design and construction. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.	
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	New development will encourage the sustainable use of water resources through the use of technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. As new technologies become more readily available this will improve.	
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will be provided on brownfield sites. Where land may have contamination as a result of previous uses, suitable remediation would be needed before development can proceed	

Sustainability Objectives		Timescale				Core Strategy Policy 10: Jobs and Businesses	Commentary on Results
10	S	M	L				
SDO 11 To protect and enhance the quality of landscape and townscape	✓	✓	✓	✓		Providing suitable space for a range of businesses and other uses as part of mixed use developments is likely to ensure varied townscapes and protect more sensitive landscapes in other areas. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.	
SDO 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓		Directing new development to areas where there is a greater need of regeneration will help to protect the historic environment and cultural assets. New development will need to show the impacts upon the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs	
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓	✓	✓	✓		Directing new development to areas where there is a greater need of regeneration will help to protect existing open spaces, green corridors and levels of biodiversity. Development will be expected to preserve or enhance registered parks and gardens. The priorities for the borough are set out in the Open Space and Biodiversity strategies. Further guidance is provided in the Sustainability SPDs	
SDO 14 To reduce vulnerability to flooding	?	?	?	?		Areas at high risk of flooding will be avoided; however, the majority of developable land in the borough is in the flood zone. Focusing new development in accessible locations could therefore have a negative impact on vulnerability to flooding, although business use is a less vulnerable use than housing. Flood Risk Assessments and suitable mitigation measures will need to be carried out as part of the planning application. Further guidance on mitigation measures, such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs	
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-		No significant impact.	
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	?	?	?		The quantum of development is likely to have a negative impact on transport however focusing new employment opportunities in accessible locations accessibility should reduce reliance on the car and promote more sustainable travel patterns.	
SDO17 To provide the necessary infrastructure to support existing and future development	X	X	X	X		The quantum of new development proposed in the borough will increase the demands on the existing infrastructure capacity. Improvements will be required to ensure that provision of infrastructure can meet the additional demands associated with new development especially in areas where large regeneration schemes are proposed.	

Sustainability Objectives		Timescale				Commentary on Results
11	S	M	L			
SDO 1 To tackle poverty and encourage wealth creation	✓	-	✓	✓	Protecting and improving open spaces in the borough will improve the quality of life and provide a range of employment opportunities which will help to reduce poverty and encourage wealth creation.	
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	Protecting and improving open spaces in the borough will also provide a range of employment and education opportunities which will help to improve education and skills of the population.	
SDO 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	Protecting and improving open spaces will ensure more people have access to parks, gardens for recreation which help will improve well being and quality of life as well as encourage more physical activity which will improve the health of the population.	
SDO 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Protecting and improving open spaces will ensure that they are safer and well used helping to reduce fear of crime and providing more facilities for young people which may help to reduce incidences of crime.	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Protecting and improving open spaces in the borough especially in areas that are currently deficient will ensure more people have access to parks, gardens for recreation improving the quality of life for local residents as well as providing a range of employment opportunities which will promote social inclusion, equality, diversity and community cohesion. The open space and biodiversity strategies identify the areas of priority for the borough. New development will be required to meet the needs of a growing population and avoid harming protected and priority plants	
SDO 6 To reduce contributions to climate change	✓	✓	✓	✓	Protecting existing open spaces and encouraging more open space in the borough will help to reduce contributions to climate change. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.	
SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	Protecting existing open spaces and encouraging more open space in the borough will help to improve air quality. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.	
SDO 8 To reduce waste and maximise use of waste arising as a resource	-	-	-	-	No significant impact.	
SDO 9 To encourage sustainable use of water resources	?	?	?	?	Water may be required for irrigation of new and existing open spaces therefore the sustainable use of water is dependent on the implementation measures used to address this. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.	
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	Protecting existing open spaces and encouraging more open space in the borough will help to enhance the quality of land and soils through the possible remediation of brownfield sites.	
SDO 11 To protect and enhance the quality of landscape and townscape	✓	✓	✓	✓	Protecting existing open spaces and encouraging more open space will have a positive impact on the quality of landscape and townscape in the borough. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction, Sustainability Assessment and Design & Access SPDs.	

Sustainability Objectives		Timescale				Core Strategy Policy 11: Open Spaces and Wildlife
		11	S	M	L	
SD0 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	✓	Commentary on Results Protecting existing open spaces and encouraging more open space will have a positive impact on the historic environment and cultural assets in the borough, particularly the listed parks in the borough, which are of specific importance
SD0 13 To protect and improve open spaces, green corridors and biodiversity	✓✓	✓✓	✓✓	✓✓	✓✓	Protecting existing open spaces and encouraging more open space will result in more high quality open spaces and green corridors and increased levels of biodiversity in the borough. Important open spaces will be protected from inappropriate development. New development will be required to meet the needs of a growing population whilst avoiding harm to protected and priority species.
SD0 14 To reduce vulnerability to flooding	✓	-	✓	✓	✓	Protecting existing open spaces and encouraging more open space and greening of buildings in the borough will help to reduce vulnerability to flooding as it will help to decrease surface water run-off by reducing the amount of hard surfaces, reducing risk associated with new development.
SD0 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact.
SD0 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	Improving existing open spaces and encouraging more green corridors in the borough will encourage more people to walk and cycle reducing the need to travel by car.
SD017 To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	✓	Protecting and improving open spaces will increase green infrastructure provision in the borough and help to meet the demands associated with a growing population. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives		Timescale				Core Strategy Policy 12: Design and Conservation	Commentary on Results
		12	S	M	L		
SDO 1	To tackle poverty and encourage wealth creation	✓	-	✓	✓		Requiring high standards of design for buildings and public spaces will help to improve quality of life and reduce poverty.
SDO 2	To improve the education and skill of the population	✓	-	✓	✓		Requiring high standards of design for buildings and public spaces may lead to a wider range of education and training opportunities that will help to improve education and skills of the population.
SDO 3	To improve the health of the population	✓	-	✓	✓		Requiring high standards of design for buildings and public spaces will make places safer and more attractive. This will encourage more people to walk and cycle which will improve the health of the population.
SDO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓	✓	✓✓		Requiring high standards of design for buildings and public spaces will make places safer and more attractive which will help to reduce fear of crime. New development will meet 'Secured by Design' standards, which will help to reduce incidences of crime especially in regeneration areas.
SDO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓		Requiring high standards of design for buildings and public spaces will make places safer and more attractive helping to promote social inclusion and community cohesion. As new development will be focused in areas where there is the greatest need of regeneration this will help to address existing inequalities in the borough. Further guidance is provided in the Design and Access SPD
SDO 6	To reduce contributions to climate change	?	?	?	?		Requiring high standards of design for buildings and public spaces may help to reduce contributions to climate change however this will depend on the type of new development and the design measures used to mitigate against negative impacts. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 7	To improve the air quality in Southwark	?	?	?	?		Requiring high standards of design for buildings and public spaces may help to improve air quality however this will depend on the type of new development and the design measures used to mitigate against negative impacts. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 8	To reduce waste and maximise use of waste arising as a resource	?	?	?	?		Requiring high standards of design for buildings and public spaces may help to reduce levels of waste however this will depend on the type of new development and the design measures used to mitigate against negative impacts. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 9	To encourage sustainable use of water resources	✓	?	✓	✓		Requiring high standards of design for buildings and public spaces will help to encourage sustainable use of water resources through the use of sustainable urban drainage systems, grey water recycling and other design measures. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.

Sustainability Objectives		Timescale				Core Strategy Policy 12: Design and Conservation	Commentary on Results
		12	S	M	L		
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	Requiring high standards of design for buildings and public spaces will help to enhance the quality of land and soils through the possible remediation of brownfield sites.	
SDO 11 To protect and enhance the quality of landscape and townscape	✓✓	✓✓	✓✓	✓✓	✓✓	Requiring high standards of design for buildings and public spaces will ensure new development has a positive impact on the quality of landscape and townscape in the borough. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.	
SDO 12 To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	✓✓	✓✓	✓✓	Requiring high standards of design for buildings and public spaces will ensure new development has a positive impact on the historic environment and cultural assets in the borough including the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs	
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓✓	✓✓	✓✓	✓✓	✓✓	Requiring high standards of design for buildings and public spaces will ensure new development has a positive impact on open spaces, green corridors and biodiversity. Development will be expected to preserve or enhance registered parks and gardens. The priorities for the borough are set out in the Open Space and Biodiversity strategies. Further guidance is provided in the Sustainability SPDs	
SDO 14 To reduce vulnerability to flooding	?	?	?	?	?	Requiring high standards of design for buildings and public spaces may help to reduce vulnerability to flooding however this will depend on the type and location of new development and the design measures used to mitigate against flood risk. Further guidance on mitigation is provided in the Sustainability SPDs	
SDO 15 To provide everyone with the opportunity to live in a decent home	✓	✓	✓	✓	✓	Requiring high standards of design for buildings will mean more people have the opportunity to live in a decent home.	
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	Requiring high standards of public spaces will help to encourage more people to walk and cycle reducing reliance on the car.	
SDO17 To provide the necessary infrastructure to support existing and future development	-	-	-	-	-	No significant impact.	

Sustainability Objectives		Timescale				Core Strategy Policy 13: High Environmental Standards
		13	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	-	✓	✓	✓	Commentary on Results Encouraging development that is of a very high environmental standard will help to improve quality of life and provide a range of employment opportunities that will reduce poverty and encourage wealth creation.
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	✓	Encouraging development that is of a very high environmental standard will provide a range of training opportunities that will help to improve education and skills of the population.
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	Encouraging development that is of a very high environmental standard will improve quality of life and may help to improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	-	No significant impact.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	-	✓	✓	✓	Encouraging development that is of a very high environmental standard will help to improve quality of life and provide a range of employment opportunities which will help to promote social inclusion, equality, diversity and community cohesion
SDO 6 To reduce contributions to climate change	✓✓	✓	✓✓	✓✓	✓✓	Encouraging development that is of a very high environmental standard will help to reduce contributions to climate change through good design. Development will be required to meet the highest possible environmental standards and minimise greenhouse gas emissions across its lifetime. Existing buildings will also be enabled to become more energy efficient and make use of low and zero carbon sources of energy. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 7 To improve the air quality in Southwark	✓✓	✓	✓✓	✓✓	✓✓	Encouraging development that is of a very high environmental standard will help to improve air quality in the borough through good design. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 8 To reduce waste and maximise use of waste arising as a resource	✓✓	✓	✓✓	✓✓	✓✓	Encouraging development that is of a very high environmental standard will help to reduce waste and maximise use of waste arising as a resource through good design measures. Applicants will need to demonstrate how they will avoid waste and minimise landfill from construction and use of the development. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 9 To encourage sustainable use of water resources	✓✓	✓	✓✓	✓✓	✓✓	Encouraging development that is of a very high environmental standard will help to encourage sustainable use of water resources through the use of sustainable urban drainage systems, grey water recycling and other design measures. Developments will be required to minimise water use and local sources of water where possible. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 10 To maintain and enhance the quality of land and soils	✓✓	✓	✓✓	✓✓	✓✓	Encouraging development that is of a very high environmental standard will help to enhance the quality of land and soils through the possible remediation of brownfield sites.
SDO 11 To protect and enhance the quality of landscape and townscape	?	?	?	?	?	The impact of new environmental technologies may have a negative impact on the quality of landscape and townscapes in the borough. Mitigation measures will need to be taken. Further guidance is set out in the Design and Access SPD and Sustainability SPDs

Sustainability Objectives		Timescale				Core Strategy Policy 13: High Environmental Standards	Commentary on Results
		13	S	M	L		
SD0 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	?	The impact of new environmental technologies may have a negative impact on the historic environment and cultural assets of the borough. Mitigation measures will need to be taken. Further guidance is set out in the Design and Access SPD and Sustainability SPDs.	
SD0 13 To protect and improve open spaces, green corridors and biodiversity	✓	✓	✓	✓	✓	Encouraging development that is of a very high environmental standard will help to protect open spaces, green corridors and biodiversity by requiring access to amenity space and encouraging development to promote levels of biodiversity. The priorities for the borough are set out in the Open Space and Biodiversity strategies. Further guidance is provided in the Sustainability SPDs	
SD0 14 To reduce vulnerability to flooding	✓✓	✓	✓✓	✓✓	✓✓	Requiring a flood risk assessment to be submitted with proposals for development within flood risk areas will reduce vulnerability to flooding. Development will be allowed in the protected Thames flood zone as long as it is designed to be safe and resilient to flooding and meets the exceptions test as set out in PPS25. New development will be required to reduce water run-off using through the use of sustainable urban drainage systems and other design measures. Further guidance is provided in the Sustainability SPDs	
SD0 15 To provide everyone with the opportunity to live in a decent home	✓	-	✓	✓	✓	Encouraging development that is of a very high environmental standard will improve the quality of housing in the borough meaning more people have the opportunity to live in a decent home.	
SD0 16 To promote sustainable transport and minimise the need to travel by car	?	?	?	?	?	Encouraging development that is of a very high environmental standard may have a positive impact on sustainable transport however this will depend on the type and location of new development.	
SD017 To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓	✓✓	✓✓	Encouraging development that is of a very high environmental standard will help to promote more sustainable use of resources and mitigate against the demands of new development on the existing infrastructure capacity. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.	

Sustainability Objectives		Timescale				Core Strategy Policy 14: Implementation and Delivery
		14	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	-	✓	✓	✓	Commentary on Results Using new development to regenerate areas in Southwark so that it continues to be a successful and vibrant borough will create employment opportunities helping to reduce poverty and encourage investment into the borough.
SDO 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	✓✓	We will use planning obligations to require major developments to make S106 contributions towards education facilities which will improve the education and skill of the population.
SDO 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	✓✓	We will use planning obligations to require major developments to make S106 contributions towards health facilities which will improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	-	No significant impact.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	✓✓	Using new development to regenerate areas in Southwark will mean that everyone has better access to homes, employment and community facilities. This will help to address existing inequalities in the borough which will promote social inclusion, equality, diversity and community cohesion.
SDO 6 To reduce contributions to climate change	✓	-	✓	✓	✓	We will use planning obligations to reduce or mitigate the impact of developments which will help to reduce contributions to climate change. All new development will be designed to minimise greenhouse gas emissions across its lifetime. All major development will be expected to set up or connect to local energy generation networks where possible.
SDO 7 To improve the air quality in Southwark	✓	-	✓	✓	✓	We will use planning obligations to reduce or mitigate the impact of developments which will help to improve air quality in the borough.
SDO 8 To reduce waste and maximise use of waste arising as a resource	✓✓	✓	✓✓	✓✓	✓✓	We will work with infrastructure providers to identify requirements and make sure that important elements of infrastructure that are needed to support growth are delivered at the right time. We will also use planning obligations to reduce or mitigate the impact of developments which will help to reduce waste in the borough and maximise the use of waste arising as a resource.
SDO 9 To encourage sustainable use of water resources	✓✓	✓	✓✓	✓✓	✓✓	We will work with infrastructure providers to identify requirements and make sure that important elements of infrastructure that are needed to support growth are delivered at the right time. We will also use planning obligations to reduce or mitigate the impact of developments which will help to encourage more sustainable use of water resources.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	Using new development to regenerate areas in Southwark will involve development on brownfield sites. Where land may have contamination as a result of previous uses new development would require remediation of the land.
SDO 11 To protect and enhance the quality of landscape and townscape	✓	✓	✓	✓	✓	Using new development to regenerate areas in Southwark that are most in need of physical improvements will help to improve the townscapes and protect other sensitive areas of the borough.
SDO 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-	-	No significant impact.
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓	✓	✓	✓	✓	Using new development to regenerate areas in Southwark will help to protect open spaces, green corridors and levels of biodiversity in the borough. We will use planning obligations to reduce or mitigate the impact of developments which will help to improve open spaces and contribute to the green infrastructure provision in the borough.

Sustainability Objectives		Core Strategy Policy 14: Implementing the Core Strategy			
		14	Timescale		
		S	M	L	Commentary on Results
SDO 14 To reduce vulnerability to flooding	✓	✓	✓	✓	We will work with infrastructure providers to identify requirements and make sure that important elements of infrastructure that are needed to support growth are delivered at the right time. We will also use planning obligations to reduce or mitigate the impact of developments which will help to reduce vulnerability to flood risk.
SDO 15 To provide everyone with the opportunity to live in a decent home	✓	✓	✓	✓	Using new development to regenerate areas in Southwark will mean that everyone has better access to homes meaning more people have the opportunity to live in a decent home.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	We will work with infrastructure providers to identify requirements and make sure that important elements of infrastructure that are needed to support growth are delivered at the right time. We will also use planning obligations to reduce or mitigate the impact of developments which will help to ensure transport infrastructure capacity can cope with additional demands associated with new development.
SDO17 To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	✓✓	✓✓	We will work with infrastructure providers to identify requirements and make sure that important elements of infrastructure that are needed to support growth are delivered at the right time. We will also use planning obligations to reduce or mitigate the impact of developments. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives		Timescale				Core Strategic Target Policy 1: Achieving Growth	Commentary on Results
		S1	S	M	L		
SDO 1	To tackle poverty and encourage wealth creation	✓	✓	✓	✓	Achieving growth will tackle poverty and encourage wealth creation through the delivery of jobs, homes and regeneration in the growth areas. The impact is likely to increase over time as developments are completed	
SDO 2	To improve the education and skill of the population	✓	✓	✓	✓	The proposed growth is likely to have a minor positive impact upon education and the skills of the population as a result of new educational facilities that may be provided and new jobs/employment attracted to the area	
SDO 3	To improve the health of the population	✓	✓	✓	✓	Achieving growth should have a positive impact upon the health of the population through the provision of decent homes, employment and access to new health facilities	
SDO 4	To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	The regeneration of the growth areas will improve the environment and is therefore likely to reduce crime and the fear of crime	
SDO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	Regeneration of the growth areas will enable better access to homes, employment, transport and services, which will help to promote social inclusion, equality, diversity and community cohesion. Achieving growth is necessary to meet the London Plan targets and the needs for the population growth that is forecast.	
SDO 6	To reduce contributions to climate change	X	X	X	X	Achieving growth will have a negative impact on climate change as CO ₂ emissions and energy consumption and demand will increase as a result of construction and operation. Mitigation measures including energy efficient design and conservation measures will need to be taken to address this. The Sustainable Design and Construction SPD and Sustainability Assessment SPDs provide further guidance on energy efficient design and set out the targets for development to minimise impacts.	
SDO 7	To improve the air quality in Southwark	X	X	X	X	Achieving growth will have a negative impact on air quality through the construction and operation of development and increased vehicular traffic. However, locating the growth in areas of high density will help to encourage access to public transport and reliance upon the car. Further guidance is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs on suitable mitigation measures	
SDO 8	To reduce waste and maximise use of waste arising as a resource	X	X	X	X	Achieving growth will result in an increased amount of waste, however, impacts can be mitigated through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Further guidance is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs on suitable mitigation measures	
SDO 9	To encourage sustainable use of water resources	✓	?	✓	✓	The application of sustainable design and construction standards will encourage new development to adopt sustainable methods of water use through the use of systems such as Sustainable Urban Drainage, rainwater harvesting and recycling and greywater recycling. As new technologies become more readily available this is likely to improve	
SDO 10	To maintain and enhance the quality of land and soils	?	?	?	?	The growth areas are all brownfield sites. Should contamination of the land be identified as a result of previous uses, suitable remediation will need to be undertaken before development can proceed.	

Sustainability Objectives		Timescale				Core Strategic Target Policy 1: Achieving Growth
		S1	S	M	L	
SDO 11 To protect and enhance the quality of landscape and townscape	✓	✓	✓	✓	✓	Commentary on Results Achieving growth in areas that are in need of regeneration will improve the quality of landscape and townscape. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals. Design guidance will seek to ensure that any existing assets are protected and enhanced and that new development is sensitive to its surroundings.
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	?	The impact of achieving growth on the historic environment and cultural assets will be determined by the location, type and quality of development. New development will need to show the impacts upon the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs
SDO 13 To protect and improve open spaces, green corridors and biodiversity	?	?	?	?	?	Achieving growth could have an adverse impact upon open spaces, green corridors and biodiversity, however, the status of the open spaces and green corridors is identified in the Open Space Strategy. Further guidance on mitigation measures to protect and enhance open space and biodiversity is set out in the Sustainable Design and Construction and Sustainability Assessment SPDs, which includes specific measures for the built up area including the use of green roofs and living walls.
SDO 14 To reduce vulnerability to flooding	X	X	X	X	X	Achieving growth will necessitate building new development in flood risk areas owing to the lack of suitable development areas elsewhere in the Borough to accommodate the growth that is needed. The majority of the growth areas fall within flood zones 2 and 3 as identified in the SFRA. A Flood Risk Assessment will need to accompany applications and suitable mitigation measures identified such as flood resilient design. Further guidance is set out in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	✓✓	Achieving growth will enable the delivery of new homes in the borough, which will need to be constructed to the Government's decent home standards, providing access to decent homes for increased numbers of the population
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	?	✓	✓	✓	Achieving growth could increase the amount of car ownership and car use in the borough, however, concentrating development in accessible locations should increase access to public transport and encourage alternative modes of transport to the car. Provision will need to be made for new development in terms of public transport capacity and other mitigation measures can be put in place such as travel plans and car parking restrictions. Improvements to public transport provision may not be realised in the short term.
SDO17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	Achieving growth in the borough will increase the demands on the existing infrastructure capacity. Improvements will be required to ensure that provision of infrastructure can meet the additional demands associated with new development especially in areas where large regeneration schemes are proposed. An infrastructure Plan has been prepared in support of the Core Strategy to identify the existing capacity, future needs, costs, funding and timescales to ensure that development proposals will be viable and deliverable.

Sustainability Objectives		Timescale				Commentary on Results
		S2	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓✓	✓✓	✓✓	✓✓	Improving places within the Borough will help to tackle poverty and encourage wealth creation through the provision of new homes in a mix of types and tenures and employment opportunities
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	✓	Improving places within the Borough will result in the provision of new or improved education facilities and provide new opportunities for a wide skill set both in the construction and operation of development and the attraction of new businesses to the area
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	Improving places within the Borough will have a positive impact upon the health of the population as a result of new or improved health facilities, decent homes and employment opportunities, which will lead to an improved quality of life
SDO 4 To reduce the incidence of crime and the fear of crime	✓✓	✓✓	✓✓	✓✓	✓✓	Improving places within the Borough will result in the regeneration of areas thereby reducing the incidence of crime and the fear of crime. Further guidance is provided in the SPDs on the principles of Secured by Design and Designing out Crime
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	✓✓	✓✓	✓✓	Improving places within the Borough will result in the regeneration of areas thereby promoting social inclusion, equality, diversity and community cohesion through the provision of new homes with a mixture of types and tenures, employment opportunities and community facilities and services
SDO 6 To reduce contributions to climate change	X	X	X	X	X	Improving places will have a negative impact on climate change as CO ₂ emissions and energy consumption and demand will increase as a result of construction and operation. Mitigation measures including energy efficient design and conservation measures will need to be taken to address this. The Sustainable Design and Construction SPD and Sustainability Assessment SPDs provide further guidance on energy efficient design and set out the targets for development to minimise impacts.
SDO 7 To improve the air quality in Southwark	X	X	X	X	X	Improving places will have a negative impact on air quality through the construction and operation of development and increased vehicular traffic. However, locating the growth in areas of high density will help to encourage access to public transport and reliance upon the car. Further guidance is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs on suitable mitigation measures
SDO 8 To reduce waste and maximise use of waste arising as a resource	?	?	?	?	?	Improving places will result in an increased amount of waste in construction and operation of facilities, however, impacts can be mitigated through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Further guidance is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs on suitable mitigation measures
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	✓	The application of sustainable design and construction standards will encourage new development to adopt sustainable methods of water use through the use of systems such as Sustainable Urban Drainage, rainwater harvesting and recycling and greywater recycling. As new technologies become more readily available this is likely to improve
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	The growth areas are all brownfield sites. Should contamination of the land be identified as a result of previous uses, suitable remediation will need to be undertaken before development can proceed.

Sustainability Objectives		Timescale				Core Strategic Target Policy 2: Improving Places	Commentary on Results
		S2	S	M	L		
SDO 11 To protect and enhance the quality of landscape and townscape	✓✓	✓✓	✓✓	✓✓	✓✓	Improving places that are in need of regeneration will improve the quality of landscape and townscape. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals. Design guidance will seek to ensure that any existing assets are protected and enhanced and that new development is sensitive to its surroundings.	
SDO 12 To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	✓✓	✓✓	✓✓	Improving places will have a positive impact on the historic environment and cultural assets. New development will need to show the impacts upon the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs.	
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓✓	✓✓	✓✓	✓✓	✓✓	Improving places will have a positive impact upon open spaces, green corridors and biodiversity. The areas of priority are identified within the Open Space Strategy. Further guidance on measures to protect and enhance open space and biodiversity is set out in the Sustainable Design and Construction and Sustainability Assessment SPDs, which includes specific measures for the built up area including the use of green roofs and living walls.	
SDO 14 To reduce vulnerability to flooding	✓	✓	✓	✓	✓	The majority of the growth areas fall within flood zones 2 and 3 as identified in the SFRA. A Flood Risk Assessment will need to accompany applications and suitable mitigation measures identified such as flood resilient design in order to improve places. Further guidance is set out in the Sustainable Design and Construction and Sustainability Assessment SPDs	
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	✓✓	Improving places will enable the delivery of new homes in the borough, which will need to be constructed to the Government's decent home standards, providing access to decent homes for increased numbers of the population	
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	Improving areas could increase the amount of car ownership and car use in the borough, however, concentrating development in accessible locations should increase access to public transport and encourage alternative modes of transport to the car. Provision will need to be made for new development in terms of public transport capacity and other mitigation measures can be put in place such as travel plans and car parking restrictions. Improvements to public transport provision may not be realised in the short term.	
SDO17 To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	✓	Improving places in the borough will include improvements to the infrastructure to ensure that there is sufficient capacity to cope with the anticipated growth. An infrastructure Plan has been prepared in support of the Core Strategy to identify the existing capacity, future needs, costs, funding and timescales to ensure that development proposals will be viable and deliverable.	

Cumulative Impact Results

Sustainability Objectives		Cumulative Impacts of Core Strategy Policies																Sustainable Development Sustainable Transport Shopping, leisure & entertainment Places to learn & enjoy Providing new homes Homes for people on different incomes Family homes Student homes Homes for gypsies & travellers Jobs and businesses Open spaces and wildlife Design and Conservation High environmental standards Implementation & delivery Achieving growth Improving places	Key									
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	S1	S2			C								
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	
SDO 2 To improve the education and skill of the population	✓✓	-	✓	✓✓	✓	-	-	✓	✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 3 To improve the health of the population	✓✓	✓✓	✓	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	✓✓	-	✓	✓	✓	✓	-	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 6 To reduce contributions to climate change	✓✓	✓	✓	✓	✓	-	-	?	-	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	X	X	X	?	?	?	?	?	X
SDO 7 To improve the air quality in Southwark	✓✓	✓	✓	✓	✓	-	-	?	-	X	✓	✓	✓	✓	✓	✓	✓	✓	X	X	X	?	?	?	?	?	?	?
SDO 8 To reduce waste and maximise use of waste arising as a resource	✓✓	-	?	?	?	-	-	?	?	X	-	?	✓	✓	✓	✓	✓	✓	X	X	X	?	?	?	?	?	?	?
SDO 9 To encourage sustainable use of water resources	✓✓	-	?	?	?	-	-	?	?	?	?	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	?	?	?	?	?	?
SDO 10 To maintain and enhance the quality of land and soils	✓✓	-	✓	✓	✓	-	-	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 11 To protect and enhance the quality of landscape and townscape	✓✓	✓	✓✓	✓	✓✓	?	?	?	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 12 To conserve and enhance the historic environment and cultural assets	✓✓	-	✓	-	?	-	?	?	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	?	?	?	?	?	?
SDO 13 To protect & improve open spaces, green corridors & biodiversity	✓✓	✓	✓	-	?	-	?	?	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	?	?	?	?	?	?
SDO 14 To reduce vulnerability to flooding	✓	-	?	?	X	-	-	X	✓	?	✓	✓	✓	✓	✓	✓	✓	✓	X	X	X	?	?	?	?	?	?	?
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	-	-	-	✓✓	✓✓	✓✓	✓✓	✓✓	-	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	✓	?	✓	✓	✓	✓	?	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO17 To provide the necessary infrastructure to support existing and future development	✓✓	?	✓	✓	?	?	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	?	?	?	?	?	?	?

Cumulative Impact Commentary

Sustainability Objectives		Cumulative Impacts	
	C	Commentary on Results	
SDO 1 To tackle poverty and encourage wealth creation	✓✓	Delivering growth through the provision of homes and new business space will have a major positive impact upon tackling poverty and encouraging wealth creation throughout the borough	
SDO 2 To improve the education and skill of the population	✓	The encouragement of new development and the safeguarding of existing business should have a positive impact upon the provision of facilities and services providing opportunities for education and skills for the local population	
SDO 3 To improve the health of the population	✓	The quality of life of the population will be improved as a result of better access to health facilities, job opportunities and services through the regeneration of the borough	
SDO 4 To reduce the incidence of crime and the fear of crime	✓	The regeneration of the borough should improve the quality of housing and public realm which should result in a reduction in crime and the fear of crime	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	The promotion of mixed use development will have a major positive impact with regard to social inclusion, equality, diversity and community cohesion	
SDO 6 To reduce contributions to climate change	x	The quantum of development is likely to result in an increase in CO ₂ emissions both in the construction and operation of development overall. Mitigation measures will help to reduce but the collective impact is likely to be negative. As technology evolves to address the need for a low carbon future the impact could improve. The impact of the policies on climate change will need to be carefully monitored	
SDO 7 To improve the air quality in Southwark	?	The quantum of development is likely to have a negative impact upon air quality, however, this should be suitably managed through mitigation measures in both construction and operation	
SDO 8 To reduce waste and maximise use of waste arising as a resource	?	The quantum of development is likely to result in an increase in waste, however, this should be suitably managed through mitigation measures in both construction and operation	
SDO 9 To encourage sustainable use of water resources	✓	The quantum of development will put pressure on water resources, however suitable mitigation and targets have been identified to encourage the sustainable use of water.	
SDO 10 To maintain and enhance the quality of land and soils	✓	Suitable remediation will need to be carried out prior to the start of development	
SDO 11 To protect and enhance the quality of landscape and townscape	✓	Development will need to be carried out with full consideration of the design guidance to demonstrate that the impact upon the quality of the landscape and townscape is positive, in particular the impact on scale, massing and views. Further guidance is provided in the AAPs and SPDs	
SDO 12 To conserve and enhance the historic environment and cultural assets	✓	Development will need to be carried out with full consideration of the design guidance to demonstrate that the impact upon historic environment and cultural assets is positive. Attention must be given to the Conservation Area appraisals and any listed buildings. Further guidance is found in the AAPs and SPDs	
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓	Development will need to be carried out with full consideration of the design guidance to demonstrate that the impact upon open spaces, green corridors and biodiversity is positive. Attention must be given to the Conservation Area appraisals and any listed buildings. Further guidance is found in the Open Space and Biodiversity Strategies, AAPs and SPDs	
SDO 14 To reduce vulnerability to flooding	?	The majority of developable land lies within flood zones 2 and 3 as identified in the SFRA. FRAs will need to be undertaken in support of applications. Mitigation measures including flood resilient design measures should be able to address increased vulnerability to flooding, however, the impact of climate change makes the impact uncertain	

Sustainability Objectives	Cumulative Impacts	
	C	Commentary on Results
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	The policies will enable the housing targets for the borough to be met, providing everyone with the opportunity to live in a decent home. New housing will need to be built in accordance with the council's design standards
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	The provision of mixed use development in accessible locations, that encourages walking and cycling, will promote sustainable transport use and minimise the use of the private car
SDO17 To provide the necessary infrastructure to support existing and future development	✓	The quantum of development will put pressure on the existing infrastructure. Development will need to demonstrate that infrastructure needs can be met. An infrastructure plan has been prepared in support of the Core strategy that identifies the capacity, costs, funding and timescales of infrastructure provision.

APPENDIX 8

Glossary

Air Quality Management Area (AQMA)

An area designated for action where it is predicted that the Air Quality Objectives in the Council's AQMA Plan will be exceeded.

Archaeological Priority Zones

The boundaries of Archaeological Priority Zones are designated on the Proposals Map. These are areas where there is potential for significant archaeological remains, and planning applications within these areas must be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

Biodiversity

Biodiversity is the diversity or variety of plants and animals and other living things in a particular area or region. The term encompasses the diversity of landscapes, eco-systems, species, habitats and genetics.

Conservation Areas

An area of special architectural or historic interest designated by the local planning authority under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990, the character or appearance of which it is desirable to preserve or enhance.

Greenhouse gases

Greenhouse gases are those gases that contribute to climate change. In the UK, the most common greenhouse gas is carbon dioxide, which contributed around 77% of the UK's total emissions of greenhouses gases in 1990. Other greenhouse gases are methane (12% of total UK emissions), nitrous oxide (9%) and fluorinated gases (2.4%).

Local development framework (LDF)

A portfolio of local development documents, which will provide the framework for delivering the spatial planning strategy for the area.

Local Development Scheme (LDS)

A chart that sets out the council's timetable for preparing planning documents over a three year period. It also explains what each document is.

London Plan

The London Plan is the strategic plan for the whole of London produced by the Mayor of London. The main purpose of the London Plan is to ensure that all the individual plans produced by the London boroughs work together to meet the priorities that are agreed for the whole London region. The Local Development Framework cannot contain strategies or policies that are not in general conformity with the London Plan.

Proposals maps

Illustrate the geographical extent of planning policies and designations.

Regional Spatial Strategy (RSS)

The RSS is a spatial framework for a region over a 15 to 20 year period including policies for housing, environmental protection, transport and waste management. The London Plan is the Regional Spatial Strategy that with which Southwark Plan Policies should be consistent.

Renewable Energy

Energy derived from a source which is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material. Although not strictly renewable, geothermal energy is generally included.

Supplementary Planning Documents (SPD) or Guidance (SPG)

Guidance notes, additional and supplementary to the Unitary Development Plan, on how to implement the policies. They also contain background information applicants may find useful when preparing their planning applications.

Sustainability Appraisal/ Strategic Environmental Assessment

SA/SEA is a systematic and interactive process undertaken during the preparation of a plan or strategy, which identifies and reports on the extent to which the implementation of the plan or strategy would achieve environmental, economic and social objectives by which sustainable development can be defined, in order that the performance of the strategy and policies is improved.

Sustainable Development

Development that contributes towards the principles of sustainability, that is, development that does not cause environmental damage, contributes to the local economy and meets the needs of the local community.

Unitary Development Plans (UDPs)

Statutory plans produced by each borough, which integrate strategic and local planning responsibilities through policies and proposals for the development and use of land in their area.

Southwark Plan See "Unitary Development Plans"

APPENDIX 9

Abbreviations

AQMA	Air Quality Management Area	SA	Sustainability Appraisal
CABE	Commission for Architecture and the Built Environment	SINC	Sites of Importance for Nature Conservation
DCLG	Department for Communities and Local Government	SCI	Statement of Community Involvement
DETR	Department for Environment, Transport, and the Regions	SDO	Sustainable Development Objective
DfT	Department for Transport	SEA	Strategic Environmental Assessment
DPD	Development Plan Document	SOA	Super Output Areas
GLA	Greater London Authority	SPD	Supplementary Planning Document
IMD	Index of Multiple Deprivation	SPG	Supplementary Planning Guidance
LDD	Local Development Documents	UDP	Unitary Development Plan
LDF	Local Development Framework		
LDS	Local Development Scheme		
ODPM	Office of the Deputy Prime Minister		
PPG	Planning Policy Guidance		
PPS	Planning Policy Statement		

Appendix 10 – Core Documents

International

- CDIN1. Kyoto Protocol (1997)
 CDIN2. Johannesburg Declaration on Sustainable Development (2002)

EU

- CDEU1. EU Biodiversity Strategy (1998)
 CDEU2. EU Biodiversity Action Plan (2006)
 CDEU3. EC Habitat Directive 92/43/EEC (1992)
 CDEU4. EU Biodiversity Action Plan (2006)
 CDEU5. EU Water Framework Directive 2000/60/EC
 CDEU6. EC Waste Framework directive 2006/12/EC
 CDEU7. EC Air Quality Framework directive 92/62/EC and daughter directives(99/30/EC), (2000/69/EC, (2002/3/EC)
 CDEU8. EC Landfill Directive 1999/31/EC and other waste management directives
 CDEU9. EC Birds Directive 79/409/EEC
 CDEU10. Environmental Impact Assessment directive 85/337/EC
 CDEU11. Strategic Environmental Assessment directive 2001/42/EC
 CDEU12. Energy Performance of Buildings Directive 2002/91/EC
 CDEU13. EU Sixth Action Plan (Sustainable Development Strategy) 2002
 CDEU14. European Spatial Development Strategy, 1999
 CDEU15. European Landscape Convention (ratified by UK Government 2006)
 CDEU16. European Transport Policy for 2010:time to decide (EC2001)
 CDEU17. EU Directive on the promotion of biofuels or other renewable fuels for transport (2003/30/EC)
 CDEU18. EU Renewable Energy Directive (2009/28/EC)
 CDEU19. EU Sustainable Development Strategy, 2002 (revised 2006)
 CDEU20. Floods Directive (2007/60/EC)

National

- CDN1. Planning Policy Statement 1 Planning for Sustainable Development (2005)
 CDN2. Planning Policy Statement: Planning and Climate Change Supplement to Planning Policy Statement 1 (2007)
 CDN3. Planning Policy Guidance 2 (Green Belts) (1995)
 CDN4. Planning Policy Statement 3 Housing (2006)
 CDN5. Planning Policy Statement 4: Planning for Sustainable Economic Growth (2009)
 CDN6. Planning Policy Statement 9: Biodiversity and Geological Conservation (2005)
 CDN7. Planning Policy Statement 10: Planning for Sustainable Waste Management (July 2005)
 CDN8. Planning Policy Statement 12 Local Spatial Planning (2008)
 CDN9. Planning Policy Guidance 13: Transport (Communities and Local Government, April 2001)
 CDN10. Planning Policy Guidance15: Planning and the Historic Environment
 CDN11. Planning Policy Guidance 16: Archaeology and Planning
 CDN12. Planning Policy Guidance 17 (PPG17) Planning for Open Space, Sport and Recreation (2002)
 CDN13. Assessing Needs and Opportunities: Planning Policy Guidance 17 Companion Guide (2003)
 CDN14. Planning Policy Statement 22: Renewable Energy
 CDN15. Planning For Renewable Energy: Implementing PPS22 - Guidance for Preparing Renewable Energy Planning Policies in Development Plan Documents
 CDN16. Planning Policy Statement 23: Planning and Pollution Control (2004)

CDN17.	Planning Policy Statement 25: Development and Flood Risk (PPS25) (2006)	CDN42.	DCLG 'Proposals for amending Part L and Part F of the Building Regulations', (June 2009)
CDN18.	Circular 05/05 Planning Obligations	CDN43.	DCLG Mandating Water Efficiency in New Buildings - A Consultation (December 2006)
CDN19.	Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites	CDN44.	Office of Climate Change, 'Stern Review on the Economics of Climate Change' (October 2006)
CDN20.	Circular 04/2007 Planning for Travelling Showpeople	CDN45.	Planning Policy Statement 6: Planning for Town Centres, Communities and Local Government, March 2005
CDN21.	Circular on the Protection of World Heritage Sites (July 2009)	CDN46.	Planning Policy Guidance 24: Planning and Noise, 1994
CDN22.	Planning and Compulsory Purchase Act (2004)	CDN47.	Climate Change: The UK Programme, 2006
CDN23.	UK Renewable Energy Strategy (2009)	CDN48.	Air Quality Strategy, 2007
CDN24.	UK Strategy for Sustainable Development (2005)	CDN49.	Future Water Strategy, 2008
CDN25.	Guidance on Tall Buildings, (CABE & English Heritage, July 2007)	CDN50.	Energy Act, 2008
CDN26.	Understanding Place: Historic Characterisation For Planning And Development Draft Document (English Heritage, July 2009)	CDN51.	Strategy for Sustainable Construction, 2008
CDN27.	By Design – Urban Design in the planning system: towards better practice (DETR/CABE, 2000)	CDN52.	Draft Heat and Energy Saving Strategy, 2009
CDN28.	Recommendation for living at Superdensity, Design for Homes (July 2007)	CDN53.	Towards Zero Carbon Homes, Consultation, 2009
CDN29.	Waste Strategy (2000)	CDN54.	Local Government White Paper, Strong and Prosperous Communities, 2009
CDN30.	Waste Management Licensing Regulations (1994)	CDN55.	Local Government Act 2000
CDN31.	Code for Sustainable Homes: Technical Guide Version 2 (May 2009)	CDN56.	England Biodiversity 2002
CDN32.	DCLG Guidance Notes on Employment Land Reviews (2004)	CDN57.	Communities Plan – Sustainable Communities: Building for the Future (2003)
CDN33.	ONS Annual Population Survey 2007	CDN58.	UK Climate Change Regulations (2009)
CDN34.	ONS Annual Population Survey 2008	CDN59.	UK Sustainable Procurement Action Plan (2007)
CDN35.	ONS Annual Population Survey 2009	CDN60.	English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)
CDN36.	ONS Annual Business Inquiry 2007	CDN61.	Department of Health: Next Step Review: High Quality Care for All (2008)
CDN37.	Census 2001, Neighbourhood Statistics	CDN62.	Health inequalities: progress and next steps (2008)
CDN38.	BREEAM Offices 2008 Assessor Manual (BES 5055: ISSUE 3.0), 2009)	CDN63.	Healthy Weight Healthy Lives: A Cross Government Strategy for England (2008)
CDN39.	BREEAM Education 2008 Assessor Manual (BES 5051 ISSUE 3.0), 2009	CDN64.	Model Procedures for the Management of Contaminated Land- Environment Agency (2004)
CDN40.	UK Climate Change Act (2008)	CDN65.	Environment Agency: Adapting to Climate Change Strategy
CDN41.	Building A Greener Future: Policy Statement (July 2007)	CDN66.	Environment Agency Strategies, Plans and Reports

CDN67.	Department for Transport 10 Year Transport Plan (2000)	CDN80.	Local Development Framework Core Output Indicators, Department for Communities and Local Government, October 2005
CDN68.	Biodiversity and the Built Environment. A report by the UK-GBC Task Group	CDN81.	English Indices of Deprivation 2004, Department for Communities and Local Government, June 2004
CDN69.	Biodiversity by Design – a Guide for Sustainable Communities, TCPA, 2004	CDN82.	UK Climate Change Programme 2006
CDN70.	Design and quality standards, Housing Corporation, April 2007	CDN83.	Building Regulations: England and Wales (Part L – Conservation of Fuel and Power, 2006 and Part G - Sanitation, hot water safety and water efficiency, 2010)
CDN71.	Zero Carbon for New Non-domestic Buildings: Consultation on Policy Options, Communities and Local Government, November 2009	CDN84.	UK Low Carbon Transition Plan, 2009
CDN72.	A cost review of the Code for Sustainable Homes, Cyril Sweett on behalf of English Partnerships and the Housing Corporation, February 2007	CDN85.	The Fourth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC), September 2007
CDN73.	Cost Analysis of The Code for Sustainable Homes – Final Report, Communities and Local Government, July 2008	CDN86.	Town and Country Planning Act (May 1990)
CDN74.	Putting a price on sustainability, BRE Centre for Sustainable Construction and BRE Trust, and Cyril Sweett, 2005	CDN87.	Town and Country Planning (General Development Procedure) Order (June 1995)
CDN75.	Research to Assess the Costs and Benefits of the Government's Proposals to Reduce the Carbon Footprint of New Housing Development, DCLG, September 2008	CDN88.	Town and Country Planning (Applications) Regulations (December 1998)
CDN76.	Schools for the Future: The cost of BREEAM compliance in Schools, Faithful & Gould, 2006	CDN89.	Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations (March 1999)
CDN77.	Consultation Response Government Consultation on a National Heat and Energy Saving Strategy, NHS Sustainable Development Unit, April 2009	CDN90.	Town and Country Planning (Mayor of London) Order (July 2000)
CDN78.	Flood Risk Data Report for England and Wales: An analysis of the National Flood Risk Assessment 2006 and the Flood Map for England and Wales, Environment Agency, March 2007	CDN91.	Town and Country Planning (Development Plan) (England) Regulations 1999 (January 2000)
CDN79.	Planning Policy Statement 25: Development and Flood Risk - Practice Guide, Communities and Local Government, 2009	CDN92.	Planning and Compulsory Purchase Act (May 2004)
		CDN93.	Planning Act (2008)
		CDN94.	Planning and Energy Act 2008
		CDN95.	A Practical Guide to the Strategic Environmental Assessment Directive, 2005
		CDN96.	Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, November 2005
		CDN97.	The Plan-Making Manual
		CDN98.	Draft PPS15 Planning for the Historic Environment, 2009
		CDN99.	Department for Health: Draft Guidance on SEA, 2007
		CDN100.	Planning for a Sustainable Future White Paper, 2007

Regional

CDR1. The London Plan Consolidated with alterations (2008)

CDR2. Consultation draft replacement London Plan (October 2009)

CDR3. Minor alterations to the draft replacement London Plan (December 2009)

CDR4. Draft London Housing Strategy (May 2009)

CDR5. London Economic Development Strategy (January 2005)

CDR6. Mayor's Housing SPG (2005)

CDR7. Mayor's Draft revised interim Housing Supplementary Planning Guidance (October 2009)

CDR8. GLA Industrial Capacity Supplementary Planning Guidance (SPG) (March 2008)

CDR9. London Tourism Action Plan 2009-2013

CDR10. London Development Agency's Corporate Plan 2007-2010

CDR11. Providing for Children and Young People's Play and Informal Recreation SPG (March 2008)

CDR12. Mayor's Sustainable Design and Construction SPG (2006)

CDR13. Draft Revised Supplementary Planning Guidance

CDR14. London View Management Framework (May 2009)

CDR15. The Mayor's Climate Change Action Plan 2007

CDR16. The Mayor's Energy Strategy 2004

CDR16. Strategic Housing Market Assessment in London. Statement from Government Office for London, the Greater London authority and London Councils (March 2008)

CDR17. Addressing PPS3 requirements for a 15-year housing land supply (interim approach). Statement from Government Office for London and the Greater London Authority (March 2008)

CDR18. GLA Economics- Economics Evidence Base – October 2009

CDR19. The GLA Hotel Demand Study (2006)

CDR20. GLA Strategic Housing Land Availability Assessment and Housing Capacity Study 2009

CDR21. Gypsies and Travellers Accommodation Needs Assessment (May 2008)

CDR22. Central London Infrastructure Study 2009

CDR23. London Student Housing Requirements Study (2007)

CDR24. GLA London Town Centre Health Check (2009)

CDR25. London Office Policy Review (2009)

CDR26. Mayor of London – Biodiversity Strategy (2002)

CDR27. South London Sub-regional Development Framework (Mayor of London, May 2006)

CDR28. London: Cultural Capital – Realising the potential of a world-class city. The Mayor's Culture Strategy (2004)

CDR29. Draft City Fringe Opportunity Area Framework, (Mayor of London, Feb 2008)

CDR30. London Waste Apportionment Study (December 2006)

CDR31. Mayor's Municipal Waste Management Strategy (2003)

CDR32. Mayor's draft replacement Municipal Waste Management Strategy (2010)

CDR33. GLA Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (March 2009)

CDR34. Experian Goad Category Report (July 2007)

CDR35. North East and South East London Industrial Baseline (2007)

CDR36. Industrial and Warehousing Demand in London (2004)

CDR37. www.visitlondonmediacentre.com - Press Release (London's hotel room supply set to increase by 2012)

CDR38. GLA Demand and Supply for Land for Logistics (2007)

CDR39. GLA Economics – Working Paper 38- Employment Projections for London by sector (Nov 2009)

CDR40. GLA Economics –Working Paper 39 Borough Employment Projections to 2031 (Nov 2009)

CDR41. Mayor's 'Evidence Base: Climate Change in the further alterations to the London Plan' (April 2007)

CDR42. London View Management Framework, The London Plan Supplementary Planning Guidance, Mayor of London, July 2007

CDR43. Tower of London World Heritage Site Management Plan, Historic Royal Palaces, 2007

CDR44.	Westminster World Heritage Site Management Plan, May 2007	CDR67.	Draft Water Resource Management Plan (Thames Water Utilities) 2008
CDR45.	CAP 738, Safeguarding of Aerodromes, Civil Aviation Authority, December 2006	CDR68.	Our Plans for Water (Thames Water Utilities) 2008
CDR46.	GLA Strategic Housing Market Assessment (CCC)	CDR69.	Draft Strategic Proposals for Sludge Management (Thames Water Utilities) 2008
CDR47.	GLA Housing Space Standards 2006	CDR70.	Thames Corridor Catchment Abstraction Management Strategy (CAMS)
CDR48.	GLA draft Housing Design Guide 2009	CDR71.	Living Well in London: The Mayor's draft Health Inequalities Strategy (2008)
CDR49.	Building for Life, CABE, November 2008	CDR72.	NHS London: Strategic Plan (2008)
CDR50.	Recommendation for living at Superdensity, Design for Homes, July 2007	CDR73.	Healthcare for London: A Framework for Action (2007)
CDR51.	GLA 2008 Round Population Projections (High)	CDR74.	State of the Environment Report for London
CDR52.	Accessible London: Achieving an Inclusive Environment. Mayor's Supplementary Planning Guidance (2004)	CDR75.	Thames Path National Trail – Management Strategy 2006-11
CDR53.	A Sustainable Development Framework for London. London Sustainable Development Commission (June 2003)	CDR76.	Improving Londoner's Access to Nature, Mayor of London, 2008
CDR54.	Sustainable Communities Plan for London: Building for the Future (2003)	CDR77.	The London Rivers Action Plan, 2009
CDR55.	Adapting to Climate Change: A checklist for Development (2005)	CDR78.	Mayor's Draft Transport Strategy, October 2009
CDR56.	Integrating renewable energy into new developments: toolkit for planners, developers and consultants, 2004	CDR79.	Mayor's Draft Economic Strategy, October 2009
CDR57.	Sounder City: The Mayors Ambient Noise Strategy (2004)	CDR80.	Mayor's Draft Air Quality Strategy, 2009
CDR58.	Cleaning London's Air, The Mayor's Air Quality Strategy (2002)	CDR81.	Mayor's Draft London Water Strategy, 2009
CDR59.	Planning for Equality and Diversity in London. Mayor's Supplementary Planning Guidance (2007)	CDR82.	Mayor's Draft London Climate Change Adaptation, 2008
CDR60.	Land for Transport Functions. Mayor's Supplementary Planning Guidance (2007)	CDR83.	GLA working paper on Economics Retail in London: small retailers (2005)
CDR61.	London Remade Demolition Protocol Report (2005)		
CDR62.	English Heritage's Heritage at Risk- London 2008		
CDR63.	Thames Region Catchment Flood Management Plan		
CDR64.	Thames River Basin Management Plan		
CDR65.	Regional Flood Risk Appraisal		
CDR66.	Taking Care of Water- Our Plan for the next 25 years (Thames Water Utilities 2007)		

LOCAL	
General	
CDL1.	Southwark Plan (2007)
CDL2.	Southwark 2016: Sustainable Community Strategy (2006)
CDL3.	Southwark Corporate Plan 2009-2011
CDL4.	Southwark Statement of Community Involvement (2008)
CDL5.	Southwark Local Development Scheme (January 2010)
CDL6.	Annual Monitoring Report (2008-2009)
CDL7.	Annual Monitoring Report (2007-2008)
CDL8.	Annual Monitoring Report (2006-2007)
CDL9.	Annual Monitoring Report (2005-2006)
CDL10.	Annual Monitoring Report (2004-2005)
CDL11.	Southwark Plan Proposals Map (2007)
CDL12.	Local Area Agreement (2007)
CDL13.	Southwark Land Use Survey 2004, Southwark Council
CDL14.	Southwark unitary development plan Inspector report (2006)
CDL15.	Secretary of State direction (2007)
Core strategy development plan document and supporting documents	
CDCS1.	Core Strategy Submission/Publication 2009
CDCS2.	Core Strategy Submission/Publication Consultation plan 2009
CDCS3.	Core Strategy Submission/Publication EQIA 2009
CDCS4.	Core Strategy Submission/Publication Sustainability Appraisal and appendices 2009
CDCS5.	Core Strategy Submission/Publication Appropriate assessment 2009
CDCS6.	Core Strategy Submission/Publication Consultation statement and appendices 2009
CDCS7.	Core Strategy Submission/Publication Changes to proposals map document and maps 2009
CDCS8.	Core strategy issues and options report 2008
CDCS9.	Core strategy preferred options report 2009
CDCS10.	Core strategy submission/ publication questionnaire 2009
CDCS11.	Core Strategy Sustainability Appraisal - Scoping Report and Appendices 2008
CDCS12.	Core Strategy Issues and Options - Interim Sustainability Appraisal and Appendices 2008
CDCS13.	Core Strategy Preferred Options - Draft Sustainability Appraisal and Appendices 2009
CDCS14.	Core Strategy Submission Version - Sustainability Appraisal Report and Appendices 2009
Background papers	
CDB1.	Environmental Performance Feasibility Study
CDB2.	Housing background paper one
CDB3.	Housing background paper two
CDB4.	Housing background paper three -density
CDB5.	Retail
CDB6.	Employment
CDB7.	Energy Performance and Flooding
CDB8.	Strategic Flood Risk Sequential Test
CDB9.	SINCS
CDB10.	Infrastructure
CDB11.	Borough-wide tall buildings
CDB12.	Joint Waste Apportionment Technical paper
Canada Water area action plan and supporting documents	
CDAAP2	Canada Water AAP submission/publication 2010
CDCW1.	Canada Water AAP submission/publication Sustainability Appraisal 2010
CDCW2.	Canada Water AAP submission/publication Consultation Plan 2010
CDCW3.	Canada Water AAP submission/publication Consultation Statement 2010
CDCW4.	Canada Water AAP submission/publication Equalities Impact Assessment 2010
CDCW5.	Canada Water AAP submission/publication Appropriate Assessment 2010
CDCW6.	Canada Water AAP Preferred Options 2009

CDCW7. Canada Water AAP Consultation Statement Preferred Options 2009

CDCW8. Canada Water AAP Issues and Options 2008

CDCW9. Canada Water AAP Sustainability Appraisal Scoping Report 2008

CDCW10. Canada Water AAP Issues and Options Interim Sustainability Appraisal 2008

CDCW11. Canada Water AAP Preferred Options Draft Sustainability Appraisal 2009

CDCW12. Canada Water AAP Submission Version Final Sustainability Appraisal Report 2009

Canada Water AAP background papers

CDCW13. Employment

CDCW14. Retail

CDCW15. Housing

CDCW16. Infrastructure

CDCW17. Delivery of Proposal Sites

CDCW18. Urban Design

CDCW19. Proposed changes to proposals map

CDCW20. S106

Environment

CDEN1. Southwark Climate Change Strategy (2006)

CDEN2. Strategic Flood Risk Assessment (2008)

CDEN3. Southwark Open Space Study (2010)

CDEN4. Southwark Play Strategy (2008-2011)

CDEN5. Southwark's Biodiversity Action Plan 2006-2010 (Work for Wildlife) (2007)

CDEN6. Southwark Local Implementation Plan (LIP)

CDEN7. Southwark Waste Management Strategy 2003 – 2021

CDEN8. Southwark Waste Minimisation Strategy 2007 - 2010

CDEN9. Southwark Contaminated Land Strategy (2001)

CDEN10. Southwark Air Quality Management and Improvement Plan

CDEN11. The Canada Water Area Action Plan Energy Study (2009)

CDEN12. Southwark State of the Environment Fact Sheet

CDEN13. Southwark Sustainability Policy and Strategy, 2004-09

CDEN14. Elephant and Castle -Sustainable Community Infrastructure, Southwark Council

CDEN15. Elephant and Castle - Position Paper on Low and Zero Carbon Energy

CDEN16. Background paper: Sustainable design and construction strategy Aylesbury Area Action Plan, Ramboll, 2009

CDEN17. Southwark Climate Change and Sustainability Strategy (Emerging)

CDEN18. State of Environment Report for Southwark (March 2009), Environment Agency www.environment-agency.gov.uk/static/documents/Research/SOUTHWAR_K_factsheet.pdf

CDEN19. Reserved Matters Application Planning Energy Statement 31/01/09, Fulcrum Consulting, submitted with reserved matters application for Aylesbury Phase 1a

CDEN20. Canada Water Area Action Plan Energy Study, Aecom, 2009

Housing

CDH1. Draft Strategic Housing Market Assessment (2009) key findings report

CDH2. Draft Strategic Housing Market Assessment (2009) core data report

CDH3. Draft Strategic Housing Market Assessment sub report – students (2009)

CDH4. Southwark Housing Requirements Study (2009)

CDH5. Southwark Housing Requirements Study sub report – Camberwell (2009)

CDH6. Southwark Housing Requirements Study sub report – Bermondsey (2009)

CDH7. Southwark Housing Requirements Study sub report – Rotherhithe (2009)

CDH8. Southwark Housing Requirements Study sub report – Dulwich (2009)

CDH9. Southwark Housing Requirements Study sub report – Borough and Bankside (2009)

CDH10.	Southwark Housing Requirements Study sub report – Aylesbury Estate (2009)	CDD4.	Canada Water Site A Environmental Statement (Barratt Homes and British Land Canada Quays Limited) (August 2009)
CDH11.	Southwark Housing Requirements Study sub report – Walworth (2009)	CDD5.	Canada Water Town Centre Feasibility Study, Benoy, (Nov 2009)
CDH12.	Southwark Housing Requirements Study sub report – Peckham (2009)	CDD6.	Background paper: Visual impact assessment, Aylesbury Area Action Plan (May 2009)
CDH13.	Southwark Housing Requirements Study sub report – Nunhead and Peckham Rye (2009)	CDD7.	Old Barge House Alley Conservation Area Appraisal, Southwark Council
CDH14.	Southwark Housing Strategy (2009)	CDD8.	Bankside and Bear Gardens Conservation Area Appraisal, Southwark Council
CDH15.	Research into the need for additional student housing in Southwark (December 2008)	CDD9.	Union Street Conservation Area Appraisal, Southwark Council
CDH16.	Southwark Affordable Housing Viability Study (2010)	CDD10.	Thrale Street Conservation Area Appraisal, Southwark Council
CDH17.	Southwark Private Sector Stock Condition Survey (2009)	CDD11.	Borough High Street Conservation Area Appraisal, Southwark Council
CDH18.	Study of residential density within the London Borough of Southwark, Southwark Council, January 2005	CDD12.	Tooley Street – north and south Conservation Area Appraisal, Southwark Council
CDH19.	Southwark Housing Capacity Study (2005)	CDD13.	Bermondsey Street Conservation Area Appraisal, Southwark Council
CDH20.	Southwark Housing Development Capacity Assessment January 2010	CDD14.	Kings Bench Conservation Area Appraisal, Southwark Council
CDH21.	South-East London Housing Strategy 2006	CDD15.	St Georges Circus Conservation Area Appraisal, Southwark Council
CDH22.	South East London Guide for RSLs and developers (2007)	CDD16.	West Square Conservation Area Appraisal, Southwark Council
CDH23.	South East London Wheelchair Homes Design Guidelines (revised August 2009)	CDD17.	Tower Bridge Conservation Area Appraisal, Southwark Council
CDH24.	Southwark Supporting People Strategy 2005-2010	CDD18.	Trinity Church Square Conservation Area Appraisal, Southwark Council
CDH25.	Developing minimum standards for permanent gypsy and traveler sites in South East London	CDD19.	St. Saviour's Dock Conservation Area Appraisal, Southwark Council
CDH26.	Study of residential density within the London Borough of Southwark (2005)	CDD20.	Pullen Estate Conservation Area Appraisal, Southwark Council
Design, heritage, conservation and tall buildings		CDD21.	Dulwich Village Conservation Area Appraisal, Southwark Council
CDD1.	Core Strategy Borough-wide Tall Buildings Research Paper, (December 2009)		
CDD2.	Core Strategy Bankside, Borough and London Bridge Opportunity Area Tall Buildings Research Paper, (December 2009)		
CDD3.	Draft Bankside, Borough and London Bridge SPD/OAPF - Tall Buildings Study (December 2009)		

CDD22.	Sunray Estate Conservation Area Appraisal, Southwark Council	CDD41.	Southwark Alliance, Neighbourhood Renewal Strategy 2002 – 2004
CDD23.	Camberwell Grove Conservation Area Appraisal, Southwark Council	CDD42.	Southwark Archaeology Priority Zones
CDD24.	Camberwell Green Conservation Area Appraisal, Southwark Council	CDD43.	South Bank Partnership Manifesto, "Under pressure and on the edge: London's South Bank – a Manifesto for Action" (2006)
CDD25.	The Gardens Conservation Area Appraisal, Southwark Council	CDD44.	Canada Water Site A Design and Access Statement, Barratt Homes, British Land, Canada Quays Limited and Glenn Howells Architects, August 2009
CDD26.	Holly Grove Conservation Area Appraisal, Southwark Council	CDD45.	Canada Water Public Realm Improvements Study, The Landscape Partnership, September 2009
CDD27.	Nunhead Cemetery Conservation Area Appraisal, Southwark Council	CDD46.	Canada Water Sites A & B Revised Design Code, Urban Strategies Inc, British Land and Canada Quays Limited, 2006
CDD28.	Sceaux Gardens Conservation Area Appraisal, Southwark Council	CDD47.	Canada Water CBRE Financial Viability Study 2010
CDD29.	Stradella Road Conservation Area Appraisal, Southwark Council	CDD48.	Canada Water St. George's Wharf Study 2010
CDD30.	Thorburn Street Conservation Area Appraisal, Southwark Council	CDD49.	Inspector's Report, 1 Blackfriars Road and 20 Blackfriars Road, The Planning Inspectorate, December 2008
CDD31.	Caroline Gardens Conservation Area Appraisal, Southwark Council	CDD50.	Decision letter, 1 Blackfriars Road and 20 Blackfriars Road, The Planning Inspectorate, March 2009
CDD32.	Blackfriars Road Character Area Appraisal, Southwark Council	CDD51.	Inspector's Report, Upper Ground and Doon Street East, The Planning Inspectorate, May 2008
CDD33.	North of Southwark Street Character Area Appraisal, Southwark Council	CDD52.	Decision letter, Upper Ground and Doon Street East, The Planning Inspectorate, August 2008
CDD34.	South of Southwark Street, Southwark Council	CDD53.	Inspector's Report to the First Secretary of State, Land Adjoining London Bridge Station, The Planning Inspectorate, July 2003
CDD35.	South of Union Street Character Area Appraisal, Southwark Council	CDD54.	Decision letter, Land Adjoining London Bridge Station, Office of the Deputy Prime Minister, November 2003
CDD36.	Borough Market, Clink Street and Southwark Cathedral Character Area Appraisal, Southwark Council		
CDD37.	Borough High Street Character Area Appraisal, Southwark Council		
CDD38.	London Bridge and Guy's Hospital Campus Character Area Appraisal, Southwark Council		
CDD39.	Tooley Street Character Area Appraisal, Southwark Council		
CDD40.	Bermondsey Village Character Area Appraisal, Southwark Council		

Employment

- CDE1. Southwark Employment Land Review (2009)
- CDE2. Southwark's Tourism Strategy 2005- 2010
- CDE3. Southwark Employment Strategy 2005 - 2016 (June 2006)
- CDE4. Southwark Enterprise Strategy 2005 - 2016 (June 2006)
- CDE5. Southwark Retail Study (2009) and appendices
- CDE6. Strategic Review of Southwark Markets & Street Trading Service October – December 2008
- CDE7. Camberwell Creative Industries Mapping Report (2007)
- CDE8. LB Southwark, Sector Skills Agency
- CDE9. Business Incubators Managed and Affordable Workplace Feasibility Study (2004)
- CDE10. Market Measures, Southwark profile (March 2008)
- CDE11. Background paper: Economic development Aylesbury Area Action Plan (March 2009)
- CDE12. www.elephantandcastle.org.uk - regeneration programme

Infrastructure

- CDI1. London Borough of Southwark, Children and Young People's Plan (2008)
- CDI2. London Borough of Southwark School Organisation Plan and Education Development Plan
- CDI3. Southwark PCT Involving People Strategy 2009-2012 (2009)
- CDI4. Southwark PCT Asset Management Strategy (2007)
- CDI5. Schools for the Future Programme
- CDI6. Metropolitan Police Estate – Asset Management Plan, Southwark, 2007
- CDI7. Southwark Walking Plan, 2006
- CDI8. Southwark PCT Commissioning Strategy Plan 2009-2012 (2007)
- CDI9. Southwark PCT Asset Management Strategy (2007)
- CDI10. Southwark Play Strategy 2007-12
- CDI11. Southwark Voluntary and Community Sector Asset Management Strategy

- CDI12. Canada Water Site Utilities Infrastructure Study, Hoare Lea, 2005
- CDI13. Review of primary school places, Report to Executive, November 2009
- CDI14. Southwark Schools for the Future: Strategic Business Case for Investment in Secondary Mainstream and Special Schools under the BSF Programme, and Associated Investments in Academies and Primary Schools, including Primary Special Schools, July 2006
- CDI15. Southwark Schools for the Future: New school provision, September 2006
- CDI16. Development Impact Report – Canada Water 2010

Area Action Plans

- CDAAP1. Aylesbury Area Action Plan (Jan 2010)
- CDAAP2. Draft Canada Water Area Action Plan
- CDAAP3. Submission/Publication Report (Jan 2010)
- CDAAP3. Draft Peckham and Nunhead Area Action Plan 2009 – Stage 1: Issues and Options (Mar 2009)
- CDAAP4. Aylesbury AAP background paper, Housing density

Draft and Adopted SPDs/SPGs

- CDSPD1. Draft Bankside, Borough and London Bridge SPD/OAPF (2009)
- CDSPD2. Draft Dulwich SPD (2009)
- CDSPD3. Draft Sustainable Transport SPD (2008)
- CDSPD4. Southwark Sustainable Design and Construction SPD (2009)
- CDSPD5. Sustainability Assessments SPD (2009)
- CDSPD6. Southwark Section 106 Planning Obligations SPD 2007
- CDSPD7. Affordable Housing SPD (2008)
- CDSPD8. Residential Design Standards SPD (2008)
- CDSPD9. Design and Access Statement SPD (2007)
- CDSPD10. Elephant and Castle Development Framework SPG (2004)
- CDSPD11. Elephant and Castle Enterprise Quarter SPD (2008)
- CDSPD12. Walworth Road SPD (2008)
- CDSPD13. Canada Water SPG (2005)

Neighbouring borough's plans

- CDNB1. Bexley Unitary Development Plan
- CDNB2. Bexley Local Development Framework
<http://www.bexley.gov.uk/index.aspx?articleid=608>
- CDNB3. Waste Management Strategy for Bexley 2009 – 2014
- CDNB4. Bromley Unitary Development Plan 2006
- CDNB5. Bromley Local Development Framework
<http://www.bromley.gov.uk/environment/planning/planningpolicy/ldf/>
- CDNB6. Bromley Draft Waste Management Strategy
- CDNB7. Bromley Draft Waste Minimisation Plan
- CDNB8. Greenwich Unitary Development Plan 2006
- CDNB9. Greenwich Local Development Framework
http://www.greenwich.gov.uk/cgi-bin/MsmGo.exe?grab_id=202&page_id=4724992&query=local+development+framework&hiword=DEVELOP+DEVELOPED+DEVELOPING+DEVELOPMENTAL+DEVELOPMENTS+DEVELOPS+FRAMEWORKS+LOCALITY+LOCALLY+LOCALS+LOCATED+LOCATED+LOCATION+development+framework+local+
- CDNB10. Lewisham Unitary Development Plan
- CDNB11. Lewisham Local Development Framework
<http://www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/LocalDevelopmentFramework/>
- CDNB12. Lewisham Draft Waste Management Strategy
- CDNB13. Lewisham Employment Land Study (2009)
- CDNB14. Metropolitan Views Draft Supplementary Planning Guidance, City of Westminster, October 2007
- CDNB15. St. Paul's Monument View Supplementary Planning Guidance, City of London, December 2007
- CDNB16. Lewisham Council Sustainable Community Strategy (2008-2020)
- CDNB17. Lambeth Council Unitary Development Plan (2007)
- CDNB18. Lambeth Council Sustainable Community Strategy (2008-2020)

Appendix F

Core Strategy publication/submission version equalities impact assessment (available in the members' offices and on the internet)

Appendix F for Planning Committee Report and Cabinet Report: Core Strategy

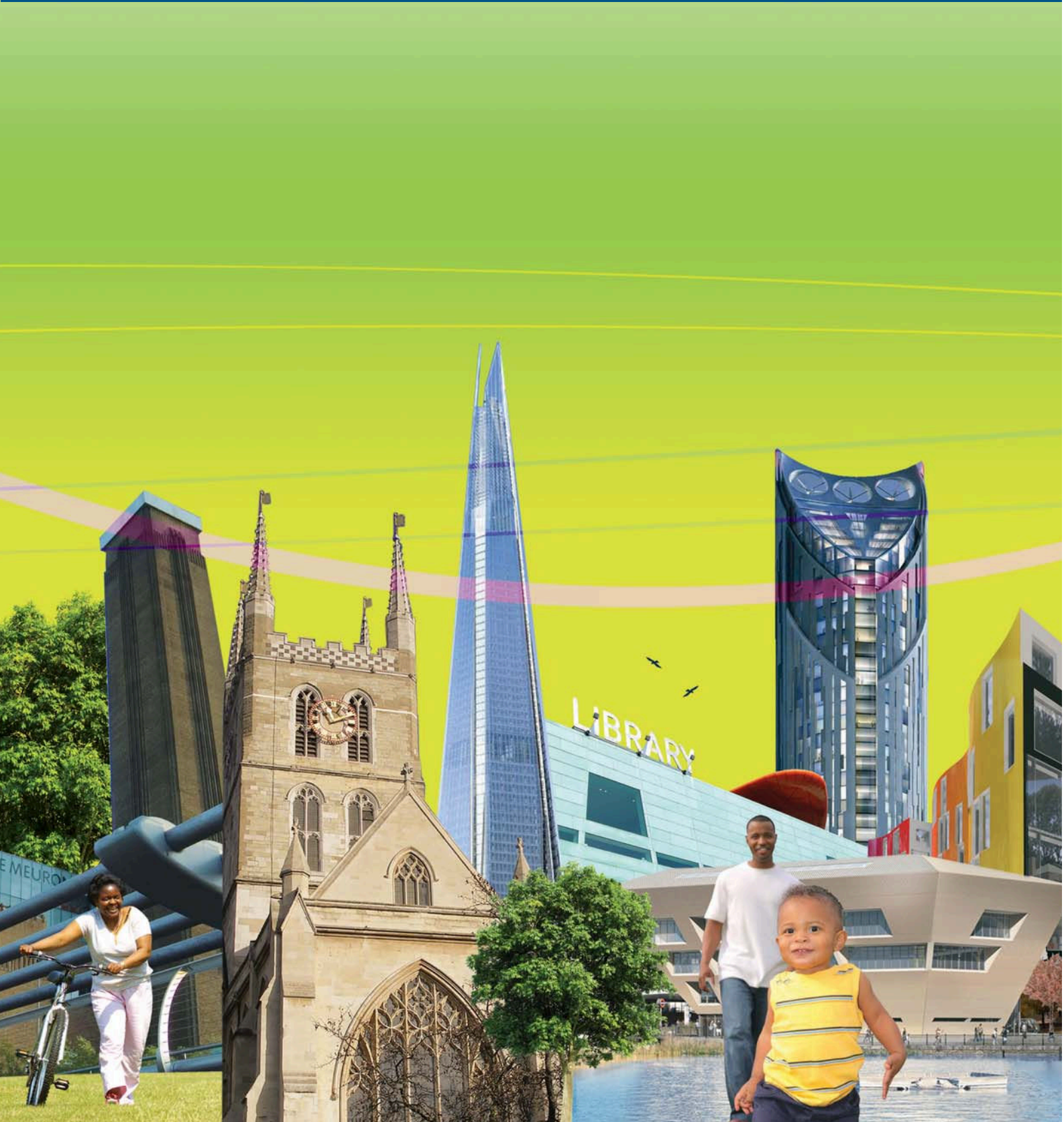
Planning Committee: 21 March 2011
Cabinet: 22 March 2011

Appendix A	Core strategy final version and proposals map changes (available on the internet and with report)
Appendix B	Inspector's report on the Core Strategy (available in the members offices and on the internet)
Appendix C	Consultation and sustainability statement (available in the members offices and on the internet)
Appendix D	Core strategy publication/submission version consultation report (available in the members offices and on the internet)
Appendix E	Core strategy publication/submission version sustainability appraisal (available in the members offices and on the internet)
Appendix F	Core Strategy publication/submission version equalities impact assessment (available in the members offices and on the internet)
Appendix G	Core Strategy publication/ submission version appropriate assessment (available in the members offices and on the internet)

Core strategy

CDCS15 Equalities Impact Assessment

March 2010



EQUALITIES IMPACT ASSESSMENT

1. What policy, strategy or plan is this assessment addressing?

This is the Equalities Impact Assessment for the core strategy.

The core strategy is one of the most important documents in the local development framework. The Planning and Compulsory Purchase Act (2004) introduced the local development framework (LDF) as a replacement for unitary development plans. LDFs are designed to take a more pro-active approach to the planning system, linking with key partners to deliver specific plans for areas. The core strategy is the over-arching document in the LDF and all other LDF documents must be in line with the policies in the core strategy. Other documents in Southwark's LDF include the Peckham and Nunhead, Aylesbury, Canada Water, Camberwell and Old Kent Road area action plans and supplementary planning documents for a number of topics and areas.

The core strategy sets out the vision for what type of place Southwark will be in the future. It will shape the development of the borough up to the year 2026 by providing clear objectives, policies and a delivery plan to make development happen in the right place at the right time. The core strategy must help to achieve the vision and objectives set out in Southwark Alliance's sustainable community strategy, Southwark 2016

The core strategy includes:

- A vision that sets out what type of place Southwark will be in the future
- Objectives that show how that vision will be achieved

- A strategy for all future development. This includes a clear spatial strategy which will set out how much growth will take place in the borough and where development will happen and planning policies to get the right kind of development
- A key diagram and changes to the proposals map that shows how different areas will develop and sets out areas of growth
- A delivery and implementation plan that will show how the strategy for Southwark will be achieved and who will help to make it happen
- A monitoring plan that shows how the core strategy policies will be monitored to make sure that they are being correctly implemented to achieve the overall vision.

The core strategy has been developed and prepared in accordance with statutory regulations and in consultation with the local community. The community have been consulted on the core strategy in accordance with our Statement of Community Involvement (2008) and the core strategy consultation strategy. The core strategy has been prepared in a number of stages as set out below

- The first stage was the Issues and Options stage which identified the challenges relating to development in the borough and set out a number of different options for how development could take place.

The Issues and Options core strategy was formally consulted on from November 3 to the December 15 2008.

- The second stage in preparing the core strategy was called the Preferred Options and this set out the way development in the borough should take place based on the results of consultation on the Issues and Options.

The Preferred Options core strategy was formally consulted on from June 9 to July 23 2009.

- The final stage of consultation was the publications/submission stage of the core strategy. This stage set out the final approach proposed for development in the borough. We formally consulted on this stage from January 22 to March 5 2010.

This Equality Impact Assessment (EQIA) includes our assessment of the following

- Core strategy issues and options. This is set out in the scoping section 1 of the EQIA.
- Core strategy preferred options. This is set out in section 2 assessments of impacts of the EQIA. At this stage we revisited the scoping section and carried out the section 2 assessment.
- Core strategy publications/submission. At this stage of the core strategy we revisited both section 1 and 2 of the EQIA. We have set out a new (second) section 2 (assessment of impacts) to show how we have progressed the development of the core strategy and the EQIA. This sets out further considerations at the publications/submission stage to ensure that we have carried out a full EQIA of the core strategy. It needs to be read alongside the first two sections on the issues and options and preferred options EQIA.
- Final comments received from the Equalities and Diversity Panel at the second stage 2 of the EQIA on the core strategy publication/submission core strategy.

The EQIA shows a clear audit trail of how we have developed the core strategy taking into account the findings from the EQIA and how we have revised the EQIA at each stage of the preparation of the core strategy.

2. Is this a new or an existing policy/strategy?

The core strategy is a new planning policy document. It replaces some of the policies in the existing adopted Southwark Plan (Unitary Development Plan, 2007).

CORE STRATEGY– ISSUES & OPTIONS

EQUALITIES IMPACT ASSESSMENT

STAGE ONE: SCOPING

THIS SECTION OF THE EQIA WAS CARRIED OUT AT THE ISSUES AND OPTIONS STAGE OF THE CORE STRATEGY. THIS SECTION FEEDS INTO THE STAGE TWO FOR THE PREFERRED OPTIONS AND PUBLICATION/SUBMISSION CORE STRATEGY. THE CORE STRATEGY WORDING HAS BEEN UPDATED AT EACH STAGE.

4. What do you think are the main issues for your policy or strategy in relation to equality, diversity and social cohesion?

We identified potential barriers that could prevent our equalities target groups (race, faith and belief, age, disability, sexuality, gender and Travellers and Gypsies) from benefiting fully from the core strategy. These barriers could create differential impacts on certain groups and reduce social cohesion. We also identified how the core strategy may have positive impacts on these groups and how it may improve social cohesion.

These impacts can be split into two categories; impacts created through the production of the core strategy in terms of public consultation and impacts associated with the implementation of the core strategy. More detail on the way we consulted on the document is available in our consultation strategy, plans and report.

4.1 Impacts associated with consultation on the core strategy

There are a number of barriers associated with consultation on all our planning policy documents which may create problems for social cohesion. It is important that everyone is offered the ability to be involved in the preparation of the core strategy and that the final document reflects the views of our diverse community. We have prepared a consultation strategy and a consultation plan for the every stage of consultation on the core strategy. These set out how we plan to consult the local community, developers and stakeholders. After each stage of consultation we prepared a consultation report which sets out the findings of our consultation and the different methods we used to consult the local community. These documents are in accordance with our adopted Statement of Community Involvement (SCI), which sets out how and when we will involve the community in the development of planning documents and applications for planning permission. Within the SCI, we have identified barriers to involving equalities target groups and ways to overcome them. These include English not being someone's first language, problems accessing information, people not feeling safe attending evening meetings and the documents using too much jargon. Please refer to Appendix A of this document for the full list of barriers to consultation.

4.2 Impacts associated with the objectives and implementation of the Core strategy

The core strategy issues and options paper is split into three main sections. The equalities impact of the proposals in each of the three sections is set out below.

- **Vision and objectives**

The vision and objectives of the core strategy are directly related to Southwark 2016, the sustainable community strategy for Southwark. As Southwark 2016 was subject to an Equalities Impact Assessment, it is expected that the vision and objectives of the core strategy will be able to demonstrate that they have

adequately taken into account equalities issues. However in order to make sure that the core strategy is assessed correctly and completely, the vision and objectives are set out below;

Core strategy Vision:

By 2026 Southwark will be a world class quarter of a world city with a thriving economy and improved job opportunities for local people. There will be less economic and social differences between communities and places. The creation of mixed communities and the provision of a wide range of housing will improve links between communities. All development will promote environmental sustainability.

Core strategy objectives (please note these are the same as the objectives in Southwark 2016):

<p>Improve individual life chances:</p> <ul style="list-style-type: none"> • Achieve economic well being • Achieve educational potential • Be healthy • Stay safe • Enjoy cultural and leisure opportunities • Value diversity and be active citizens <p>Deliver quality public services:</p> <ul style="list-style-type: none"> • Public services that are accessible and integrated, customer focused, efficient and modern 	<p>Make the borough a better place for people:</p> <ul style="list-style-type: none"> • Create mixed communities • Promote sustainable use of resources • Provide more and better homes • Create a vibrant economy • Have a liveable public realm • Ensure conservation and protection <p>Make sure positive change happens</p> <ul style="list-style-type: none"> • Provide enough funding for regeneration to positively transform the image of Southwark
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The vision of the core strategy seeks to create a more balanced borough with less economic and social differences between communities and places. This is directly linked to the vision of the Southwark 2016 which

recognises that there are vast differences in the borough between different places and communities and aims to reduce these differences. The vision is likely to have a positive impact on those people in equalities target groups (race, faith and belief, age, disability and sexuality) as well as gypsies and travellers, refugees and asylum seekers as these people are more likely to live in deprived areas and not be as wealthy as other people.

By aiming to improve the social and economic quality of life for residents in these specific equality groups, residents in other equality target groups such as age, gender and sexuality may feel that this is a barrier to their representation in the core strategy. In order to overcome this, as many residents as possible will be consulted widely on the vision of the document. Furthermore the objectives of the core strategy, which are the same as the objectives of Southwark 2016, are applicable to all equalities target groups so this should overcome the barrier identified in the vision.

Core strategy key policy issues

The likely barriers, differential impacts and impacts on social cohesion were discussed at the EQIA workshop held on 11 August 2008. These can have both negative and positive impacts. We need to consider all of the issues below when writing the core strategy.

Housing

The core strategy will introduce a number of policies on housing. This will include looking at: how much new housing we should build, where the new housing should be located, how much family housing we should provide, how much wheelchair housing we should provide, how much should be affordable housing, and whether we should allocate areas for specialist housing such as student housing, and gypsies and travellers sites. We need to consider:

- Ensuring there is an adequate supply of housing suitable for wheelchair users. Without this, disabled people may not be housed in dwellings that meet their needs.
- Access to specialist housing such as care homes and supported housing. This is likely to have the greatest impact on elderly people and people with disabilities.
- Supply of housing so that we ensure we have enough dwellings to house everyone. If we do not allocate enough sites for housing, we may find we do not have enough space to build housing to meet local need. This may result in the building of more one and two bedroom dwellings which may have a negative impact on some groups, such as some groups and some ethnic groups which are more likely to have larger families.
- Affordable housing. We may vary the amount of affordable housing we require through the core strategy. If we reduce the amount, it is likely to have a negative impact on those in poverty. This is often particular equality groups, such as asylum seekers who are new to the country and have little money.
- As part of affordable housing, we require a percentage to be intermediate housing, which is often shared ownership. This may not be suitable for all religious groups, such as Muslims or people from other cultures who may not want to take out a mortgage for religious or cultural reasons.
- As part of the core strategy we will look at how we can successfully create mixed communities with a range of housing types and tenures. This should help to improve social cohesion.
- Allocating sites for student housing may have a differential impact. For example, young people may benefit from the increased bars and shops in the area due to the increase in students, but older people may object to the noise of so many young people.
- By improving areas, there is always the likelihood that house prices will rise which may cause conflict between groups. For example new people may move into the area and be able to afford the new housing whilst existing groups may have to continue to live in less desirable housing.
- The core strategy may provide guidance on the allocation of sites for Travellers and Gypsies. This will have differential impacts on different groups and may have an impact on community cohesion. This could be

either a positive or a negative impact as it may cause friction between groups as land could be designated for Travellers and Gypsies (and other groups may feel their needs are being prioritised above their own needs), or it may improve relations by showing acceptance for these sites. It will clearly have the most positive impact on Travellers and Gypsies.

- The core strategy includes issues and options to improve the quality of future housing. This should have a positive impact on all groups.
- We may encourage more or less family housing in different areas. When we encourage a higher amount of family housing, this will have a positive impact on certain groups such as religious and ethnic groups who are more likely to have larger families. It may have a less positive impact on groups who are more likely to live alone and do not want family housing.
- People currently living in the area may feel resentful towards large numbers of people moving in. This tension could be further exacerbated if people moving into the area buy up newer and higher quality housing.
- New housing may only meet the needs of some people, and other people may feel it does not meet their needs and that other groups are being prioritised over their needs. This could cause tension between different groups.
- Communities may be split up by regeneration which could have a negative impact on all the equality groups.

Transport

The core strategy encourages more walking, cycling and public transport, and reduce car use in the borough. We need to consider the impact on transport infrastructure when we look at designating areas for growth. We need to consider:

- Some areas may see greater improvements to public transport than other areas. This can have an impact on all the equality groups in terms of access to employment, shops, leisure facilities and education. It may

have a particular impact on groups less likely to have access to a car such as young people and single parents (particularly women).

- We may encourage car-free developments which can have a negative impact on some groups who need a car more than others. For example, families with young children, elderly people, and disabled people.
- We need to consider pedestrian and cyclist links. This should have a positive impact for everyone, particularly those groups most likely to not have access to a car. However, we also need to consider that not everyone can cycle or walk easily through areas, such as disabled people, elderly people and parents with young children and buggies.
- Whilst the core strategy suggests how to and where to improve transport infrastructure, many projects are reliant on central and regional government funding. Sometimes funding gets cut or we have to wait longer than expected for funding to come through. This may cause tension and anger between communities as expectations are not always met. This may have a particularly negative impact on those people most reliant on public transport; often children older people and parents with young children (who are predominantly women).
- Some people may not feel safe using public transport, for example women and members of the LGBT community and certain faiths. Similarly walking routes may not feel safe for these people.
- Disabled access may be provided but sometimes it may be segregated from other access routes causing more isolation from the rest of the community.
- Public transport could continue to be unaffordable to some groups. This can limit access to job opportunities, leisure facilities, education etc.

Employment

The core strategy looks at whether we should release some of our protected employment land for other uses (such as housing), and whether we should allow other uses on the rest of our land currently used for employment. It will look at both industrial land and land used for offices. We need to consider:

- Having the right types of jobs in the right areas and suited to people's skills. Local people may not have the skills to access job opportunities that are created through the regeneration of areas and therefore may not benefit from these new opportunities. This may impact on some groups more than others such as young people, people without qualifications, people without English as their first language, single parents with childcare problems etc.
- We may allocate areas for industry. This may have an impact on local people's amenity, particularly people who are less able to move elsewhere or who are at home a lot, such as parents with young children, disabled people and elderly people.
- Certain groups may experience discrimination in accessing jobs such as young black men.
- Groups may feel it is unfair for land to remain as employment land when there is a need for housing. This could create tension between groups.

Community Facilities

The core strategy looks at the provision and location of community facilities. This may include faith centres, youth centres, community centres and libraries. We need to consider:

- Providing locations where places of worship can go. This will have a positive impact on certain faith groups and may have a negative impact on some other groups who may object to the noise of places of worship.
- Options for where we should improve sports facilities/put in new sports facilities may have a differential impact on different groups. For example, a sports centre catering for football may have more of a positive impact on boys than girls. It may also have differential impacts on people with disabilities.
- Improving sports facilities may have a differential impact as they may become more expensive and not affordable to everyone. This can harm social cohesion.
- Improving community facilities is likely to impact positively on everyone and may help resolve tensions between different groups as places for people to come together and interact.

Education

The core strategy looks at the provision of educational facilities, including pre-school, primary and secondary schools, and further and higher education. We will be linking in with some of the ‘Schools for the Future’ work. We need to consider:

- At the moment there is a “postcode lottery” when it comes to access to schools, which results in people living in more affluent areas usually having access to better schools. Through the core strategy we can help ensure there are more and better schools, which will have a positive impact on all the equality targets groups.
- Some equality target groups achieve a lot better than others in the education system. By improving access to and provision of schools, we will hopefully benefit all the equality groups.

Health

The core strategy looks at where we should locate new health facilities and the idea of whether we should be allocating land for large health facilities. We need to consider:

- Where we choose to locate health facilities can have an impact on different groups. For example, if we allocate land for a large health facility, other GP surgeries may close down, and some groups may find it difficult to get to the polyclinic. For example those groups which are least likely to have access to a car.

Shopping and town centres

We will be looking at whether we should focus future retail development and which areas of the borough have the most capacity for growth. We will also be looking at whether we should encourage a night time economy (such as restaurants, bars and cinemas) in certain areas of the borough. We need to consider:

- We may choose to focus shops in just a few areas. If we do this, then it may have an impact on others areas as money may be redirected and local shops may close down. This could have varied impacts on

different groups, such as a negative impact on elderly people who may be less able to travel further away for the better shops.

- When we choose to improve shopping in some areas, these areas may undergo gentrification and increased rent, meaning some of the existing local shops may be pushed out. This will have an impact on local shop owners. It may also cause tension between groups, between those who can and those who cannot afford the inflated rents.
- We may encourage more leisure and night time economy activities in certain areas. This may have an impact on some groups, such as increased drinking may increase violence against young people and may intimidate older people.

Cultural and tourist facilities

The core strategy looks at where we should locate tourist attractions. We need to consider:

- Meeting needs of different groups in the borough. Tourist and cultural attractions should also meet the needs of local people. If they are too expensive, certain groups such as young people may not be able to enjoy the facility.
- Locating tourist attractions may cause frictions between groups as it means less land available for local needs such as housing, sports facilities or community facilities. This causes friction between groups who do use the facility and those who don't.

Core strategy spatial options

The core strategy sets out a spatial strategy for the borough which provides a clear guide for future development and sets out where development will take place. At this issues and options stage two different

spatial strategies are being put forward for consideration. The equalities implications for each of these strategies are considered below.

Spatial option 1. Growth Areas: Create Growth Areas for new housing, shops, offices, community facilities, tourism and culture facilities. The Growth Areas will be the Central Activities Zone, Elephant and Castle, London Bridge and Bankside, Peckham, Canada Water and Camberwell. These are areas with good public transport links.

Under this option new development, jobs, shops and community facilities would be concentrated in the growth areas. As these areas can often be more deprived this would have a positive impact on residents in equalities target groups such as race and ethnicity, faith and belief and disability groups, Travellers and Gypsies and asylum seekers who tend to live in more deprived areas. The differential impact of this may be that residents living in other areas of the borough, in other equalities target groups such as sexuality, no faith, gender and age are located further away from jobs and services such as shops and community facilities. However a barrier to overcome this is that this option would also locate some development in town centres which provide local services to meet the needs of other equalities target groups.

The area-based approach to family housing could again be seen to have a more positive impact on the equalities target groups who live in these specific areas such as those in certain race, ethnicity, faith and belief equalities target groups as they may be more in need of family housing. However this would mean that less family housing would be provided in other areas in the borough as a result of this policy, this may have a differential impact on other equalities target groups living outside of these areas. A way to overcome this would be to ensure that where more family housing is provided it is based on a clear understanding of where the greatest need is. Southwark Council are also preparing a housing strategy that will inform this policy. In addition the local community will be consulted on this approach.

This option would apply an overall affordable housing target for the borough but the amount of affordable housing required would vary according to different areas, so we would require more affordable housing in areas where house prices are highest such as Bankside and London Bridge and more private housing in areas where there is a lot of social housing already such as Peckham and Elephant and Castle. This may have a positive impact on younger people who are more likely to want to live in areas such as Bankside and London Bridge as these areas traditionally have more flats and not as much family housing. However directing more private housing to areas such as Elephant and Castle may create an issue for people who live in those areas and want to purchase a home but cannot afford to do so. This is more likely to affect people in race, ethnicity, faith and belief equalities target groups who are more likely to live in these areas. The impact of this will be mitigated by carrying out consultation on these proposals to seek views from the local community. Also more private housing in these deprived areas would be likely to bring in more money from section 106 planning obligation agreements which could be used for the benefit of the wider local community (such as to improve parks or provide a new community facility) and could benefit specific equalities target groups.

Sites could be allocated for student housing in Peckham, Camberwell and Elephant and Castle. This may have a negative impact on equalities target groups living in these areas, particularly those in the faith, age, race and ethnicity target groups. A large proportion of people in these areas come from BME groups. These equalities target groups may feel that the land could have been set aside for a different use such as more housing or jobs for the local community or for a new community facility. A way to overcome this would be to ask local people, as part of the core strategy consultation, if specific sites should be allocated for student housing or if they would prefer the council to deal with applications for student housing on an individual basis.

Under this option major transport improvements in the growth areas would be possible as services, shops, tourist and cultural and community facilities would be more centralised. As a result many of the existing

services and community facilities would become more accessible to people in specific equality groups, such as faith and belief, race and ethnicity, who are more likely to live in these growth areas. Centralised services may also have a more positive impact on younger people who are more likely to use public transport compared to older people or those with a physical disability who may be reliant on cars to reach local services and would therefore find it more difficult to park in busy town centres. A way to overcome this would be to ensure that adequate parking is required in all new development for disabled people. We will also need to consult on an alternative core strategy option to have more localised community facilities.

Increasing employment opportunities is an important factor in addressing barriers for many of the equalities target groups, particularly those in faith and belief, race and ethnicity equalities target groups who suffer from economic deprivation and high unemployment levels. This option would see the greatest provision of new jobs in the growth areas. This would bring about many advantages for these equalities target groups as these areas tend to already have good public transport accessibility so jobs would be easier to get to.

Spatial option 2. Housing led growth: New housing will be allowed throughout the borough. It will not be focused in specific places.

Under this option new housing would be distributed across the borough, Southwark would meet and exceed the London Plan target for new homes. As there is a general need for more housing throughout the borough this is likely to have a positive impact on all equalities target groups. It may have more of a positive impact on young people who are keen to get onto the property ladder as more housing will provide more opportunities for this. The provision of more housing will result in more opportunities for affordable housing, this may also have a positive impact on those in the more deprived equalities target groups, and younger people who may not be able to afford to purchase a property on the open market. This may also have a positive impact on those in the

sexual orientation equalities target groups who may find it difficult to purchase a property if they are single, as opposed to being in a couple with a joint higher income.

This option would also set a standard requirement for the provision of affordable housing throughout the borough. There would be no area-based policies as in Option 1. This would mean that we could not ask for more or less affordable housing in certain areas to achieve wider regeneration and social and economic benefits. It is likely that this option would result in more affordable housing being provided than in Option 1. This could have a positive impact on the equalities group that tend to be income deprived as it may make it easier to find an affordable home. Alternatively this may have a negative impact on equalities target groups who live in deprived areas as under Option 1 we would try to create more balanced communities by introducing more private housing. If we continue to provide affordable homes in areas that are already deprived these places may just continue to be deprived.

Sites would not be allocated for student housing and instead applications will continue to be dealt with on an individual basis. This may have a negative impact on younger people who would be most likely to benefit from student accommodation, if they are students themselves and also who would benefit more from student nightlife such as bar and cafes. This would have a more positive impact on all other equalities target groups who may object to allocating sites for student housing and would prefer a more individual approach.

This option would be likely to result in less new jobs being provided in the borough overall, as more housing would be developed rather than new employment land. This is likely to have more of a negative impact on those equalities target groups who suffer from high unemployment. However the jobs that would be provided under this option would more likely to be located throughout the borough and not just confined to the growth areas. This may make it easier for people to walk to work or get to work quicker and improve their access to jobs.

Under this option, services and community facilities would be more spread out across the borough. More localised services may have a negative impact on younger people who are more likely to use public transport than compared to older people or those with a physical disability who may be reliant on cars to reach local services and would therefore find it more convenient to drive to local services rather than to drive and park in town centres. We will consult on an alternative option to have more centralised community facilities.

CORE STRATEGY – PREFERRED OPTIONS

EQUALITIES IMPACT ASSESSMENT

STAGE TWO: ASSESSMENT OF IMPACTS

THIS SECTION OF THE EQIA WAS CARRIED OUT AT THE PREFERRED OPTIONS STAGE OF THE CORE STRATEGY. THE CORE STRATEGY WORDING HAS BEEN UPDATED AT EACH STAGE.

Part A: Feedback from the Equalities and Diversity panel

1. What feedback did the panel give you at stage one

As part of the issues and options consultation on the core strategy, the EqIA was taken to Equalities and Diversity Panel on September 16 2008. The Equalities and Diversity Panel made comments on the EqIA and these have been incorporated into the preparation of this Equalities Impact Assessment and the core strategy preferred options.

At the issues and options stage, the Equalities and Diversity panel advised us to consider the following issues. We have set out below how we have taken these comments forward.

- Hostels and homelessness

We have addressed this through our policies to increase affordable housing and family housing. We are also looking at all potential sites (above 0.25 hectares) across the whole borough which will help us to provide more housing across Southwark. This will help to provide more homes for everyone.

- Asylum seekers in Elephant and Castle and Peckham. The core strategy is a strategic document and does not go into the detail of how to provide more housing and help for asylum seekers. By having policies to provide more housing (see above in response to hostels and homelessness) we will ensure there is more housing for everyone across the whole borough and that there is affordable housing, including housing that asylum seekers can be housed in.
- Overcrowding of existing Traveller and Gypsy sites. At this stage of consultation, we are waiting for a study to be released by the Mayor on how many new Traveller and Gypsy pitches we should provide in Southwark. This information may be put into the publications/submission version of the core strategy.
- Importance of education. Policy 4 of the preferred options sets out how we will have a joined up approach to how we will use our existing community facilities, including schools. We will continue to build new schools through the Southwark Schools for the Future Programme and require section 106 payments for schools. Our objective 1B also sets out that we want to achieve educational potential.
- Importance of disabled housing and Lifetime Homes. We are addressing this through our policies for wheelchair homes and lifetime homes which will be set out in our Development Management Development Plan Document or our Housing Development Plan Document.

Part B: Purpose and aims of policy/strategy

2. What is the overall purpose of the policy/ strategy?

The core strategy, when adopted, will be part of Southwark's Local Development Framework. The core strategy will be the main document setting out the strategic policies which will be used for deciding what sort of development should take place within the borough, and when, where and how it should happen.

3. What are its aims?

The overall approach

The core strategy sets out a spatial strategy for the borough which provides a clear guide for future development and sets out where development will take place. At this stage the preferred options are being put forward for consideration. The equalities implications for choosing these options are considered below.

The core strategy sets out what we would like Southwark to be like. The vision set out in the preferred options is:

Southwark will be a world class quarter of a world city with a thriving economy and improved job opportunities for local people. There will be less economic and social differences between communities and places. The creation of mixed communities and the provision of a wide range of housing will improve links between communities. All development will promote environmental sustainability.

We are taking forward a growth areas approach with development in town centres and areas with good public transport. We will prioritise development in: Central Activities Zone, Elephant and Castle Opportunity Area,

Peckham Action Area, Canada Water Action Area, Bankside, Borough and London Bridge Opportunity Area, Aylesbury Action Area, West Camberwell housing regeneration area and Old Kent Road regeneration area.

Under this option new development, jobs, shops and community facilities would be concentrated in the growth areas; mostly in the Central Activities Zone, the cores of the action areas and the opportunity areas. As these areas contain concentrations of the most deprived parts of Southwark this would have a positive impact on residents in equalities target groups such as race and ethnicity, faith and belief, and disability groups, gypsies and travellers and asylum seekers who tend to live in more deprived areas. The differential impact of this may be that residents living in other areas of the borough, in other equalities target groups such as sexuality, no faith, gender and age, are located further away from jobs and services such as shops and community facilities.

The area-based approach to family housing will have a more positive impact on the equalities target groups who live in these specific areas such as those in the faith and belief, race and ethnicity equalities target groups as they may be more in need of family housing. However this would mean that less family housing would be provided in other areas in the borough as a result of this policy. This may have a differential impact on other equalities target groups living outside of these areas. A way to overcome this would be to ensure that where more family housing is provided it is based on a clear understanding of where the greatest need is. Our Housing Strategy and other housing studies inform this policy. In addition the local community will be consulted on this approach.

This option would apply an overall affordable housing target for the borough but the amount of affordable housing required would vary according to different areas, so we would require more affordable housing in areas where house prices are higher, and more private housing in areas where there is a lot of social housing already such as Peckham and Elephant and Castle. This may have a positive impact on younger people who are more likely to want to live in areas such as Bankside and London Bridge as these areas traditionally have more flats

and not as much family housing. However directing more private housing to areas such as Elephant and Castle may create an issue for people who live in those areas and want to purchase a home but cannot afford to do so. This is more likely to affect people in race, ethnicity, faith and belief equalities target groups who are more likely to live in these areas. To better understand the possible impacts of this approach we will be carrying out consultation on these proposals to seek views from the local community. Also more private housing in these deprived areas would be likely to bring in more money from Section 106 agreements which could be used for the benefit of the wider local community (such as to improve parks or provide a new community facility) and would benefit specific equalities target groups.

We also need to consider the benefits of regeneration of areas versus improvements to tenants homes to ensure that we consider the needs of current residents in addition to how areas can be improved.

Sites could be allocated for student housing in Peckham, Camberwell and Elephant and Castle. This may have a negative impact on equalities target groups living in these areas, particularly those in the faith and belief, age, race and ethnicity equalities target groups. A large proportion of people in these areas come from BME groups. These equalities target groups may feel that the land could have been set aside for a different use such as more housing or jobs for the local community or for a new community facility. To help address this we are asking local people, as part of the core strategy consultation, if specific sites should be allocated for student housing or if they would prefer the council to deal with applications for student housing on an individual basis.

Under the preferred options major transport improvements in the growth areas would be supported as services, shops, tourist, cultural and community facilities would be more centralised here. As a result of transport improvements many of the existing services and community facilities would become more accessible to people in specific equality groups, such as faith and belief, race and ethnicity, who are more likely to live in these growth areas. Centralised services may also have a more positive impact on younger people who are more

likely to use public transport compared to older people or those with a physical disability who may be reliant on cars to reach local services and would therefore find it more difficult to park in busy town centres. A way to overcome this would be to ensure that adequate parking is required in all new development for disabled people. We are also protecting local services and shopping areas outside of growth areas.

Increasing employment opportunities is an important factor in addressing barriers for many of the equalities target groups, particularly those in faith and belief, race and ethnicity equalities target groups who suffer from economic deprivation and high unemployment levels. This option would see the greatest provision of new jobs in the growth areas. This would bring about many advantages for these equalities target groups as these areas tend to already have good public transport accessibility so jobs would be easier to get to.

Approach to different areas

Central Activities Zone

We will continue to support the regeneration of the area and there are opportunities for a considerable amount of new development. We will support new homes, businesses and tourism and other services, improved streets and spaces and community facilities. New hotels and student accommodation are changing the character of some areas. We are considering limiting these and directing them to areas where there are fewer. We will facilitate improvements to the stations, public transport, walking and cycling infrastructure as these are important to enable people to get to and around the area. It is particularly important to link the Elephant and Castle with London Bridge and Bankside. We will also facilitate local employment and training schemes which are needed to make sure that local people can access jobs.

The River Thames, Elephant and Castle opportunity area and Borough, Bankside and London Bridge opportunity area are all within the Central Activities Zone.

River Thames

We will continue to protect and improve the Thames policy area to maintain the characteristics that help make it a special area. These characteristics include a diverse range of activities in many parts of it, the Thames Path, historic conservation areas, and some of London's finest panoramas and views. We will continue to encourage the many different types of development using the central activities zone and strategic cultural areas policies. These include tourism such as the Tate in Bankside and offices in London Bridge mixed in with new homes. There is little potential for development in the riverside sites from Shad Thames along to Rotherhithe so they are unlikely to change.

Also the Thames can act as a barrier to attracting businesses into Southwark and for residents travelling into central London for work. We will encourage river transport to increase use of the Thames and link the south of the river with the City to ensure continued and improved access.

The height of tall buildings is lower than in the rest of Southwark in the Thames policy area at 25 metres. This is to provide more control of developments next to the riverside to make sure the character is retained.

We will continue to require all new developments along the Thames to provide access to the river walk as there are still some areas where people cannot walk along the river.

Elephant and Castle opportunity area

There is an SPG for the central part of Elephant and Castle and an SPD for the Enterprise Zone.

Elephant and Castle has lots of potential for redevelopment and we will be transforming it into an attractive part of central London with. It will become a desirable place for high density living, shopping, leisure and study that is very accessible from other places in Southwark and London. We will use our land at the heart of the area to stimulate development of up to 75,000 sqm of new shops community, health and leisure facilities and 6,000 new homes. We will support the university to grow and there will be up to 12,000 sqm of more offices, hotels, small businesses, cultural, creative and other activities that will increase vitality and create 4,200 jobs especially in the Enterprise Zone and Core Area. We will protect a route for a tram or public transport corridor, to pass through the centre. The tube stations will be transformed and public transport will improve to make this very accessible area even easier to get to. The public realm and cycle ways will be linked up and improved with a new street pattern that will make it easy and safe to get around.

Borough, Bankside and London Bridge opportunity area

We are preparing a supplementary planning document for Borough, Bankside and London Bridge opportunity area. We will be consulting on this from July.

We will continue to maintain the character which helps make Borough and Bankside a unique location, facilitating positive change that combines the area's historic character with the best attributes of new developments. We need to achieve this in the context of significant pressure for development. We will protect and facilitate growth of businesses, culture, arts and tourism along with allowing new housing. We will also encourage provision of new community and youth facilities. Although these activities are important for the area to thrive, we need to balance growth with protection of the area's historic character and improvements to support increased population living and working in the area. To achieve this we will not support tall buildings except for at

the northern end of Blackfriars Road. Design excellence will be required to make sure developments enhance this varied and interesting place. We will also focus on improvement of current open spaces to provide essential areas for relaxation and play and we will continue to make the area easier to get around by enhancing cycling routes and the public realm. New hotels and student accommodation are changing the character of some areas. We are considering limiting these and directing them to areas where there are fewer of these uses.

We will continue to create a more cohesive and vibrant London Bridge within the context of the area's historic character through new developments. Although already busy, there are a number of large development sites that could contribute to more thriving activity through new homes and businesses mixed with the hospital, health organisations and tourism. We will be supporting excellently designed tall buildings to add interest to the skyline, increase the capacity for homes and jobs and to provide local landmarks. We will improve the public realm within a strategy for improving access around the area by walking and cycling.

Together, Borough, Bankside and London Bridge will provide over 2,500 new homes and 30,000 new jobs by 2026.

Canada Water (and Rotherhithe) action area

We are preparing an area action plan for Canada Water. We finished consulting on the issues and options stage in February 2009 and will be consulting on the preferred option stage June to August 2009.

Over the next 15 years, we will work with landowners and the local community to transform Canada Water into a town centre. It will have a much more diverse range of shops than at present, including a new department store and independent shops. These will be accommodated in generally mixed use developments with new homes above. As well as shops and homes, the centre will have leisure and civic facilities, offices, restaurants and cafes. The centre will have a distinctive identity which reflects its unique location around the former dock basin. It

will have an open environment with a high street feel, and high quality public realm and open spaces. Car parking will be shared between town centre uses. The centre must reach out to the wider area, ensuring that it is accessible, particularly on foot, by bicycle and by public transport. In conjunction with this, we will work with TfL to improve the road network around Lower Road.

Outside the town centre and core area of the AAP, development will be less dense and should reflect the leafy and suburban character of much of the AAP area.

Across the AAP area, development will contribute to achieving a great network of parks and open spaces, which together with the docks and the River Thames, can help make Rotherhithe known as an attractive destination to visit, relax in and have fun. It will provide a good range of quality homes and successful schools to help make Rotherhithe a desirable place to live, particularly for families.

Peckham and Nunhead

Peckham town centre is the largest in Southwark and will continue to play a major role and provide a mix of activities. We are preparing an area action plan covering Peckham that will help regenerate the area and build on its growing role as a centre for creativity. Consultation on the issues and options stage of the action plan closes on the 25th May.

There are a number of development opportunities in Peckham. We will work with landowners to bring forward key sites for development that will have knock-on benefits for the area so that it becomes a safe place with a healthy community. This will include providing more housing in the area to provide choice for people on a range of incomes and a mix of uses including shops, cafes, businesses and cultural and leisure uses. We are currently consulting on what could be built on particular sites in and around the town centre, this includes the possibility of creating a new public square in front of Peckham Rye Station. There is also the opportunity to extend the town

centre so that exciting new spaces and activates are provided in and around the railway lines and Copeland Road industrial land.

There will be an improved environment so that the area looks better, including more trees and improvements to parks. New developments will build on Peckham's history. But there will be a mix of historic buildings and exciting new architecture, such as the Peckham Library. We are consulting on whether to have a new conservation area in the town centre as this could help regenerate Peckham, as happened in Bermondsey Street. The scale of development would stay much the same except in the town centre where there could be some taller buildings and more intense development on some sites. We are consulting on these options through the area action plan. Shopfronts will be improved and new development will need to make sure it does not impact on the residential areas which immediately surround the town centre.

There will be huge improvements to transport if the tram or a similar scheme came to Peckham. But there are also other improvements planned such as the East London Line Extension and we will look at how traffic can flow better through the area.

Nunhead

We would protect the character and scale of development in Nunhead so that it continues to be mostly low density housing. There will not be much new development apart from small infill housing development. There are local shopping areas in Nunhead that will be protected and will be improved through streetscape and shopfront schemes.

Nunhead has a number of important large open spaces including Nunhead Cemetery which will continue to be protected.

Aylesbury action area

We have prepared an area action plan for Aylesbury. This will be submitted to the Secretary of State in May for Examination before final agreement by the council.

We will use the guidance established in the Aylesbury Area Action Plan to achieve a phased redevelopment of the Aylesbury Estate over the period 2009 to 2027, which will deliver a new and more balanced mixed community with far better living conditions. The Plan will deliver quality private, intermediate, and social rented housing, the latter based on Parker Morris +10% standards. There will be a significant proportion of family homes with 23% houses, together with all the facilities needed by families, to make sure that the whole area is family-friendly. The new development will broadly keep the existing street structure but will be arranged on a more secure and permeable layout with good street frontages. The new homes will overlook the streets and spaces so that there will be much better natural security. Good urban design and high quality architecture will enable us to provide homes for 4,200 households, many more than at present. These will benefit from the highly accessible position of the Aylesbury area with its good transport links to the centre of London and the emerging centre at Elephant and Castle. Design excellence will be at the core of the redevelopment and we will emphasise and control design quality at each stage of the project to create a varied and interesting new residential neighbourhood. To reinforce its image as a place for families to live, the Plan will also deliver an excellent range of quality public and private open spaces, and will provide new local opportunities for shopping and employment in Thurlow Street and East Street, as well as supporting existing town centres.

Herne Hill town centre

Herne Hill is partly in Lambeth and partly in Southwark, there are few development sites in the Southwark area. We are consulting on a Dulwich Supplementary Planning Document until June which includes the Southwark part of Herne Hill. This will inform the next stage of the core strategy. We will also be contributing to a master plan for the whole area that is being prepared.

We will continue to protect shops and services to retain the range of independent shops, art galleries, bars and restaurants that give Herne Hill character. We will support development of the railway arches into niche businesses or other activities that provide vibrancy to the town centre. We will work with Lambeth to tackle traffic congestion.

Camberwell town centre

We will continue to protect this successful, attractive town centre which has many small and medium sized businesses. Many of them are independently run which helps to give Camberwell a special character. Butterfly Walk is the only large development site and there are few small sites, so the emphasis is on protection rather than development. We will also facilitate Camberwell as a creative place with artistic influences clustering around Camberwell College of the Arts. We will also support large health institutions as they add to the vibrancy of the area and provide employment.

The Blue

We will continue to protect the Blue as a local shopping centre providing essential services for local people.

Dulwich town centre

We are consulting on a Dulwich Supplementary Planning Document until September 2009. This will inform the next stage of the core strategy.

We will continue to protect Dulwich Village as a historic area for homes, shops, local services and open spaces that retains an original shopping street and nearly all of its original 18th and 19th century buildings.

Lordship Lane town centre

We are consulting on a Dulwich Supplementary Planning Document until September 2009 which includes Lordship Lane. This will inform the next stage of the core strategy.

We will continue to protect Lordship Lane as a distinct and vibrant area with a variety of shops, cafes and bars providing amenities for the local residents. This is to retain the interesting character of this popular area created by the specialist businesses, cafes and unusual shop fronts.

Old Kent Road regeneration area

We will prepare an area action plan to facilitate regeneration of the Old Kent road. We will set out an integrated plan for housing and employment and small, local shops to complement the multiple retailers already there. We want to create a stronger sense of place at a scale that is comfortable to walk around. We would like new homes to overlook new streets and spaces so that there will be much better natural security. The area will benefit from good urban design and high quality architecture to change the image to a place rather than a busy road. These must be within a strategy for improved accessibility for pedestrians, cyclists and public transport users, and an enhanced public realm.

West Camberwell housing regeneration area

West Camberwell is a large area of council housing which could be developed as a catalyst for regeneration taking advantage of the good transport links. Although we are not proposing to plan out this regeneration in the short term, there is potential for growth so we are flagging this up in the core strategy.

Bermondsey Spa

Bermondsey Spa was an action area in the Southwark plan. This was because there was a large housing regeneration project taking place. Most of the housing has been built or projects are underway. There are only a

few sites left to develop so this area no longer needs to be described as an action area with targets and an implementation plan as the regeneration is nearly complete.

4. Could these aims be in conflict with the Council's responsibility to:

- **Eliminate discrimination**
- **Promote equality of opportunity**
- **Promote community cohesion and good relations between different groups**

Housing and Density

The preferred option aims to develop a mixed community through the balanced provision of social rented, intermediate and private housing which should contribute to the promotion of community cohesion and good relations between different groups. The type and size of homes will reflect the housing needs of the residents living in Southwark. The core strategy seeks to promote a range of housing types. The preferred option promotes development that will continue to deliver high levels of affordable housing whilst increasing the provision of family accommodation in the borough. The dwelling mix in the preferred option is derived from Southwark's borough-wide housing needs assessment. There will be higher residential densities in some areas but these will only be in locations with good existing and future public transport links and where there are good local facilities.

Education

The aim of the preferred option is to ensure we continue to protect community uses, including educational uses and to make sure our Southwark Schools for the Future programme can be delivered. This will help promote equality of opportunity by providing more schools across the borough and improving existing schools.

Transport

The preferred option is intended to help ensure that homes, jobs, shops and other services in the new neighbourhood are accessible and to promote sustainable transport choices. In general this means prioritising cycling and walking in the layout and design of new development, discouraging car use through locating higher density development in areas which have very good public transport accessibility, and restricting the amount of parking to the minimum which is needed to ensure that the development can operate effectively. This approach is in line with government policy and is intended to promote healthier lifestyles and reduce carbon emissions arising from car use and dependency on fossil fuels. In principle, this approach benefits all members of the community. Car ownership levels tend to be lower among the young and elderly. Therefore a policy which seeks to promote walking and cycling, creating routes which are safe from conflict with vehicles, which prioritises non-car users, and which also maximises opportunities to use public transport should benefit these groups in particular, promoting inclusivity and equality of access to jobs, services etc. It should be noted however that there are certain groups who may rely on using a car. This might include the elderly, people with disabilities and parents with young children. The preferred options seek to mitigate the impact of a general presumption in favour of low parking levels by prioritising parking for people with disabilities, even within what are otherwise “car free” developments. The preferred option seeks to ensure that parking spaces are provided equitably across housing tenures which should help promote social cohesion.

It will also be very important that a reduction in car parking and promotion of sustainable modes of transport are undertaken in tandem with improvements in public transport and the public realm. While in theory promoting walking and cycling is beneficial to all users, if routes out of developments are poorly lit, secluded and at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups such as the elderly and young, people with disabilities, women and LGBT groups. It could also apply in areas which already experience significant levels of deprivation.

Community facilities

The preferred options report looks to protect all community facilities unless it can be demonstrated that there is no need for them any more. It also will encourage new community facilities. This should help to improve community cohesion.

Open spaces and wildlife

Our preferred options policies protect all existing open spaces and propose some new open spaces to protect. This will help to improve community cohesion and eliminate discrimination by ensuring everyone has access to open spaces

Consultation

The stage 1 EqIA highlighted the need to ensure that the methods used to consult and engage people in the preparation of the core strategy are open accessible to all members of the community. To help address this issue the council has prepared a consultation strategy which sets out the principles of how it will consult and the importance of reducing barriers to consultation. It emphasises that particular needs such as access, transport, childcare and translation need to be considered, as well as a strategy to broaden the appeal of consultation and make it attractive to a diverse range of people and groups. At each stage, participation will be monitored and analysed to see whether any particular groups have not been engaged and whether this can be addressed at the next stage.

At issues and options stage a variety of means were used to publicise, consult and engage with local people. These are described in detail in the consultation statement which accompanies the preferred options report and is summarised below:

- Publicity: Consultation on the core strategy issues and options report was widely publicised through a mailout to contacts on Southwark's Planning Policy database, Southwark's website, a newspaper advert, making information available in libraries and council offices
- Officers attending community councils and area housing forums to raise awareness of the consultation
- A number of workshops and drop in sessions were held across the borough in order to enable local people to find out more about the document and how it effects their area.

5. Does the documentation relating to this policy/strategy include specific reference to the Council's responsibility (as set out above) and a commitment to work to meet this?

While the council's responsibility for eliminating discrimination and promoting equality of opportunity and social cohesion are not specifically referred to in the preferred options report, the objectives of the core strategy consistently refer to the aim of creating a strong community and neighbourhoods in which the needs of all groups are taken into account. The consultation strategy for the core strategy does refer specifically to the need to ensure that in accordance with Southwark's Equalities Scheme 2005-2008 to ensure the Equalities priorities groups are involved and that arrangements are made to include under-represented groups and individuals.

Part C: Application of this policy/strategy

6. What steps are you taking or will you take to ensure that the policy is or will be implemented consistently and fairly?

Consultation on the core strategy will be monitored at each stage of the plan preparation process to ensure that all groups will be engaged as effectively as possible. The consultation plan which accompanies the preferred

option report contains more details on this. A consultation statement has also been prepared with the preferred option report setting out who was consulted at the issues and options stage and how this was carried out. When the draft core strategy is submitted to the Secretary of State, the council will also submit a consultation statement (Statement of Compliance) demonstrating that the consultation on the preferred option has been carried out meets statutory minimums and meets the requirements of Southwark's Statement of Community Involvement.

7. Could the way that this policy/strategy is being or will be implemented be discriminating against any particular individuals or groups or be potentially damaging to relations between different groups?

The preferred option aims to contribute to eliminating discrimination, promoting equality of opportunity and promoting social cohesion and good community relations. In the long term the core strategy should help to improve relations between different groups and should not discriminate against any particular individuals.

8. What changes could you make to either the policy/strategy itself or the way it is applied to improve the positive outcomes for all groups and to reduce or eliminate any negative outcomes?

In preparing the preferred options report, the findings of the EqIA scoping have been considered and the report has been prepared iteratively with the stage 2 EqIA. This stage 2 assessment recognises those areas where the core strategy may have differential impacts and where appropriate mitigation measures are proposed to address these. The council will take all representations on the preferred options into account and there will be a further opportunity to adjust policies prior to the submission of the draft plan to the secretary of state, should this be necessary or appropriate.

9. What information do you collect or do you plan to collect to monitor the impact of this policy/strategy on different groups?

As is noted above, the council monitors participation in the core strategy preparation process to ensure that all groups have the opportunity to be involved. Where there is evidence that some groups have not been engaged, the council can seek to address this at the next stage. The consultation which has been carried out will be reported in the consultation statement to be submitted to the secretary of state.

The council's team in the Analytical Hub prepares periodic updates on demographic changes in the population, including changes relating to ethnicity, age, faith and belief. The council also monitors economic activity, health and pupil attainment in schools. Biannually the council also commissions a residents' survey to ascertain how local people feel about their area and whether it is improving. These analyses are carried out at community council level. These analyses are also reported in the council's annual monitoring report which assesses the impact of all development in the borough.

Once the core strategy has been adopted, the AMR will report annually on the implementation of the core strategy, using indicators such as new housing built in the borough, social rented and intermediate housing built, new retail and business space built, including small business units, average household income, the percentage of residents who feel safe at night, business start ups and the local employment rate.

Organisations such as the PCT may have their own strategies for monitoring the impact of their policies on key equalities target groups. The preparation of the core strategy may enable the council and PCT to identify a set of key indicators for Southwark. The council will ensure that a monitoring framework is put in place to assess this aspect of the core strategy. The need to provide high quality schools is a key objective of the core strategy and in this respect it seeks to support the Southwark Schools for the Future Programme and the Academies

Programme. An EqIA has already been carried out for the SSF secondary schools programme, which assesses the impact on equalities up to outline business case stage. The council has also prepared an EqIA for the SSF primary schools programme and details of the monitoring framework will be identified as part of that process.

CORE STRATEGY – PUBLICATIONS/SUBMISSION VERSION

EQUALITIES IMPACT ASSESSMENT

STAGE TWO: ASSESSMENT OF IMPACTS

THIS SECTION OF THE EQIA WAS CARRIED OUT AT THE PUBLICATIONS/SUBMISSION VERSION STAGE OF THE CORE STRATEGY. THE STAGE ONE AND STAGE 2 (PREFERRED OPTIONS EQIA) WERE REVIEWED TO INFORM THIS STAGE OF THE EQIA. THE CORE STRATEGY WORDING HAS BEEN UPDATED AT EACH STAGE.

Part A: Feedback from the Equalities and Diversity panel

1. What feedback did the panel give you at stage one/stage two

As part of the preferred options consultation on the core strategy, the EqIA was taken to Equalities and Diversity Panel on June 16 2009. The Equalities and Diversity Panel made comments on the EqIA and these have been incorporated into the preparation of this Equalities Impact Assessment and the core strategy publications/submission version. We will be attending another Equalities and Diversity Panel between October and December 2009 to update the panel on our publications/submission version.

At the preferred options stage, the Equalities and Diversity panel advised us to consider the following issues. We have set out below how we have taken these comments forward.

- How will the core strategy respond to hostels, homelessness and asylum seekers?

The housing strategy will provide the framework for meeting the housing needs of vulnerable people. In addition, the core strategy is looking at increasing large housing (3+ bedrooms) and increasing minimum space standards.

- Will wheelchair accommodation be spread across larger housing?

This is too detailed to be addressed in the core strategy. When we consulted on the issues and options core strategy we considered having a policy on wheelchair housing. We have since decided that this is too detailed a policy to be in the core strategy. Instead, we will prepare a housing development plan document (DPD) and a development management DPD which will consider this issue. These will both be used to make decisions on planning applications, alongside the core strategy. We will save our current unitary development plan (Southwark Plan, 2007) policy and use to the wheelchair standards set out in our Residential Design Standards Supplementary Planning Document, 2008 (SPD) to make sure new development makes provision for wheelchair users.

- In lifetime homes, the walls need to be of sufficient strength to put on a grab rail, or a stair lift, etc. Materials used should be covered in lifetime homes standard.
- The Lifetime Homes Standards are a series of sixteen national standards intended to make homes more easily adaptable for lifetime use. The core strategy is a strategic planning document and does not look at the detailed design of buildings.
- The fact that employment sites will be protected should be discussed in the EqIA.

We have added this in to our assessment of the publications/submission version of the core strategy as set out in the section below.

- There is nothing specific about a VCS support/ resource centre and will there be provision for a borough wide facility?

Policy 4 in our publications/submission version sets out how we will facilitate a network of community facilities that meet the needs of local communities. The core strategy will encourage new community facilities where there is a local need and an identified occupier for the space. This will help to improve community cohesion and ensure that community facilities are well used and supported in the long term.

- The term faith and belief is incorrect, and should be religion and belief, as it is a legal term that includes people who have no religion or no belief.

This is consistent with our Statement of Community Involvement (SCI).

Part B: Purpose and aims of policy/strategy

2. What is the overall purpose of the policy/ strategy?

The core strategy, when adopted, will be part of Southwark's Local Development Framework. The core strategy will be the main document setting out the strategic policies which will be used for deciding what sort of development should take place within the borough, and when, where and how it should happen.

3. What are its aims?

The overall approach

The core strategy sets out a spatial strategy for the borough which provides a clear guide for future development and sets out where development will take place. At this stage the final approach to development is being put forward. The approach builds on the approaches set out in the issues and options and preferred options. The additional equalities implications for this final approach are considered in the sections below.

The core strategy sets out what we want would like Southwark to be like. The vision set out in the publications/submission version is as below. This has been amended throughout the core strategy preparation due to responses from consultation. The vision now reflects the needs of all of the communities and different equalities target groups in Southwark. It is now more locally distinctive and reflects the unique characteristics of Southwark.

We will make sure that Southwark improves as a place where local facilities, the transport network and infrastructure is supporting the fast pace of change in growth areas such as Borough, Bankside and London Bridge, Elephant and Castle, Canada Water, Peckham and Nunhead and the Aylesbury, where we are increasing homes by around 10% from 123,945 to 148,398, office space by around 30% from 1,255,000 to 1,674,885 and people working by around 15 % from 165,800 to 190,800 between 2009 and 2026.

We will make sure that this regeneration is as sustainable as possible by setting high environmental and design standards along with protecting and improving a network of open space and heritage throughout the borough.

Set beneath the River Thames, Southwark is made up of a diverse group of places with distinct identities where people who live, learn, work and have fun here can benefit from the vibrancy of our cultures and communities. We have set out unique visions to show the successful places that we want them to be.

We have also set out separate visions for the different areas of the borough to reflect their different characteristics. This will help to address local issues and overcome inequalities in the borough. We considered the equalities impact of these different area visions at the preferred options stage of consultation and the key issues for each area remain the same. The majority of these area visions will be developed into policies and guidance in area action plans and area supplementary planning documents. As part of the plan preparation process for these documents we will carry out a detailed EqIA on each of these documents. This has already been done/is ongoing for some of these areas including Aylesbury, Peckham and Nunhead, Canada Water and Dulwich.

The publications/submission of the core strategy sets out how new development, jobs, shops and community facilities would be concentrated in the certain areas; mostly in the Central Activities Zone, the cores of the action areas and the opportunity areas. These are our growth areas. As these areas contain concentrations of the most deprived parts of Southwark this would have a positive impact on residents in equalities target groups such as faith and belief, no faith, race and ethnicity, disability groups, Travellers and Gypsies and asylum seekers who tend to live in more deprived areas. The differential impact of this may be that residents living in other areas of the borough, in other equalities target groups such as sexuality, gender and age, are located further away from jobs and services such as shops, employment and community facilities.

The main core strategy submission/publication document sets out the detail on all of all policies and approaches.

- 4. Could these aims be in conflict with the Council's responsibility to:**
- **Eliminate discrimination**

- **Promote equality of opportunity**
- **Promote community cohesion and good relations between different groups**

We set out the significant changes to the publication/submission core strategy from the preferred options core strategy where they need to re-evaluated to see whether they are in conflict with the council's responsibility as set out above. Where there is no additional information, the same evaluation applies as set out at the preferred options consultation.

Housing

Some of the housing policies have changed slightly from the preferred options core strategy.

We have amended our approach to affordable housing to require the maximum amount of affordable housing possible across the whole of the borough. This should have a positive impact on all equality groups and help to promote equality of opportunity by offering affordable housing across the whole of Southwark. We will consider changing the required tenure mix within our housing development plan document.

We will allow student housing only in the town centres and in areas with good access to public transport services. This may have a negative impact on equalities target groups living in these areas, particularly those in the age, race and ethnicity equalities target groups. A large proportion of people in these areas come from BME groups. These equalities target groups may feel that the land could have been set aside for a different use such as more housing or jobs for the local community or for a new community facility. However, it may also promote cohesion between different groups as student housing will be located in the areas most suitable to accommodate it. Furthermore, we will require a section 106 agreement and affordable housing within student housing schemes which will have a positive impact by making sure that the communities where new student housing is located also benefit from the development.

We have now set out criteria for how we may allocate Traveller and Gypsy sites in the future. This may improve community cohesion and good relation by making sure that new sites are located in suitable areas. We are also protected the four existing Traveller and Gypsy sites. This will have a very positive impact on the Traveller and Gypsy group.

Employment

Through policy 10 of the core strategy we are protecting some of our employment areas. At the equalities and diversity panel on the preferred options stage of the core strategy, it was raised that the EqIA did not go into enough detail on the protection of employment sites. Protecting employment sites should have a positive impact on discrimination and opportunity by increasing the amount of jobs in the borough and protecting the jobs already there. Through our employment and enterprise strategies we will work to ensure that these jobs are suitable for all of the different groups in the community.

Community facilities

The publications/submission version aims to facilitate a network of community facilities that meet the needs of local communities. Community facilities will be protected unless it can be demonstrated that there is no need for them any more. We will encourage new community facilities where there is a local need and an identified occupier for the space. This should help to improve community cohesion and ensure that community facilities are easily accessible so that everyone can benefit from access to a range of community facilities.

Consultation

The stage 1 EqIA highlighted the need to ensure that the methods used to consult and engage people in the preparation of the core strategy are open accessible to all members of the community. To help address this issue the council has prepared a consultation strategy which sets out the principles of how it will consult and the

importance of reducing barriers to consultation. It emphasises that particular needs such as access, transport, childcare and translation need to be considered, as well as a strategy to broaden the appeal of consultation and make it attractive to a diverse range of people and groups. At each stage, participation will be monitored and analysed to see whether any particular groups have not been engaged and whether this can be addressed at the next stage.

At Preferred Options stage a variety of means were used to publicise, consult and engage with local people. These are described in detail in the Consultation Statement which accompanies the Publications/submission version and are summarised below:

- Publicity: Consultation on the core strategy Preferred Options was widely publicised through a mailout to contacts on Southwark's Planning Policy database, Southwark's website, a newspaper advert, making information available in libraries and council offices
- Officers attending community councils and area housing forums to raise awareness of the consultation
- A number of workshops and drop in sessions were held across the borough in order to enable local people to find out more about the document and how it affects their area.

5. Does the documentation relating to this policy/strategy include specific reference to the Council's responsibility (as set out above) and a commitment to work to meet this?

The core strategy reflects the objectives of Southwark 2016 and through the implementation plan there is a commitment to meeting this. We have also amended policy 1 of the core strategy to make a specific commitment to continuing to carry out equalities impact assessment on all out development plan documents. The consultation strategy for the core strategy does refer specifically to the need to ensure that in accordance

with Southwark's Equalities Scheme 2005-2008 to ensure the Equalities priorities groups are involved and that arrangements are made to include under-represented groups and individuals.

Part C: Application of this policy/strategy

6. What steps are you taking or will you take to ensure that the policy is or will be implemented consistently and fairly?

Consultation on the core strategy has been reviewed at each stage of the plan preparation process to ensure that all groups have been engaged as effectively as possible. The consultation plan and consultation statement which accompanies the publications/submission version contains more details on this. When the draft core strategy is submitted to the Secretary of State, the council will also submit a consultation statement (Statement of Compliance) demonstrating that the consultation on the publication/submission version has been carried out meets statutory minimums and meets the requirements of Southwark's Statement of Community Involvement.

Our implementation and delivery plan within section 6 of the core strategy sets out detail of how we will implement our policies to ensure that they are implemented consistently and fairly.

7. Could the way that this policy/strategy is being or will be implemented be discriminating against any particular individuals or groups or be potentially damaging to relations between different groups?

The publications/s version aims to contribute to eliminate discrimination, promote equality of opportunity and promote social cohesion and good community relations. This EqIA has set out the likely impact of the core strategy and overall it will be positive for all groups. In the long term the core strategy should help to improve relations between different groups and should not discriminate against any particular individuals.

8. What changes could you make to either the policy/strategy itself or the way it is applied to improve the positive outcomes for all groups and to reduce or eliminate any negative outcomes?

In preparing the publications/submission core strategy, the findings of the EqIA scoping have been considered and the report has been prepared iteratively with the stage 2 EqIA. This second stage 2 assessment recognises those areas where the core strategy may have differential impacts and where appropriate mitigation measures are proposed to address these. The council will take all representations on the publications/submission version into account however there will not be any further opportunity to adjust policies prior to the submission of the draft plan to the secretary of state.

9. What information do you collect or do you plan to collect to monitor the impact of this policy/strategy on different groups?

As is noted above, the council monitored and reviewed participation in the core strategy preparation process to ensure that all groups had the opportunity to be involved. The consultation that has been carried out will be reported in the consultation statement to be submitted to the secretary of state.

The council's team in the Analytical Hub prepares periodic updates on demographic changes in the population, including changes relating to ethnicity and age. The council also monitors economic activity, health and pupil attainment in schools. Biannually the council also commissions a residents' survey to ascertain how local people feel about their area and whether it is improving. These analyses are carried out at community council level. These analyses are also reported in the council's annual monitoring report (AMR) which assesses the impact of all development in the borough.

Once the core strategy has been adopted, the AMR will report annually on the implementation of the core strategy, using indicators such as new housing built in the borough, social rented and intermediate housing built, new retail and business space built, including small business units, average household income, the percentage of residents who feel safe at night, business start ups and the local employment rate. The monitoring framework is set out within section 7 of the core strategy.

Organisations such as the Primary Care Trust (PCT) may have their own strategies for monitoring the impact of their policies on key equalities target groups. The preparation of the core strategy may enable the council and PCT to identify a set of key indicators for Southwark. The council will ensure that a monitoring framework is put in place to assess this aspect of the core strategy. The need to provide high quality schools is a key objective of the Core strategy and in this respect it seeks to support the Southwark Schools for the Future Programme and the Academies Programme. An EqIA has already been carried out for the SSF secondary schools programme, which assesses the impact on equalities up to outline business case stage. The council has also prepared an EqIA for the SSF primary schools programme and details of the monitoring framework will be identified as part of that process.

Further feedback from the Equalities and Diversity Panel

The publications/submission core strategy and the EQIA was presented to the Equalities and Diversity Panel for the fourth time on November 17 2009. The main comments raised were:

- Clarification regarding new Traveller and Gypsy sites
- The Housing Development Plan Document will manage the need to allocate new Traveller and Gypsy sites. This is set out in policy 9 of the core strategy and will be consulted on in 2011.
- Questions regarding the student housing policy

Explanation provided of the purpose of policy 8 as set out in the core strategy.

- The EQIA should be amended to read Travellers and Gypsies rather than gypsies and travellers because they are a separate ethnic group and as Travellers are the predominant group in Southwark. Policy 9 of the core strategy has been reworded to refer to Travellers and Gypsies, as has the wording within this EQIA.
- Question raised on how the core strategy related to Lifetime Homes Standards Policy 4.3 of the Southwark Plan is being saved and this requires Lifetime Homes Standards. This will be reviewed through the preparation of the Housing Development Plan Document.
- Concern raised on there being many empty council buildings which are currently not being utilised. Other parts of the council are looking at asset management with regard to council property.

APPENDIX A: Barriers to community involvement with different equalities target groups and how to overcome them
(extract from Southwark Statement of Community Involvement (January 2008))

1. Voluntary groups and organisations – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>The voluntary sector in Southwark is made up of around 18,000 individuals delivering services through 1,600 organisations, groups and projects. In 2001-2 Southwark Council supported around 300 voluntary and community groups with an investment of around £10m in grant-aid, service agreements and contracts.</p>	<p>These barriers are generic barriers faced by many voluntary groups.</p> <ul style="list-style-type: none"> • Need for prior knowledge and experience; • Jargon and legal terms; • Other funding commitments and priorities than planning; • Lack of time; and • Knowledge of how and where to access information. 	<ul style="list-style-type: none"> • Provision of information and training about planning focused on these groups; • Ensure that a range of community involvement methods are used that are accessible to these groups; • Make sure that groups are added on to relevant mailing lists; and • Hold/attend meetings at appropriate times that are accessible to these groups. • Translators and interpreters to be used where appropriate.

2. Community groups and organisations – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>Southwark is lucky in having a large number of community groups that are involved with a diverse range of</p>	<p>These barriers are generic barriers faced by many community groups:</p> <ul style="list-style-type: none"> • Need for prior knowledge and 	<ul style="list-style-type: none"> • Provision of information and training in planning focused on these groups; • Ensure that a range of community

<p>issues.</p>	<ul style="list-style-type: none"> • experience; • Jargon and legal terms; • Lack of time; • Other priorities than planning; • Accessing information barriers. 	<p>involvement methods are used that are accessible to these groups;</p> <ul style="list-style-type: none"> • Make sure that groups are added on to relevant mailing lists; and • Hold/attend meetings at times that are accessible to these groups. • Translators and interpreters to be used where appropriate.
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3. Business – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>There are 11 000 businesses in Southwark. These range from large international and national organisations to small family owned businesses. Approximately 96% of the total businesses in Southwark comprise less than 50 employees of which, approximately 20% are Black and Minority Ethnic businesses. Many businesses are members of Southwark Chamber of Commerce and other local groupings.</p>	<ul style="list-style-type: none"> • Accessing information outside of business hours (this is particularly a problem for small businesses); • Attending community meetings that do not address their needs; • Not understanding planning influences on their issues; • Other priorities than planning. 	<ul style="list-style-type: none"> • Ensuring that information is available at places which are open outside of normal office hours; • Hold/attend meetings at times that are accessible; and • Provide information and training focused at businesses. • Translators and interpreters to be used where appropriate.

4. Environmentalist and amenity groups – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation

<p>A wide range of people express their concern for their environment through membership groups such as Friends of the Earth or Greenpeace. Some of these larger organisations have active local branches. Some people get involved in local groups with the aim of protecting or improving a particular area or amenity such as the Friends of Burgess Park or the Dulwich Society.</p>	<ul style="list-style-type: none"> • Other priorities than planning; • Attending community meetings that do not address their issues; • Jargon and legalistic terms; and • May not be aware of how other planning issues may affect their area of interest. 	<ul style="list-style-type: none"> • Provide information to ensure these groups are aware of how planning influences their area; • Use plain English; and • Translators and interpreters to be used where appropriate. .
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5. Neighbourhood, tenants and residents groups – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>There are approximately 232 neighbourhood, tenants and residents groups in Southwark. Many are formally consulted by us to provide residents views about social and private housing. These groups meet, many of them very regularly, to discuss matters affecting the local area including estate improvements.</p>	<ul style="list-style-type: none"> • Other priorities than planning; • Suffer from 'consultation fatigue' as they get consulted on a number of our initiatives and programmes; • Need prior understanding and knowledge of planning issues; and • Finding the time to get involved in planning. 	<ul style="list-style-type: none"> • Coordinate consultation between different parts of the council to ensure that groups are not overwhelmed with consultations; • Make sure that groups are added on to relevant mailing lists; • Provide focused information; and • Hold/attend meetings at accessible times. • Translators and interpreters to be used where appropriate.

6. Health organisations – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Health service organisations provide important services to the community. Formal structures can be used to consult and gain feedback from local health organisations on how healthy living issues and requirements might influence or affect planning.	<ul style="list-style-type: none"> • Limited time to access and absorb detailed planning information; • Other priorities than planning; and • May not understand how planning impacts on health. 	<ul style="list-style-type: none"> • Hold/attend meetings at appropriate times; and • Ensure that information is easily accessible, relevant and understandable. • Translators and interpreters to be used where appropriate.

7. Transport organisations – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Transport for London and the public transport providers are statutory consultees. There are smaller local groups that are interested in the improvement of cycling, walking and public transport infrastructure.	<ul style="list-style-type: none"> • Other priorities than planning; and • May not be aware of how other planning issues may affect their area of interest. 	<ul style="list-style-type: none"> • Provide information to ensure these groups are aware of how planning affects them. • Translators and interpreters to be used where appropriate.

8. Refugee and Asylum seekers – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
The Southwark Refugee Communities Forum (SRCF) was established by Refugee Community Organisations (RCO) in 2003 to	<ul style="list-style-type: none"> • Need for prior knowledge and experience • English may not be their first language 	<ul style="list-style-type: none"> • Avoid jargon and ensure that all information is given in plain English • Ensure that all written information is available in different languages

<p>enable the voices of refugees themselves to be heard. The membership of SRCF currently includes 28 Southwark-based Refugee Community Organisations. An estimated 7,000 people from refugee backgrounds across Southwark are in direct contact with SRCF members and participate in their activities on a regular basis.</p>	<ul style="list-style-type: none"> • Other priorities than planning • Discrimination • Lack of knowledge of how and where to access information • Difficult to gain access to these groups, as they may not be recognised local community groups on our database 	<ul style="list-style-type: none"> • Provide information and training that is focused on these groups • Use a range of community involvement methods to ensure that they are accessible to all. • Source local knowledge about how to engage groups and those for our mailing lists. • Translators and interpreters to be used where appropriate.
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9. Individuals and groups from other boroughs – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>A number of issues in Southwark have an impact on our neighbouring boroughs such as Lambeth and Lewisham. Groups and residents that are on the borders of Southwark should be included in matters that affect them.</p>	<ul style="list-style-type: none"> • Need for prior knowledge and experience; • Other priorities in their own borough and other than planning; • English as a first language; and • Lack of knowledge of how and where to access information. 	<ul style="list-style-type: none"> • Provision of information in appropriate locations; • Hold/attend meetings/events at appropriate locations that are accessible and appropriate to these groups. • Translators and interpreters to be used where appropriate.

10. Residents and individuals (including newcomers to the borough) – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>Residents and individuals in the borough may not belong to a</p>	<ul style="list-style-type: none"> • Need for prior knowledge and experience; 	<ul style="list-style-type: none"> • Provision of information and training in planning focused on these groups;

<p>specific group, but it is important that they are able to engage and get involved with issues and decisions that impact on them.</p>	<ul style="list-style-type: none"> • Jargon and legal terms; • English may not be their first language; • Discrimination; • Problems accessing information; • Other priorities than planning; and • Lack of knowledge of how and where to access information. 	<ul style="list-style-type: none"> • Ensure that a range of community involvement methods are used that are accessible; • Source local knowledge about how to engage individuals; and • Add onto our mailing lists. • Translators and interpreters to be used where appropriate.
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11. Black and minority ethnic groups (including travellers and gypsies) - Equalities Target Group – Race

<p>Description</p> <p>Southwark is a very ethnically diverse borough. As a result there are many established and new groups and organisations that address issues relevant to each different community.</p>	<p>Barriers to involvement</p> <ul style="list-style-type: none"> • Jargon and legal terms; • Need for prior knowledge; • English may not be the first language; • Other priorities than planning; • Discrimination; • Problems accessing information; • We may not be aware of their existence. 	<p>Measures to overcome barriers to consultation</p> <ul style="list-style-type: none"> • Avoid jargon; Use plain English; • Translators and interpreters to be used where appropriate. • Training groups in planning and council officers in understanding equality and diversity issues; • Coordinate council consultations; • Range of involvement methods; and • Gain local knowledge about how to engage groups; and • Add to mailing lists.
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12. Religious groups - Equalities Target Group –Faith/Belief

<p>Description</p>	<p>Barriers to involvement</p>	<p>Measures to overcome barriers to consultation</p>
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<p>organisations are a valuable consultation link due to their very strong links to local communities. groups have a contribution to make to social inclusion and community cohesion that is separate from promoting religion. As they are involved in running community services, community development and leadership representing community interests.</p>	<ul style="list-style-type: none"> • Needs not being understood; • Need for prior knowledge and experience; • English may not be their first language; • Other priorities than planning; • Discrimination; • Accessing information; and • May not understand how planning affects their group. 	<ul style="list-style-type: none"> • Avoid jargon; Use plain English; • Translators and interpreters to be used where appropriate. • Training groups and individuals in planning and • Training council officers to understand and belief issues; • Coordinate our consultations; • Range of involvement methods; and • Gain local knowledge about how to engage groups; and • Add to mailing lists.
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13. Older people Forum's Equalities Target Group – Age

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>Pensioner forums help represent older people's views and are able to represent many local people over particular issues that are affected by planning.</p>	<ul style="list-style-type: none"> • Older people may not feel safe attending meetings in the evenings; • A lack of respect for their views; and • Lack of knowledge of how and where to access information; • Other priorities than planning. 	<ul style="list-style-type: none"> • Provision of information in appropriate locations; • Hold/attend meetings/events at accessible times; • We listen to the views and feedback ; and • Make information relevant. • Translators and interpreters to be used where appropriate.

14. Education and young people - Equalities Target Group – Age

Description	Barriers to involvement	Measures to overcome barriers to consultation

<p>Schools, colleges, learning institutions and youth agencies are important aspects of the community, particularly as finding ways of involving young people have been identified as a priority by a large number of people</p>	<ul style="list-style-type: none"> • May not be aware of the impact planning can have on them and/or how they can have an input; • English may not be a first language; and • May not be able to attend meetings in the evenings or during the day in term time. • Other priorities than planning. 	<ul style="list-style-type: none"> • Provide information that is focused at young people; • Attend schools and after-school centres and local youth forums to consult them on planning issues; • Translators and interpreters to be used where appropriate; and • Hold/attend meetings/events at accessible times.
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15. Disability Forum - Equalities Target Group – Disability

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>This forum helps to identify planning issues including safety, access and housing from the perspective of disabled people.</p>	<ul style="list-style-type: none"> • Venues for meetings may not be accessible; and • Written or verbal material is not always appropriate. • Other priorities than planning. 	<ul style="list-style-type: none"> • Hold/attend meetings/events at accessible locations; and • Ensure that all written information is available in different formats such as Braille, large print and audio. • Translators and interpreters to be used where appropriate.

16. Lesbian, gay, bisexual and transgender - Equalities Target Group – Sexuality

Description	Barriers to involvement	Measures to overcome barriers to consultation

<p>The Southwark Anti Homophobic Forum (SAHF) is the longest established LGBT Forum of its kind and works to meet the needs of the LGBT community in key areas including education, safety in the home, the streets and housing. The Southwark LGBT Network is a social support group for LGBT people and their friends who live and work in Southwark.</p>	<ul style="list-style-type: none"> • Do not feel secure in raising LGBT issues at open events; • Other priorities than planning; 	<ul style="list-style-type: none"> • Hold specific LGBT consultation events; • Avoid jargon and use plain English; • Hold/attend meetings/events at convenient times and ensure that the venue is accessible and a safe environment. • Translators and interpreters to be used where appropriate.
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Appendix G

**Core Strategy publication/submission version
appropriate assessment (available in the members'
offices and on the internet)**

Appendix G for Planning Committee Report and
Cabinet Report:
Core Strategy

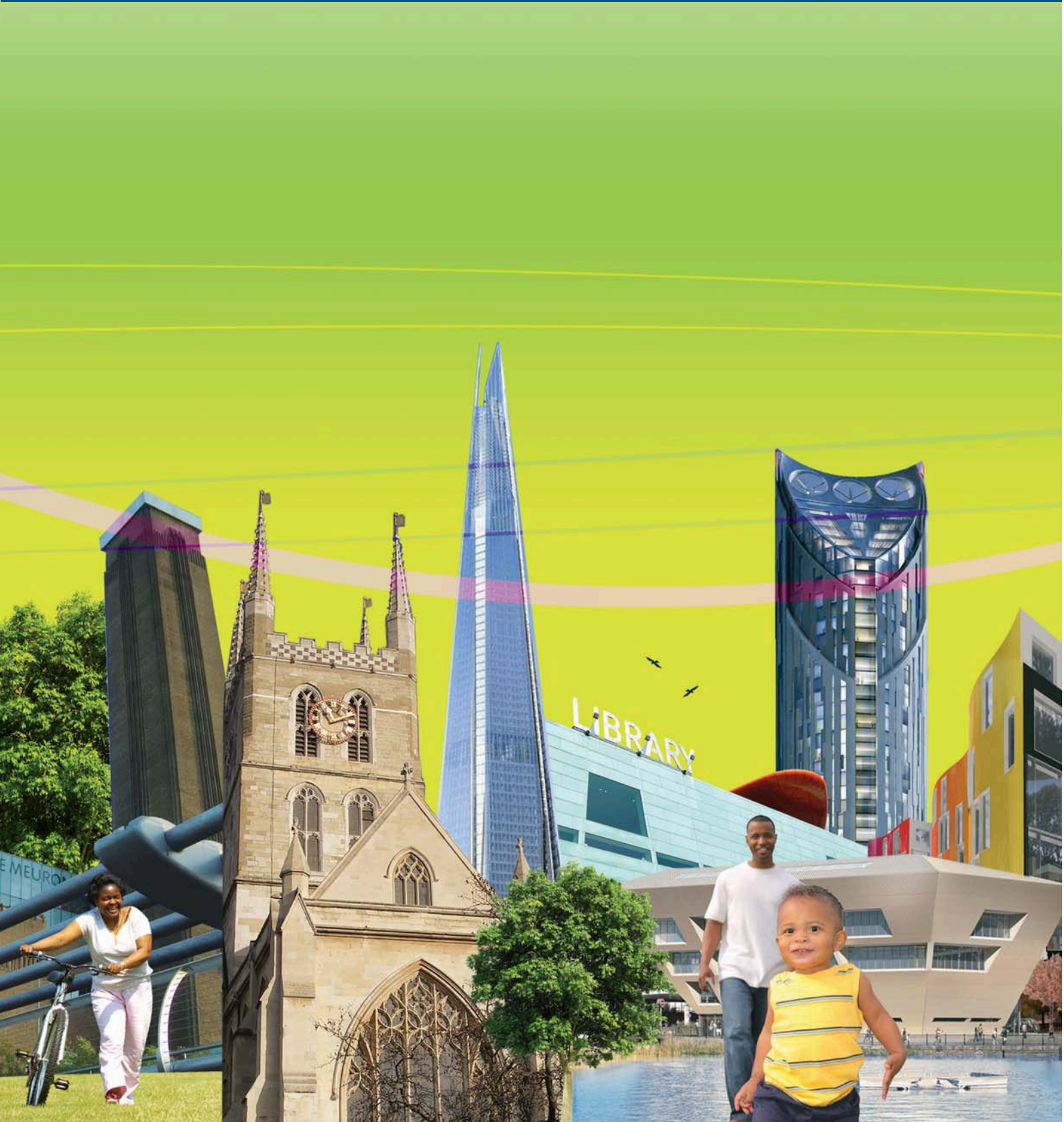
Planning Committee: 21 March 2011
Cabinet: 22 March 2011

Appendix A	Core strategy final version and proposals map changes (available on the internet and with report)
Appendix B	Inspector's report on the Core Strategy (available in the members offices and on the internet)
Appendix C	Consultation and sustainability statement (available in the members offices and on the internet)
Appendix D	Core strategy publication/submission version consultation report (available in the members offices and on the internet)
Appendix E	Core strategy publication/submission version sustainability appraisal (available in the members offices and on the internet)
Appendix F	Core Strategy publication/submission version equalities impact assessment (available in the members offices and on the internet)
Appendix G	Core Strategy publication/ submission version appropriate assessment (available in the members offices and on the internet)

Core strategy

CDCS5 Appropriate Assessment Screening

November 2009



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- 1 Introduction
 - 2 The Need for Appropriate Assessment
 - 3 Identifying Likely Significant Effects
 - 4 Methodology
 - 5 Identification of Relevant Sites
 - 6 Analysis of the Core Strategy Submission
 - 7 Screening analysis of the Analysis of the Core Strategy Submission

 - 8 Conclusion
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1 Introduction

- 1.1 This report presents the findings of a screening exercise undertaken to determine whether stages 2 and 3 of the Appropriate Assessment (AA) process are needed for the Core Strategy Submission. The council has also undertaken a separate Sustainability Appraisal (incorporating Strategic Environmental Assessment) for the document.
- 1.1 This AA will be submitted to the Secretary of State alongside the Core Strategy Submission and other related submission documents for consideration at the Independent Examination. The Inspector will consider the soundness of the Core Strategy Submission using the Appropriate Assessment as part of the evidence base. It is not the role of the Inspector to assess the compliance of the plan with the Habitats Directive.

2 The need for Appropriate Assessment (AA)

- 2.1 In October 2005, the European Court of Justice ruled that appropriate assessment (AA) must be carried out on all planning policy documents in the UK. The purpose of AA of planning policies is to ensure that the protection and integrity of European sites (also known as the Natura 2000 network) is part of the planning process at the regional and local level. It is the responsibility of the Local Planning Authority (LPA) to ensure that the AA process is carried out in accordance with the Habitat Directive which is in force and the amended Habitat Regulations which are yet to come into force.
- 2.2 The Natura 2000 network is a network of sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within the European Community and which must be protected. These sites, which are also referred to as 'European sites', consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Site (OMS). There are no OMS designated at present.
- 2.3 Draft Guidance¹ from the DCLG on Appropriate Assessment¹ states that: 'The purpose of Appropriate Assessment (AA) of land use plans is to ensure that protection of the integrity of 'European sites' is a part of the planning process at a regional and local level. The requirement for AA of plans or projects is outlined in Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora ("Habitats Directive").'
- 2.4 The DCLG guidance summarises the AA process prescribed in Article 6(3) and (4) of the Habitats Directive into three main stages:
1. likely significant effects (AA task 1);
 2. appropriate assessment and ascertaining the effect on site integrity (AA task 2);
 3. mitigation and alternative solutions (AA task 3); and
- * imperative reasons of overriding public interest.*
- 2.5 The test to identify whether a plan option is 'likely to have a significant effect' on a European site is also referred to as 'screening'. This determines whether stages 2 and 3 of the AA are required.

¹ Planning for the Protection of European Sites: Appropriate Assessment Guidance For Regional Spatial Strategies and Local Development Documents, DCLG, August 2006

3 Identifying likely significant effects

- 3.1 Screening for AA will determine if planning policy documents are likely to have a significant effect on the conservation objectives of the Natura sites. This will determine whether stages 2 and 3 of the AA are required. In considering whether the plan policy or site allocation is likely to have a significant effect on a Natura site, it should be noted that a site may be located either within or outside the area covered by the plan as significant effects may be incurred in cases where the area of the plan is some distance away.
- 3.2 If, following screening, significant adverse impacts are anticipated, a 'full' AA considers the potential for impacts in more detail and whether alternative measures can be adopted. If there are no viable alternatives, the planning policy can only be implemented if there are 'imperative reasons of overriding public interest'.

4 Methodology

- 4.1 The legal requirement to undertake AAs is set out in the Habitats Directive. However, there is no standardised method for undertaking an AA. The council has followed the screening method used on the Appropriate Assessment of the Draft Further Alterations to the London Plan by 'Forum for the Future'. This methodology is based primarily on the draft guidance by Tydesley and Associates prepared for Natural England - 'The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the Provisions of the Habitats Regulations' (2006). Although it has been written for the assessment of Regional Spatial Strategies the council considers that all but two of the criteria this method employs are also suitable for the assessment of local development documents. Using the same methodology also helps ensure consistency between the AA of regional and local of plan making.

5 Identification of relevant sites

- 5.1 Using the Joint Nature Conservation Committee (JNCC) website², and in line with the methodology employed in the AA of Further Alterations to the London Plan, the council identified those Natura 2000 sites within a 10km zone extending from the boundary of the Borough. SACs, SPAs, and RAMSARS were included. European sites were scoped into the study if they occurred either wholly or partially within this geographical area. The council identified that there are no Natura 2000 sites in Southwark. Three sites are partially within 10km of Southwark are set out below:

Identified conservation sites of EC importance
<u>Sites at least partially in Southwark</u> None
<u>Sites at least partially within 10km of Southwark</u> Wimbledon Common (SAC) Richmond Park (SAC) Lee Valley (SPA)

- 5.2 The information for these sites concerning the rationale for EU conservation has been taken from the 'Appropriate Assessment of the Draft Further Alterations to the London Plan' undertaken by 'Forum for the Future' which also includes supplementary information in order to assist in considering the vulnerability of sites to potential adverse impacts. This is presented in the table on the following pages.

Site Description table

- 5.3 This information has been sourced from the Appropriate Assessment Screening report: 'Draft Further Alterations to the London Plan', by 'Forum for the Future', September 2006. The contents of the table were compiled with reference to the sources listed below, and also informed by consultation with Natural England.

- Site name + Designation and code.

Obtained from Natural England 'Natura 2000 Forms' and RAMSAR forms from the JNCC website.

- Qualifying features.

Denotes the habitats and species for which the sites have been awarded EU conservation status. It is these qualifying features which the AA must safeguard. Obtained from 'Natura 2000' and RAMSAR forms. The qualifying features form the basis of Natural England's 'conservation objectives for the European interest on SSSIs', which were drawn upon for pertinent additional information.

- Current condition and threats

² www.jncc.gov.uk

Information pertaining to the current status of sites, recognised trends, and potential threats. From Natura 2000, RAMSAR, and Conservation Objectives forms.

- Result of July 2006 SSSI condition survey

Further information on European sites which are also SSSI's - from Natural England's 2006 review of SSSI condition.

- Key ecosystem factors

Denotes general ecological parameters of importance to maintaining site integrity. Summarised from the 'attributes' in the Conservation Objectives forms.

Site Name	Designation and code	Habitat	Species	Current Condition and Threats	Result of July 2006 SSSI condition survey	Key ecosystem factors
Wimbledon Common	SAC UK0030301	To maintain in favourable condition the European dry heath, for which the area is considered to support a significant presence. Northern Atlantic wet heath with <i>Erica tetralix</i> , for which the area is considered to support a significant presence.	To maintain in favourable condition the habitats for the population of: Stag beetle, for which this is one of only 4 known outstanding localities in the UK.	The site is located in an urban area and therefore experiences intensive recreational pressure which can result in damage to the sensitive heathland areas. Air pollution is also thought to be having an impact on the quality of the heathland habitat.	Area favourable 40% Area unfavourable but recovering 59%	<ul style="list-style-type: none"> Population size of species Number of old broadleaved trees Population structure of broadleaved trees Condition of old broadleaved trees State of decay Quantity and size of fallen broadleaved dead wood Position and degree of exposure of old broadleaved dead trees and stumps. Condition and position of available dead timber.
Richmond Park	SAC UK0030246		To maintain in favourable condition the habitats for the population of: Stag beetle, for which this is one of only 4 known	The site is surrounded by urban area and therefore experiences high levels of recreational pressure. This does not directly affect the European interest feature. The	Area favourable 6% Area unfavourable recovering 8% Area	<ul style="list-style-type: none"> Population size of species Number of old broadleaved trees Population structure of broadleaved trees

Lee Valley	SPA UK9012111 RAMSAR UK 11034	To maintain in favourable condition the habitats for the populations of an Annex I species* and populations of migratory bird species**, of European importance with particular reference to: Open water and surrounding marginal habitats.	*bittern ** gadwall shoveler Under Ramsar criteria 2, the site also supports a nationally scarce plant species and a rare invertebrate.	Most of the site is in favourable condition. There are currently no factors having a significant adverse effect on the site's ecological character. However, a significant increase in recreational pressure could impact upon wintering wildfowl numbers	whole site has been declared an NNR.	outstanding localities in the UK.	unfavourable no change 86%	<ul style="list-style-type: none"> • Condition of old broadleaved trees • state of decay • Quantity and size of fallen broadleaved dead wood • Position and degree of exposure of old broadleaved trees and stumps. • Condition and position of available • dead timber.
				There are a number of SSSI's contained within the Lee Valley Ramsar site of which Walthamstow Reservoirs, Waltham Abbey and Turnford and Cheshunt Pits are 100% favourable. Walthamstow Marshes are 36% favourable and 63% unfavourable but recovering.			<ul style="list-style-type: none"> • Disturbance • Extent and distribution of habitat • Landscape • Landform • Vegetation characteristics • Water area • Water depth • Food availability 	

6 Analysis of the Core Strategy Submission for potential adverse impacts

- 6.1 The Core Strategy Submission policies have been analysed to assess whether they would be likely to result in significant adverse impacts on European sites. The draft Natural England guidance defines 'likely' as meaning 'probably, not merely a fanciful possibility'. The potentially adverse impacts were screened according to the approach set out in Appendix A and Figure 3 of the guidance. However criteria 2 and 3 were not considered because these are applicable to the assessment of Regional Spatial Strategies not Development Plan Documents.
- 6.2.1 A precautionary approach was adopted so that the assessment also considered cumulative impacts therefore all potentially significant adverse impacts were assessed.

Coding used for recording effects / impacts on European Sites (from Tydesley and Associates, 2006, Annex 2)

Coding used for recording effects/impacts on European Sites
Reason why policy will have no effect on a European Site
1. The policy will not itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy)
4. Concentration of development in urban areas will not affect European Site and will help to steer development and land use change away from a European Site and associated sensitive areas.
5. The policy will help to steer development away from a European Site and associated sensitive areas, e.g. not developing in areas of flood risk or areas otherwise likely to be affected by climate change.
6. The policy is intended to protect the natural environment, including biodiversity.
7. The policy is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a European Site.
Reason why policy could have a potential effect
8. The DPD steers a quantum or type of development towards, or encourages development in, an area that includes a European Site or an area where development may indirectly affect a European Site.
Reason why policy would be likely to have a significant effect
9. The policy makes provision for a quantum, or kind of development that in the location(s) proposed would be likely to have a significant effect on a European Site. The proposal must be subject to appropriate assessment to establish, in light of the site's conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site.

- 6.3 Every option was assessed and the relevant criterion/criteria determined for each. Options considered likely to have no significant adverse effect on European sites were deemed to require no further AA (stages 2 and 3).

7 Screening analysis of the Analysis of the Core Strategy Submission

7.1 This section screens the Core Strategy Submission policies for impacts on Natura 2000 sites. Each option has been assessed against the criteria provided in paragraph 6.2 and adapted from the Appropriate Assessment Screening report: 'Draft Further Alterations to the London Plan', Forum for the Future, September 2006 which itself is based on draft guidance prepared by Tydesley and Associates for Natural England titled, 'The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the Provisions of the Habitats Regulations 2006.'

Policy Analysis

Policy	Likely to have an impact	Why option will have no impact on Natura 2000 sites	Essential recommendations to avoid potential negative effects on European sites
Strategic Target Policy 1 Achieving Growth	No	4	None
Strategic Target Policy 1 Making Places	No	4	None
Strategic Policy 1. Sustainable Development	No	6	None
Strategic Policy 2. Sustainable Transport	No	1	None
Strategic Policy 3. Shopping, leisure and entertainment	No	4	None
Strategic Policy 4 Places to learn and enjoy	No	4	None
Strategic Policy 5 Providing new homes	No	4	None
Strategic Policy 6 Homes for people on different incomes	No	1	None
Strategic Policy 7 Family homes	No	1	None
Strategic Policy 8 Student Homes	No	4	None
Strategic Policy 9 Homes for Gypsies and travellers	No	4	None
Strategic Policy 10 Jobs and businesses	No	4	None
Strategic Policy 11 Open spaces and wildlife	No	6	None
Strategic Policy 12 Design and conservation	No	7	None
Strategic Policy 13 High environmental standards	No	6	None
Strategic Policy 14 Implementation and delivery	No	1	None

8 Conclusion

- 8.1 None of the policies of the Core Strategy Submission were found likely to have any significant discernible adverse impact on European sites therefore task 2 (appropriate assessment and ascertaining the effect on site integrity) and task 3 (mitigation and alternative solutions) of the Appropriate Assessment process are not considered necessary.

References

Appropriate Assessment Screening report: 'Draft Further Alterations to the London Plan', Forum for the Future, September 2006.

Planning for the Protection of European Sites: Appropriate Assessment Guidance for Regional Spatial Strategies and Local Development Documents, DCLG, August 2006.

The Conservation (Natural Habitats, &c.) (Amendment) (England and Wales) Regulations 2006 Consultation Document, DEFRA 2006.

Tyldesley and Associates - prepared for Natural England Draft Guidance - The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the Provisions of the Habitats Regulations 2006.

CANADA WATER AREA ACTION PLAN

Further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation)

No.	Title
Appendix A	Further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation)
Appendix B	Plan for publicising the Further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation)
Appendix C	Canada Water AAP sustainability appraisal
Appendix D	Canada Water AAP equalities impact assessment

London Borough of Southwark
Planning Policy Team
March 2011

REVITALISE¹⁶



Canada Water Area Action Plan

Further Changes to the Canada Water AAP Publication/Submission Version March 2011
(Dwelling sizes and sites of importance for nature conservation)



www.southwark.gov.uk/canadawateraap

How to comment

We are proposing some focussed further changes to the Canada Water AAP Publication/Submission draft. These changes relate to policy 23 (Family Homes) and Policy 18 (Open spaces and biodiversity). The changes address the recommendations of the Core Strategy Inspectors Report on minimum dwelling sizes and sites of importance for nature conservation (SINCs). We are inviting you to comment on the soundness of these changes. Following this stage, the proposed further changes and your comments will be sent to the Secretary of State for Communities and Local Government in June 2011. An Examination in Public will be held and a government inspector will examine whether the AAP meets their standards and will provide us with a final AAP for our agreement.

You may comment on the proposed further changes to the Canada Water AAP publication/submission draft between 22 April 2011 and 2 June 2011. Your comments should relate only to the soundness of the proposed further changes to the AAP. These changes are shown in text which is either underlined or ~~scored through~~. All comments must be received by 5pm on 2 June 2011 if you wish for them to be considered as part of the inspector's examination. Comments will not be accepted after this date.

Representations should be made using the response form found on our website <http://www.southwark.gov.uk/canadawater.html> or e-mailed to canadawater@southwark.gov.uk

Representations can also be sent to:

Tim Cutts
Planning policy
Regeneration and neighbourhoods
FREEPOST SE1919/14
London SE17 2ES

Contact Tim Cutts or Barbara-Ann Overwater with any questions you have on proposed further changes to the publication/submission version Canada Water AAP or for copies of this document by email: canadawater@southwark.gov.uk or phone on: 0207 525 5471

When we receive your comments/ representations we will:

- Acknowledge your response by email (or letter if an email address is not provided)
- Publish your comments and our officer responses when the proposed further changes to the Canada Water AAP are formally submitted to the Secretary of State in June 2011. This will be available on our website: <http://www.southwark.gov.uk/canadawater>

Help with your comments

For independent help and advice on this document or for any other planning matter contact Planning Aid for London on Tel 02072474900 or by emailing info@planningaidforlondon.org.uk.

INTRODUCTION

The Council has prepared a draft Area Action Plan (AAP) for Canada Water. The AAP will form part of the Local Development Framework (LDF) and it sets out a vision for how the area will change over the period leading up to 2026. This is supported by a strategy with policies we will put in place to achieve this vision, the reasons we have chosen the policies, and the delivery plan for implementing the vision.

The draft AAP was approved at council assembly on 27 January 2010 and submitted to the Secretary of State in March 2010 for examination in public. This followed several stages of consultation. The first stage, completed in February 2009, involved consulting on issues and options for the future growth of the area. The second stage, completed in November 2009, involved consulting on the preferred options for the future growth of the area. Consultation on the publication/submission draft took place between January and March 2010.

In March 2010 the council also submitted its draft Core Strategy to the Secretary of State for public examination. The Core Strategy is the overarching planning policy document for the borough. All of the planning documents in the Local Development Framework need to be consistent with the Core Strategy. The examination in public for the Core Strategy was held in July 2010. The Planning Inspector's binding report was received on 28 January 2011.

In his report on the Core Strategy, the inspector stated that it was not appropriate to designate new open spaces or sites of importance for nature conservation in the Core Strategy. He also deleted the minimum dwelling sizes from the Core Strategy, stating that there were not appropriate in a strategic document.

We are proposing focussed changes to the publication/submission draft Canada Water AAP to address these recommendations of the Inspector.

1) Minimum dwelling sizes (Policy 23 'Family Homes')

We propose to add a table showing minimum dwelling sizes to policy 23. Although he deleted them from the Core Strategy, the Inspector stated that they would be more appropriate in lower tier documents such as AAPs. We have adjusted the Core Strategy table so it relates more directly to occupancy, which also reflects the Inspector's recommendation. The dwelling sizes we are proposing for the AAP are broadly in line with the Core Strategy preferred option.

2) Sites of importance for nature conservation (SINCs) (Policy 18 'Open Spaces and Biodiversity')

We propose to designate three new SINCs in Rotherhithe: King's Stairs Gardens, Durand's Wharf and Deal Porters Walk. As with dwelling sizes, the Inspector stated that such designations would be more appropriate in lower tier documents such as AAPs, than in the Core Strategy. We consulted widely on designating these three SINCs during the AAP issues and options stage in January and February 2009 and also during consultation on the Core Strategy preferred options between May-July 2009.

Further changes to the Canada Water AAP Publication/Submission Version - (Dwelling sizes and sites of importance for nature conservation)

Note: the proposed further changes to the AAP are shown as underlined and scored through. At this stage in the process of preparing the AAP, you may only comment on these changes. Comments made on other aspects of these policies have been passed to the inspector and will be considered in the examination-in-public.

Policy 23: Family homes

Developments must provide the following in schemes of 10 or more homes:

- a minimum of 60% of units with two or more bedrooms
- a maximum of 5% of units as studio flats
- a minimum of 20% of units with 3, 4 or 5 bedrooms with directly accessible amenity space in the core area
- a minimum of 30% of units with 3, 4 or 5 bedrooms with directly accessible amenity space in the suburban density zone

Other than studio flats which must be private, homes of all sizes should provide a mix of private, social and intermediate housing.

All developments must meet the minimum overall floor sizes set out in Table 1.

Across a scheme, the mix of unit types should cater for the full range of household sizes. We will assess this using the average dwelling sizes set out in Table 1.


Table 1: Minimum space standards for new development

<u>Development type</u>	<u>Dwelling type (bedroom/persons)</u>	<u>Essential GIA (sq m)</u>
<u>Flats</u>	<u>Studios</u>	<u>36</u>
	<u>1b2p</u>	<u>50</u>
	<u>2b3p</u>	<u>61</u>
	<u>2b4p</u>	<u>70</u>
	<u>2b average</u>	<u>66</u>
	<u>3b4p</u>	<u>74</u>
	<u>3b5p</u>	<u>86</u>
	<u>3b6p</u>	<u>95</u>
	<u>3b average</u>	<u>85</u>
	<u>4b5p</u>	<u>90</u>
	<u>4b6p</u>	<u>99</u>
	<u>4+b average</u>	<u>95</u>

<u>2 storey houses</u>	<u>2b4p</u>	<u>83</u>
	<u>3b4p</u>	<u>87</u>
	<u>3b5p</u>	<u>96</u>
	<u>3b average</u>	<u>92</u>
	<u>4b5p</u>	<u>100</u>
	<u>4b6p</u>	<u>107</u>
	<u>4+b average</u>	<u>104</u>
<u>3 storey houses</u>	<u>3b5p</u>	<u>102</u>
	<u>4b5p</u>	<u>106</u>
	<u>4b6p</u>	<u>113</u>
	<u>4+b average</u>	<u>110</u>
<u>When designing homes for more than six persons developers should allow approximately 10 sq m per extra person.</u>		

We are doing this because

- 4.6.12 Our Strategic Housing Market Assessment and Housing Requirements Study show that there is a need for more family housing in Southwark across all tenures. At the moment we do not have enough family housing to meet needs. The result is that families are either forced to live in overcrowded homes or unsuitable housing or they have to move out of the borough.
- 4.6.13 Throughout consultation, local people have consistently stated that providing larger homes should be a priority, and that the current Southwark Plan requirement of 10% family homes is too low.
- 4.6.14 Our approach ~~in the core strategy and AAP~~ is to provide a mix of housing sizes and types to meet the housing needs of different groups, a range of housing with more family homes of 3 or more bedrooms for families of five or more people of all incomes. This will mean that households of different sizes will ~~people~~ have suitable housing and do not need to move out of Canada Water. Other than for studio units, for which there is no identified need in the affordable sector, we will encourage all tenures to provide a range of dwelling sizes, to maximise the diversity of housing choice. Maximising choice of housing is one of the key objectives of the London Plan and is consistent with Policy 3A.5:Housing Choice.
- 4.6.15 We will require a higher proportion of family homes in the suburban density zone, as this would be consistent with the suburban character of the area. In this area, there is scope to provide more outside amenity space, which is particularly important for families. In the core area densities will be higher and developments will have to be imaginative about the way private outdoor space is provided. Rather than having gardens, some family homes would have access to balconies, patios or roof terraces instead. We have tested this policy in the feasibility study we have carried out on the shopping centre and overflow car park to ensure it is deliverable.

- 4.6.16 The policy will help achieve our objective of ensuring that the area is attractive for families. It will also complement the investment we are making in schools, leisure facilities and the library.
- 4.6.17 We want all new development to be high quality with good living conditions. Sufficient space is needed by everyone in the home to have space to play, work and study, and for privacy and quiet. Requiring minimum floor areas will help to achieve this by making sure that an adequate amount of space is provided to create pleasant and healthy living environments for different sizes of households. This is also a priority for the Mayor, who has set out minimum floor areas for housing in Policy 3.5 of the draft replacement London Plan. We will expect new development to meet these space standards, as set out in Table 1. These are minimum standards which developers are encouraged to exceed. They are based on the number of people expected to live in a house. This means developers should state the number of occupiers a home is designed to accommodate.
- 4.6.18 To ensure we get a mix of dwelling types and sizes for the full range of household sizes, we have set out average minimum floor areas.
- 

Policy 18: Open spaces and biodiversity**The wider network**

Our strategy is to protect and maintain and improve a network of open spaces (shown indicatively on **Error! Reference source not found.**), green corridors and habitat for wildlife. We will:

- Protect important open spaces as Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS)
- Allocate the Fish Farm and St Pauls Sports Ground as open spaces and bring them back into active use
- Protect and designate new Sites of Importance for Nature Conservation (SINCs) and ensure that development does not result in a loss of biodiversity

The Core Area

Development in the core area must:

- Provide high quality public open spaces. These should have variety of functions, which could include a market, children's play areas, performance space, ecological and learning areas, places to sit, relax and take part in recreational activities such as fishing
- Provide safe, direct and attractive pedestrian and cycle routes to connect open spaces and help link space into the surrounding network
- Improve the overall greenness of the area, through planting street trees, creating living roofs and walls and providing habitats for wildlife which increase biodiversity

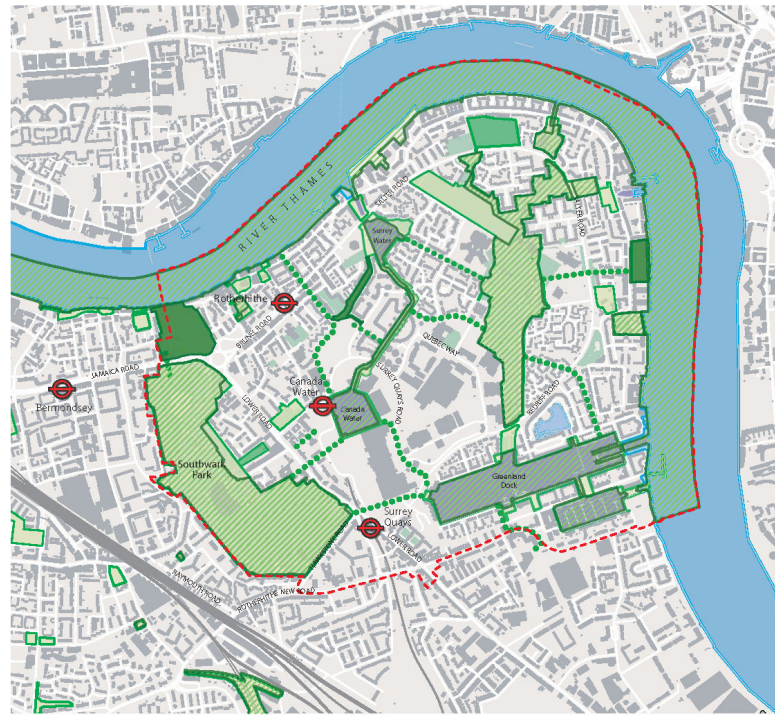
Detailed landscaping plans will be required as an integral part of development proposals.

We are doing this because

- 4.5.18 The AAP area contains a variety of open spaces and green areas. These include Southwark Park and Russia Dock Woodlands, the remaining docks and many important smaller parks, public squares and playgrounds. Many of these are protected in the core strategy either as Metropolitan Open Land, Borough Open Land or Other Open Space.
- 4.5.19 These areas provide a range of landscapes and leisure opportunities for both local people and people across Southwark and are part of the heritage of the area. We surveyed existing open spaces in 2003 in preparing the Southwark Plan. We are currently updating this survey and preparing an open spaces strategy which will include a capital investment framework. We will work with the community including 'Friends' groups, the GLA, Groundwork UK, developers and landowners to implement the strategy within the AAP area. Improvements will be part funded by s106 contributions towards open space improvements. Our Section 106 Planning Obligations SPD sets out a borough-wide standard charge that we apply for open space contributions. In the future we will tailor this charge to carry out improvements needed to help deliver the open spaces strategy.

- 4.5.20 There are a number of sites, including Russia Dock Woodlands which are protected as sites of importance for nature conservation (SINCs). These areas provide valuable habitat and opportunities for experiencing nature. These are important in helping local plant and animal species to survive. ~~In the core strategy,~~ In addition to those designated in the Southwark Plan, we have designated new SINCs at Durrand's Wharf, King Stairs Gardens and Deal Porters Way~~k~~. These are shown indicatively on Figure 10.
- 4.5.21 It is important to create new open spaces in the town centre and core area to help support the growing population. They can help provide relief in what is a built-up area, encourage physical activity and help wellbeing. We have recently committed funding to bringing the Fish Farm into active use as an open space and will consider the most appropriate role for St Paul's Sports Ground through the preparation of the open spaces strategy.
- 4.5.22 Within the core area, new hard and soft spaces will be created. The original LDDC landscaping strategy envisaged a network of hard and soft spaces linked by roadside planting to create wildlife habitats. New development in the core area will be expected to strengthen links between spaces within the Canada Water and also improve the nature conservation value of sites through measures such as living roofs and walls, tree planting and landscaping. Improvements to the biodiversity of sites can be measured through a Code for Sustainable Homes or BREEAM assessment.

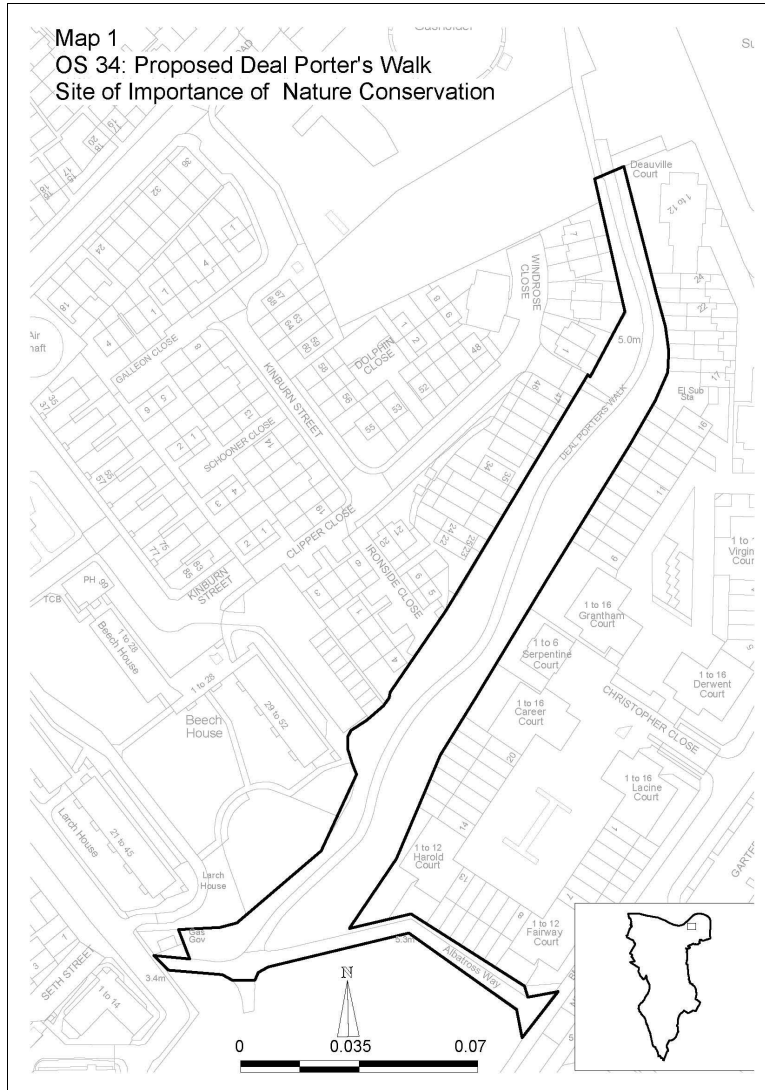
Figure 10 - The network of open spaces in the AAP area



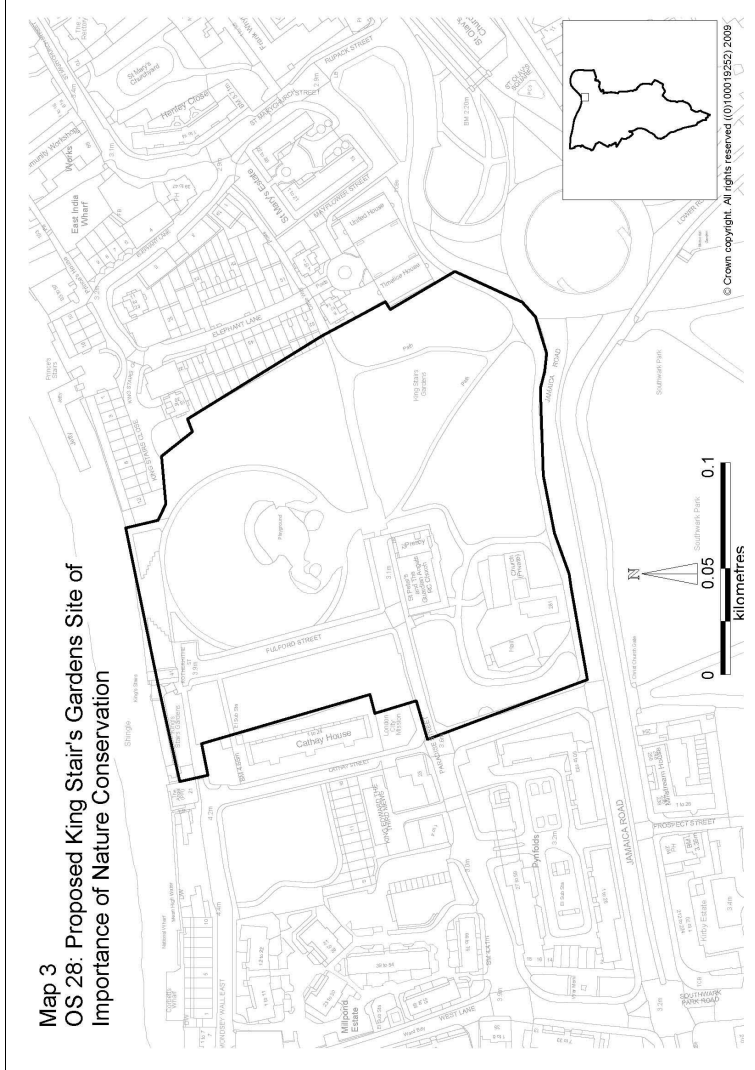
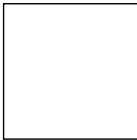
- Existing open spaces protected in the Core Strategy
- Additional open spaces protected in the Area Action Plan Preferred Options
- Key links between spaces
- Docks and water bodies protected as open spaces in the Core Strategy
- Wider AAP Area
- Existing Sites of Importance for Nature Conservation (SINCs)
- Proposed Sites of Importance for Nature Conservation (SINCs)

Changes to the proposals map associated with the designation of new SINCs

We propose the following changes to the proposals map:







LOCAL DEVELOPMENT FRAMEWORK

PLAN FOR PUBLICISING FURTHER CHANGES

Further changes to the Canada Water Area Action Plan Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation)

No.	Title
Appendix A	Further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation)
Appendix B	Plan for publicising further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation)
Appendix C	Canada Water AAP sustainability appraisal
Appendix D	Canada Water AAP equalities impact assessment

March 2011

INTRODUCTION

The Council has prepared a draft Area Action Plan (AAP) for Canada Water. The AAP will form part of the Local Development Framework (LDF) and it sets out a vision for the future of Canada Water and provides planning policies that will help achieve this vision.

The draft AAP was approved at council assembly on 27 January 2010 and submitted to the Secretary of State in March 2010 for examination in public. This followed several stages of consultation. The first stage, completed in February 2009, involved consulting on issues and options for the future growth of the area. The second stage, completed in November 2009, involved consulting on the preferred options for the future growth of the area. Consultation on the publication/submission draft AAP took place between January and March 2010.

Several focussed changes to the publication/submission version AAP are now proposed and for the following reasons:

- 1) Incorporating minimum dwelling sizes in the AAP
 - In March 2010 the council also submitted its draft core strategy to the secretary of state for public examination. The inspector's binding report was received on 28 January 2011. The core strategy proposed to incorporate minimum dwelling sizes. However, these were deleted by the inspector on the grounds that they would be more appropriate in lower tier documents such as AAPs.
- 2) Designating new sites of importance for nature conservation (SINCs) through the AAP and providing a more detailed strategy for Open Spaces.
 - The core strategy also sought to designate new sites of importance for nature conservation (SINCs). The inspector did not accept the proposed SINCs stating that it would be more appropriate to designate these in lower tier documents such as AAPs.

The purpose of this document is to set out the plan for publicising the further changes to the publication/submission version AAP. Documents produced include:

Further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation)	This sets out the policies in the publication/submission version AAP where further changes are proposed as a result of the Core Strategy Inspectors Report.
An updated draft Sustainability Appraisal	This assesses the social, economic and environmental impacts of the policies presented including an assessment of the potential impacts of the proposed further changes
An updated Equalities Impact Assessment	This identifies the main issues in relation to equality, diversity and social cohesion that the AAP will have an impact on, updated to reflect the proposed further changes.
A Publications/submission Statement of Compliance - Consultation Report	This sets out who we consulted on the AAP at the publication/submission version stage, how they were consulted and a summary of the main issues raised during consultation
Officer comments on the representations received on the Publication/Submission version report.	This sets out the officer responses to each representation received on the publication/submission stage.
Consultation Strategy	This sets out how we will consult on the AAP, who will be involved and when.
Appropriate Assessment	This report presents the findings of a screening exercise undertaken to determine whether stages 2 and 3 of the Habitats Directive Appropriate Assessment (AA) process are needed for the Canada Water Area Action Plan publications/submission.
Plan for Publicising Further Changes (THIS DOCUMENT)	This sets out the timetable for publicising the proposed further changes to the publication/submission version AAP.

This plan elaborates on the overarching consultation strategy for the Canada Water AAP. This document should therefore be read in conjunction with the consultation strategy.

This Plan is structured as follows:

- Canada Water AAP: this section sets out the purpose and scope of the Canada Water AAP;
- Consultation Strategy: this section summarises the consultation principles and approach outlined within the Consultation Strategy;
- Plan for publicising the further changes; this section outlines the approach for publicising the proposed further changes to the publication/submission version AAP.
- Appendix 1: List of Consultees
- Appendix 2: List of Statutory Consultees and Locations to find documents

THE CANADA WATER AAP

The Canada Water Area Action Plan (AAP) is a plan to regenerate the area around Canada Water. Looking forward to 2026, it sets out a vision which describes the kind of place that Canada Water will be and a strategy for implementing the vision.

It will build on the work we have done in preparing the 2007 Southwark Plan and supplementary guidance for Canada Water. Like those documents, the focus of the AAP will be a core area around Canada Water. However, the AAP will also look at a wider set of measures that are needed to help the area fulfil its potential and build on some of its key strengths, particularly its attraction for families, its fantastic leisure opportunities and great parks, the docks and green links and the quality of its environment.

The AAP is being prepared to manage this change. It will identify the measures that need to take place and crucially, unlike the Southwark Plan, it will set out how and when these changes will be delivered. It will guide future investment in Canada Water and will be used to make decisions on planning applications.

The core area identified in the AAP will be the main focus for transformation. The wider AAP area extends beyond this core area to ensure future development within the area is well integrated with its surroundings.

THE CONSULTATION STRATEGY

The consultation strategy provides a framework for consultation and public engagement in the preparation of the AAP. It sets out the principles which will be used to guide consultation on the AAP. These are:

- Empower local people to participate in the Canada Water Area Action Plan
- Recognise the diversity of the Canada Water area community and make sure everyone who may be affected is encouraged to have their say. This includes reaching out to people we may not have heard from in the past and holding events at accessible times and locations.
- Make sure our consultation promotes good community relations and positive feelings about the future of the Canada Water area and the planning process.
- Communicate clearly, openly and honestly and keeping people informed at all stages of the process. Making information easily to access and understand.
- Avoid asking questions local people have already answered in recent consultation.
- Work with local groups and organisations to tailor consultation exercises and where possible make use of existing planned events, meetings and communication channels.
- Make consultation relevant and interesting to those who will be affected by the Canada Water Area Action Plan.
- Exceed the minimum legal requirements for involving people and making sure we follow Southwark's Statement of Community Involvement

It also states that the council will be clear about:

- How feedback will be used to make decisions and what has already been decided.
- What the outcomes of the Canada Water Area Action Plan will be; how these affect local people and change the local area (the wider Rotherhithe area is covered, not just Canada Water).
- The limitations of the Canada Water Area Action Plan and what it cannot do.

- How the Canada Water Area Action Plan differs from previous planning documents and the Canada Water Masterplan. It is about pulling together projects to improve the Canada Water area and making sure what's planned happens.
- How previous consultation has been taken into consideration in preparing the Canada Water Area Action Plan.
- How agreed or proposed developments yet to be built will be affected. The Area Action Plan will build on change that is already happening in the area, such as the new Canada Water library.

The strategy outlines how consultation will meet statutory minimum requirements. In accordance with our Statement of Community Involvement, it also sets out our ambition to go beyond the statutory requirements, to engage more continuously and intensively and enable those people with a stake in the area to be able to participate and influence the preparation of the AAP.

The strategy emphasises that to help break down barriers to consultation, particular needs such as access, transport, childcare and translation will be considered, as well as a strategy to broaden the appeal of consultation and make it attractive to a diverse range of people and groups. At each stage, participation will be monitored and analysed to see whether any particular groups have not been engaged and whether this can be addressed at the next stage.

At the end of the process, we will also prepare a "statement of compliance" showing what consultation has taken place and how this has influenced the preparation of the AAP.

PLAN FOR PUBLICISING FURTHER CHANGES FURTHER CHANGES TO THE CANADA WATER AAP PUBLICATION/SUBMISSION VERSION (DWELLING SIZES AND SITES OF IMPORTANCE FOR NATURE CONSERVATION)

Consultation timeframe

We have found that the statutory six weeks consultation period is too short for planning policy documents. We will therefore carry out a period of **six weeks informal** consultation in addition to the statutory **6 week formal** consultation period. We will do this in order to make sure there is enough time for you to submit comments and understand the information prior to the commencement of the formal consultation period. This means that we will carry out a 3 month consultation period for the proposed further changes to the submitted AAP

The six week informal period is from 11 March 2011 – 21 April 2011. **The six week formal consultation period runs from 22 April 2011 to 2 June 2011.**

The following table outlines all of the consultation methods that will be undertaken for the proposed further changes to the publication/submission version Canada Water AAP. It also sets out the different groups that we will be consulting and the consultation methods that are applicable to those groups.

CONSULTATION TIMETABLE

Reason for consultation	Method and Objective of Consultation	Consultee	Date
Publication of the further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation)	Present all documents to Planning committee Objective: To obtain comments from members of the Planning Committee to inform the decision of the Cabinet member for Regeneration. To comply with Southwark' constitution.	Planning committee members	21 March 2011
This identifies the proposed further changes to the publication/submission AAP as a result of the Core Strategy DPD Inspectors Report.	Present all documents to Cabinet and Council Assembly Objective: To obtain approval from Cabinet and Council Assembly to commence formal consultation on the further changes to the Canada Water AAP Publication/Submission version. To comply with Southwark's constitution	Cabinet members	Cabinet 22 March 2011 Council Assembly 6 April 2011

CONSULTATION TIMETABLE			
Reason for consultation	Method and Objective of Consultation	Consultee	Date
	<p>Display the further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation) and accompanying documents on the council's website.</p> <p>Objective: To comply with statutory requirements, inform local residents and stakeholders</p> <p>Statutory Requirement</p>	ALL	11 March 2011
	<p>Mail out to statutory consultees, planning policy mailing lists for planning policy documents and affected properties. This mail out will use the consultation database that has been compiled by the Council over the course of the plan preparation process.</p> <p>Objective: To comply with statutory requirements, inform local residents and stakeholders about the Further changes to the Canada Water AAP publication/submission version (dwelling sizes and sites of importance for nature conservation).</p> <p>Statutory Requirement</p>	ALL on planning policy consultee database	Week commencing 7 March 2011

CONSULTATION TIMETABLE			
Reason for consultation	Method and Objective of Consultation	Consultee	Date
	<p>Display the further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation) and supporting documents and a statement of the representations procedure in the council's offices, libraries, the one-stop shops and neighbourhood housing offices. A list of these locations is shown in Appendix 2.</p> <p>Objective: To comply with statutory requirements, inform local residents and stakeholders of the proposed further changes to the publication/submission AAP.</p> <p>Statutory Requirement</p>	ALL	Week commencing 18 April 2011
	<p>Press notice in local newspaper to indicate the start of the formal consultation period on the further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation) and accompanying documents.</p> <p>Objective: To comply with statutory requirements, inform local residents and stakeholders about the further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation).</p> <p>Statutory Requirement</p>	ALL	Thursday 21 April 2011

CONSULTATION TIMETABLE			
Reason for consultation	Method and Objective of Consultation	Consultee	Date
	<p>Planning Officers will present information at Rotherhithe Community Council and Rotherhithe Area Housing Forum.</p> <p>Objective: To provide an update on the Further changes to the Canada Water AAP publication/submission version (dwelling sizes and sites of importance for nature conservation) to a wide audience and to explain how and when individuals can get involved in the formal consultation.</p>	Councillors and Local Residents	27 April 2011
	<p>Planning Officers will engage with Equality Target Groups and consult on the Further changes to the Canada Water AAP publication/submission version (dwelling sizes and sites of importance for nature conservation).</p> <p>Objective: To ensure Equalities Target Groups are consulted and appropriate engagement is undertaken.</p>	<p>Equalities Target Groups - identified in our Statement of Community Involvement (SCI)</p>	Throughout the consultation period

PLAN FOR PUBLICISING THE FURTHER CHANGES

Individual/ Organisation Name	Method of Consultation	When consulted	Contact
Local groups	<ul style="list-style-type: none"> - Proposed further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation) and accompanying documents on website - Mail out advising of the further proposed changes to the publication/submission version AAP to those groups on our consultation database - Press notice - Display at council offices/libraries etc 	<ul style="list-style-type: none"> - 11 March – 2 June 2011 - w/c 7 March 2011 - 21 April 2011 - w/c 18 April 2011 	All local groups in Canada Water database
Councillors	<ul style="list-style-type: none"> - Planning Committee - Cabinet - Community Councils - Proposed further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation) and accompanying documents on website - Mail out advising of the further proposed changes to the Publication/Submission version AAP (Dwelling sizes and sites of importance for nature conservation) and accompanying documents - Press Notice 	<ul style="list-style-type: none"> - 21 March 2011 - 22 March 2011 - 27 April 2011 - 11 March - 2 June 2011 - w/c 7 March 2011 - 21 April 2011 	All Councillors in Southwark
Statutory consultees	<ul style="list-style-type: none"> - Mail out advising of the further proposed changes to the Publication/Submission version AAP (Dwelling sizes and sites of importance for nature conservation) 	<ul style="list-style-type: none"> - w/c 7 March 2011 	See list of statutory consultees in Appendix 2
Consultees on planning policy database	<ul style="list-style-type: none"> - Mail out advising of the further proposed changes to the Publication/Submission version AAP (Dwelling sizes and sites of importance for nature conservation) and accompanying documents to 	<ul style="list-style-type: none"> - w/c 7 March 2011 	All consultees on planning policy database

General public	<p>all consultees on the planning policy database</p> <ul style="list-style-type: none"> - Publications/submission AAP and accompanying documents on website - Mail out advising of the further proposed changes to the Publication/Submission version AAP (Dwelling sizes and sites of importance for nature conservation) and accompanying documents to all consultees on the planning policy database - Display documents at council offices/libraries etc - Press notice - Community Councils & Area Housing Forums 	<ul style="list-style-type: none"> - w/c 7 March 2011 - w/c 7 March 2011 - 22 April – 2 June 2011 - 21 April 2011 - Community Council - 27 April 2011 - Area Housing Forum - 11 March – 2 June 2011 	All consultees on planning policy database
Staff	<ul style="list-style-type: none"> - Email Publications/submission AAP to internal council officers and invite comments 	<ul style="list-style-type: none"> - w/c 7 March 2011 	Relevant officers involved in the Canada Water AAP
Equalities Target Groups	<ul style="list-style-type: none"> - Planning Officers to engage with Equality Target Groups and attend forums 	<ul style="list-style-type: none"> - 11 March – 2 June 2011 	All Equality Target Groups within the Canada Water database

Where possible we will link the publicising of the further changes on the publication/submission version AAP with other events happening in the borough at the same time. As well as these proposed further changes to the publication/submission AAP we will also be consulting on the preferred options stage for the Peckham and Nunhead AAP.

Appendix 1 LIST OF CONSULTEES

It is proposed to include ALL individuals, groups and organisations in the Planning Policy Consultation Mailing List. These comprise:

Type of organisation	Numbers of consultees
Businesses	493
Community and voluntary groups	896
Residents	234
Tenants and residents associations	141
Health related organisations	23
Statutory	37
Government and local authority	10
Libraries	18
Members	62
Schools	68
Council offices	14
Neighbourhood housing offices	10
Others	227
Total	2233

Appendix 2

STATUTORY CONSULTEE*

* Please note this list is not exhaustive and also relates to successor bodies where re-organisations occur.

We must consult the following specific consultation bodies in accordance with The Town and Country Planning (Local Development) (England) Regulations 2004 and The Town and Country Planning (Local Development) (Amendment) Regulations 2008.

- British Telecommunications
 - Bromley Council
 - Corporation of London
 - English Heritage (London Region)
 - Environment Agency
 - Greater London Authority
 - Lambeth Council
 - Lewisham Council
 - LFEDA
 - London Development Agency
 - Natural England
 - Secretary of State
 - Secretary of State for Transport
 - Thames Water Property Services
 - The Coal Authority
 - Southwark Primary Care Trust
- Any of the bodies from the following list who are exercising functions or a function in the borough:
1. Person to whom a licence has been granted under section 7 (2) of the Gas Act 1986
 2. Sewage undertakers
 3. Water undertakers.
- Any person to whom the electronic communalisation code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003
- Any person who owns or controls electronic communications apparatus situated in any part of the borough

Local consultees

All Councillors

Liberal

Labour

Conservatives

LIST OF LOCATIONS IN WHICH YOU CAN FIND THE DOCUMENTS

Council offices (Opening times 9am-5pm Monday-Friday)

- Town Hall - Peckham Road, London, SE5 8UB

Libraries (Opening times listed individually below)

- Blue Anchor Library - Market Place, Southwark Park Road, SE16 3UQ
(Monday, Tuesday and Thursday 9am to 7pm, Friday 10am to 6pm, Saturday 9am to 5pm)
- Brandon Library - Maddock Way, Cooks Road, SE17 3NH
(Monday 10am to 6pm, Tuesday and Thursday 10am to 7pm, Saturday 10am to 5pm)
- Camberwell Library - 17-21 Camberwell Church Street, SE5 8TR
(Monday, Tuesday and Thursday 9am to 8pm, Friday 10am to 6pm, Saturday 9am to 5pm)
- Dulwich Library - 368 Lordship Lane, SE22 8NB
(Monday, Thursday and Friday 9am to 8pm, Tuesday 10am to 8pm, Saturday 9am to 5pm Sun 12pm to 4pm)
- East Street Library - 168-170 Old Kent Road, SE1 5TY
(Monday and Thursday 10am to 7pm, Tue 10am to 6pm, Sat 10am to 5pm)
- Grove Vale Library - 25-27 Grove Vale, SE22 8EQ
(Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)
- John Harvard Library - 211 Borough High Street, SE1 1JA
(Monday, Tuesday and Thursday 10am to 7pm, Wednesday and Friday 10am to 6pm, Saturday 10am to 2pm)
- Kingswood Library - Seeley Drive, SE21 8QR
(Monday and Thursday 10am to 2pm, Tuesday and Friday 2pm to 6pm, Sat 1pm to 5pm)
- Newington Library - 155-157 Walworth Road, SE17 1RS
(Monday, Tuesday and Friday 9am to 8pm, Thursday 10am to 8pm, Saturday 9am to 5pm Sunday 10am to 2pm)
- Nunhead Library - Gordon Road, SE15 3RW
(Monday, Tuesday and Thursday 10am to 7pm, Friday 10am to 6pm, Saturday 10am to 5pm)
- Peckham Library - 122 Peckham Hill Street, SE15 5JR
(Monday, Tuesday, Thursday and Friday 9am to 8pm, Wednesday 10am to 8pm, Saturday 10am to 5pm, Sunday 12pm to 4pm)
- Rotherhithe Library - Albion Street, SE16 7HY
(Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)

Area Housing Offices (Open 9am-5pm Monday - Friday)

- Nunhead and Peckham Rye - 27 Bournemouthe Road, Peckham, SE15 4UJ
- Dulwich - 41-43 East Dulwich Road, SE22 9BY
- Borough and Bankside - Library Street Borough, London, SE1 0RG
- Camberwell - Harris Street, London, SE5 7RX
- Rotherhithe - 153-159 Abbeyfield Road, Rotherhithe, SE16 2LS

One Stop Shops (Open 9am-5pm Monday – Friday)

- Peckham one stop shop - 122 Peckham Hill Street, London, SE15 5JR
- Walworth one stop shop - 151 Walworth Road, London, SE17 1RY
- Bermondsey one stop shop - 17 Spa Road, London, SE16

CANADA WATER AREA ACTION PLAN

Submission version

Further changes to the Canada Water AAP Publication/Submission Version
(Dwelling sizes and sites of importance for nature conservation)

SUSTAINABILITY REPORT

No.	Title
Appendix A	Further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation)
Appendix B	Plan for publicising further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation)
Appendix C	Canada Water AAP sustainability appraisal
Appendix D	Canada Water AAP equalities impact assessment

London Borough of Southwark
 Planning Policy Team
~~March 2010~~
March 2011

TIMETABLE FOR CONSULTATION AND HOW TO COMMENT

SUSTAINABILITY APPRAISAL PRODUCTION STAGE	TIMETABLE
Consultation on Canada Water Sustainability Appraisal Scoping Report.	14 March 2008 to 25 April 2008
Consultation on Canada Water Issues and Options report accompanied by an Interim Sustainability Appraisal report of the Issues and Options report and Equalities Impact Assessment	18 November 2008 to 20 February 2009
Consultation on Canada Water Preferred Option report and draft Sustainability Appraisal of Preferred Options report and Equalities Impact Assessment	21 July 2009 to 13 October 2009
Consultation on the submission version of the Canada Water and SA Report	18 December 2009 to 12 March 2010
<u>Inviting representations on the further changes to the publication/submission version Canada Water AAP and SA Report</u>	11 March to 2 June 2011

HOW TO COMMENT ON THIS REPORT

If you have any queries regarding this sustainability report, please contact the Planning Policy and Research Team: Email: planningpolicy@southwark.gov.uk Tel: 020 7525 5471

Comments can be returned by post, fax or email to:

Kate Johnson
 Planning Policy
 Regeneration and Neighbourhoods Department
 PO Box 64529
 London SE1P 5LX
 Email: planningpolicy@southwark.gov.uk
 Fax: 020 7084 0347

Consultation on this report begins on 11 March 2011 ~~18 December 2009~~
All comments must be received by 5pm on 2 June 2011 ~~12 March 2010~~

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NON-TECHNICAL SUMMARY

Further changes to the Canada Water Area Action Plan Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation)

Following the receipt of the Inspector's Report on the Core Strategy, the Canada Water AAP has been revised to:

- designate three additional sites of importance for nature conservation
- set out minimum dwelling sizes

As a result, the final Sustainability Appraisal Report has been amended to reflect these changes. The SA has been carried out on the further changes to the Canada Water AAP against the Sustainability Framework set out in Section 6 of the Sustainability Report.

It was considered that the overall impact of the changes to the Canada Water AAP would not have a significant effect to change the overall appraisal of the policies however the detailed results have been amended to reflect the changes. It was considered that the changes would result in more positive impacts and no negative outcomes were identified.

Background

Section 19 (5) of the Planning and Compulsory Purchase Act 2004, requires Sustainability Appraisals of plans to be carried out. Under the requirements of the act, Sustainability Appraisal (SA) of all Local Development Documents is now mandatory. A Sustainability Appraisal has, therefore, been carried out as part of preparing the Canada Water Area Action Plan (AAP). The appraisal tests how well the planning document considers social, economic and environmental issues in order to achieve sustainable development.

In addition, the SEA Directive (2001/42/EC), implemented in the UK by the SEA Regulations 2004, requires Strategic Environmental Assessment or 'SEA' to be undertaken on all plans and programmes where they are likely to have significant environmental impacts. A Sustainability Appraisal (SA) has been carried out to predict the likely social, economic and environmental impacts of different planning options for Canada Water (including the requirements of the SEA Directive). The appraisal has assessed the extent to which different planning options will contribute towards the borough's objectives for achieving a sustainable community.

What planning document is being appraised?

We are preparing a Canada Water AAP as part of the Local Development Framework (LDF). The Local Development Framework is made up of a collection of Development Plan Documents (DPDs), which will be used to guide development in the area, including Area Action Plans and Supplementary Planning Documents. The Canada Water AAP will set out the vision for the area and the policies that will help to achieve this vision.

The aim of the SA, as summarised within this report, is to ensure sustainable development is fully integrated within the emerging AAP and forms a key part of the evaluation of the sustainability issues and preferred options.

A copy of the Canada Water AAP (submission document) can be downloaded from our website: www.southwark.gov.uk/planningpolicy

A paper copy can also be requested from the Planning Policy team.

The Process

The process has included:

- Collection of baseline information on the environmental, social and economic characteristics of the Canada Water area and its context
- Identification of the sustainability issues and objectives to be used in the SA to assess the likely impacts of the policies and to enable monitoring of progress in the future
- The preparation of a Scoping report, which set out the proposed method of assessment for the SA, issued for consultation from 14 March 2008 to 25 April 2008. As far as possible, the views and comments of the various bodies who responded to the consultation have been taken into account in preparing the SA report.
- An Interim SA of the AAP Issues and Options report, issued for consultation from 18 November 2008 to 20 February 2009. The responses from the consultation were included in the Interim SA report. The comments received have been taken into account when preparing the SA report.
- A Draft SA of the Preferred Options for Canada Water, issued for consultation from 21 July to 13 October 2009. The responses from the consultation were included in Appendix 2 of the draft SA report. The comments received have been taken into account when preparing the SA report.
- The Sustainability Appraisal Report of the submission version of the AAP for Canada Water ([this document](#)).
- The Sustainability Appraisal Report which incorporates an assessment of the Further Changes to publication/submission Canada Water AAP for Canada Water ([this document](#)).

The Sustainability Issues

The SA scoping report and subsequent consultation identified a range of significant sustainability issues for Southwark, based on a review of relevant policies, strategies and programmes and a survey of baseline data. There are key social, economic and environmental issues faced in Southwark that need to be taken into consideration by the AAP. These are:

- Relatively high levels of deprivation
- Employment inequalities and employment opportunities
- Education, skills and training deprivation
- Health inequalities and noise nuisances
- Need to promote equality, diversity and social cohesion
- High levels of crime and fear of crime
- Energy efficiency and use of renewables
- Poor air quality
- Need to minimise waste arisings and increase recycling rates
- Need for sustainable use of water resources
- Protection of landscape features and designated sites and need to address contaminated land issues
- Ensuring a high quality of design in new developments
- Need to preserve and enhance built heritage and the archaeological environment
- Minimising flood risk and improve the quality of controlled waters within the borough
- Protecting and enhancing biodiversity
- Providing everyone with a decent and affordable home to live in
- Need to improve accessibility by public transport and minimise the need to travel by car
- Need to ensure that there is social, physical and green infrastructure capacity for existing and future needs.

What sustainability objectives were used to appraise the AAP?

The likely impacts of the AAP were identified using a set of sustainability objectives, which relate to the strategic vision for the Borough. The objectives reflect the current social, economic and environmental issues affecting the borough and are linked with the aims of Southwark 2016 (Community Strategy).

The objectives set out below were presented in the Scoping Report (stage one of the SA process). Comments were received on the objectives during the consultation process, which have been taken into account.

Sustainable Development Objectives (SDOs)

- SDO 1 To tackle poverty and encourage wealth creation
- SDO 2 To improve the education and skill of the population
- SDO 3 To improve the health of the population
- SDO 4 To reduce the incidence of crime and the fear of crime
- SDO 5 To promote social inclusion, equality, diversity and community cohesion
- SDO 6 To reduce contributions to climate change
- SDO 7 To improve the air quality in Southwark
- SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource
- SDO 9 To encourage sustainable use of water resources
- SDO 10 To maintain and enhance the quality of land and soils
- SDO 11 To protect and enhance quality of landscape and townscape
- SDO 12 To conserve and enhance the historic environment and cultural assets
- SDO 13 To protect and enhance open spaces, green corridors and biodiversity
- SDO 14 To reduce vulnerability to flooding
- SDO 15 To provide everyone with the opportunity to live in a decent home
- SDO 16 To promote sustainable transport and minimise the need to travel by car
- SDO 17 To provide the necessary infrastructure to support existing and future development

Section 1 of this report sets out the stages in the development of the Area Action Plan including details on the different steps of the SA process.

Key Findings of the Sustainability Appraisals

The Canada Water AAP: Issues and Options

The Canada Water AAP Issues and Options paper set out two different options for regeneration in the area. Option 1 proposed regeneration with a focus on homes and Option 2 proposed regeneration with a focus on homes, jobs, leisure and shops.

Option 1 would mean that more new homes would be built in the area, new homes would be provided on all of the development sites in the core area. The shopping centre would remain in place and there would be a small increase in the amount of shops. Some improvements would be made to the road network and walking and cycling routes.

Option 2 would involve improvements to shopping provision, office and workspace, community facilities, tourist facilities, the road network, public realm and walking and cycling routes as well as the provision of new homes.

Both options were subject to a sustainability appraisal.

Results of Issues and Options SA

The sustainability objectives formed the basis of the SA of the Issues and Options Paper. The Issues and Options were assessed against each sustainability objective. A matrix was developed that included the objectives set out against the two options for regeneration. Within the matrix, the effects of the options are depicted by symbols showing a positive, negative, uncertain or neutral impact.

Both options were appraised separately under five topic headings:

1. Shopping
2. Transport
3. Leisure
4. Places
5. Homes
6. Community

The Issues and Options were subject to consultation from November 2008 - February 2009. The key findings of the Interim Issues and Options Sustainability Appraisal are set out below:

1. Shopping

- The construction of new shops is likely to have negative impacts on climate change, production of waste and the use and quality of water. Whilst the quantum of development is less in option 1, option 2 presents the opportunity to incorporate sustainable design and construction techniques to mitigate the impacts.
- The increase in shopping facilities could increase the amount of vehicular traffic but it could be mitigated through sustainable transport measures such as reduced car parking and improved pedestrian/cycle routes and public transport provision.

2. Transport

- The quantum of development in option 2 is more likely to bring benefits for public transport provision and improvements to the road network.
- The increase in housing could have an increase in the amount of traffic in the area. This could be mitigated through car clubs, reduced parking provision etc.

3. Leisure

- The provision of new leisure facilities and tourism attractions in Option 2 will lead to an increase in the amount of energy and water used and waste generated, mitigation will be necessary through suitable sustainable design and construction techniques

4. Places

- Option 2 will also protect and enhance the character of the area and provide greater opportunities for people to live in a decent home
- The provision of tall buildings will lead to an increase in the amount of energy and water used and waste generated, mitigation will be necessary through suitable sustainable design and construction techniques
- The impacts upon the quality of the landscape, townscape and cultural value will be dependent upon the design in implementation

5. Homes

- The provision of new housing will lead to an increase in the amount of energy and water used and waste generated; mitigation will be necessary through suitable sustainable design and construction techniques

6. Community

- The provision of new community facilities in option 2 will have a positive impact for health and social inclusion
- The impact upon social inclusion will be dependent on the type and tenure of housing provided in implementation
- The provision of new business and community facilities will lead to an increase in the amount of energy and water used and waste generated, mitigation will be necessary through suitable sustainable design and construction techniques.

This process resulted in recommendations for the preferred options on sustainability grounds and on the whole the approach specified in Option 2 has been selected. Although it has some negative sustainability impacts, in general it will provide greater benefits for the entire community.

The detailed results can be found in the Interim Sustainability Appraisal of the Issues and Options, which is available from the Planning Policy Team

Reasons for progressing with preferred options

The results of the Issues and Options appraisal showed that the overall impact of Option 2 was more positive than for Option 1. Whilst Option 1 would deliver more housing than Option 2, it will also result in an increase in contributions to climate change, traffic, and waste and water usage.

Option 2 presents more of a balanced approach to the regeneration of the area by focusing on providing leisure facilities, employment opportunities, the public realm and community facilities as well as new homes. Whilst this growth will increase demand for energy and water, and generate more waste and traffic, these impacts can all be mitigated by other policies in the AAP which seek to reduce car parking, and set energy and sustainable design guidance.

Although the negative impacts of Option 1 could also potentially be mitigated, overall Option 2 will have more sustainability benefits in the long term for job creation, new skills, community cohesion, providing local services and community facilities, improving walking and cycling routes, and reducing crime and fear of crime.

The detailed results can be found in the Draft Sustainability Appraisal of the Preferred Options, which is available from the Planning Policy Team

Response to consultation

Responses from the following organisations were received on the Draft Sustainability Appraisal of the Preferred Options

1. English Heritage
2. Natural England
3. Environment Agency

In summary, the responses suggested additional baseline data should be included within the SA and also recommendations were made in relation to appraising the impact of the policies on the historic environment. The responses were included within Appendix 2 of the draft SA report and an officer response has been made to each.

Results of SA of Preferred Options

The Draft SA report provides the results of stage three of the SA of the AAP Preferred Options. The full assessment of the Preferred Options is contained in the draft SA report which is available from the Planning Policy team. Short, medium and long-term impacts are assessed. Any uncertainties and initial suggestions for reducing negative impacts (called mitigation measures) are included in the commentary boxes in the table.

The SA of the Preferred Options has revealed the predominantly positive impact of the policies in relation to the sustainability objectives. Where negative impacts have been identified, generally there are mitigation measures which could be put in place to address these. The proposed mitigation measures will need further consideration as the document develops to ensure they are as robust as possible. Overall, the appraisal indicated that the draft Canada Water preferred option policies are likely to make a positive contribution to the area.

SA of the Submission Version of the Canada Water Area Action Plan

Following the consultation process, some changes have been made to the sustainability objectives and the policies for the area. A further iteration of the SA has therefore been undertaken on the Submission Version to ensure that sustainability has been addressed appropriately and to identify any further mitigation measures that may be necessary.

The SA has been carried out against the Sustainability Framework set out in Section 6 of the Sustainability Report.

Policies Assessed

Policy 1	Shopping in the town centre
Policy 2	Cafes and restaurants in the town centre
Policy 3	Important shopping parades
Policy 4	Small scale shops, cafes and restaurants outside the town centre
Policy 5	Markets
Policy 6	Walking and cycling
Policy 7	Public transport
Policy 8	Vehicular traffic
Policy 9	Parking for town centre uses
Policy 10	Parking for residential development in the core area
Policy 11	Leisure and entertainment
Policy 12	Sports facilities
Policy 13	Arts, culture and tourism
Policy 14	Streets and public spaces
Policy 15	Building blocks
Policy 16	Town centre development
Policy 17	Building heights on site in and adjacent to the core area
Policy 18	Open spaces and biodiversity
Policy 19	Children's play space
Policy 20	Energy
Policy 21	New homes
Policy 22	Affordable homes
Policy 23	Family homes
Policy 24	Density of residential developments
Policy 25	Jobs and business space
Policy 26	Schools
Policy 27	Community facilities
Policy 28	Early years
Policy 29	Health facilities
Policy 30	Albion Street
Policy 31	Lower Road
Policy 32	Proposals sites
Policy 33	Section 106 Obligations

~~A summary of the findings of the appraisal for each policy is summarised below. The detailed results are provided in Section 8 and Appendix 7 of the SA report.~~

SA of the Further Changes to the Submission Version of the Canada Water Area Action Plan

The final Sustainability Appraisal Report has been amended to reflect changes to the Canada Water AAP following the receipt of the Inspectors Report on the Co strategy. The SA has been carried out on the Further Changes to the Canada water AAP against the Sustainability Framework set out in Section 6 of the Sustainability Report.

A summary of the findings of the appraisal for each policy is summarised in the following table. The detailed results are provided in Section 8 and Appendix 7 of the SA report.

It was considered that the overall impact of the changes to the Canada Water AAP would not have a significant effect to change the overall appraisal of the policies however the detailed results and been amended to reflect the changes. It was considered that the changes would result in more positive impacts and no negative outcomes were identified.

SA of Submission Version of the Canada Water AAP - Summary of Results

Sustainability Objectives	Canada Water AAP – Submission Version Policies																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 2 To improve the education and skill of the population	✓	✓	-	✓	✓	-	-	-	-	-	✓	✓	✓	✓	-	✓	✓	✓	-
SDO 3 To improve the health of the population	-	-	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	✓
SDO 4 To reduce the incidence of crime and the fear of crime	?	✓	✓	✓	-	✓	✓	-	✓	?	✓	✓	✓	✓	✓	✓	-	✓	✓
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	✓
SDO 6 To reduce contributions to climate change	X	?	✓	✓	✓	✓	✓	✓	✓	✓	X	?	?	✓	?	?	?	✓	-
SDO 7 To improve the air quality in Southwark	X	?	✓	✓	✓	✓	✓	✓	✓	✓	X	?	?	✓	?	?	?	✓	-
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	X	?	-	?	-	-	-	-	-	-	X	?	?	-	?	?	?	-	-
SDO 9 To encourage sustainable use of water resources	?	?	-	?	-	-	-	-	✓	✓	✓	?	?	-	✓	✓	✓	?	-
SDO 10 To maintain and enhance the quality of land and soils	✓	-	-	-	-	-	-	-	✓	✓	✓	?	✓	✓	-	✓	✓	✓	-
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-
SDO 12 To conserve and enhance the historic environment and cultural assets	-	-	✓	?	?	✓	-	-	-	✓	?	?	✓	✓	✓	-	✓	✓	-
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	-	-	-	?	✓	-	-	✓	✓	?	?	✓	✓	✓	✓	✓	✓	✓
SDO 14 To reduce vulnerability to flooding	?	?	-	?	-	-	-	-	✓	✓	?	?	✓	✓	?	?	?	?	?
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	✓	✓	✓	✓	✓	✓	?	✓	✓	✓	?	?	✓	✓	✓	✓	✓	✓
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	-	-	-	✓	✓	✓	✓	✓	?	?	✓	✓	?	?	?	✓	-

- 1 Shopping in the town centre
- 2 Cafes and restaurants in the town centre
- 3 Important shopping parades
- 4 Small scale shops, restaurants and cafes outside the town centre
- 5 Markets
- 6 Walking and cycling
- 7 Public transport
- 8 Vehicular traffic
- 9 Parking for town centre uses
- 10 Parking for residential development in the Core Area
- 11 Leisure and entertainment
- 12 Sports facilities
- 13 Arts, culture and tourism
- 14 Streets and public spaces
- 15 Building blocks
- 16 Town centre development
- 17 Building heights on sites in and adjacent to the core area
- 18 Open spaces and biodiversity
- 19 Children's play space

Sustainability Objectives	Canada Water AAP – Submission Version Policies													
	20	21	22	23	24	25	26	27	28	29	30	31	32	33
SDO 1 To tackle poverty and encourage wealth creation	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓✓
SDO 2 To improve the education and skill of the population	✓	✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓	-	✓	✓	✓	✓✓
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 4 To reduce the incidence of crime and the fear of crime	-	✓	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	✓	✓
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓✓	✓✓	✓✓	✓	✓	✓✓	✓	✓	✓	✓	✓	✓	✓
SDO 6 To reduce contributions to climate change	✓✓	X	X	X	?	X	X	X	✓	X	?	✓	X	✓
SDO 7 To improve the air quality in Southwark	✓	X	X	X	?	X	X	✓	✓	X	?	✓	X	✓
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	X	X	X	?	X	X	X	?	X	?	-	X	-
SDO 9 To encourage sustainable use of water resources	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	✓
SDO 10 To maintain and enhance the quality of land and soils	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	✓✓
SDO 11 To protect and enhance quality of landscape and townscape	?	?	?	?	✓	✓	?	?	?	?	✓	✓✓	?	✓✓
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	✓	✓	?	?	?	?	✓	-	?	✓
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	✓✓
SDO 14 To reduce vulnerability to flooding	-	X	X	X	X	?	X	X	X	X	?	-	X	✓✓
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	✓	-	-	-	-	-	-	-	✓✓	-
SDO 16 To promote sustainable transport and minimise the need to travel by car	-	✓	✓	✓	✓✓	?	✓	✓	✓	?	✓	✓	?	✓✓
SDO 17 To provide the necessary infrastructure to support existing and future development	✓✓	?	?	?	?	?	?	?	?	?	?	✓	?	✓✓

- 20 Energy
- 21 New Homes
- 22 Affordable Homes
- 23 Family Homes
- 24 Density of residential developments
- 25 Jobs and business space
- 26 Schools
- 27 Community Facilities
- 28 Early Years
- 29 Health Facilities
- 30 Albion Street
- 31 Lower Road
- 32 Proposals sites
- 33 S106 Planning Obligations

What difference has the appraisal process made?

The sustainability appraisal process has helped to identify the environmental, social and economic issues that the AAP needs to address. It is also an important way of checking to see how well the plan has addressed these issues and identify how linked some of the issues are. This is very important, as the most effective approach will be one that can address the sustainability issues in a coordinated way.

The results of the submission version appraisal show that the overall impact is predominantly positive. Some minor negative impacts have been identified particularly in relation to SDO objectives:

SDO 6	To reduce contributions to climate change
SDO 7	To improve the air quality in Southwark
SDO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource
SDO14	To reduce vulnerability to flooding

The negative impacts largely relate to the environmental impact as a result of the quantum of new development. Mitigation measures have been identified, which will need to be put in place to minimise the impacts. With regard to flood risk, a large proportion of the AAP area falls within the flood zone but it is recognised that it is necessary to develop here as there is a lack of developable land that is not within the flood zone. Flood risk assessments and flood resilient design will need to be proposed as part of the planning applications.

The appraisal process has also helped to identify potential cumulative impacts of the policies. The cumulative impact of the development could result in a major negative impact in relation to sustainability objectives six to eight which seek to reduce climate change, improve air quality and minimise waste generation. Individually the policies scored minor negative impacts but cumulatively the impact of additional development on these sustainability objectives could have a major negative impact if suitable mitigation measures are not applied.

The sustainability appraisal has informed the decision making process to facilitate the evaluation of alternatives and has helped to demonstrate that the plan is the most appropriate given the reasonable alternatives. At each stage of plan preparation we have appraised the options to ensure that the approach taken forward has the most positive impact; environmentally, socially and economically. The final approach taken forward through the Area Action Plan is considered to be the most effective at achieving sustainable development.

The appraisal process has also provided the opportunity to consider how the AAP should be monitored to keep track of how well it performs after it is adopted. The sustainability indicators identified through the sustainability appraisal process will be used to review the impact of the AAP policies.

[For more information on the impacts of the policies see Section 8 and Appendix 7 of the SA report](#)

Next Steps

The final SA report and submission version of the Area Action Plan including the further changes will be ~~submitted to~~ considered by an Inspector for independent examination. Monitoring of the AAP will take place following its adoption and will be reported in the Annual Monitoring Report (AMR). The AMR reports on whether Southwark's planning policies are achieving what they set out to do. It is a legal requirement that local authorities produce an AMR each year. It is important that the council regularly monitors new development that takes place to identify:

- If planning policies in the Local Development Framework are having the outcomes intended and, if not, the reasons why
- The changes taking place in Southwark and how planning policies may need to respond to these changes. It may be that we need or revised policies
- Whether the council's consultation practices (as set out in the Statement of Community Involvement) are improving the amount and quality of community engagement in planning decisions.

Canada Water Area Action Plan:

~~Submission Version~~

Further changes to the AAP: Dwelling sizes and sites of importance for nature conservation

Sustainability Report

~~March 2010~~

March 2011

1 INTRODUCTION

1.1 What is this document?

1.1.1 This report provides the sustainability appraisal of the Canada Water AAP Submission Version including the further changes to dwelling sizes and Sites of importance for Nature Conservation. It is the ~~fourth~~ and final stage of the Sustainability Appraisal (SA) process for the AAP. The purpose of a SA is to promote sustainable development through the integration of social, economic and environmental considerations in the preparation of new or revised Development Plan Documents (DPDs).

1.1.2 The Canada Water AAP is being prepared as part of the Local Development Framework (LDF). The Local Development Framework is made up of a collection of DPDs, including Area Action Plans (AAPs), a Development Control DPD and Supplementary Planning Documents (SPDs), which will be used to guide development in the area. Further explanation of the LDF documents is set out below.

- **Local Development Scheme** – this is a timetable for the preparation of the LDF, setting out what documents will be produced and when the key stages will take place.
- **Statement of Community Involvement (SCI)** – this sets out how interested people and organisations can be involved in preparation of the LDF and in future planning decisions.
- **Core Strategy** – this is a key element of the LDF, setting out the spatial vision for the borough and including a set of key strategic policies from which all other documents flow. Together with the other DPDs, it will replace the Southwark Plan 2007. Southwark's Core Strategy will also identify particular locations in the borough and outline what types of development would be appropriate there in the future.
- **Area Action Plans (AAPs)** – these provide spatial strategies for key areas of the borough. As well as Canada Water, AAPs for Aylesbury and Peckham & Nunhead are being prepared and consulted on.
- **Development Management Policies DPD** - this document will build on the Core Strategy. It sets out specific policies to manage development across the borough, ensuring it contributes to our overall aims
- **Supplementary Planning Documents (SPDs)** – provide additional detail around particular priority policies such as affordable housing and sustainable construction.

More information on Southwark's Local Development Framework and the Development Plan Documents can be obtained on the council's website <http://www.southwark.gov.uk>

1.1.3 This report does the following:

- Sets out the background to the requirement for the SA for the documents and plans within the LDF
- Identifies plans and policies that will be relevant to undertaking the SA
- Identifies relevant baseline data and any data gaps
- Sets out key sustainability issues in Southwark
- Provides the SA framework
- Addresses the range of comments made during the consultation on the AAP Sustainability Appraisal Reports
- Tests the Canada Water AAP objectives against the SA framework
- Predicts and evaluates the likely significant effects of the options set out within the AAP Preferred Options
- Identifies potential mitigation measures or ways in which positive impacts can be maximised.

1.2 Why do we need to carry out a Sustainability Appraisal?

- 1.2.1 Section 19 (5) of the Planning and Compulsory Purchase Act 2004, requires Sustainability Appraisals of plans to be carried out. Under the requirements of the act, Sustainability Appraisal (SA) of all Local Development Documents is now mandatory. A Sustainability Appraisal has, therefore, been carried out as part of preparing the Core Strategy. The appraisal tests how well the planning document considers social, economic and environmental issues in order to achieve sustainable development.

“Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular, they should carefully consider the inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development.”

PPS1: Delivering Sustainable Development (paragraph 24)

1.3 Strategic Environmental Assessment

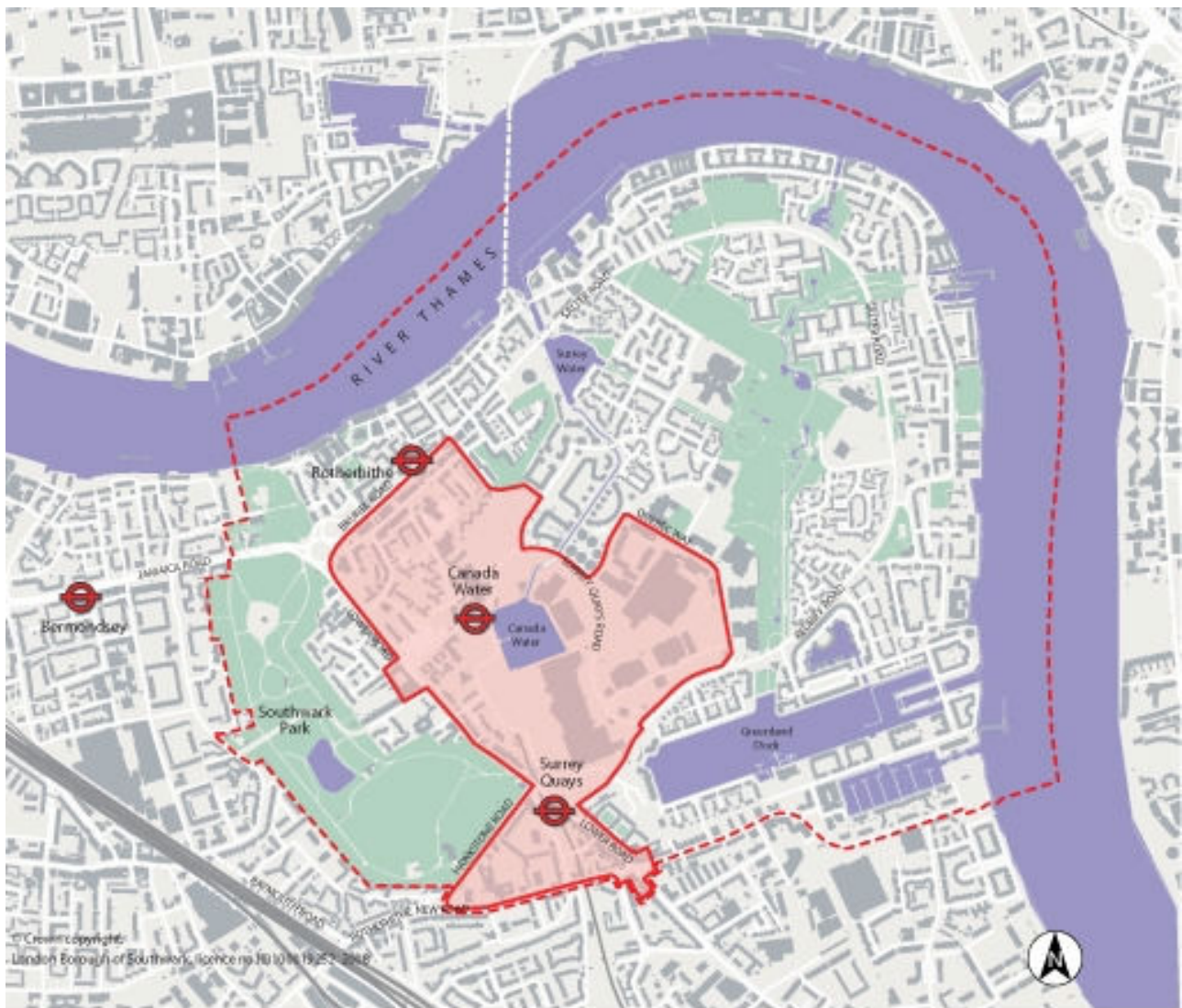
- 1.3.1 Sustainability Appraisals also need to satisfy the requirements of the European Directive 2001/42/EC. The Directive requires a formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. An SEA is required when preparing new or revised DPDs.
- 1.3.2 We have undertaken an SEA of the Canada Water AAP as part of the sustainability appraisal. The Government guidance on sustainability appraisal set out in Planning Policy Statement 12: Local Spatial Planning, 2008 and the Plan Making Manual incorporates the requirements of the SEA Directive within the SA process. For the purposes of simplicity, the term sustainability appraisal (SA) is used throughout this document to include both the SA and SEA processes. Further details on the legislative and policy background to sustainability appraisal are set out in **Appendix 1**.

1.4 Why is the Canada Water AAP needed?

- 1.4.1 The Core Strategy sets out the spatial vision and strategic objectives for the borough including the planning policies. The council will use the planning policies to make decisions on individual planning applications. All new development must be in line with the planning policies for the area. The plan will also identify areas of the borough where significant changes are expected and will explain how these changes will take place, including Canada Water.
- 1.4.2 The London Plan (2008), also classifies Canada Water as an Area for Intensification. This means that Canada Water has been identified by the Mayor as an area that can accommodate further development based on the good public transport links and available development sites. The Southwark Plan also identifies Canada Water as an Action Area (Policy 7.2) based on the fact that it is about to undergo significant change. The Canada Water Supplementary Planning Guidance (November, 2005) sets out guidelines for new development specific to the area but it does not create new planning policies, instead it expands on existing policies in the Southwark Plan.
- 1.4.3 The proposed AAP boundary (Figure 1) covers the Canada Water Action Area (identified in the Southwark Plan) and the surrounding area. The AAP identifies a core area, where the majority of development will be focused, and a periphery which will become more linked to the core area through better transport and movement routes and improved design. The area is home to residential housing, employment sites, shops and schools, as well as a number of important green spaces and docks. There are a number of vacant development sites in the area. We have recently approved planning permission for the development of the library and more development will take place over the next 10 years. The area has good public transport links with two underground stations at Rotherhithe and Surrey Quays. The area also has existing shopping and leisure opportunities such as Surrey Quays shopping centre and the Seven Island Leisure Centre.
- 1.4.4 The AAP will create new planning policies for Canada Water to make sure that the regeneration of the area is done in the best possible way, not just taking into account land use matters but also issues such as the local economy and environmental issues. The main issues to consider are:
- the type of new development appropriate on the vacant sites including building design and density
 - the need to make the most of the unique natural environment
 - the creation of a town centre
 - the need to consider the transport impacts of all new development.

The AAP will set out how the changes should take place including any development schemes and any planning obligations that may be required to make sure that development can be built to meet the planning guidance and to encourage development to take place.

Figure 1: Canada Water Area Action Plan



- AAP core area
- Wider AAP area

What are the stages of the AAP production?

1.5.1 The table below sets out the different stages involved in the preparation of the AAP.

Stages in Preparing the Canada Water AAP	
Evidence Gathering (Scoping Report)	<p>January to March 2008 This involved gathering information and understanding the key social, economic and environmental issues that affect Southwark's future and the AAP area.</p> <p>Public Consultation on Scoping Report 5 Weeks formal consultation. 14 March 2008- 25 April 008</p>
Issues & Options (Interim SA)	<p>March 2008- November 2008 This involved using the information gathered on issues to identify a vision for Canada Water in the future and different ways (options) this vision could be achieved.</p> <p>Public Consultation: 18 November 2008 to 20 February 2009</p>
Preferred Option (Draft SA)	<p>July- October 2009 Identification of the best option for achieving the vision for Canada Water in the future. This has been based on an assessment of the positive and negative impacts of each option and incorporating feedback received during previous consultations.</p> <p>Public Consultation 6 weeks informal consultation was held followed by 6 weeks formal consultation. 21 July 2009 - 6 November 2009</p>
Draft Canada Water AAP sent to the Government for approval (Final SA Report)	<p>January 2010 Following feedback, the preferred option has been written up in detail as the AAP submission version. This will be submitted to the Secretary of State and will be examined by an independent inspector who will decide whether or not we can adopt the Canada Water AAP and if any changes need to be made</p> <p>Public consultation 6 weeks informal consultation will be held from 18th December – 29th January followed by 6 weeks formal consultation from 29 January 2010 – 12 March 2010</p>

<p><u>Inviting representations on the Further Changes to the publication/submission draft Canada Water AAP (revised Final SA report)</u></p>	<p><u>March – June 2011</u></p> <p><u>Following receipt in the Inspectors report on the Core Strategy a revised version of the Canada Water AAP will be prepared to reflect the proposed changes to the final Core Strategy.</u></p> <p><u>Public consultation</u></p> <p><u>6 weeks informal consultation will be held from 11 March – 21 April followed by 6 weeks formal consultation from 22 April to 2 June 2011</u></p>
<p>Adoption</p>	<p>September 2011</p> <p>Once the Secretary of State has approved the Canada Water AAP the council will adopt the document and start implementation.</p>

1.6 Structure of the Report

This report is divided into nine sections.

- Section 1 Explains why a sustainability appraisal has been prepared and provides an overview of the Canada Water AAP and preparation process
- Section 2 Sets out the methodology used to undertake the SA including the consultation that has been carried out
- Section 3 Describes the purpose of the Canada Water AAP and the plan's objectives and policies
- Section 4 Provides information on: the context; other policies, plans and programmes; and a summary of the baseline information
- Section 5 Presents the sustainability issues and objectives relevant to the AAP.
- Section 6 Explains the Sustainability Appraisal Framework
- Section 7 Examines the AAP options that have been considered and compares the plan's objectives against the sustainability objectives
- Section 8 The effects of the AAP policies are described, including any significant positive or negative effects, cumulative impacts, proposed mitigation, uncertainties and risks
- Section 9 The next stages in the plan preparation, implementation and future monitoring are explained.

2 Sustainability Appraisal Methodology

2.1 Purpose of the Sustainability Appraisal

- 2.1.1 The purpose of Sustainability Appraisal (SA) is to ensure that sustainable development has been integrated in the formulation of development plans and to verify that due consideration has been given to social, economic and environmental factors. The SA must also show how the requirements of the Strategic Environmental Assessment (SEA) Directive have been met.

2.2 Planning Policy and Sustainable Development

- 2.2.1 Planning Policy Statement (PPS) 1: Delivering Sustainable Development; provides the over-arching policy to deliver sustainable development through the planning process. The guidance suggests that planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:

- making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life
- contributing to sustainable economic development
- protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities
- ensuring high quality development through good and inclusive design, and the efficient use of resources
- ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

- 2.2.2 Planning Policy Statement 12: Local Spatial Planning; sets out the Government's policy on local spatial planning including the need to undertake a sustainability appraisal of the plan. The guidance states:

'SA should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process.' PPS12 para. 4.43

It is also stated in the guidance that provided the sustainability appraisal is carried out following the guidelines in the *A Practical Guide to the Strategic Environmental Assessment Directive* and the *Plan-Making Manual* there will be no need to carry out a separate SEA.

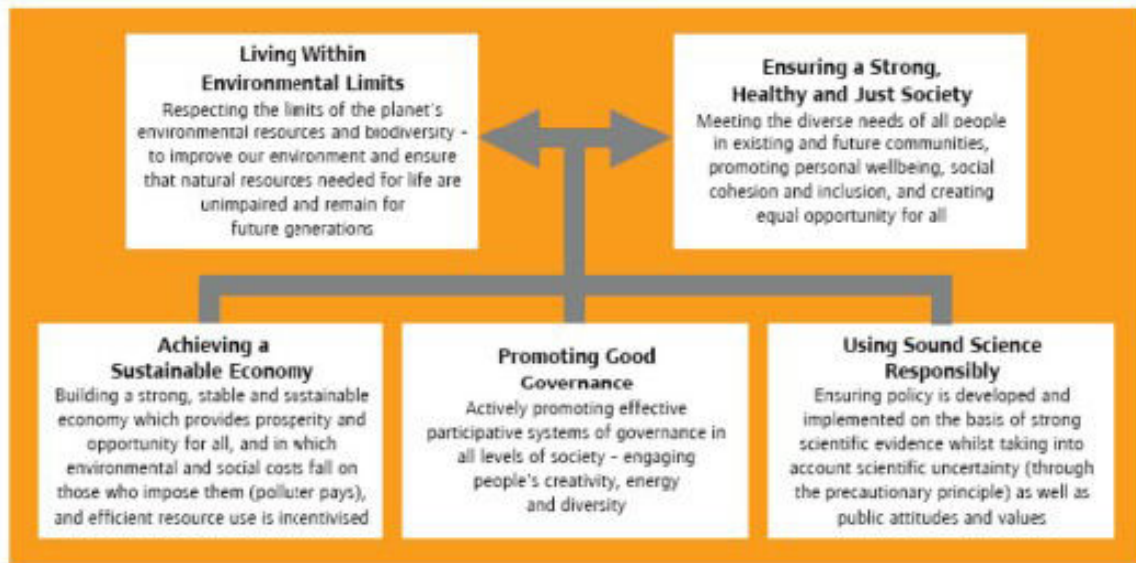
- 2.2.3 The Government has also published a Sustainable Development Strategy 'Securing the future - delivering the UK Sustainable Development Strategy, 2005'. A revision of the 1999 strategy, the document sets out the guiding principles for sustainable development and priorities for action. The strategy sets out five guiding principles to achieve sustainable development.

- Living within environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting good governance
- Using sound science responsibly

The Strategy also gives the following priorities for action:

- Sustainable consumption and production
- Climate Change and Energy
- Natural Resource Protection and Environmental Enhancement
- Sustainable Communities.

Illustration of the Government's Definition of Sustainable Development



2.3 Sustainability Appraisal Process

2.3.1 The Sustainability Appraisal of the Canada Water AAP has been carried out by council officers in accordance with Government guidance:

- Planning Policy Statement 12: Local Spatial Planning, 2008
- Plan-Making Manual
- A Practical Guide to the Strategic Environmental Assessment Directive, 2005
- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM 2005

The stages of the SA process are set out below. Stages A, B and C are the subject of previous reports. This report provides the results from **Stage D**.

Sustainability Appraisal Stages	Timetable
Stage A	
Setting the context and objectives, establishing the baseline and deciding on the scope	Consultation on the scoping report took place from 14 March 2008 until 25 April 2008
Stage B	
Developing and refining options and assessing effects against the SA framework. A draft sustainability appraisal report is prepared for consultation with the public along with the issues and options paper	Consultation on the issues and options document and draft sustainability appraisal took place from 18 November 2008 to 20 February 2009.

Stage C	
Prepare the draft SA report. This stage involves testing in detail the impacts of the preferred option. A draft sustainability appraisal report is prepared for consultation with the public along with the preferred options paper.	21 July 2009 - 6 November 2009
Stage D	
Consult on the submission version of the Canada Water AAP and the final SA report.	Consultation on the submission version document and sustainability appraisal report will take place from 18 December 2009 to 12 March 2010
<u>Inviting representations on the revised Canada Water Area Action Plan and final SA report</u>	<u>Inviting representations on the revised submission version document and sustainability appraisal report will take place from 11 March 2011- 2 June 2011</u>
Stage E	
Once the Canada Water AAP has been agreed by us, its social, economic and environmental impacts will then be monitored through our annual monitoring report.	Monitoring the Canada Water AAP will take place once it has been adopted.

Further information regarding the stages of the SA process, and the way in which they correspond with the preparation of the AAP, is given in

Appendix 1

2.4 Consultation

- 2.4.1 As part of the preparation of the AAP, community consultation is being carried out to make sure that local residents and stakeholders are informed of the future plans for the area. We have prepared a consultation strategy for the Canada Water AAP setting out how consultation will take place and showing how this relates to our Statement of Community Involvement.
- 2.4.2 Consultation on the Canada Water AAP is being carried out in accordance with the SCI (2008). This sets out how individuals, community groups, developers and anyone else who may have an interest in the Local Development Framework should be consulted on planning documents.
- 2.4.3 Planning Policy Statement 1: Delivering Sustainable Development sets out the principles that the Government believes should underpin community involvement in the planning process. SEA guidance requires that the contents of the scoping report must be consulted on with the following 'authorities with environmental responsibility':
- Natural England
 - Environment Agency
 - English Heritage.

- 2.4.4 Government guidance also recommends that additional bodies can be consulted in order to represent the social and economic aspects of sustainability. The following additional bodies were consulted, in addition to an extensive list of local consultees:
- British Telecommunications
 - Bromley Council
 - Corporation of London
 - Government Office for London
 - Greater London Authority
 - Lambeth Council
 - Lewisham Council
 - LFEDA
 - London Development Agency
 - Secretary of State
 - Secretary of State for Transport
 - Thames Water Property Services
 - The Coal Authority
 - Southwark Primary Care Trust
 - Any of the bodies from the following list who are exercising functions or a function in the borough:
 1. Person to whom a licence has been granted under section 7 (2) of the Gas Act 1986
 2. Sewage undertakers
 3. Water undertakers.
 - Any person to whom the electronic communalisation code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003
 - Any person who owns or controls electronic communications apparatus situated in any part of the borough.
- 2.4.5 The Scoping Report for the sustainability appraisal was prepared in March 2008. The law requires these organisations be provided with 5 weeks in which to respond. Consultation responses from these organisations have been used to update the elements of this report. Consultation was also carried out on the Interim SA which accompanied the Issues and Options report and the Draft SA, which accompanied the Preferred Options report. A summary of the changes made as a result of the consultations is described below.
- 2.4.6 Consultation responses on the Sustainability Appraisal Scoping Report were generally positive, although a range of minor amendments were suggested and incorporated into the scoping element of this report. These included:
- Flood risk should be taken into account at all stages in the SA process (Environment Agency)
 - Our Design and Conservation team should be involved at all stages and further indicators relating to the historic environment could be added (English Heritage)
 - The sustainable development objectives were supported (Natural England)
 - Further reference should be made to EU legislation and care should be taken to ensure that the SA has a balance of social, economic and environmental factors (GOL)
 - Some of the data relating to housing was inaccurate and should be updated; many of the homes in the area are in poor condition and do not meet decent homes standards; the shopping centre/masterplan area is not an island and should not be looked at in isolation from surrounding areas which include the Hawkstone Estate (Hawkstone TRA)
- 2.4.7 Consultation responses from the consultation of the Interim SA report (Issues and Options stage of AAP) and Draft SA report (Preferred Options stage) were received from a number of organisations including the Environment Agency, English Heritage and Natural England. The responses received and our comments can be found in Appendix 2 of the Interim SA report.

2.4.8 Consultation responses from the Draft SA report (Preferred options stage of the AAP) can be found in Appendix 2 of this report.

2.5 Any difficulties undertaking the SA

- 2.5.1 The identification of suitable sustainability indicators within the Sustainability Appraisal Framework to ensure issues can be effectively measured and monitored has been an iterative process and taken into consideration comments made in the consultation process.
- 2.5.2 We have borne in mind that the indicators need to satisfy the following characteristics since only these are suitable for monitoring purposes:
- a. **Important:**
Indicators should measure something significant to the achievement of the sustainable development aims of the Plan. These are translated into the main policy areas of the Plan and must fit within the main policy framework. Indicators should assist in the identification of the need to review a strategy, policy or proposal.
 - b. **Supported by readily available information:**
The data necessary to support the use of the indicator must be available. This may be of a technical nature.
 - c. **Capable of showing trends over time:**
Data over a reasonable time scale is required (e.g. 5 - 10 years) to enable trends to be identified. Data must be available during the Plan period.
 - d. **Easy to understand and communicate:**
Any indicator should be readily understood by non-specialists so that the wider community can understand it's relevance to sustainable development and the Local Development Framework.
- 2.5.3 The indicators have therefore been revised slightly since the Preferred Options Stage to reflect the issues above and ensure that policies can be monitored effectively.

2.6 Compliance with the SEA Directive

- 2.6.1 **Appendix 1** explains the SEA directive and signposts where the relevant information can be found within the SA report.

3.0 Canada Water AAP Objectives and Policies

3.1 The Purpose of the Canada Water AAP

- 3.1.1 The Canada Water AAP sets out the vision and objectives for regenerating the area. Issues that the Canada Water AAP considers are the delivery of new housing, the provision of new shops, creating new jobs, and protecting and enhancing the environment.
- 3.1.2 The Canada Water AAP includes planning policies specific to the area. The council will use the planning policies to make decisions on individual planning applications in Canada Water. All new development must be in line with planning policies in the AAP as well as other relevant policies given in the other DPDs and SPDs, which will form part of the Local Development Framework.

3.2 Canada Water AAP Vision and Objectives

- 3.2.1 The Canada Water vision is:

We are working with the local community, landowners, and developers to transform Canada Water into a town centre as set out in the Canada Water Area Action Plan. Our aim is to make best use of the great opportunity to create a new destination around the Canada Water basin which combines shopping, civic and leisure, business and residential uses to create a new heart for Rotherhithe.

We want to strengthen Canada Water's role as a shopping destination, expanding the amount of retail space by around 35,000sqm and providing a much more diverse range of shops than at present, including a new department store and independent shops. The action area's core will provide at least 2,500 high quality new homes, which will be accommodated in generally mixed use development. Office development will provide much needed space for local occupiers and, together with retail development, will generate around 2,000 new jobs.

Existing facilities in the town centre are currently separated and poorly linked, being built originally to serve car-borne visitors. Development in the town centre will contribute towards creating an open environment with a high street feel, and high quality public realm and open spaces. We want to make better use of car parking, ensuring that it is shared between town centre uses. The centre must reach out to the wider Rotherhithe area, ensuring that it is accessible, particularly on foot, by bicycle and by public transport. In addition we will work with Transport for London to improve the road network around Lower Road.

Outside the town centre and core area of the AAP, development will be less dense and should reflect the leafy and suburban character of much of the area.

Rotherhithe should be a desirable place to live, particularly for families, and promote healthy lifestyles. To help achieve this, we will build a new secondary school to complement existing schools in the area. Across the

AAP area, development will contribute to achieving a great network of parks and open spaces which, together with the docks and the River Thames, can help make Rotherhithe known as an attractive destination to visit, relax in and have fun.

We are working with Lewisham Council to make sure we have a joined up approach to future development and improvements to Rotherhithe.

3.2.2 The Canada Water AAP seeks to meet the following themes and objectives, which are related to Southwark 2016: Sustainable Community Strategy:

Theme 1: Shopping: A genuine town centre and neighbourhood hubs

- S1 To create an accessible, distinctive and vibrant town centre at Canada Water, which is well connected into the surrounding street network. This will enhance the setting of Canada Water basin and create a range of shops, restaurants, community and leisure facilities within mixed use developments.
- S2 To ensure that people who live and work on the wider peninsula have access to local facilities to meet their day-to-day needs.

Theme 2: Transport: Improved connections

- T1 To use a range of measures, including public transport improvements, green travel plans, road improvements and restrictions on car parking to ease the impact of new development on the transport network and services.
- T2 To make the area more accessible, particularly by sustainable transport including walking, cycling and public transport.
- T3 To use car parking in the town centre more efficiently by ensuring that shops and leisure facilities share parking facilities

Theme 3: Leisure: a great place to visit, to relax in and have fun

- L1 To promote healthy lifestyles and make the area known for its excellent sports, leisure and entertainment facilities.
- L2 To promote arts, culture and tourism.

Theme 4: Places: Better and safer streets, squares and parks

- P1 To ensure the design, scale and location of new buildings help create streets and neighbourhoods which have a varied character. There should be no gated communities and the area's green spaces and heritage should be enhanced, especially the River Thames, the docks and the parks to create a distinctive sense of place.
- P2 To create an attractive, safe, and secure public realm.
- P3 To link the docks and parks in a network of open spaces which have a variety of functions, including recreation and children's play, sports facilities and nature conservation.
- P4 To make the River Thames and its river front more accessible.
- P5 To reduce the impact of development on the environment and help tackle climate change, air quality, pollution, waste and flood risk.

Theme 5: Housing: Providing more and better homes

- H1 To create a mixed community by providing more housing choices and better homes of a high quality. There should be more affordable housing and different housing sizes including larger homes for families.
- H2 To focus higher densities in the action area core where there are town centre activities and good access to public transport.

Theme 6: Community: Enhanced social and economic opportunities

- C1 To provide more and improved educational, health and community facilities which meet the needs of the growing population.
- C2 To provide more local employment opportunities.

Theme 7: Delivering the Area Action Plan

- D1 To contribute to work with key stakeholders including the local community, landowners, Lewisham Council and TfL to deliver the vision and objectives of the AAP.
- D2 To ensure that physical and social infrastructure needed to support growth at Canada Water is provided in a timely manner.
- D3 To monitor and review the delivery of Area Action Plan Policies annually to inform phasing of future development and development of infrastructure.

3.3 Canada Water Policies

The policies for Canada Water are set out below:

Policy 1	Shopping in the town centre
Policy 2	Cafes and restaurants in the town centre
Policy 3	Important shopping parades
Policy 4	Small scale shops, cafes and restaurants outside the town centre
Policy 5	Markets
Policy 6	Walking and cycling
Policy 7	Public transport
Policy 8	Vehicular traffic
Policy 9	Parking for town centre uses
Policy 10	Parking for residential development in the core area
Policy 11	Leisure and entertainment
Policy 12	Sports facilities
Policy 13	Arts, culture and tourism
Policy 14	Streets and public spaces
Policy 15	Building blocks
Policy 16	Town centre development
Policy 17	Building heights on site in and adjacent to the core area
Policy 18	Open spaces and biodiversity
Policy 19	Children's play space
Policy 20	Energy
Policy 21	New homes
Policy 22	Affordable homes
Policy 23	Family homes
Policy 24	Density of residential developments
Policy 25	Jobs and business space
Policy 26	Schools
Policy 27	Community facilities
Policy 28	Early years
Policy 29	Health facilities
Policy 30	Albion Street
Policy 31	Lower Road
Policy 32	Proposals sites
Policy 33	Section 106 Obligations

4 Context and Baseline Information

4.1 Links to other policies, plans and programmes

- 4.1.1 A number of plans and programmes of relevance to the AAP have been reviewed to ensure that the messages from the policies are taken into account and to enable a robust appraisal of the impacts of the policies. A full list is set out in **Appendix 3**.

Further details on the objectives and requirements of other relevant Policies, Plans and Programmes are contained within the Background Paper to the Core Strategy, which can be found on the Council's website <http://www.southwark.gov.uk>

4.2 Summary Baseline Information

- 4.2.1 Baseline information has been used to measure the current characteristics of the area, to enable an assessment of how it is likely to change in the future and to monitor future implementation. The data that has been collected describes the social, environmental and economic characteristics of the area. More information on the baseline data can be found in the SA scoping report and background papers. The background papers have been prepared to accompany the submission version of the AAP, which set out the baseline data in further detail. A summary of the data is given below and a full list of all the evidence documents used in the development of the AAP can be found in Appendix 8:

- **Demographic profile**

The total population of Rotherhithe is 23,357 with a much higher proportion of people aged 20-34 living in Rotherhithe compared to the rest of Southwark and conversely there is a lower proportion of people in the 0-19 and 35 plus age groups than in Southwark as a whole. There are also far more single person households in Rotherhithe and far fewer families compared to the rest of the borough, but less students and pensioners in Rotherhithe. Rotherhithe has a significantly higher number of people of white ethnic origin and fewer people of ethnic minorities compared to the rest of Southwark.

Southwark is ranked as the 26th most deprived local authority area (1 being the most deprived) in England out of a total of 354 Local Authorities. Rotherhithe represents a mixture of deprivation, on the whole Rotherhithe ward is more deprived than Surrey Quays ward. Only 1 area within the AAP area is in the 10% most deprived and there are no areas in the 10% least deprived. On the whole, the areas next to the river tend to be less deprived than more inland areas, some areas being among the least deprived in Southwark.

- **Retail**

Rotherhithe provides approximately 39,000 sqm. of retail floorspace, largely within the purpose built Surrey Quays shopping centre and more recently completed Surrey Quays Retail and Leisure Park. There are a significant number of comparison goods retailers in the centre and demand for floorspace is high. However the Surrey Quays shopping centre has an out-of-centre character with a significant amount of parking. These shopping facilities do not reflect the potential of the area to provide a genuine town centre function, given recent improvements in public transport accessibility. There are several large employers in the area including Harmsworth Quay printing works, Surrey Quays shopping centre and Tesco.

The Southwark Retail Study (2009) **(CDE5)** provides details of the existing shopping provision in Southwark and also includes up to date health checks of the shopping centres, describing the vitality and viability of the borough's centres in terms of their retail performance.

On the basis of current market shares, increases in population levels and disposable income will increase the available comparison spend, which will create capacity for additional retail floorspace. By 2018 expenditure surplus will be sufficient to support approximately 13,996 sqm net of new comparison goods floorspace, with most of this arising in the north east (Canada Water) and central east (Peckham) of the borough.

With regards to convenience shopping there is evidence of a surplus of convenience expenditure in the borough. The borough's convenience goods capacity has been calculated based on current market shares and taking into account the retail commitments in the borough. The borough will be able to support an additional 11,554 sqm of floorspace by 2018. Analysis of capacity arising in different parts of the borough has identified most of the convenience capacity in the north east (Canada Water) and the south of the borough.

The council also commissioned Benoy to undertake a town centre feasibility study **(CDD5)**. Four design development options were tested with a varying quantum of floorspace for a mix of uses on the four key sites in the town centre. All of the options tested whether an additional 30,000 sqm (approx) of retail floorspace could be provided across the sites. The study has demonstrated that there is physical capacity to provide around 30,000sqm of additional retail floorspace on the shopping centre and overflow car park.

- **Regeneration and Employment Opportunities**

Canada Water is located between two major office locations (Canary Wharf and London Bridge). With regards to the existing business uses, the largest industrial employment site in the area is Harmsworth Quays Print Works which provides a significant number of jobs. The operation of this site involves 24 hour activity, noise etc, which may make it difficult to provide a satisfactory standard of accommodation for more sensitive uses on adjacent sites.

The sites to the north and east of the print works, namely Quebec Industrial Estate, Quebec Way and the Mulberry Business Park have historically contained warehousing operations. The Mulberry Business Park site recently obtained planning permission for a mixed use development comprising residential units and 5105m² of B1 office floorspace.

The area contains several office buildings which provide self contained office accommodation with car parking. Managed by the City Business Centre, these include Tavern Quay, which contains purpose built office suites overlooking Greenland Dock, St. Olav's Court and the City Business Centre, located on Albion Street, and the Dock Offices, located near Canada Water tube station. The offices range in size, from 330 sq ft up to 2,500 sq ft. Tavern Quay has planning permission for redevelopment to provide a new 9 storey building with mixed use, providing business and residential uses. 1,311 sqm of business floorspace would be provided on the ground and first floors, in the form of small business units.

There is a cluster of small B1 occupiers and creative and cultural industries in office/workshop units near St. Mary's Church, in close proximity to Rotherhithe Station. This area benefits from a good quality environment and buildings.

Planning permission has recently been granted for the redevelopment of the Surrey Quays Leisure site. Permission was granted for the provision of a mixed use

development, including the re-provision of the leisure facilities, and the addition of 2,500 sqm of B1 office floorspace.

Decathlon, a major retail operator, adjacent to the shopping centre, has confirmed they will be re-locating their office headquarters to the site as part of the approved redevelopment scheme.

Southwark's Employment Land Review (ELR) (**CDE1**) has provided an assessment of local demand and supply of office stock and industrial land within the borough. The ELR divided the office employment land market in the borough into two distinct market areas:

- The 'SE1' market area
- The 'local' office market

The Canada Water area is categorised in the 'local' office market. The 'local' market, mainly comprised of small and medium sized enterprises (SMEs), is more influenced by factors consistent in the local and sub-regional market more unique to the South East London boroughs.

The ELR forecasts the need to provide between 25,000 sqm and 30,000 sqm of new B1 office floorspace in Southwark by 2026 to meet the needs of the local office market which is located outside of the SE1 area of the borough. Areas with good transport accessibility and supporting shops and services are the most appropriate locations to keep and provide new business space.

Canada Water is a suitable location to accommodate new B1 office floorspace largely due to its access to public transport and the general quality of the environment. The ELR recommends that B1 uses should be protected in the area and growth facilitated for B1 development that accommodates local demand.

Overall, the ELR suggests that the demand for B1 office floorspace is expected to continue across the borough, influenced by factors such as increased regeneration and investment, continued public sector interventions, the extension of the East London Line and the Olympic Games. The development of Cross Rail across the city will also bring a beneficial impact to the area, as it will connect central London City, Canary Wharf, the West End and Heathrow Airport to areas east and west of the capital. It will bring 1.5 million people within a 60-minute commute of the city and may increase demand for office stock.

- **Education**

There are seven primary schools in Rotherhithe. Their performance ranges from good to outstanding with the exception of Rotherhithe Primary School which has been rated as satisfactory (Ofsted). Bacon's College is the only secondary school in Rotherhithe and the school performs well, achieving significantly higher than average GCSE results when compared to results for the borough and higher results than the UK average.

As at January 2009, there was capacity for 2,730 primary places in the Rotherhithe area, with a surplus of 416 places or 15.2%. One primary school had surplus capacity above 25%. It is predicted the primary population will rise to between 2,816 and 2,867 by 2019. Based on these projections, there is sufficient capacity until around 2017-2019. As well as general population changes, this forecast reflects changes as a result of the borough's housing and regeneration schemes.

With regard to reception year, the existing population is expected to rise from 373 in 2009 to 445-471 in 2019. The current number of places is 390 providing capacity up until around 2013. In view of the variables that influence projections, Southwark's

strategy is to keep capacity under review and open a combination of temporary and permanent reception classes to meet the needs of the next few years.

In the short term, there is funding within the primary capital programme budget to rebuild Rotherhithe primary school. In the longer term, the need to expand Albion Primary school to 2 forms of entry will be kept under review.

In September 2006 in the light of the projected shortfall of places Southwark's Executive approved an amended strategy to open two new secondary schools including one 5FE (750 pupil) school in Rotherhithe. In preparing the AAP an assessment of 31 sites around Rotherhithe was undertaken including their suitability for a new secondary school. This assessment concluded that Rotherhithe primary school was the most suitable site for a new secondary school.

The new school will be a five-form-of-entry (750 pupils aged 11-16) school plus sixth form (150 pupils). Bacon's College have agreed to be the sponsor of this new school and as such has guaranteed that all children who wish it and who live on the peninsula will be offered a place at either Bacon's or this new school.

- **Crime and Community Safety**

Crime deprivation varies within Rotherhithe. The majority of Rotherhithe is within the 10% most deprived in the borough in terms of crime whereas levels of crime deprivation are more varied in Surrey Docks. The riverside areas are the least deprived (in terms of crime) in Rotherhithe.

The Metropolitan Police Estate's Asset Management Plan for Southwark was published in November 2007 and sets out the strategy for the estate over the next three years. The asset management plan recognises that as demand on the current facilities in Southwark increases with additional staff, officers and the growing population it is essential that capacity is increased and the standard of facilities improved. Possible locations for Custody Centres and Patrol facilities are therefore to be investigated as well as the reorganisation and improvement of back-office facilities, which may include acquiring new office space within the borough.

A review of the future of Rotherhithe police station is to be carried out with a view to re-provide all of the facilities currently housed there in more specialised and more appropriate accommodation in order to bring the facilities up to date.

- **Health**

The 2001 census reported that there is a higher than average proportion of people of good health in Rotherhithe compared to the UK and Southwark averages. Rotherhithe also has fewer people reporting poor health and limiting long-term illnesses than the Southwark and UK averages. There are four GP surgeries in the study area. The nearest hospitals are Guy's and St Thomas's in London Bridge.

The Primary Care Trust is developing a strategy for the provision of clinical care within Southwark including primary care facilities. This will be set out in the Commission Strategy Plan 2010. This document will be published shortly by the Primary Care Trust.

- **Housing**

There is a wide variety of housing types in the study area. Rotherhithe ward has a higher proportion of local authority housing when compared to Surrey Docks, whereas Surrey Docks has a higher proportion of private and Registered Social Landlord housing stock than Rotherhithe. House prices vary in the study area with the most expensive housing concentrated in Surrey Docks ward particularly on the riverside. In comparison, the lower priced housing tends to be ex-local authority housing.

The core strategy housing background papers set out an overview of the Housing Requirements Study 2008. The study looks at the need for affordable housing and different types of dwellings including family housing. As part of the study, 9 sub-groups were prepared, including one for Rotherhithe Community Council.

The survey estimates that there are currently 13,547 households living in Rotherhithe. 80 dwellings were assessed as being vacant at the time of the survey. The median household income is £19,200 whilst the mean income is £35,000. This shows that a relatively small number of households with high incomes inflate the mean of the area. Both these figures are higher than the Southwark averages of £16,000 median household income and £29,999 mean household income.

The housing stock in Rotherhithe is predominantly flats (70%) with 22% terraced housing and 8% detached and semi-detached properties. 23% (948) of all properties in Rotherhithe are owned outright or with a mortgage. Around 48% of the stock is socially rented (both council owned (4610) and rented from a housing association (1856)) and 29% is in the private rented sector (3920). Overall almost 88% of householders in Rotherhithe were satisfied with their current property while over 3% expressed dissatisfaction with their property.

5,542 households in Rotherhithe were assessed as living in unsuitable housing due to one or more factors such as: accommodation too expensive; overcrowding; and children in high rise flats. Whilst this is a quarter of all established households, many of these households may not need to move to resolve the identified problems as solutions to their homes may be possible.

The study assessed households who want/need/expect to move. It identified that 58% can afford market housing, 13% can afford intermediate housing and the remaining 29% can afford social housing. Proportionally there are more existing households in Rotherhithe who want/need/expect to move who can afford market housing than Southwark as a whole.

BMP Paribas and Christopher Marsh & Co were commissioned to undertake an affordable housing viability study which examined, in terms of financial viability, the potential for development sites in Southwark to deliver affordable housing at varying percentages and mixes. The report concluded that there is scope for a differential policy to affordable housing based on a target of up to 50%, depending on the existing use value of the site. Across the borough, a 35% affordable housing target can be justified, although variations to this requirement (both higher and lower) may be justified through site specific financial appraisals (**CDH16**).

- **Energy Efficiency and Renewable Energy**

The Central London Infrastructure Study by URS (**CDR22**) (2009) sets out the situation for the provision of utilities across the borough. The study examined the implications for growth and demand upon infrastructure for the whole of Central London. In addition to the URS study, the following studies have also been undertaken to establish the infrastructure needs of the Canada Water Action Plan Area:

- Site Utilities Infrastructure Study, Hoare Lea, 2005 (**CDI12**)
- Canada Water Area Action Plan Energy Study, July 2009 (**CDEN20**)

The Hoare Lea Study undertook a desk top review of existing services in consultation with the utility providers. The study also assessed the capacity, budget costs and service strategies for the area. The study found that there is limited capacity to supply power to new development in the core area. The energy study also assessed the most cost effective means of supplying low and zero carbon energy in the AAP area,

including the significant potential to establish a district heating network in the area, either through linking sites or connecting to SELCHP.

AECOM was also appointed to undertake a strategic level energy study for the Canada Water Area. The Canada Water Area Action Plan - Energy Study (**CDEN20**) provides part of the evidence base in support of planning policy for the Canada Water Area Action Plan (AAP), and has helped to identify appropriate policies and targets, which promote energy efficiency and energy generation from decentralised, low carbon and renewable energy technologies.

As part of this study a model was created to try to estimate the existing baseline energy use from the Canada Water Area and to model changes to energy demand over time as new development comes forward – under a range of possible policy scenarios. As a result, the major opportunity for the area was considered to be access to heat from a local waste combined heat and power (CHP) plant (SELCHP). The majority of the proposed developments area could be linked to a district heating network utilising waste heat from the CHP to provide low carbon heat to buildings.

Negotiations are currently underway with (SELCHP) to connect the waste heat from the incinerator to district heating systems in several of the council's housing estates, some of which are located in the Canada Water AAP area. It is proposed that the initial development phase would connect Southwark estates to the north of SELCHP, supplying around 2,700 dwellings with heat. A strategic approach will be necessary to successfully manage and co-ordinate delivery. A local authority public (or partnered) ESCo would be ideally placed to plan, deliver and operate part or all of a district heating network.

- **Air Quality**

The entire AAP area is located in an air quality management area. This means that UK air quality objectives for levels of pollutant gases are unlikely to be met in this area. Any new development in the AAP area should not result in a reduction in air quality.

- **Waste Management**

National Government has set targets for Southwark Council to increase recycling rates and reduce the amount of waste going to landfill. The Mayor has also set waste targets for boroughs through the London Plan including the need to allocate enough land to process at 323,000 tonnes of waste per year by 2015 and 379,000 tonnes per year by 2020. This will help meet the London-wide target of processing at least 85% of the city's waste within London by 2020.

A Joint Waste Technical Paper with Bromley, Bexley, Greenwich and Lewisham has been prepared to ensure that the waste targets are met. This technical paper provides detail of how working together we will meet our apportionment target. It demonstrates that there is enough combined capacity across these boroughs to meet the Mayor's target for these boroughs. As part of this approach we have safeguarded 11ha of land at Old Kent Road for waste management, providing enough land to meet the Mayor's waste processing target. A new state of the art facility is being built on part of this land by Veolia Environmental Services, the Council's waste management partners, in order to help meet the targets by processing 111,940 tonnes of waste per annum with the potential to treat further waste by converting it into biomass fuel.

Southwark's Waste Management Strategy, 2003-2021(**CDEN7**) sets out the council's proposals for moving Southwark towards more sustainable waste management. The key features include:

- a reduction in the amount of municipal solid waste generated in Southwark to below 3% by 2005, and below 2% by 2010. In real terms, due to population growth (estimated at a further 27,000 residents by 2021) the absolute amount of

- waste will rise but the strategy aims to deliver a decrease in the actual rate of growth
- achievement of 30% recycling and composting standards for household waste by 2010-11 and 40% by 2015-16 and 50% standards by 2020-21
 - recovery of value from 45% of municipal solid waste by 2010-11, 67% by 2015-16 and 75% by 2020-21.

Southwark's Waste Minimisation Strategy, 2007 – 2010 (**CDEN8**) sets out the council's proposals for addressing waste growth by minimising household waste. The Strategy identifies a number of policies, initiatives and projects that can help achieve a reduction in waste growth to 2% or less by 2010, a major element being through engendering behavioural change in Southwark. Veolia Environmental Services will assume responsibility for the implementation and monitoring of the Strategy in the medium and longer term.

- **Water Resources**

Thames Water has provided details of the mains water services located around the core area. Thames Water has confirmed that at present their existing infrastructure has the capacity to serve the proposed development on Sites A and B without reinforcement being needed. They have also noted that the development parcels should all be able to be supplied from the existing carriageway.

Thames Water has also confirmed that the foul trunk (main) sewer infrastructure should have capacity to accept the additional foul flow from the proposed development on Sites A and B.

- **Quality in Design**

The Area Action Plan seeks to strengthen Canada Water's role as a shopping destination, expanding the amount of retail space by around 35,000sqm and providing a much more diverse range of shops than at present, including a new department store and independent shops. The action area's core will provide at least 2,500 high quality new homes, which in general will be accommodated in mixed use development. Office development will provide much needed space for local occupiers and together with retail development, will generate around 2,000 new jobs.

Existing facilities in the town centre are currently separated and poorly linked, being built originally to serve car-borne visitors. Development in the town centre will contribute towards creating an open environment with a high street feel, and high quality public realm and open spaces. We want to make better use of car parking, ensuring that it is shared between town centre uses. The centre must reach out to the wider Rotherhithe area, ensuring that it is accessible, particularly on foot, by bicycle and by public transport. In addition we will work with Transport for London to improve the road network around Lower Road. Outside the town centre and core area of the area action plan, development will be less dense and should reflect the leafy and suburban character of much of the area.

The AAP area is a peninsula surrounded by the River Thames, therefore, all of the riverside in the AAP area is designated as part of the Thames policy area. This allows special control of development next to the riverside. Any development in this area must enhance the character of the riverside area and ensure continued access to the Thames. The study area has a number of important water resources including Greenland Dock, Rotherhithe, Surrey Water and South Dock, which are designated as borough open land and will be protected against development.

Part of the AAP area is within the strategic viewing corridor for St Paul's Cathedral. The impact of any new tall buildings in this area will need to be considered in terms of their

impact on the viewing corridor. Further details are set out in the Urban Design Background paper.

- **Conservation of Historic Environment**

There is one conservation area within the wider study area (St Mary's Rotherhithe). Any development in this area must protect or enhance the character or appearance of the Conservation Area. There are several listed buildings in the AAP area, any development should preserve these buildings and their historical or architectural features of interest. There is one building classified as a listing building at risk in the study area, this is the Former Clare College Mission Church in Southwark Park.

Archaeological evidence suggests the Rotherhithe Peninsula has been inhabited since the Bronze Age. An archaeology priority zone (APZ) exists in the wider area arching over the top of the study area along the riverfront. This marks the potential for archaeology to be present on the fringe of proposed developments.

- **Open Space and Biodiversity**

pmplgenesis was appointed by the council in February 2009 to undertake an open space, sport and recreational facilities study. This study is also being used to inform the preparation of an Open Spaces Strategy for the borough. The council also commissioned a separate but related Playing Pitch Strategy and a Capital Investment Strategy to identify priorities for investment amongst open space sites in the borough.

Rotherhithe has 2 parks, Southwark Park and King's Stairs Gardens, covering a total area of 28.3 ha. The quality of the parks within Rotherhithe is regarded as good with an average ranking of 77% - King's Stairs Gardens (70%) and Southwark Park (84%). Southwark Park also has Green Flag status. In relation to accessibility, the study has shown that a small part of Rotherhithe falls outside the guidance for accessibility

With regard to Amenity Green Space, Rotherhithe currently has 47 sites covering 13.5 ha, made up of small open spaces and pocket parks. These include King George's Field, Pearson's Park playground and Durands Wharf. Overall the quality of these spaces is regarded as good. It is recognised that amenity green spaces can also be used to create linkages between larger open spaces and to promote a green, sustainable environment. Protecting these sites should be a key priority, since they serve an important visual and psychological purpose in densely-populated areas.

Eight sites of natural and semi-natural green space have been identified in Rotherhithe covering an area of 33.21 ha, the largest covering 10.22 ha, which include:

- Russia Dock Woodlands
- Greenland Dock
- South Dock
- Canada Water
- Surrey Water
- Stave Ecological Park
- Ground Lavender Pond

Several sites in the AAP area have also been formally designated sites of importance for nature conservation. This includes the docks, Canada Water basin and Albion Channel, Russia Dock Woodlands, Lavender Pond, Southwark Park, Deal Porters Walk and King Stairs Gardens.

No allotments are located within Rotherhithe. It is acknowledged that it will be very challenging to deliver additional provision, given the density of development in the borough and competing demands for space.

A new civic plaza is being constructed alongside the new Rotherhithe library, which will be completed in early 2011. The plaza has been designed to allow for the potential hosting of a market. There will also be a more formal programme of activity considered for the plaza that will be drawn up ahead of the library opening to make sure it is a safe and welcoming space. Possibilities include music, art events and family activities.

Within Rotherhithe, the Albion Channel and Deal Porters Walk are important green corridors. Establishing strong links and a network of routes across the borough has the potential to ease many of the perceived quantity and accessibility issues.

Nine outdoor facilities were identified within Rotherhithe covering an area of 5.97 ha, including Mellish Fields sports pitches, Southwark Park Athletic Track and synthetic pitch and St. Pauls Sports Ground. It has also been identified that St. Pauls Sports ground is in need of further improvements and it has been put forward specifically to be reviewed in further detail under the Capital Investment Strategy

- **Flood Risk**

The study area is protected by flood defences which can cope with 1 in 1000 year flood water levels in the River Thames. Without the flood defences parts of the study area closest to the river would have a 1 in 100 year chance of flooding from the Thames. Areas closer to the middle would have a lesser chance of flooding (between 1 in 100 and 1 in 1000 year chance). However, there is a small chance that the flood defences could break during a flood event or water levels in the Thames rise higher than the height of the defences.

A strategic flood risk assessment (SFRA) has been prepared for the borough which investigated what would happen in such an event. Whilst the area is likely to flood relatively quickly given its proximity to the river, flooding would not be a high hazard to much of the area (including around the town centre) because of the depth and/or speed at which flood waters are likely to flow. Flooding of areas adjoining the river and along the western part of the study area would pose a high hazard.

Flooding can also occur from other sources including drainage overflowing, water pipes bursting and soils becoming waterlogged. The risk of this could increase with climate change as storms become more frequent and severe. Appropriate drainage infrastructure is therefore important. Soils under the area are Thames gravels which are susceptible to groundwater flooding, although there is no evidence historically of this occurring. Gravels are more permeable and therefore provide more opportunities for sustainable urban drainage solutions.

The study area also contains large bodies of water in the form of docks. The SFRA concludes that any failure of these structures will result in them draining into the river and so there is no risk of them flooding and causing harm to life or property. Future development in the study area will need to address flood risk. Certain vulnerable uses, such as housing, school and emergency services, will need to be located away from high risk areas where possible. Ground floor and basement residential development (and other highly vulnerable uses) is not likely to be possible in the parts of the study area within flood zone 3 because of how quickly they could flood.

- **Sustainable Transport**

Public transport in the majority of the study area is good. There are three underground stations, Canada Water, Surrey Quays and Rotherhithe. Surrey Quays and Rotherhithe station are both closed at the moment to enable the extension of the East London Line, this is expected to be complete by 2010. The jubilee line runs from Rotherhithe station. The area is also well connected by bus and cycle routes (see map in Appendix 12).

The creation of a pedestrian and cycle bridge to connect the Rotherhithe peninsula to the Isle of Dogs is currently being considered by Sustrans although no decision has been made as yet to decide if this will definitely go ahead.

Located adjacent to the river Thames, there are also various river crossings and piers in the borough. Two public accessible services operate in the area including the Hilton to Canary Wharf ferry service that operates seven days a week on a 20minute timetable. A commuter service is also provided from Greenland pier accessing the embankment to the west and as far as Woolwich to the east. Other tourist and chartered services operate within the area.

Part of the study area is designated as a public transport accessibility zone (PTAZ). A PTAZ is considered to have a very high level of public transport accessibility compared to the rest of the borough and significant potential for new development and investment. The PTAZ has a public transport accessibility level (PTAL) of 6B (highest possible accessibility score) whilst the rest of the study area varies in terms of its PTAL score.

A multi-modal transport study (Mouchel, 2007) undertaken for Rotherhithe looks at the impact of future development on the transport infrastructure in the study area. The study tested the possible impacts of additional development at Rotherhithe based on the development of more housing on sites A to G. The results of the modelling indicated that, even with the extension to the East London Line and improvements to the road network, there will be significant traffic congestion on the road network with additional development in Rotherhithe.

There are two controlled parking zones (CPZs) in the AAP area: (Zone H) in the area around Canada Water tube station and Rotherhithe Station and Zone N in the area around Surrey Quays station and the southern part of Lower Road. The extension of these CPZ's will need to be considered as the area changes.

In 2007, Urbed and the Landscape Partnership were commissioned to undertake a Public Realm Investment Strategy for Rotherhithe. The 2007 study concluded that the peninsula was like a 'wheel with broken spokes' with Canada Water at the hub of the wheel and Salter Road/Redriff Road forming the outer rim. The internal roads and cycle/pedestrian paths form the 'spokes' which are broken or crooked and which need to be reconnected with the hub. Cars dominate the central area of the peninsula and movement corridors elsewhere are indirect and disperse pedestrians and cyclists so that they can rarely be seen.

Building on this study, the Landscape Partnership were appointed to undertake a Public Realm Improvements Study (2009) to help identify necessary improvements to the pedestrian and cycle network in the AAP area. Through this analysis, key routes were identified which link the wider AAP area with the town centre and public transport hubs. The 2009 study set out a series of costed measures which would improve these routes. These projects were those considered to have the greatest potential to improve the accessibility of facilities in the town centre and reduce car travel.

5 Sustainability Issues and Objectives

5.1 Sustainability Issues

5.1.1 This section sets out the main sustainability issues that need to be taken into consideration. These issues have been identified by considering the baseline information as well as the messages from related plans, policies and programmes.

- Relatively high levels of deprivation
- Employment inequalities and employment opportunities
- Education, skills and training deprivation
- Health inequalities and noise nuisances
- Need to promote equality, diversity and social cohesion
- High levels of crime and fear of crime
- Energy efficiency and use of renewables
- Poor air quality
- Need to minimise waste arisings and increase recycling rates
- Need for sustainable use of water resources
- Protection of landscape features and designated sites and need to address contaminated land issues
- Ensuring a high quality of design in new developments
- Need to preserve and enhance built heritage and the archaeological environment
- Minimising flood risk and improve the quality of controlled waters within the borough
- Protecting and enhancing biodiversity
- Providing everyone with a decent and affordable home to live in
- Need to improve accessibility by public transport and minimise the need to travel by car
- Need to ensure that there is social, physical and green infrastructure capacity for existing and future needs

5.2 Sustainability Objectives

5.2.1 Seventeen Sustainability Objectives have been identified, which are set out below. The objectives reflect the current social, economic and environmental issues affecting the area and were consulted on as part of the scoping report:

SDO 1	To tackle poverty and encourage wealth creation
SDO 2	To improve the education and skill of the population
SDO 3	To improve the health of the population
SDO 4	To reduce the incidence of crime and the fear of crime
SDO 5	To promote social inclusion, equality, diversity and community cohesion
SDO 6	To reduce contributions to climate change
SDO 7	To improve the air quality in Southwark
SDO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource
SDO 9	To encourage sustainable use of water resources
SDO 10	To maintain and enhance the quality of land and soils
SDO 11	To protect and enhance quality of landscape and townscape
SDO 12	To conserve and enhance the historic environment and cultural assets
SDO 13	To protect and enhance open spaces, green corridors and biodiversity
SDO 14	To reduce vulnerability to flooding
SDO 15	To provide everyone with the opportunity to live in a decent home
SDO 16	To promote sustainable transport and minimise the need to travel by car
SDO 17	To provide the necessary infrastructure to support existing and future development

6 The Sustainability Framework

6.1 What is the SA Framework?

6.1.1 The Sustainability Framework provides a way in which the sustainability effects of the AAP can be described, analysed and compared. The framework provides a set of sustainability objectives and indicators to be used when undertaking the appraisal. The indicators should be measurable to provide a way of checking whether the objectives are being met, for example, the number of jobs created.

6.2 The SA Framework

	Sustainability Objective and questions	Sustainability Indicators	
Economy, Regeneration and Employment Opportunities	<p>SDO 1: To tackle poverty and encourage wealth creation Will it improve the range of job opportunities? Will it help to diversify the economy? Will it encourage the retention and /or growth of local employment? Will it close the gaps between equalities target groups compared with the National average? Will it encourage business start-ups and support the growth of businesses?</p>	1.1 1.2 1.3 1.4	Employment land available Change in VAT registered businesses Numbers and % jobs in Southwark by sector Southwark compared to London (broken down by micro, small and medium sized businesses)
Education	<p>SDO2: To improve the education and skill of the population Will it provide opportunities to improve the skills and qualifications of the population, particularly for young people and adults? Will it help improve employee education/training programmes? Will it help reduce skills shortages? Will it help to reduce the disparity in educational achievement between different ethnic groups?</p>	2.1 2.2 2.3 2.4	Indices of multiple deprivation; Education deprivation % of the population with higher education qualifications % of population with no qualifications Proportion of resident pupils attending Southwark schools achieving 5+ A-Cs including English and Maths split by equality group

	Sustainability Objective and questions	Indicators	
Health	<p>SDO3: To improve the health of the population</p> <p>Will it promote and facilitate healthy living and active lifestyles? Will it reduce health inequalities? Will it promote non-polluting forms of transport? Will it improve access to health and social care/treatment?</p>	<p>3.1</p> <p>3.2</p> <p>3.3</p> <p>3.4</p> <p>3.5</p> <p>3.6</p> <p>3.7</p>	<p>Health life expectancy at age 65 by equality group</p> <p>Indices of multiple deprivation: Health deprivation</p> <p>Rate of obesity in children</p> <p>Mortality from cancer, heart disease and stroke</p> <p>Incapacity benefit for mental illness</p> <p>Distance to GP premises from home</p> <p>Admissions to hospital per 1,000 people</p>
Crime and Community Safety	<p>SDO4: To reduce the incidence of crime and the fear of crime</p> <p>Will it improve safety and security? Will it incorporate measures to reduce crime and the fear of crime, including anti-social behaviour?</p>	<p>4.1</p> <p>4.2</p> <p>4.3</p> <p>4.4</p>	<p>Indices of multiple deprivation: Crime deprivation</p> <p>Numbers of crime per annum</p> <p>Percentage of residents who feel fairly safe or very safe outside during the day/night</p> <p>Reports of anti-social behaviour</p>
Social Inclusion and Community Cohesion	<p>SDO5: To promote social inclusion, equality, diversity and community cohesion</p> <p>Will it help support voluntary sector and promote volunteering? Will it support active community engagement? Will it support a diversity of lifestyles? Will it address equality's groups?</p>	<p>5.1</p> <p>5.2</p> <p>5.3</p>	<p>Proportion of people who think they can influence decision-making in their locality</p> <p>Employment/Skills/Health/Homelessness waiting list by equality group</p> <p>Satisfaction with area</p>

	Sustainability Objective and questions	Indicators	
Mitigation of and adaption to climate change	<p>SDO6: To reduce contributions to climate change</p> <p>Will it reduce consumption of energy? Will it use renewable sources of energy? Will it help local people cope with hotter drier summers and warmer wetter winters? Will it mitigate against the urban heat island effect?</p>	6.1 6.2 6.3 6.4	<p>CO2 emissions and energy consumption (break down by source/type)</p> <p>No. of extreme weather events by type</p> <p>No. of hospital admissions as a result of extreme weather</p> <p>SAP rating of borough's housing stock</p>
Air Quality	<p>SDO7: To improve the air quality in Southwark</p> <p>Will it help to reduce emissions of PM10, NO2? Will it encourage a reduction in amount and length of journeys made by car?</p>	7.1 7.2 7.3	<p>Number of days of high pollution</p> <p>Annual average concentrations and number of hourly exceedences of nitrogen dioxide in air</p> <p>Annual average concentrations and number of daily exceedences of PM10 in air</p>
Waste Management	<p>SDO8: To avoid waste and maximise, reuse or recycle waste arising as a resource</p> <p>Will it promote the reduction of waste during construction / operation? Will it minimise the production of household and commercial waste? Will it promote sustainable processing of waste?</p>	8.1 8.2 8.3	<p>Municipal waste land-filled (tonnes)</p> <p>Residual household waste per household (tonnes)</p> <p>Percentage of municipal waste sent for reuse, recycling and composting</p>
Water Resources	<p>SDO9: To encourage sustainable use of water resources</p> <p>Will it encourage reuse of water? Will it maximise use of rainwater or other local water supplies? Will it reduce discharges to surface and groundwater?</p>	9.1 9.2	<p>Average domestic and commercial potable water consumption (l/head/day)</p> <p>Water quality measure</p>

	Sustainability Objective and questions	Indicators	
Soil and Land Quality	<p>SDO10: To maintain and enhance the quality of land and soils</p> <p>Will it encourage the remediation of land identified as potentially contaminated? Will it prevent further contamination of soils?</p>	10.1	Number of contaminated sites not remediated
Quality in Design	<p>SDO11: To protect and enhance quality of landscape and townscape</p> <p>Will it have a negative impact on important strategic/local views? Will it improve the quality of public spaces and street? Will it improve the relationship between different buildings, streets, squares, parks and waterways and other spaces that make up the public domain?</p>	11.1 11.2 11.3	Satisfaction with local area People who can identify with their local area Building for Life Assessments
Conservation of the Historic Environment	<p>SDO12: To conserve and enhance the historic environment and cultural assets</p> <p>Will it involve the loss or damage to historic buildings and remains and their setting? Will it improve the historic value of places? Will it promote the historic environment and also contribute to better understanding of the historic environment?</p>	12.1 12.2 12.3 12.4 12.5 12.6	Amount of Southwark covered by Conservation Area or APZ Numbers of heritage assets in the borough on the English Heritage buildings at Risk Register Changes in numbers of listed buildings Number of scheduled ancient monuments at risk Number of conservation areas at risk Number of conservation areas with up-to-date appraisal/management plans
Open Space and Biodiversity	<p>SDO13: To protect and improve open spaces, green corridors and biodiversity</p> <p>Will it encourage development on previously developed land? Will it improve the quality and range of open spaces? Will it improve access to open space and nature? Will it improve the quality and range of habitat for wildlife? Will it avoid harm to protected and priority species?</p>	13.1 13.2 13.3 13.4 13.5 13.6	Change in quantity of open space (ha) Resident satisfaction with open space Change in SINCS and LNPS Change in quality of open space (ha) Open space deficiency Deficiency in access to nature

	Sustainability Objective and questions	Indicators	
Flood Risk	<p>SDO14: To reduce vulnerability to flooding</p> <p>Will it minimise the risk of and from flooding? Will it protect and improve flood defences and allow them to be maintained?</p>	14.1 14.2	<p>Number of flooding incidents (including sewer flooding)</p> <p>Condition of flood defences</p>
Housing	<p>SDO15: To provide everyone with the opportunity to live in a decent home</p> <p>Will it contribute towards meeting housing need, in particular affordable housing and family homes? Will it improve the supply and range of housing? Will it contribute towards improving the quality of homes and the living environment? Will it reduce overcrowding?</p>	15.1 15.2 15.3 15.4 15.5 15.6	<p>Amount of homes in the borough</p> <p>Percentage of households living in temporary accommodation</p> <p>Households in housing need</p> <p>Households on housing register</p> <p>Households unintentionally homeless and in priority need</p> <p>Income to average house price ratio</p>
Sustainable Transport	<p>SDO16: To promote sustainable transport and minimise the need to travel by car</p> <p>Will it reduce car use? Will it promote walking and cycling? Will it reduce the number and length of journeys? Will it improve public transport? Will it reduce road traffic accidents?</p>	16.1 16.2 16.3	<p>Estimated traffic flows per annum (mil.vehicle km)</p> <p>The number of people killed or seriously injured in road traffic collisions</p> <p>Proportion of personal travel made on each mode of transport overall and by equalities groups</p>
Infrastructure	<p>SDO17: To provide the necessary infrastructure to support existing and future development</p> <p>Will it provide enough social infrastructure ? Will it provide enough physical infrastructure? Will it provide enough green infrastructure?</p>	17.1 17.2	<p>Capacity of existing infrastructure (social, physical and green)</p> <p>Capacity of future infrastructure (social, physical and green)</p>

6.3 Internal Comparison of the SA Objectives

6.3.1 As part of the sustainability appraisal, a comparison of the sustainability objectives was undertaken to check if the objectives are compatible with one another.

Compatibility of SA Objectives

Objective	SDO 1	SDO 2	SDO 3	SDO 4	SDO 5	SDO 6	SDO 7	SDO 8	SDO 9	SDO 10	SDO 11	SDO 12	SDO 13	SDO 14	SDO 15	SDO 16	SDO 17
SDO 2	✓																
SDO 3	✓	0															
SDO 4	✓	0	✓														
SDO 5	✓	✓	✓	✓													
SDO 6	✓	0	✓	0	0												
SDO 7	✓	0	✓	0	0	✓											
SDO 8	✓	0	0	0	0	✓	0										
SDO 9	✓	0	✓	0	0	✓	0	0									
SDO 10	✓	0	✓	0	0	0	0	✓	0								
SDO 11	✓	0	0	0	0	?	0	?	0	0							
SDO 12	✓	0	0	0	0	?	0	?	0	0	✓						
SDO 13	✓	0	✓	0	0	✓	✓	0	✓	✓	✓	✓					
SDO 14	✓	0	✓	0	0	✓	0	0	✓	0	0	0	✓				
SDO 15	✓	0	✓	0	✓	✓	✓	0	✓	0	✓	✓	✓	✓			
SDO 16	✓	✓	✓	0	✓	✓	✓	✓	0	0	✓	0	✓	✓	✓		
SDO 17	✓	0	✓	0	0	✓	✓	0	✓	0	0	0	✓	✓	✓	✓	✓

✓ Compatible
 0 No significant link
 ? Depends on implementation

The compatibility of SDO 6: Mitigation of and Adaption to Climate Change and SDO 8: Waste Management with SDO11: Quality in Design and SDO12 Conservation of the Historic Environment will depend upon implementation.

Careful application of renewable technologies and waste provision will be needed to ensure that quality in design or the setting of historic environment is not compromised.

7 AAP Issues and Options

7.1 Compatibility of the SA Objectives against the Canada Water AAP Objectives

7.1.1 An assessment of the compatibility of the SA objectives against the AAP objectives has been carried out. The results show that the objectives are largely compatible with each other. Some uncertainties do occur in a few of the policies, which will be dependent on the implementation of the policies. The full results can be found at [Appendix 4](#).

7.2 What options have been considered and why?

7.2.1 Two options were considered at the Issues and Options stage of the development of the AAP. These were

Option 1: Regeneration with a focus on homes

Option 2: Regeneration with a focus on homes, shops, jobs and leisure.

In summary, these options were based on:

- The London Plan target to deliver new homes and jobs in the area
- The amount of affordable housing and types of affordable housing to be delivered in the borough
- The amount of family housing to be built
- The provision of shops and leisure opportunities suited to the needs of the local population
- Provision of offices, industrial, tourism, cultural and community facilities
- The quality of public transport links in different parts of the borough.
- Environmental standards

7.2.2 Option 1: Regeneration with a focus on homes

In this option, regeneration in the core area would focus on the provision of new homes. The shopping centre would remain in place, but new mixed use developments would be built in the car parks around the shopping centre.

- The Seven Islands Leisure Centre would be refurbished.
- Building heights would range between 4 and 6 storeys on the shopping centre site, and would generally be below 10 storeys on sites A and B. One taller building of up to 15 storeys would be built on site A (to the north of Surrey Quays Road).
- Small scale improvements would be made to the road network to help ease the pressure on some of the junctions on Lower Road. Some streetscape improvements would be made to Lower Road, Albion Street and in St Mary's conservation area.
- Key pedestrian and cycle links in and around the town centre would be improved and a new green link would be created between Southwark Park and Russia Dock Woodland.
- New homes would be built on most development sites in the core area.
- No council owned estates would be redeveloped on the peninsula.

7.2.2 Option 2: Regeneration with a focus on homes, shops, jobs and leisure.

In this option, the character of the core area would become much more like a town centre. The shopping centre would be demolished or remodelled. The amount of shopping space in the centre would substantially increase. This increase would provide space for a new department store as well as more independent shops.

- Improvements would be made to Greenland Dock and South Dock marina to promote tourism. We would move the residential marina to Greenland Dock. Upgrade Dock facilities, improve the watersports facilities or promote some facilities

for local people and visitors at South Dock such as a shop, cafe, restaurant and a hotel.

- Leisure facilities including a new swimming pool would be provided.
- There would be some carefully located taller buildings around the height of the Canada Towers.
- We would make changes to the road network, possibly by simplifying the gyratory and re-introducing two-way traffic on Lower Road, potentially improving the junctions of Lower Road and Surrey Quays Road as well as Lower Road and Redriff Road to improve the environment and allow traffic to move through the area more efficiently.
- This option would create additional green links and improve water and landscape quality in the key open spaces on the peninsula. The network of open spaces and leisure facilities on offer would ensure that the peninsula becomes a great leisure destination.
- There would be more new housing of all tenures than in Option 1.
- There would be more regeneration of estates on the peninsula in this option depending on feedback
- Around 25% of new homes would be family sized homes with three or more bedrooms.
- New homes would be provided on the Hawkstone Estate through redevelopment of the low rise housing and John Kennedy House.
- There would be more intermediate housing, such as low cost home ownership to help lower and middle income families get onto the housing ladder.
- As well as residential and retail use, there would also be an increase in business space (retail as well as office space), including space suitable for small and medium sized enterprises (SMEs).

7.3 What have the options identified?

- 7.3.1 The two options for regeneration, identified above, were subject to detailed testing against the sustainability framework. The results of the appraisal showed that the overall impact of Option 2 was more positive than for Option 1.

Summary of Results

The results of the appraisal showed that the overall impact of Option 2 was more positive than for Option 1. Whilst Option 1 would deliver more housing than Option 2 it will increase contributions to climate change and traffic as well as waste and water usage.

In comparison Option 2 presents more of a balanced approach to the regeneration of the area by focusing on providing leisure facilities, employment opportunities, the public realm and community facilities as well as new homes. While this growth will increase demand for energy, water and generate more waste and traffic these impacts can all be mitigated by other policies in the AAP which seek to reduce car parking, set energy guidance and design guidance. While the impacts of option 1 can also be mitigated against, overall Option 2 will have more sustainability benefits in the long term than Option 1 in terms of job creation, new skills, community cohesion, providing local services and community facilities, improving walking and cycling routes, and reducing crime and fear of crime.

As a result it was decided that Option 2 should be taken forward as the Preferred Option for the AAP. Further details can be found in [Appendix 5](#).

8 Effects of the Canada Water AAP Policies

8.1 How has sustainability been considered in developing the plan?

- 8.1.1 The findings of the SA carried out for the Issues and Options report helped to determine the sustainability of the AAP policy options and the results were considered when selecting and drafting the policies for the Preferred Options report. The Preferred Options SA identified areas where special care needs to be taken when implementing policies such as building a new school in a high flood risk area, this will help to ensure potential conflicts are avoided. A final iteration of the SA has been undertaken to take into account comments from the consultations process and subsequent changes to the AAP, and sustainability objectives and indicators.
- 8.1.2 Areas of concern identified at the Issues and Options and Preferred Options stages have led to a refinement of the policies, objectives and indicators to address areas that had not been covered in sufficient detail. A final appraisal of the amended AAP has subsequently been undertaken (see section 8.3)

8.2 AAP Preferred Option

- 8.2.1 In general, Option 2, regeneration with a focus on homes, shopping, jobs and leisure has been taken forward, following the sustainability appraisal at the Issues and Options stage of the Core Strategy. The results of the Issues and Options SA showed that the overall impact of Option 2 was more positive in terms of social, economic and environmental impacts than for Option 1.
- 8.2.2 Twenty three draft policies were prepared in order to seek to achieve sustainable development and direct spatial growth within the borough. These are set out below:

- Policy 1 Shopping in the town centre
- Policy 2 Cafes and restaurants in the town centre
- Policy 3 Important shopping parades
- Policy 4 Small scale shops, cafes and restaurants outside the town centre
- Policy 5 Markets
- Policy 6 Walking and cycling
- Policy 7 Public transport
- Policy 8 The road network
- Policy 9 Parking for town centre uses
- Policy 10 Parking for residential development in the core area
- Policy 11 Leisure and entertainment
- Policy 12 Sports facilities
- Policy 13 Arts, culture and tourism
- Policy 14 Design principles for the town centre
- Policy 15 Building heights in the core area
- Policy 16 Open spaces
- Policy 17 Energy
- Policy 18 Housing
- Policy 19 Jobs and business space
- Policy 20 Schools
- Policy 21 Young people
- Policy 22 Health
- Policy 23 Community facilities

8.2.3 The appraisal of the Preferred Options found that there would be a potential minor negative impact against the following objectives:

SDO 6	To reduce contributions to climate change
SDO 7	To improve the air quality in Southwark
SDO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource
SDO 9	To reduce the use of water and source water as locally as possible and protect water quality
SDO14	To reduce vulnerability to flooding

The policies that showed a potential negative impact were:

Policy 1	Shopping in the town centre
Policy 11	Leisure and entertainment
Policy 18	Housing
Policy 19	Jobs and business space
Policy 20	Schools
Policy 22	Health
Policy 23	Community facilities

The reason for the likely negative impacts is because of the quantum of development that is proposed will increase the carbon emissions, waste and water use both in construction and operation. A large amount of the development is also located in the flood zone. However, the development is needed in order to regenerate the area and cannot be accommodated in areas that are not in the flood zone. Suitable mitigation measures have been identified to minimise the impacts and further guidance is provided in the SPDs.

Policy 14: Design principles for the town centre and Policy 16: Open spaces were identified as having the most positive impact as they will improve the environment and help to regenerate the area.

8.3 The Submission Version

8.3.1 A final appraisal of the Submission Version of the AAP has been carried out to check that the revised plan has addressed sustainable development appropriately. Some additional policies have been added to respond to feedback from the consultation. The changes to the policies include:

Policy 8	Vehicular traffic
Policy 14	Streets and public spaces
Policy 15	Building blocks
Policy 18	Opens spaces and biodiversity
Policy 19	Children's play space
Policy 21	New homes
Policy 22	Affordable homes
Policy 23	Family homes
Policy 24	Density of residential development
Policy 28	Early years
Policy 30	Albion street
Policy 31	Lower road
Policy 32	Proposals sites
Policy 33	S106 planning obligations

8.4 What are the significant positive effects of the plan?

8.4.1 The appraisal found that the majority of the policies in the submission version will have a positive impact. For every policy, the positive impacts outweighed the negative impacts when assessed across the whole range of sustainability objectives. In some cases the policies have no significant impact with the sustainable objective.

8.4.2 The results of the appraisal showed a major positive impact for the following policies:

Policy 14 **Streets and public spaces**
Policy 33 **S106 planning obligations**

Policy 14 scores the highest number of positive impacts. This policy aims to create an attractive environment by linking spaces together and creating a defined town centre area. An improved environment will help attract more inward investment to the area as well as providing an improved landscape and townscape.

Policy 33 scores the second highest number of positive results. This policy will enable the policies to be implemented by ensuring that funding is put in place to deliver the regeneration of the area and appropriate facilities and services to make it a success.

The following sustainability objectives also scored very positive scores overall:

SDO 1 To tackle poverty and encourage wealth creation

SDO 5 To promote social inclusion, equality, diversity and community cohesion

The positive results reaffirm the benefits of regeneration that the area action plan is seeking to achieve.

8.5 What are the significant negative effects of the plan?

8.5.1 In total, there are four SDOs that show potential minor negative impacts. These are:

SDO 6 **To reduce contributions to climate change**

SDO 7 **To improve the air quality in Southwark**

SDO 8 **To avoid waste and maximise, reuse or recycle waste arising as a resource**

SDO14 **To reduce vulnerability to flooding**

The following policies showed a minor negative impact against SDO6, SDO7 and SDO8:

Policy 1 Shopping in the town centre

Policy 11 Leisure and entertainment

Policy 21 New homes

Policy 22 Affordable homes

Policy 23 Family homes

Policy 25 Jobs and business space

Policy 26 Schools

Policy 27 Community facilities

Policy 29 Health facilities

Policy 32 Proposals sites

The reason for the negative result is that the quantum of new development is likely to have negative impacts in both construction and operation upon climate change and air quality as a result of an increase in carbon emissions from energy consumption and traffic. The development will also increase the amount of waste produced. However, the development is necessary in order to regenerate the area. Negative impacts can be addressed through suitable mitigation measures such as the requirement to reduce carbon emissions through

implementing the energy hierarchy, the proposed district heating network and the application of the core strategy policies and supplementary planning documents.

The following policies showed a minor negative impact against SDO 14:

Policy 21	New housing
Policy 22	Affordable homes
Policy 23	Family homes
Policy 25	Jobs and business space
Policy 26	Schools
Policy 27	Community facilities
Policy 29	Health facilities
Policy 32	Proposals sites

Much of the AAP area lies in flood zone 3a (high probability of flooding in the event of a breach of flood defences). The above policies therefore scored negatively against this objective as vulnerability to flooding could be increased. The core strategy policy 13 states that Southwark will allow development to occur in the flood zone providing it is designed to be safe and resilient to flooding, as it is recognised that there is a shortage of developable land outside the flood zone. Further guidance is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.

8.6 Uncertain impacts

The impact of several policies scored as uncertain against the sustainability objectives. Further details can be found in the individual appraisal of each policy but the uncertain scores were largely due to mitigation being required and/ or the impact being dependant on the detailed design of developments, which will not be known until the pre-application stage.

8.7 Cumulative impacts

- 8.7.1 The SEA Directive requires an assessment of secondary, cumulative, and synergistic effects, which should be incorporated in the SA. Collectively these effects are called cumulative impacts. Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects (e.g. noise, dust and visual) have a combined effect.
- 8.7.2 Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.
- 8.7.3 The cumulative impact of policies with a minor negative or uncertain impact could result in a major negative impact overall. It is difficult to assess the extent of such impacts at this stage in the process with the lack of detailed information on individual sites. Providing that suitable mitigation measures are applied to individual proposals it is considered that the potential negative impacts will remain minor and, with the development of new technologies and regulations, could even be reduced further over time. Cumulative impacts may also be positive – for example several minor positive impacts on open space and biodiversity could lead to a major positive impact for the area as a whole.
- 8.7.4 The cumulative impacts of the policies will need to be kept under review through the monitoring process and assessment of planning applications to measure the success of implementing the policies and inform any amendments that may be needed to policies and guidance.

8.8 Proposed mitigation

- 8.8.1 Where the SA identified potential shortcomings of particular policies, mitigation measures are proposed to help off-set the negative impacts. Many of these mitigation measures are policy requirements in either the Core Strategy or Supplementary Planning Documents (SPDs) such as the Sustainable Transport SPD, Residential Design Standards SPD, Sustainable Design and Construction SPD and Sustainability Assessment SPD. For example: Strategic Policy 13 in the Core Strategy, which sets out the council's targets for development to minimise their impacts upon climate change.
- 8.8.2 Some of the negative impacts will be mitigated through other policies within the AAP which deal with individual issues. Further specific guidance will also be provided in the Development Management and Housing DPDs which are to be produced.

8.9 Uncertainties and risks

- 8.9.1 The conclusions that were reached in undertaking the SA of the Submission Version policies were a result of qualitative (i.e. subjective) judgement, albeit by planning professionals within the Council. Where possible, the quantitative impacts of the AAP policies will be considered in the Annual Monitoring Report, e.g. the number of listed buildings at risk in the area.
- 8.9.2 In addition, predicting the outcome of a potentially complex mix of social, economic and environmental factors is an inherently difficult task to undertake, and can only be undertaken on the basis of the background data that is available. Consequently, there may be some questions about the way some policies were ranked against particular sustainability objectives. However, whilst some individual rankings may possibly be challenged at this level, it is the overall performance of a policy against the Sustainability Framework taken as a whole, which is the most important element to consider.

[The detailed results of the SA are provided in Appendix 7](#)

8.10 Further Changes to the Submission Version: Dwelling sizes and Sites of Importance for Nature Conservation

- 8.10.1 A final appraisal of the Further Changes to the Submission Version of the AAP has been carried out to check that the revised plan has addressed sustainable development appropriately. The changes to the policies included setting out minimum requirements for dwelling sizes in Policy 23 Family homes and designating three sites in the area as Site of Importance for Nature Conservation in Policy 18 Open spaces and biodiversity.

8.11 What are the significant positive effects of the changes?

- 8.11.1 The appraisal found that the changes to these policies in the revised submission version will have a positive impact. For each policy, there were no negative impacts identified when assessed across the whole range of sustainability objectives. In some cases the policies had no significant impact with the sustainable objective.

- 8.11.2 The results of the appraisal showed a positive impact for both policies:

<u>Policy 18</u>	<u>Open spaces and biodiversity</u>
<u>Policy 23</u>	<u>Family homes</u>

Policy 18 already scored highly in terms of positive impacts. This policy aims to protect and improve open spaces in the area and the addition of three Sites of Importance to

Nature Conservation supports this. An improved environment will help attract more inward investment to the area as well as providing an improved landscape and townscape.

Policy 23 also scored highly under the previous SA. This policy will enable the development of more family homes in the area. The addition of the minimum dwelling sizes had a positive impact on all of the sustainability objectives. In particular it will help achieve our objective of ensuring that the area is attractive for families.

The positive results reaffirm the benefits of regeneration that the area action plan is seeking to achieve.

8.12 What are the significant negative effects of the plan?

8.12.1 No significant negative effects were identified from the inclusion of either the Sites of Importance for Nature Conservation in Policy 18 or the minimum dwelling sizes in Policy 23.

8.13 Uncertain impacts

8.13.1 No uncertain impacts were identified from the inclusion of either the Sites of Importance for Nature Conservation in Policy 18 or the minimum dwelling sizes in Policy 23.

8.14 Cumulative impacts

8.14.1 The cumulative impacts of these policies will be kept under review through the monitoring process and assessment of planning applications to measure the success of implementing the policies and inform any amendments that may be needed to policies and guidance.

8.15 Proposed mitigation

8.15.1 No mitigation measures are required for the inclusion of either the Sites of Importance for Nature Conservation in Policy 18 or the minimum dwelling sizes in Policy 23 as no negative impacts were identified.

8.16 Uncertainties and risks

8.16.1 No uncertainties and risks were identified for the inclusion of either the Sites of Importance for Nature Conservation in Policy 18 or the minimum dwelling sizes in Policy 23 as no negative impacts were identified.

The detailed results of the SA are provided in Appendix 7

9 IMPLEMENTATION

9.1 What are the next stages in the plan preparation?

SA PRODUCTION STAGE	TIMETABLE
Preparation of the final sustainability appraisal report to accompany the <u>further changes to the publication version of the AAP.</u>	March 2010 March 2011
Adoption of the Canada Water AAP and publication of the final sustainability appraisal report.	September 2011 2013

9.2 How will the plan be implemented?

9.2.1 The AAP sets out the vision for the regeneration of Canada Water. The Canada Water AAP will shape the development of the area up to the year 2026 by providing a list of clear objectives and a delivery plan to make development happen in the right place at the right time. The plan sets out what should be achieved in the area and directs development. All planning applications must adhere to the AAP.

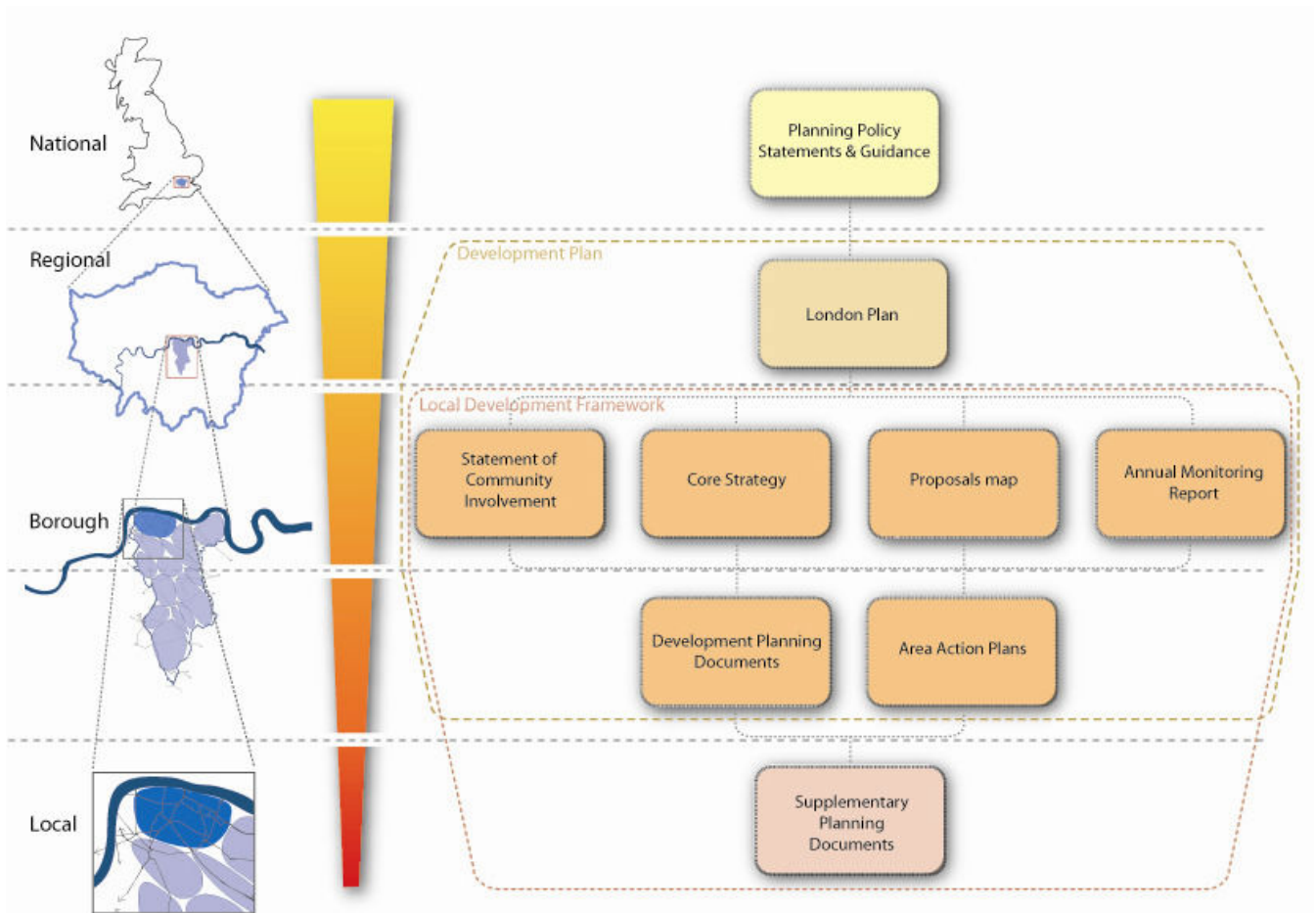
9.3 Links to other tiers of plans, programmes and other guidance

9.3.1 The LDF for Southwark will guide development in the future and is made up of a series of documents, prepared in stages. More information on the LDF can be viewed on our website. This includes the Local Development Scheme which sets out the programme for the production of documents. The Core Strategy sets out the overarching vision for all development in Southwark and what places should be like in the future, including Canada Water. The Core Strategy also provides new housing and affordable housing policies, which will relate to new housing development in Canada Water. SPDs on Residential Design Standards, Sustainable Transport, Sustainable Design and Construction and Sustainability Assessment provide further guidance on the standards that new development in Canada Water will be expected to meet.

9.3.2 It should be noted that local planning policy is produced within a framework set by national and regional government planning guidance. This guidance indicates the broad principles that local policy should adopt. For example the need to provide further housing as established in guidance means that it would not be possible to have an option of no further housing provision.

9.3.3 Further guidance will also be provided in the following DPDs and SPDs:

- Development Management DPD
- Housing DPD
- Sustainable Design and Construction SPD
- Sustainability Assessments SPD
- Design and Access SPD
- Residential Design Standards SPD
- Affordable housing SPD
- Sustainable Transport SPD



9.4 Proposals for monitoring

- 9.4.1 It is important that the plan is monitored to keep track of whether it is working in the way it should. This report has identified indicators that should be used to monitor the AAP. The most appropriate way to monitor the AAP is through the Local Development Framework Annual Monitoring Report (AMR). The AMR monitors the type of development that is occurring as a result of all of all of the council's planning policies and guidance and the effects development is having in terms of sustainability. Where new indicators have been identified, through the SA process, these will be added to the AMR.

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APPENDIX 1 Legal and Policy Background for Sustainability Appraisal and Development Plan Documents

Strategic Environmental Assessment and Sustainability Appraisal

The Canada Water AAP falls within the definition of a 'plan or programme' under European Directive 2001/42 (the SEA Directive). As it is likely to have significant environmental effects, it must also undergo a Strategic Environmental Assessment (SEA), as part of the sustainability appraisal.

The SEA directive is transposed (made) into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004. Guidance on the implementation of the 2004 Regulations and the Planning and Compulsory Purchase Act is set out in the ODPM's Practical Guide to the Strategic Environmental Assessment Directive (September 2005) and Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (November 2005) respectively. Further guidance is also provided in PPS12: Local Spatial Planning, 2008 and the Plan Making Manual.

These guidance documents set out a similar methodology to be used in the preparation of both SAs and SEAs. The government guidance on SA incorporates the requirements of the SEA Directive within the SA process. In the case of the AAP, all reference to SA should be understood as referring to both the SA and SEA process. The components of the SA and its relationship to the information required within the SEA report is set out below.

Components of the SA Report which make up the Environmental Report for the purposes of the Strategic Environmental Assessment

Information Required in Environment Report		Section in SA Report
	Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I)	The SA report
a	An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plan and programmes	Sections 1, 3 and 4 Appendices 3 and 8
b	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Sections 4 and 5
c	The environmental characteristics of areas likely to be significantly affected	Sections 4 and 5
d	Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Section 4
e	The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 4 Appendix 3
f	The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Sections 7 and 8 Appendices 4, 5, 6 and 7
g	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Sections 8 and 9
h	An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Sections 6, 7 and 8 Appendices 5 and 6
i	A description of measures envisaged concerning monitoring in accordance with Article 10	Sections 2 and 9
j	A non-technical summary of the information provided under the above headings.	Non-technical summary

	<p>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).</p>	Sections 2, 3 and 9
	<p>Consultation:</p> <ul style="list-style-type: none"> • authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4). • authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2). • other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7). 	Section 2 Appendix 2
	<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)</p> <p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> • the plan or programme as adopted; • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9 and 10) 	Section 9
	<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	Section 9
	<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA checklist Directive (Art. 12).</p>	The Quality Assurance Checklist has been followed

APPENDIX 2 RESPONSES TO CONSULTATION

Scoping Report

Comment number	Name	Report section	Representation	Council's response
1.	GLA	All	No comment at this stage.	Noted.
2.	GOL - SE London Plans and casework	Chapter 3	Chapter 3 looks at the relationship to other plans and programmes. It would have been helpful to say whether you encountered any difficulties/issues in doing this and how you will address them. Also, I could not see any reference to European guidance/plans/programmes. Were they taken into account?	Agreed. Reference to the following documents has been made in Table 3.1: European Landscape Convention 2000; EU Sustainable Development Strategy 2006
3.	GOL - SE London Plans and casework	Chapter 4	The baseline topics shown in Chapter 4 and from this the objectives in Chapter 5 appear to be heavily weighted towards environmental issues with only one reference to economic issues.	The council disagrees. The baseline matters as set out in Table 4.1 refer to education, crime and community safety, health, regeneration and economic opportunities. Moreover the objectives set out in the framework also cover a range of matters, including economic and social matters (see table 6.1).
4.	GOL - SE London Plans and casework	Appendix 4	Appendix 4 considers baseline data in more detail. I could not see any reference to indicators which will form the basis for monitoring the objectives within the document.	Appendix 4 of the scoping report contained a list of indicators along with relevant baseline information for each. At the next stage (preferred options) the council will set out the monitoring framework in more detail. It is likely that for the main part, monitoring will take place through the preparation of the AMR. The indicators in the AMR have been dovetailed to correspond as closely as possible with indicators in the SAs.
5.	GOL - SE London Plans and casework	Annex 5	I welcome the diagrams/maps set out in Annex 5.	Noted.

Comment number	Name	Report section	Representation	Council's response
6.	Thames Water Property Services	General	<p>It is essential that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and Thames Water (or any successor) has no planned improvements, the Local Council will require the developer to fund appropriate improvements that must be completed prior to occupation of the development. Network upgrades can take up to 18 months and where additional funding from our regulator is required up to 5 years lead in times may be necessary. We rely heavily on the planning process to ensure we have the necessary infrastructure in areas where development is clearly identified and seek planning conditions where it is not. Capacity problems, possibly leading to flooding, could occur in some cases if we have not been given the opportunity, either through advance planning or through conditional planning approvals, to provide the capacity prior to development.</p> <p>Page 10 - SDO 9. Support.</p>	<p>Noted. The council will work with Thames Water to identify future infrastructure requirements.</p>
7.	Thames Water Property Services	Chapter 3		Noted.
8.	Thames Water Property Services	Chapter 6	<p>Page 20 - Flood Risk. This needs to be extended to ensure as a result of the development it does not cause flooding further down the network</p>	Noted. The AAP will take flood risk into account.
9.	Natural England	Relevant Plans and Policies	<p>Southwark have considered appropriate and suitable Plans, Programmes and strategies that are relevant to this Document, and are in line with those that would be recommended by Natural England</p>	Noted.
10.	English Heritage	Chapter 1	<p>1. Relationship to other Plans and Programmes - English Heritage notes and welcomes that PPG15 and PPG16 have been identified as key documents to be taken into account in preparation of the APP, as well as the joint CABE and EH guidance on Tall Buildings. In addition, English Heritage recommends the European Landscape Convention, which was ratified by the United Kingdom government in 2006, also be included in the International Plans and Programmes section. It is</p>	<p>Noted. A reference to the CABE guidance was made in Table 31. A reference to the European landscape Convention has been added to the same table. As yet, a character appraisal has not been published for St Mary's Conservation Area. It will be taken into account should an area appraisal be prepared.</p>

Comment number	Name	Report section	Representation	Council's response
11.	English Heritage	Chapter 2	<p>the first international convention for the management and protection of landscape, for the text of the treaty please see: http://conventions.coe.int/Treaty/en/Treaties/Html/176.htm. Local plans relating to the historic environment could also be included, for example the Boroughs Conservation Area Appraisal and Management plan for St Mary's Rotherhithe (if one exists).</p> <p>2. Social, Economic and Environmental Context - English Heritage notes that baseline data is being gathered for the historic environment to form the evidence base for Rotherhithe AAP. We welcome inclusion of data on buildings at risk and conservation areas, however the full range of heritage assets should also be considered. For example, an understanding of historic buildings, areas and their setting; historic parks and gardens; heritage landscapes and the wider historic environment, such as those elements that may not be statutorily protected, yet help define the Boroughs local distinctiveness. The appropriate information sources that should be consulted, in respect of the historic environments, are as follows: Greater London Sites and Monuments Record (archaeology, including Scheduled Ancient Monuments and Archaeology Priority Areas); The Schedule of Buildings of Architectural and Historic Interest (listed buildings); The borough's conservation area records and adopted guidance (including conservation area designation reports, statements, appraisals and design guidance); The borough's list of Locally Listed Buildings (or equivalent); The Register of Historic Parks and Gardens The London Buildings at Risk Register www.english-heritage.org.uk/BAR; The HELM website www.helm.org.uk; and The Heritage Counts website www.heritagecounts.org.uk</p> <p>3. Sustainability Appraisal Framework - English Heritage notes and welcomes that a specific sustainability objective on the historic environment has been included. Regarding the criteria, LB of Southwark could consider including a question as to whether it will enhance access to the historic environment and also contribute to better understanding of the historic environment.</p>	<p>Noted. However there are 16 sustainable development objectives and indicators are set out for each. The purpose of the SA is to provide an overview of the sustainability of the AAP. In the interests of manageability and retaining a sharp focus on key matters, the list of indicators has been constrained with two or three key indicators listed for each objective.</p>
12.	English Heritage	Chapter 3		<p>The council considers this to be adequately covered by sustainable development objective 12.</p>

Comment number	Name	Report section	Representation	Council's response
13.	English Heritage	Chapter 4	<p>4. Main Sustainability Issues relevant to the Rotherhithe AAP - English Heritage notes and welcomes that 'conservation of the historic environment', is included as a main sustainability issue that needs to be taken into consideration when preparing the Rotherhithe AAP. Regarding the evidence for this topic, we would again refer you to our comments above in section 2 and the potential to highlight the wider opportunities and benefits that can be achieved through enhancement of the historic environment.</p>	Noted. See comment on representation no. 12.
14.	English Heritage	General	<p>Finally, English Heritage would strongly advise that the local authority's conservation staff is involved throughout the preparation and implementation of the APP, as they are often best placed to advise on: local historic environment issues and priorities, sources of data; and consideration of options relating to the historic environment. This advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the Rotherhithe AAP and its Sustainability Appraisal, and which may have adverse effects on the historic environment. I hope you find this response helpful in preparing the draft Rotherhithe Area Action Plan and Sustainability Appraisal.</p>	Noted. The council's Design and Conservation team have been involved in the preparation of the options set out in the issues and options report.
15.	Environment Agency	Flood risk	<p>Rotherhithe is bounded by a significant length of Thames tidal defence and as such any development should be mindful of flood risk management issues, including future flood defence raising requirements. Although the AAP has addressed flood risk, using the SFRA as part of the evidence base, there is potential to more clearly delineate flood risk in the area. The action plan area lies within an area that would flood if it were not for the River Thames Tidal Defences, including the Thames Barrier and the river walls. There remains a residual risk of the river walls failing, breaching or being over topped in severe weather. The SFRA assesses this risk in more detail.</p> <p>Some of the action plan area lies on higher ground which means it may be at a lower risk of flooding than other parts. This information may be gleaned from the SFRA. A drawing as part</p>	Noted. The issues and options report and AAP will take out of flood risk and the sequential test in the allocation of sites. The Strategic Flood Risk Assessment is an important part of the baseline.

Comment number	Report section	Representation	Council's response
		<p>of the AAP could show which areas are at lower flood risk due to their topography and that are therefore more appropriate for vulnerable development such as residential. Areas that are at higher risk of flooding should be used for development of lower vulnerability such as commercial or industrial.</p> <p>Where there are exceptional circumstances for building in the floodplain, the ongoing cycle of redevelopment and urban regeneration is the crucial opportunity to reduce the risk. This involves changing the layout and design of development within the floodplain. The borough should consider how to apply Annex G of PPS25 (managing residual flood risk within redevelopment plans) and link to SFRA and policies within the plan.</p> <p>Southwark SFRA has delineated areas of "flood hazard" through more detailed flood mapping and modelling. Areas are categorised according to "flood hazard" and depicted on a drawing. The Rotherhithe AAP must refer to the Southwark SFRA as part of the evidence base to ensure that development is located and designed appropriately taking into account flood risk issues. All development adjacent to flood defences must submit appropriate detail with the development proposals to demonstrate the potential impact of the development on the integrity of the defences. The flood defences must be appropriate for the lifetime of the development. Design drawings and calculations may be required to support a development proposal.</p> <p>For specific policy requirements, it should be noted that the buildings must be located and designed to reduce the flood risk over the lifetime of the development. This should be taken as: sixty years for commercial and hundred years for residential development. All architectural drawings which accompany flood risk assessment should compare the finished floor levels of the proposed development with the 200 year (0.5% Annual Exceedance Probability) and the 1000 year (0.1 AEP) flood water levels to assess flood risk to the development.</p>	

Comment number	Report Name	Report section	Representation	Council's response
16.	POLA	Chapter 6	<p>In some areas residential basements will not be acceptable. The SFRA should provide further details on areas where this is not acceptable. More information on sustainability and householder development would be obtained from 'Improving the Flood performance of new buildings' Flood resilient construction (Defra May 2007). This document aims to provide guidance to developers and designers on how to improve the resilience of new properties in low or residual flood risk areas by the use of suitable materials and construction details. These approaches are appropriate for areas where the probability of flooding is low (e.g. flood zone 1 as defined by PPS 25) or areas where flood risk management or mitigation measures have been put in place. Specifically this guidance document provides:</p> <ul style="list-style-type: none"> • practical and easy-to-use guidance on the design and specification of new buildings (primarily housing) in low or residual flood risk areas in order to reduce the impacts of flooding • recommendations for the construction of flood resistant and resilient buildings. 	<p>It should be noted that there are no working wharves in the borough. With respect to passenger transport, sustainable development objective 16 refers to the promotion of public transport which would include river transport. It is an issue which will be taken into account in the issues and options report.</p>
			<p>There are no references within the sustainable transport section to the use of the River Thames for the transport of passengers and freight. The London Plan seeks a 5% increase in passengers and freight transported on the blue ribbon network from 2001 - 2011. There are a number of passenger and tourist piers in Southwark including Greenland pier in the AAP area. Policy 4c.7 of the London plan seeks to protect existing facilities for passenger and tourist traffic and to encourage the development of new facilities. Policy 4c.8 of the London Plan seeks for new development close to navigable waterways to maximise water transport for bulk materials particularly during demolition and construction phases. As a riparian borough opportunities may therefore exist when sites are being developed to transport materials to and from sites by water. The omission of references to the river Thames for the transport of passengers and freight is therefore contrary to planning policy. References should be made within the sustainable transport section to the Thames and to encouraging the use of the river for the transport of freight and passengers.</p>	

Comment number	Name	Report section	Representation	Council's response
17.	Hawkstone TR&A		<p>Accuracy / completeness of data A primary concern of this response is the representation, incompleteness and accuracy of baseline and other data. We see it as fundamental and essential that further rich data is collected to ensure that decision making around sustainability issues is properly informed. We are aware that other groups have a long standing relationship with Canada Water activity and therefore perhaps feel they have "staked a claim". However, the data on Housing (page 21) appears, in the version I have, to be wrong with incorrect levels of dwellings and therefore statistics.</p> <p>Estates, such as Tissington, while located within the area marked on Figure 1 are not mentioned at all. Other estates, such as Canada, appear accurately recorded. This draft report reproduces a "division" in other ways that includes data collection and analysis. The report acknowledges that more data needs to be collected and our T&RA's are always available to help the Council, and reasonably behaved consultants, to collect accurate data for our area.</p> <p>The report is perhaps rather too biased & prejudicial to do best practice of consultation as it stands.</p>	<p>The council notes that the information relating to the estates on page 21 was inaccurate. Accurate information on the estates within the AAP area is currently being sourced. The council agrees that it is fundamental that the AAP is founded on a sound evidence base.</p>
18.	Hawkstone TR&A		<p>We are looking for the RAAP to substantially lower environmental pollution in our area and local streets and not the bland statement on page 19 that seeks to implement an aim that is a "should" and not a "must". It is this type of "cleverly" worded fudge that attracts our attention and reduces the level of trust in the document and its authors.</p>	<p>The council agrees that these matters are extremely important and must not be overlooked. The issues and options report sets out options on energy supply and generation, water consumption and flood risk as these are issues which are particularly relevant for Rotherhithe. Those issues which affect the borough as a whole, such as air quality will be dealt with through the Core Strategy.</p>
19.	Hawkstone TR&A		<p>1.2 (and 1.3, p.8) We note the inclusion of Southwark Park in the RAAP area which is a potential site for a new leisure centre and stadium. The creation of RAAP or local development plan must not reduce, extinguish, limit or in any other way interfere with any rights of engagement, involvement and consultation me may enjoy under statutory law, by contract or otherwise. Our residents request that any communication approaches avoid</p>	<p>Noted. The issues and options report will be written in plain English and will be widely consulted on.</p>

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20.	Hawkstone TR&A		<p>jargon, are concise and written in plain English. Residents will not answer long lists of questions or read 78 pages. (We send only 9 in reply!)</p> <p>The idea of a "core" and a "periphery" concerns us greatly and seems to reproduce the divisions highlighted by the report rather than seek to resolve them. I can understand what the author might be trying to say but it comes across and is open to an interpretation potentially detrimental to the RAAP and for us.</p> <p>We expect there will be other "core" areas of substantial development such as a potential stadium, road changes and regeneration of estates such as the Hawkstone. We do not take this RAAP language positively.</p>	<p>Noted. The core area is the area which will experience the greatest degree of change. The Hawkstone Estate is included in the area. The reason why we have designated a wider area is to ensure that changes in the core area are taken into account.</p>
21.	Hawkstone TR&A		<p>We assume that we are involved in consultation to establish what the main things to consider are for the whole Rotherhithe area and not a predetermined agenda that appears focused on new build within the existing Canada Water Action Area. Across the tracks our main issues include the appalling condition of many existing homes and not necessarily new builds which are not always accessible or affordable for most of our residents. The creation of a "new town centre" is also an issue about location within stated "divides".</p>	<p>Noted. Part of the rationale behind preparing the AAP is to ensure that the wider impacts of development in the town centre are addressed. The council is aware that Lower Road is a barrier to movement and that the relationship between the shopping centre is very poor, both in terms of pedestrian and cycle movement as well as visually. Options within the AAP will seek to reduce this barrier.</p>
22.	Hawkstone TR&A	Chapter 2	<p>Timetable The timetable on page 9 is noted together with opportunities for further consultation. We note that dates do not coincide with Spring 2009 when some of the Hawkstone residents expect to be informed if their homes will be demolished or refurbished after 5 years of delays, and withdrawn tenders, as the future of Hawkstone Road & Cope Street etc. is repeatedly considered.</p>	<p>Noted. The council will come to a decision as quickly as possible on the Hawkstone. This process will be integrated into the preparation of the AAP. The council expects to decide on preferred options in May 09.</p>
23.	Hawkstone TR&A	Chapter 3	<p>Consultation Question 1: page 10. We would like to get back to you on this complex item. Strategies that deliver an improvement in safety, security, fuel efficiency and conservation, reduce congestion, accessibility, pollution reduction, and housing supply and affordability should be taken into account along with others because we need action across a wide range of factors and functions in order to make things better.</p>	<p>Noted. The issues and options report contains options on energy, including options on setting up an Energy Services Company (ESCO) to supply energy in the area or connecting to SELCHP to use waste heat.</p>

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		<p>Our estates not are part of the 22,000 council dwellings with heating via district heating networks. This does not help our residents suffering increased fuel poverty from 27 year old boilers, drafty un-insulated (or poorly fitted) single glazing systems, badly designed and installed double glazing systems etc. The Canada Water Draft Energy Scheme (p.11) might be extended to include help and advice to other sites and existing developments wanting to save energy within the RAAP. Repeatedly our residents see a lot of investment and good work being done for new builds but not for existing properties. 24SDO 12, page 11, is of particular interest. Again we see a focus on new build and not refurbishment of existing dwellings. The potential demolition and clearance of Hawkstone homes drives our interest in plans for new build social housing in Rotherhithe whether it be on our own estate or on other sites within the RAAP.</p> <p>Many residents enjoy living in well designed and maintained high rise blocks and our residents would prefer a range of housing solutions. We are not adverse to high rise development depending on the merits of each case and such development should not be ruled out when replacing existing high rise blocks and where such archetype homes are in demand from residents.</p> <p>We are adverse to high rise blocks being allowed to fall in serious unsightly disrepair, or refurbished incompetently, as they subside (and crack) into the marsh and pebbles.</p> <p>Recycling and waste management. The design of existing estates makes recycling a challenge. However, on the Hawkstone the T&RA is currently not supporting an extension of recycling. We have the highest number of rat boxes of any in Southwark, our buildings are partially covered in pigeon excrement, and we have no end of pests. While infestations continue we are not in a position to accept action such as recycling bins in the absence of guarantees (and substantial) fines for not emptying them on a</p>	<p>The comments on taller buildings and waste/recycling are also noted.</p>

Comment number	Name	Report section	Representation	Council's response
24.	Hawkstone TR&A	Chapter 4	<p>daily basis. Money needs to follow Southwark's rhetoric about recycling. The RAAP can make a contribution by taking a joined up integrative approach to recycling that considers changes to designed structures and education programmed to increase and sustain recycling.</p> <p>Page 12.</p> <p>Question 2. In short the answer is that the data and data sources provided in the RAAP will not measure changes effectively. Data collection needs to be localised. The evidence base is therefore currently incomplete and we believe not fit for purpose as intended to describe the current situation within the RAAP area or extrapolate what might occur in the future.</p> <p>We are minded that models used by Southwark (and consultants) appear to be perennially wrong and include too many assumptions that are not carefully examined. Decent Homes housing finance is the perfect example.</p> <p>We believe that there is a lot of work to do if the aims are to be met.</p> <p>We note the note at the foot of page 12 about extending data however we also believe that consultation will highlight where "gaps" in data exist. The note contradicts the request made in Question 2.</p>	<p>Noted. The council is continually updating the evidence base for the AAP and will consider any further evidence the objector wishes to supply. As is noted above, it is very important that the AAP is founded on a sound evidence base.</p>
25.	Hawkstone TR&A	Chapter 5.	<p>We would rearrange the order of statement "environment, economy and the community". Our order would be "community, environment and the economy" although of course the report authors might have all these concepts entangled. The point is that our residents want to see the community come first not private business. We are not against partnerships and appropriate business ventures but we like to see Council policy phrased and structured so that it places the residents and community of Southwark first. Where our residents detect that their interests are being unreasonably or inappropriately subordinated for other people to benefit they will take action and reply.</p> <p>Question 4, page 13. This is long and complex. We will get back to you about it.</p>	<p>Noted.</p>

Comment number	Name	Report section	Representation	Council's response
26.	Hawkstone TR&A	Chapter 6.	<p>We note that no value, rank or priority is being attached to issues at this time.</p> <p>Population: The population stats provided are "known". Our Estates have 2 bedroom dwellings that can house up to 5 people before being "over crowded". We have "illegal's" who are never the less "residents" who draw on / and contribute towards local services. It must be acknowledge that the actual population profile could be much higher and look very different. The move to compare "Rotherhithe Study Area" with "Southwark" masks pockets of variation that need to be identified.</p> <p>We not sure what the comparisons with Southwark are trying to achieve and what the intended use is.</p> <p>Linked to EqIA intentions – Is there some plan for proactive social engineering rather than monitoring? If so, we would like to know about it.</p> <p>T&RA's are in a very good position to collect and provide accurate data to supplement secondary sources pulled from existing databanks.</p> <p>Hawkstone T&RA with Tisiba T&RA represent a large chunk of the 23,357 residents living our side of the tracks.</p> <p>The comment on "ethnicity" is produced using standardised data collection forms and can only include returned forms – it is "reported" not actual. Our residents are aware, as is the Council, that substantial numbers of people exist outside of mechanisms used to collect such data.</p> <p>We question that the English Indices of Deprivation are accurate at estate level or appropriate to support the claims being made in the RAAP. At a general level the Indices are of interest but are not designed for such purpose.</p>	<p>The comments on population are noted. The statistics presented in the scoping baseline are not perfect, but do provide an overview of the population of the area. For the purposes of consultation etc it is important to have an understanding of local demographics. Comparisons with other (wider) areas, such as Southwark, London, England or the UK can help provide a context. They are not presented as a basis on which to embark on social engineering.</p>

Comment number	Name	Report section	Representation	Council's response
			<p>The remarks about statistical "divides" in the report are noted. We suggest these be supplemented with qualitative data collection to explore the extent of the divides to inform the creation, community ownership & support of a new "town centre".</p> <p>The RAAP needs to help deliver improvements including CCTV and police "cabins" etc. There are spaces on the Estate that might house police or wardens. There is a need for much better lighting in streets and on estates.</p> <p>Appendix 10: Public Transport Accessibility Level Map.</p> <p>This map (2007) appears to exclude Surrey Quays (Docks) Tube station and Rotherhithe Tube Station. Why?</p> <p>We assume that "accessibility" is a very important factor in placing the new "town centre", and design, and the decision to discard / reform any current combination of structures that might be locally taken to be a "centre" of some sort.</p> <p>We would like to see this map redrawn to accurately reflect the level of accessibility expected when the East London Line reopens & properly inform decision making.</p>	<p>Noted. The provision of street lighting on streets and in and around estates will be considered during redevelopment.</p> <p>PTAL maps are drawn up through a methodology established by TfL. The council is aware that they are not always perfect. The maps will be updated once the East London line is in place.</p>
27.	Hawkstone TR&A	Appendix 9: Noise Map	<p>The graphic image map appears to inaccurately chart the noise on our estates and provides a detailed computer imaged generated by extrapolating sampling. We would prefer to see a map with locations and readings of samples. From local knowledge we can see that the map scales and indicated reading does not make sense for particular waypoints. It's something that Mouchel might produce.</p> <p>Hawkstone T&RA have noise measuring equipment and our residents will happily volunteer to collect and provide data. Provided with the proper information we can also verify the data provided. Vibration also needs to be factored in. Our residents suffer from serious vibration and we are waiting to hear how heavier new East London Line trains will increase this nuisance.</p>	<p>The offer of additional information on noise is noted. The noise map does however give a general indication of those areas which suffer more acutely from traffic noise.</p> <p>The comment on estate cleaning satisfaction is noted, but it is not an issue which can be effectively dealt with by an AAP.</p>

Comment number	Name	Report section	Representation	Council's response
28	Environment Agency	Main River Designation	<p>Being Clean</p> <p>Rotherhithe Area Housing (social) has a dissatisfaction rating for Estate Cleaning (ICC etc) approaching 50%. Dulwich maintains near enough 100% satisfaction (See 2007 ICC report – MORI). Clearly these variations need to be addressed before more stress is placed on our local cleaning services. The percentages mask that on some estates dissatisfaction is even worse and conditions totally unacceptable.</p> <p>In the short time I have it is not possible to fully engage in detail with the 78 page draft RAAP report. I hope the response provided here will help inform the process. The Draft RAAP report and this response will form a useful structure for our residents to engage with.</p> <p>Much of the dock area within the AAP is not designated Main River, such as Greenland Dock, Surrey Water and Canada Water. The small inlets adjacent to the River Thames, for example up to the dock Surrey Water, north of Brunel Road and the two inlets between the River Thames and Rotherhithe Street are designated main river. A main river is a watercourse marked as such on a main river map. This is an official document. In England, Defra decides which the main rivers are. All works or development within 8 metres of a fluvial main river or 16 metres of a tidal main river will require consent from the Environment Agency. Please contact you local Environment Agency Development Control Team with any queries regarding consent required for works adjacent or within main rivers.</p> <p>All River Thames walls have a statutory flood defence level, and the crest of these river walls must remain at this height, during and after any works to the river walls. Consent is required for any work on the river walls. We are pleased to see the following comment supporting our objectives for the River Thames. <i>“The Thames policy area allows special control of development next to the riverside. Any development in this area must enhance the character of the riverside area and ensure continued access to the Thames.”</i> Access to the River is not only required for social reasons but for flood risk management reasons, in general all</p>	Noted.

Comment number	Name	Report section	Representation	Council's response
29	Environment Agency	SUDs	<p>development should be set back at least 16 metres from the River Thames and/or any flood defences associated with the River. Setting back development will allow for access and maintenance to the defences and provide adequate space should the defences need to be improved in the future.</p> <p>Canada Water which is identified as an action area and about to undergo significant change is not part of the Thames tidal defences; instead it is protected by a flood defence wall near the entrance to Surrey Commercial Dock.</p> <p>SUDs are of particular importance within national planning policy (including Planning Policy Statement 25: <i>Development & Flood Risk</i>). Annex F, (Paragraph F6) states “<i>Surface water arising from a developed site should, as far as is practicable, be managed in a sustainable manner to mimic surface water flows arising from the site prior to the proposed development.</i>”</p> <p>SUDs are promoted as the preferred drainage option by other National planning policy statements. These include: PPS1, PPS3, PPS9, PPS23 and the London Plan (February 2008) – Policy 4A.3 Sustainable design and construction Policy 4A.9 Adaptation to Climate Change Policy 4A.11 Living Roofs and Walls Policy 4A.14 Sustainable drainage Policy 4A.17 Water quality</p> <p>Throughout the London Plan SUDs is cited as one of the most effective means of reducing flood risk. A drainage impact assessment / surface water management plan is to be submitted as part of development proposals, demonstrating how the rates and volumes of surface water runoff from sites will be reduced in accordance with the London Plan, using the most sustainable methods and techniques. Developers should aim to achieve greenfield runoff from their site through incorporating rainwater harvesting and sustainable drainage.</p> <p>The action area has a significant amount of green space. This may provide an opportunity to design in some storage/retention of surface water into green spaces, in the form of small</p>	Noted

Comment number	Report section	Representation	Council's response
30	Environment Agency	Waterfront development	Noted.
		<p>detention basins or wetlands. This option can be investigated in more detail as part of the AAP. Surface water from development could drain to these storage and/or wetland areas and they would also be valuable amenity for local residents as well as improving habitat.</p> <p>In Rotherhithe SUDS techniques which may be appropriate would include green roofs, pervious paving, rainwater harvesting, infiltration gardens and small swales, conventional drainage such as pipes and storage cells may also form part of a sustainable drainage solution, when combined with more sustainable elements. Please refer to the drainage hierarchy in the London Plan for further guidance. Where possible paving should be avoided. Further information on the London Plan can be accessed via the link below http://www.london.gov.uk/the-london-plan/docs/londonplan08.pdf</p> <p>Flood risk management planning needs to be linked closely with regeneration and redevelopment so that the location of development can help to reduce flood risk. There is need to incorporate long-term policies in the AAP that outline protecting and recreating river corridors and areas where flooding can happen naturally. These policies will support the objectives of Thames Estuary 2100 (TE2100) and the London Plan Blue Ribbon Network (Policy eC.3 The natural value of the Blue Ribbon Network , Policy 4C.6 Sustainable growth priorities for the Blue Ribbon Network and Policy 5D.1 The strategic priorities for South East London)</p> <p>Development proposals within the defended tidal flood plain must consider the residual risks that are present, i.e., increasing risks from rising flood water and sea levels due to climate change and the risks resulting from a failure or overtopping of a section of defence protecting the area under consideration. This may lead to reallocating some of the more vulnerable uses to areas with lower residual risks as well as designing new development in a more flood resilient manner.</p>	

Comment number	Name	Report section	Representation	Council's response
			<p>Flood resilience must be built into buildings and other infrastructure, such as transport in areas currently at residual risk. Emergency Planning and evacuation procedures are required that fully understand current and future risk. Defra's Policy to achieve <i>Making Space for Water</i> must be delivered in the short and long term to enable us to maintain existing defences and plan for future land use. If developments are set back from existing defences we retain the option of future upgrades, as well as making space for flood storage. This will require land allocation many years in advance, which needs to occur through current spatial planning.</p> <p>The Council should seek to maintain and look for opportunities to enhance the setting of and increase space for the River Thames and its tributaries. In considering development proposals it will:</p> <ol style="list-style-type: none"> Ensure the protection of landscape features that contribute to the setting of the rivers Seek to protect and enhance existing views of the rivers Pay special attention to the design of development located in riverside settings to ensure that it respects and makes a positive contribution to the setting of the rivers Ensure that the quality of the water environment is maintained Seek opportunities to improve public access to and alongside the rivers and ensure that existing public access is maintained 	
31	Environment Agency	Sequential test and exception test	<p>Paragraphs 8 and D.5 of PPS25 require decision-makers to steer new development to areas at the lowest probability of flooding by applying a 'Sequential Test'. Only if the council can demonstrate through the sequential process that a site with a lower probability of flood risk is not reasonably available can a case be put forward as to why a site could be considered as an exception. If this can be achieved, then, in accordance with PPS25, for the exception test to be passed it must be demonstrated that the development provides wider benefits to the community that outweigh flood risk, the site is previously-</p>	Noted. A sequential test will be carried out.

Comment number	Name	Report section	Representation	Council's response
32	Environment Agency	Climate change	<p>developed land, and a Flood Risk Assessment must demonstrate that the development will be safe without increasing flood risk elsewhere. PPS25 states in paragraph 14 that:</p> <p><i>'A sequential risk-based approach to determining the suitability of land for development in flood risk areas is central to the policy statement and should be applied at all levels of the planning process'. It goes on to state in paragraph 16 that:</i></p> <p><i>LPA's allocating land in LDDs for development should apply the Sequential Test (see Annex D and Table D.1) to demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed. A sequential approach should be used in areas known to be at risk from other forms of flooding.</i></p> <p>The rising sea level will steadily reduce the level of protection that defences offer. The predictions for how quickly sea level will rise vary considerably depending on the assumptions used about emissions and climate modelling.</p> <p>The TE2100 project has considered a range of climate change derived sea level rises from 0.9m (Defra 2006 Climate Change Scenario) to 4m (High++ Level where all conceivable sea level rise contributions up to 2100 occur). The Environment Agency Thames Catchment Flood Management Plan (Thames CFMP) (September 2006) confirms the above and sets out some main messages:-</p> <ul style="list-style-type: none"> a) Flood defences cannot be built to protect everything. b) The ongoing cycle of development and urban regeneration is a crucial opportunity to manage flood risk. c) Land for future flood risk management will be identified and protected by authorities. <p>Work undertaken so far by Thames Estuary 2100 (TE2100) indicates that the present system of flood risk management for the tidal flooding can continue to provide an acceptable level of</p>	Noted. Climate change is taken into account in the borough's strategic flood risk assessment.

Comment number	Name	Report section	Representation	Council's response
33	Environment Agency	SDO 4	<p>risk management up to 2030. Beyond 2030 more actions will be needed. These actions would be easier and more affordable and sustainably delivered if they are planned now. The London Plan states inter alia that <i>"The Mayor will, and boroughs and other agencies should, take fully into account the emerging findings of the Thames Estuary 2100 Study, the Regional Flood Risk Appraisal and the Thames Catchment Flood Management Plan"</i> page 211</p> <p>New development should be avoided in those areas with likely increased vulnerability to climate change, particularly where it is not viable to manage likely risks through suitable measures to provide resilience; and bring forward adaptation options for existing development in likely vulnerable areas.</p> <p>The council should require development proposals to take account of the expected changes in local climate conditions, throughout the proposed lifetime of the development, by adaptation or flexibility to allow future adaptation. Information on these measures must be submitted with an application.</p> <p>Specifically, the council should require major developments to:</p> <ul style="list-style-type: none"> • identify the type of and extent of the main changes expected in the local climate throughout the lifetime of the proposed development, • identify the potential impacts of these changes on the proposed development and its neighbours, indicate the ways in which the proposed development design overcomes the hazards and exploits the opportunities associated with these impacts whilst meeting other sustainable development criteria, particularly the need to achieve overall reductions in greenhouse <p>Sustainable development indicator (i) is acceptable; however, sustainable development indicator (ii) needs to be reviewed to be more positive. ii) "Percentage of new development within relevant urban catchment managed according to DEFRA SUDS Guidance." Could be reworded to include – "the percentage of new development significantly reducing runoff rates and volumes as well as improving water quality through the use of</p>	<p>The comments on surface water run-off are noted. The issues and options report contains options on water which include reduction in surface water run off and SUDs.</p>

Comment number	Name	Report section	Representation	Council's response
			<p>SUDS techniques." These indicators can refer to London Plan SUDS policies mentioned above. Baseline data needs to be compiled for flood risk issues. This is needed to allow the assessment of change and policy performance against key indicators. Examples include: -the number of dwellings in Flood Zone 3, the number of new or replacement dwellings permitted in Flood Zone 3 and the number of highly vulnerable premises within flood Zone 3 (as per PPS25 Annex D). It may be possible to compile some baseline data using the recently completed SFRA. As you will appreciate, any housing development in the area will have to take account of the findings of the SFRA to satisfy the sustainability appraisal and the tests of soundness.</p> <p>Information on planning permissions granted contrary to the advice of the Environment Agency on flood risk could be accessed using our external website link provided below: http://www.environment-agency.gov.uk/aboutus/512398/908812/1351053/571633/?lang=en</p> <p>Additional questions</p> <ul style="list-style-type: none"> • Is the site riparian? • Will the proposed development impact on the structural integrity of the defences? • Are the defences appropriate for the lifetime of the development? • Will any work be required to bring them up to this standard? • Will there be appropriate set-back between the defences and the proposed development? <p>Can the site be drained in a sustainable manner (i.e. no pumping will be required?)</p> <p>To encourage sustainable use of water resources. Will it lead to a reduction in the quality of surface water/ waterways? - This could be reworded to - "Will it improve the quality of surface water/waterways?" (The use of SUDS can achieve an improvement in the quality of surface water)</p>	<p>The comments The additional questions suggested are noted. However the SA provides an overview of the impact of the plan on sustainability. In the interests of manageability and maintaining a balance of environmental, social and economic objectives, the additional questions have not been added.</p>
34	Environment Agency	SDO9		<p>The comments on water quality are noted. The issues and options report contains options on water which include reduction in surface water runoff and SUDS.</p>

Comment number	Name	Report section	Representation	Council's response
35	Environment Agency	Maps	<p>This <i>BASELINE DATA FOR ROTHERHITHE</i> report has a number of drawings related to the text appended, however there does not seem to be a map or drawing from the SFRA on areas at risk of flooding. This is imperative.</p> <p>We recommend that to ensure that energy is used efficiently and carbon emissions reduced; AAP should require rather than promote low and zero carbon developments throughout the Borough. The London plan states that London boroughs should in their DPDs require all developments to demonstrate that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions (Policy 4A.6).</p> <p>The London Plan also states that boroughs should ensure future developments meet the highest standards of sustainable design and construction and reflect this principle in DPD policies. Boroughs should require all applications for major developments to include a statement on the potential implications of the development on sustainable design and construction principles (Policy 4A.3).</p> <p>Regarding renewable energy on site, the London Plan states that boroughs should in their DPDs adopt a presumption that developments will achieve a reduction in carbon dioxide emissions of 20% from onsite renewable energy generation (which can include sources of decentralised renewable energy) unless it can be demonstrated that such provision is not feasible. Boroughs in their DPDs should identify broad areas where the development of specific renewable energy technologies is appropriate. Policy 4A.7)</p> <p>We recommend that the AAP should identify areas where zero carbon development is appropriate.</p>	<p>Noted. The SFRA is an important part of the evidence base.</p> <p>Noted. The issues and options report contains options on energy supply and generation.</p>
36	Environment Agency	SDO6	<p>Environment Agency supports AAP Objective on sustainable waste management but notes with concern that waste water treatment is not included. It would be preferable to have a separate waste water treatment objective taking into account the Water Framework Directive and the need for any further</p>	<p>Noted. The council will work with the EA and Thames Water to identify water infrastructure requirements for the AAP area.</p>

Comment number	Name	Report section	Representation	Council's response
37	Environment Agency	SDO10	<p>operational development at the existing Sewage Treatment Works. More new development will create higher volumes of sewage to be transported from houses to sewage treatment works, and additional treated effluent to discharge to surface and ground waters.</p> <p>Therefore the infrastructure should be sufficient to guarantee both surface and ground water quality would not be detrimentally affected, and avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property and pollution of land and watercourses. The Water Framework Directive sets ecological standards in addition to chemical standards for rivers. This is likely to place greater demands on Sewage Treatment Works to achieve cleaner effluents. In preparing the AAP, the council must:</p> <ul style="list-style-type: none"> i) ensure that the rate of development broadly accords with the capacity of existing water supply, sewage treatment and discharge systems, particularly in connection with major new development ii) require development to incorporate measures to enhance water efficiency, and sustainable drainage solutions iii) work with the Environment Agency and water companies to identify infrastructure needs and allocate areas for and permit necessary infrastructure 	Noted.
			<p>We are pleased to note that land contamination has been included as one of the key environmental objectives. We strongly recommend that if potentially contaminating activities have previously been conducted at a site, such as chemical or fuel storage, manufacturing or other industrial processes, an assessment of risk of potential contamination to controlled waters should be carried out. This work should follow 'Environment Agency guidance on requirements for land contamination reports' and the 'Model Procedures for the Management of Contaminated Land' (CLR11). These documents can be down loaded from our website at http://www.environment-agency.gov.uk/subjects/landquality/113813/887579/1101611/?lang=e. If potential for significant contamination is identified, the</p>	

Comment number	Name	Report section	Representation	Council's response
38	Environment Agency	Environmental characteristics of the area	<p>Environment Agency and the Local Authority Contaminated Land Officer should be consulted for advice prior to work commencing on site. Responsibility for the safe development and secure occupancy of the sites rest with the developer/landowner. Should contamination on the sites be found to be affecting controlled waters subsequent to the redevelopment, the sites may be determined as contaminated land under Part IIA of the Environmental Protection Act 1990 and cost for remedial action sought from the developers. A 'watching brief' should be maintained during the construction period to deal with any unexpected areas of contamination, which may be identified during excavations (generally by visual or olfactory evidence). If contamination is found a reputable environmental consultant should assess the level of contamination. In the event of significant contamination being identified, then the Environment Agency should be contacted for advice.</p>	Noted.
39	Environment Agency	Environmental outcomes	<p>From the perspective of environmental sustainability we expect Rotherhithe Area to display the following characteristics:</p> <ul style="list-style-type: none"> • The quality of the environment needs to be protected and improved • The demands on natural resources needs to be managed sustainably • Both new and existing development needs to contribute to a low carbon region and designed to adapt to climate change • The necessary environmental infrastructure to support both new and existing development needs to be in place <p>Development in Rotherhithe Area should be delivered to ensure the following outcomes are achieved:</p> <ul style="list-style-type: none"> • Water quality is improved • Land quality is improved and Brownfield Land is appropriately developed • Cleaner, healthier air • Biodiversity is protected and enhanced • Access to the environment is improved and promoted • Water is managed wisely and we have enough water for people and the environment 	Noted. These issues will be considered in preparing the plan.

Comment number	Report Name	Report section	Representation	Council's response
			<ul style="list-style-type: none"> • Waste is managed sustainably • A sustainable construction approach is adopted on all developments • Energy resource is used efficiently and carbon emissions reduced • A Climate change adaptation plan is in place • The impact of flooding understood and the risks appropriately managed • Appropriate water supply and waste water infrastructure is provided • Appropriate waste infrastructure is in place • A network of green infrastructure is in place 	
40	Environment Agency		These matters will be considered in preparing the Plan.	Noted.
41	Environment Agency	Conclusion	The Environment Agency supports growth that can be supported by the necessary environmental infrastructure (for water resources, wastewater, waste and flood risk management), provided in a co-ordinated and timely manner to meet the physical and social needs of both new development and existing communities. Early investment and careful planning may be required to ensure expanded or improved infrastructure will have the capacity to cope with additional demands, particularly with climate change. See our report ' <i>Hidden Infrastructure: The Pressures on Environmental Infrastructure</i> . The report can be downloaded at http://publications.environment-agency.gov.uk/pdf/GEHO0307BMCD-E-E.pdf	Noted.
42	Natural England	Baseline data	We hope regeneration in Rotherhithe will deliver greater resource efficiency, appropriate use of brownfield land and protect and enhance a network of well designed greenspace. It must incorporate the highest standards of flood risk management and contribute to an improved and protected water environment. The Baseline Topics and Baseline Data proposed cover the areas and issues that Natural England would wish to see considered by such a document.	Noted.
43	Natural England	SDOs	The sixteen Sustainability Objectives listed cover the areas that	Noted.

Comment number	Name	Report section	Representation	Council's response
	England		<p>natural England would wish to see address by an Strategic Environmental Assessment and are broadly supported by Natural England, and in particularly the following;</p> <p>SDO 6: To reduce contributions to Climate Change.</p> <p>SDO 11: To protect and enhance the quality of landscape and townscape, given its reference to the public realm.</p> <p>SDO 13: To protect and enhance open spaces, green corridors and biodiversity. The inclusion of green corridors is especially welcomed.</p> <p>SDO 16: To promote sustainable transport and minimise the need to travel by car.</p>	
44	Natural England	Sustainability issues	<p>The Sustainability Issues are appropriate and would be in line with recommendations and or suggestions from Natural England. The reference to Sites of Importance for Nature Conservation is welcomed, as are the references and consideration given to Green Links, under the Open Space and Biodiversity section.</p>	Noted.
45	Natural England	Baseline	<p>This section includes comparators and targets and under the Open Space and Biodiversity Objective, Natural England are pleased to see the indicators for Green Flag Status for area Parks/Green Spaces, together with the number of open spaces that have Council approved management plans, which would be in line with recommendations from Natural England.</p>	Noted.

Name	Report section	Representation	Council's response
English Heritage	All	<p>In general terms, English Heritage is of the view that the interim SA is on the right track in terms of structure and demonstrating a clear attempt to assess each of the options against key sustainability objectives. In addition, English Heritage supports SD12 - the SA objective for the historic environment.</p> <p>English Heritage notes that the baseline information in respect of the historic environment currently appears to be a bit inconsistent and incomplete. While archaeological resources are referred to in the table on page 7, they are omitted from the table at page 23, as is Southwark Park's status as a Grade II Registered Historic Park and Garden. These matters are symptoms of a broader concern however, which will need to be placed in the appropriate context of providing proportionate coverage of the issues for the area. That broader concern is the absence of the development of a sense of identity for the area based on a thorough understanding of what it is at present and what it has been in the past. The designated historic environment assets need to be seen as essentially indicators of this development over time rather than simply curiosities that need to be worked around. If they are treated in this way, they can anchor a characterisation of the area which will in turn enable a better understanding of how the area works and how it can most effectively be adjusted.</p> <p>English Heritage recommends approaching the borough's own cultural services department for more information about the local history of the area. This information combined with an understanding of the existing built environment, including archaeology; can provide inspiration for establishing identity for the area that is based on positive continuity. In turn, this will mean that the design of new development has the opportunity to be creative and reinforce positive values for the local community rather than inadvertently creating a disconcerting sense of disconnection in the environment.</p>	<p>Noted. The baseline information on the historic environment will be compiled and presented in a background evidence bas paper which will accompany the submission AAP. In this we will refer to Southwark Park's status. The AAP seeks to protect and improve open spaces and historical features.</p> <p>In terms of the appraisal of the impact of the policies and their impact on the historic value of the area this has been taken into account throughout the Sustainability Appraisal process by assessing the AAP policies against SA objective SDO12. This document sets out the appraisal of the preferred options with reasons why each score was given.</p> <p>In many cases where the policy will include new development, the impact on the historic environment cannot be fully assessed until the planning application stage when the detailed design and plans for a scheme will help officers to assess the impact of the development.</p> <p>The historical value of the area has been a key consideration in the policy which promotes cultural and tourist assets in the area.</p>

Name	Report section	Representation	Council's response
		<p>English Heritage appreciates the borough's point (made in response to our comments on the Scoping Report on page 36) that the sustainability appraisal needs to be manageable. However, this needs to be balanced against the need to ensure that the assessments are of sufficient extent to convey the impact on cultural heritage for the purposes of the European Directive on the Assessment of Certain Plans and Programmes (SEA) (2001/EC/42). It would be useful to understand for example, why option A for shopping is neutral for the historic environment and Option B is positive and it is interesting that the relationship of the historic environment with new development has been assessed as neutral for all the related issues i.e. housing, business floorspace, new leisure, culture and faith facility provision. Is this because there are no historic assets in the areas designated for the development? Or have some measures been incorporated in the plan that neutralise any impacts on the historic environment? This is not clear and it needs to be in order to show whether or not impacts have been appropriately addressed.</p> <p>If, because the historic environment assets and consequent cultural heritage of the area have not been successfully defined in the baseline information section of the SA, the historic environment issues have to be set out in full in the discussion under each of the matrices, the document will become unwieldy. However, if the assets and cultural heritage issues are well defined then assessment statements can be short, targeted and highly effective. A specific example might be "the use of the housing development sites has the potential to increase the usage of the Grade II Registered Historic Park and Garden, Southwark Park and building heights will need to be restricted on development sites in the path of the St Paul's cathedral viewing corridor." A more generalised example might be "The character of [x] Street derives from its history as a residential quarter for the manufacturing industry workers in the 1970s. The decline of this sector has been mirrored in the street and the upgrading of the neighbouring shopping facilities and introduction of public art referencing the past contribution of this area should help to positively strengthen the identity of the local community and assist in the regeneration of the street."</p>	

Name	Report section	Representation	Council's response
Natural England	All	<p>The key sustainability issues identified have recognised the need to maintain and enhance open space provision and promote biodiversity within the area and this is welcomed and supported. However, Natural England would remind the Council of the presence of Canada and Surrey Waters SINC within the Peninsula/Action Plan area</p> <p>The sixteen Sustainability Objectives listed cover the areas that Natural England would wish to see addressed within a Sustainability Appraisal/ Strategic Environmental Assessment and these are broadly supported by Natural England, and in particularly the following;</p> <p>SDO 6: To reduce contributions to Climate Change.</p> <p>SDO 11: To protect and enhance the quality of landscape and townscape, given its reference to the public realm.</p> <p>SDO 13: To protect and enhance open spaces, green corridors and biodiversity. The inclusion of green corridors is especially welcomed.</p> <p>SDO 16: To promote sustainable transport and minimise the need to travel by car.</p> <p>Relationships to other Plans and Programmes are appropriate and identify suitable legislation that would be recommended by Natural England, whilst the Social, Economic and Environmental Context identifies the issues and topics that Natural England would wish to see contained within such a document.</p>	<p>Noted. The presence of the Canada and Surrey Waters SINC will be added to the baseline information.</p>
Environment Agency	Issues and Options report: Section 4	<p>Our previous response to your consultation on the Sustainability Scoping Report, in a letter dated 25th April 2008, went into some detail about flood risk. We would therefore refer you back to that letter. Reference should be made to the borough's Strategic Flood Risk Assessment (SFRA), which we note is explained in table 5.1 on page 24 of the draft Sustainability Appraisal. In general we advise that proposed land uses should consider flood risk and the sequential approach to allocating development sites, in line with PPS25. Where possible it would be appropriate to locate commercial uses (which are 'less vulnerable' in flood risk terms according to PPS25) at areas of higher flood risk. Housing is 'more vulnerable' and should therefore be placed in the areas of lowest flood risk.</p>	<p>Noted. The Preferred Options report identifies potential sites for development in the area. It is recognised in the Sustainability Appraisal of the Preferred Options that in some cases the risk of flooding will need to be mitigated by the design of developments.</p>

It is possible to apply the sequential approach within the AAP boundary because there is higher land in the centre of the AAP area which is outside the high risk floodplain. We suggest this would be the most suitable place for new residential development in flood risk terms. Generally, the highest risk is to areas closest to the river and the lowest areas, where the depth and speed of flooding would be greater. The SFRA has some flood mapping and detailed recommendations about this. Further to our comment on the SA Scoping report consultation, the SA states in Appendix 1 (pages 37 and 53) that the AAP I&O would take account of the sequential test in the allocation of sites, but it is not clear from the report how this has been considered. We advise this should be explained at the next stage of the process.

Issues and Options report; Section 3.2. The objectives

We particularly support objectives P1-4 under 'Places: Better and safer streets, squares and parks' and also L1-2 under 'Leisure: a great place to visit, relax and have fun'. While we would support objective P4, we consider that the objectives should set higher environmental standards, which should be informed by particular environmental issues raised through the Sustainability Appraisal Process. A good example is that there are water quality problems in the docks and the Albion Channel but this does not appear to have been highlighted in the AAP I&O or in the Sustainability Appraisal. Opportunities should be sought to help to reduce this. There are measures that could be carried out to improve the water quality, which would improve the habitat of the docks for fish and biodiversity, as well as improving their aesthetic value. A direct benefit would be an enhancement to the recreational use of the docks for angling.

Noted. An energy study for the area is being prepared which will help to inform the energy standards sought in the AAP.

Clarification is sought from the Environment Agency on what measures could be implemented through the planning system and the AAP to improve water quality in the area.

Preferred Options

Respondent	Question	Comments submitted	Officer Response
Charlotte Amor		It is noted that the draft Sustainability Appraisal highlights some potential negative effects of the AAP on the flood risk objective. The SA indicates on page 45 that the impact of new developments on flood risk should be mitigated. We would suggest that as a first principle, ways to avoid flood risk should be sought, in line with the guidance in the PPS25 Practice Guide. We have attached our previous representations for your ease of reference.	These are covered in objective P5 and these issues are discussed in the infrastructure. There is also policy set out in the Southwark Plan and Core Strategy.
Alison Fairhurst GOL	Question 21	You refer to the London Plan designating Canada Water as an area for intensification with capacity to provide over 2000 homes. You are also undertaking a capacity study of the area to establish how many new homes could be built. Have you taken into account testing the information coming out of the capacity study through your Sustainability Appraisal prior to the publication of the plan, including any implications that may arise from this, in particular in relation to the delivery of essential infrastructure? Paragraph 4.50 of PPS12 states that under the Planning and Compulsory Act 2004 an Inspector, at examination, is charged with firstly checking that the plan has complied with legislation, including, that a plan has been subject to sustainability appraisal and complied with a boroughs Statement of Community Involvement. At examination, you will have to provide a robust audit trail to justify that the policies contained within it are the most realistic and achievable for the plan area.	We have carried out our sustainability appraisal and testing of the plan prior to publication. This includes an options appraisal setting out the reasons why we took our approach and how problems will be overcome. The implementation section also covers how we will work with landowners and partners to unlock development issues.
		Part 3 - it would have been helpful here if you had briefly set out, within the "We are doing this because" paragraphs, references to the responses received to your Regulation 25 consultation and Sustainability Appraisal; also to include linkages to Appendix 3 (Rejected options).	Our consultation report sets out how we comply with the SCI.
David Hammond Natural England		Natural England welcomes the inclusion and recognition of Climate Change affects on the area and their inclusion within the Area Action Plan/Sustainability Appraisal linked to the overall strategy.	We have added references to consultation and the SA in the justification for the policies where this is particularly relevant.
		Draft Sustainability Appraisal The sixteen Sustainable Development Objectives listed can be broadly supported by Natural England, and in particular the following; SDO 6 "To reduce contributions to Climate Change and adapt to Climate Change that is already happening".	Support noted
			Support noted

Response		Comments submitted	Officer Response
<p>English Heritage</p>	<p>Policy 17 – SDO12 It is noted that the commentary provided states that the policy aims to set clear guidelines about the height of buildings in the core area, and that parts of the core area are sensitive to tall buildings. It supports the need to restrict heights to approx 10 storeys. However the AAP highlights the potential for two tall buildings to be beyond this height. In addition it is not clear whether the setting of all heritage assets were carefully assessed when considering the impact of this policy on SDO12.</p>	<p>The commentary acknowledges that parts of the core area are sensitive to tall buildings and particular care will need to be taken in these areas with buildings restricted to approx. 10 storeys. The quality of the architecture will also need to be of the highest quality. Buildings that have the potential to be taller than 10 storeys will need to be considered carefully in view of the possible impacts on heritage assets. Sustainable Development Objective 12 is as follows: To conserve and enhance the historic environment and cultural assets. The supporting questions in the sustainability framework reiterate the need to consider the wider environment. It is therefore considered clear that the appraisal has considered the setting of all heritage assets when considering the impact of the policy</p> <p>Sustainability indicator 12.2 has been altered as a result of comments received from EH on the Core strategy. The indicator now refers to 'heritage assets' instead of 'buildings' to reflect the proposed changes in the PPS. The indicator will be used to monitor the effectiveness of the policies.</p>	
<p>Environment Agency</p>	<p>We note the Sustainability Appraisal acknowledges that the majority of the area within the AAP lies within Flood Zone 3a (high probability of flooding in the event of a breach of flood defences) and one of the key sustainability issues raised within SA is to minimise flood risk and this is reflected through Sustainability Development Objective 14: To reduce vulnerability to flooding.</p> <p>We also pleased to see the inclusion of 'flood risk' within Objective P5. It is essential flood risk management is a key objective within the Canada Water AAP given the scale of development and opportunities this offers.</p> <p>It is noted that the Sustainability Appraisal (SA) highlights some potential negative effects of the AAP on the flood risk objective. We understand some negative impacts identified within the SA will be mitigated through policies within the AAP and other local development documents.</p>	<p>Support noted</p>	

	<p>We previously commented that the AAP should address how proposed redevelopment in Canada Water can reduce and manage flood risk through its layout and design. The SA indicates on page 43 that the impact of new developments on flood risk should be mitigated. The SA explains how the appraisal has shaped the formation of polices and location of certain development types such as locating schools at the lowest flood risk. We promote applying the sequential approach to locating the most vulnerable development at the lowest flood risk.</p> <p>We are aware core strategy policy 13 states that Southwark will allow development to occur in the flood zone providing it is designed to be safe and resilient to flooding, as it is recognised that there is a shortage of developable land outside the flood zone. The SA states that further guidance is contained within the Sustainable Design and Construction and Sustainability Assessment Supplementary Planning Documents.</p>	
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The full set of representations on the Canada Water AAP is available to view on the website at: <http://www.southwark.gov.uk/canadawater>

APPENDIX 3 RELEVANT PLANS, STRATEGIES AND PROGRAMMES

POLICY OR PLAN
International
Kyoto Protocol to the United Nations framework convention on climate change (1997)
Johannesburg Declaration on Sustainable Development (2002)
European
EU Sixth Action Plan (SD Strategy) (2002)
Council Directive 79/409/EEC on conservation of wild birds
Council Directive 92/43/EEC on conservation of natural habitats and of wild fauna and flora
EU Water Framework Directive (2000/60/EC)
EU Directive 2002/91/EC on the energy performance of buildings
Air Quality Framework Directive 96/62/EC and daughter directives (99/30/EC), (2000/69/EC), (2002/3/EC)
European Spatial Development Strategy (1999)
European Landscape Convention (ratified by the UK government in 2006)
European transport policy for 2010: time to decide (EC, 2001)
European Directive 2003/30/EC on the promotion of the use of biofuels or other renewable fuels for transport
Waste Framework Directive 75/442/EEC Landfill Directive (99/31/WC)
The Water Framework Directive (2000) Put into UK law (transposed) in 2003.

POLICY OR PLAN
National
PPS 1: Delivering Sustainable Development (2005)
Planning and Climate Change: Supplement to PPS1(2007)
PPS 3: Housing (2006)
Draft PPS4: Planning for Sustainable Economic Development (2008)
PPS 6: Planning for Town Centres (2005)
PPS 9: Biodiversity and Geological Conservation (2005)
PPS 10: Planning for Waste Management (2005)
PPS 12: Local Spatial Planning (2008)
PPG 13: Transport (2001)
PPG 15: Planning and the Historic Environment (1994)
PPG 16: Archaeology and Planning (1990)
PPG 17: Planning for Open Space, Sport and Recreation (2002)
PPS 22: Renewable Energy (2004)
PPS 23: Planning and Pollution Control (2004)
PPG 24: Planning and Noise (1994)
PPS 25: Development and Flood Risk (2006)
Biodiversity – The UK Action Plan (1994)
Biodiversity by Design
Biodiversity and the Built Environment. A report by the UK-GBC Task Group
Department for Transport 10 Year Transport Plan (2000)
By Design – Urban design in the planning system: towards better practice. DETR / CABE (2000)

POLICY OR PLAN
Urban White Paper 2001
England Biodiversity (2002)
Communities Plan - Sustainable Communities: Building for the Future (2003)
Guidance on Tall Buildings CABE and English Heritage (2007)
Securing the Future – UK Sustainable Development Strategy (2005)
The UK Climate Change Programme (2006)
Air Quality Strategy (2007)
Waste Strategy (2007)
Future Water: The Government's Water Strategy for England (2008)
Sustainable Construction Strategy (2007)
Energy White Paper (2007)
UK Sustainable Procurement Action Plan (2007)
English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)
Department of Health: Next Step Review: High Quality Care for All (2008)
Health inequalities: progress and next steps (2008)
Healthy Weight Healthy Lives: A Cross Government Strategy for England (2008)
Model Procedures for the Management of Contaminated Land- Environment Agency (2004)
Environment Agency: Adapting to Climate Change Strategy
Environment Agency Strategies, Plans and Reports

POLICY OR PLAN
London
The London Plan: Spatial Development Strategy for Greater London consolidated with alterations since 2004 (2008)
Draft Replacement London Plan 2009
A Sustainable Development Framework for London. London Sustainable Development Commission (June 2003)
Sustainable Communities Plan for London: Building for the Future (2003)
Sustaining Success: The Mayor's Economic Development Strategy (2004)
London: Cultural Capital – Realising the potential of a world-class city. The Mayor's Culture Strategy (2004)
Connecting with London's Nature. The Mayor's Biodiversity Strategy (2002)
Sounder City: The Mayors Ambient Noise Strategy (2004)
Cleaning London's Air, The Mayor's Air Quality Strategy (2002)
Green Light to Clean Power. The Mayor's Energy Strategy (2004)
Rethinking Rubbish in London. The Mayor's Waste Management Strategy (2003)
Accessible London: Achieving an Inclusive Environment. Mayor's Supplementary Planning Guidance (2004)
Industrial Capacity Mayor's Supplementary Planning Guidance (2003)
Providing for Children and Young People's Play and Informal Recreation. Mayor's Supplementary Planning Guidance (2008)
Planning for Equality and Diversity in London. Mayor's Supplementary Planning Guidance (2007)
London View Management Framework. Mayor's Supplementary Planning Guidance (2007)
Land for Transport Functions. Mayor's Supplementary Planning Guidance (2007)
London Plan Sustainable Design and Construction. Mayor's Supplementary Planning Guidance (2006)
Housing Mayor's Supplementary Planning Guidance (2005)
London Remade Demolition Protocol Report (2005)
English Heritage's Heritage at Risk- London 2008
Thames Region Catchment Flood Management Plan
Thames River Basin Management Plan

POLICY OR PLAN
Regional Flood Risk Appraisal
Taking Care of Water- Our Plan for the next 25 years (Thames Water Utilities 2007)
Draft Water Resource Management Plan (Thames Water Utilities) 2008
Our Plans for Water (Thames Water Utilities) 2008
Draft Strategic Proposals for Sludge Management (Thames Water Utilities) 2008
Thames Corridor Catchment Abstraction Management Strategy (CAMS)
Adapting to Climate Change: A checklist for development (2005)
Living Well in London: The Mayor's draft Health Inequalities Strategy (2008)
NHS London: Strategic Plan (2008)
Healthcare for London: A Framework for Action (2007)
State of the Environment Report for London
Thames Path National Trail – Management Strategy 2006-11
Improving Londoner's Access to Nature
The London Rivers Action Plan

POLICY OR PLAN
Local
London Borough of Southwark: Community Strategy 2006-16
Southwark's Unitary Development Plan (2007)
Southwark Local Implementation Plan (LIP)
Southwark Waste Management Strategy: 2003 – 2021
London Borough of Southwark: Enterprise Strategy: 2005 – 2016
London Borough of Southwark: Employment Strategy: 2005 – 2016
London Borough of Southwark Contaminated Land Strategy (2001)
London Borough of Southwark Biodiversity Action Plan
London Borough of Southwark Air Quality Management and Improvement Plan
Southwark Housing Strategy 2005- 2010
London Borough of Southwark Crime and Drugs Strategy 2005 - 2008
Southwark Climate Change and Sustainability Strategy (Emerging)
Southwark Open Spaces Strategy, 2003
Southwark Tourism Strategy 2005-2010
London Borough of Southwark, Children and Young People's Plan 2006/7- 2008/9
London Borough of Southwark School Organisation Plan and Education Development Plan
Southwark Alliance, Neighbourhood Renewal Strategy 2002 – 2004
Southwark Conservation Area Appraisals
Southwark Archaeology Priority Zones
Southwark State of the Environment Fact Sheet
Metropolitan Police Estate – Asset Management Plan, Southwark, 2007
Southwark Walking Plan, 2006

POLICY OR PLAN
Southwark PCT Commissioning Strategy Plan 2009-2012 (2007)
Southwark PCT Asset Management Strategy (2007)
South Bank Partnership Manifesto, "Under pressure and on the edge: London's South Bank – a Manifesto for Action" (2006)
Lambeth Council Sustainable Community Strategy (2008-2020)
Lewisham Council Sustainable Community Strategy (2008-2020)

Further details can be found in the Background Papers that support the Canada Water Area Action Plan, which are available to view on the website at: <http://www.southwark.gov.uk/canadawater>

APPENDIX 4 Comparison of Sustainability Objectives

Sustainability Objectives

- SDO 1 To tackle poverty and encourage wealth creation
- SDO 2 To improve the education and skill of the population
- SDO 3 To improve the health of the population
- SDO 4 To reduce the incidence of crime and the fear of crime
- SDO 5 To promote social inclusion, equality, diversity and community cohesion
- SDO 6 To reduce contributions to climate change
- SDO 7 To improve the air quality in Southwark
- SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource
- SDO 9 To encourage sustainable use of water resources
- SDO 10 To maintain and enhance the quality of land and soils
- SDO 11 To protect and enhance quality of landscape and townscape
- SDO 12 To conserve and enhance the historic environment and cultural assets
- SDO 13 To protect and enhance open spaces, green corridors and biodiversity
- SDO 14 To reduce vulnerability to flooding
- SDO 15 To provide everyone with the opportunity to live in a decent home
- SDO 16 To promote sustainable transport and minimise the need to travel by car
- SDO 17 To provide the necessary infrastructure to support existing and future development

Canada Water AAP Objectives

- Theme 1: Shopping: A genuine town centre and neighbourhood hubs
- S1 To create an accessible, distinctive and vibrant town centre at Canada Water, which is well connected into the surrounding street network. This will enhance the setting of Canada Water basin and create a range of shops, restaurants, community and leisure facilities within mixed use developments.
 - S2 To ensure that people who live and work on the wider peninsula have access to local facilities to meet their day-to-day needs.

Theme 2: Transport: Improved connections

- T1 To use a range of measures, including public transport improvements, green travel plans, road improvements and restrictions on car parking to ease the impact of new development on the transport network and services.
- T2 To make the area more accessible, particularly by sustainable transport including walking, cycling and public transport.
- T3 To use car parking in the town centre more efficiently by ensuring that shops and leisure facilities share parking facilities

Theme 3: Leisure: a great place to visit, to relax in and have fun

- L1 To promote healthy lifestyles and make the area known for its excellent sports, leisure and entertainment facilities.
- L2 To promote arts, culture and tourism.

Theme 4: Places: Better and safer streets, squares and parks

P1 To ensure the design, scale and location of new buildings help create streets and neighbourhoods which have a varied character. There should be no gated communities and the area's green spaces and heritage should be enhanced, especially the River Thames, the docks and the parks to create a distinctive sense of place.

P2 To create an attractive, safe, and secure public realm.

P3 To link the docks and parks in a network of open spaces which have a variety of functions, including recreation and children's play, sports facilities and nature conservation.

P4 To make the River Thames and its river front more accessible.

P5 To reduce the impact of development on the environment and help tackle climate change, air quality, pollution, waste and flood risk.

Theme 5: Housing: Providing more and better homes

H1 To create a mixed community by providing more housing choices and better homes of a high quality. There should be more affordable housing and different housing sizes including larger homes for families.

H2 To focus higher densities in the action area core where there are town centre activities and good access to public transport.

Theme 6: Community: Enhanced social and economic opportunities

C1 To provide more and improved educational, health and community facilities which meet the needs of the growing population.

C2 To provide more local employment opportunities.

Theme 7: Delivering the Area Action Plan

D1 To contribute to work with key stakeholders including the local community, landowners, Lewisham Council and TfL to deliver the vision and objectives of the AAP.

D2 To ensure that physical and social infrastructure needed to support growth at Canada Water is provided in a timely manner.

D3 To monitor and review the delivery of Area Action Plan Policies annually to inform phasing of future development and development of infrastructure.

Compatibility Matrix		Canada Water AAP Objectives																			
Sustainability Objectives		S1	S2	T1	T2	T3	L1	L2	P1	P2	P3	P4	P5	H1	H2	C1	C2	D1	D2	D3	
SDO 1	To tackle poverty and encourage wealth creation	✓	✓	✓	✓	0	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 2	To improve the education and skill of the population	✓	✓	0	0	0	0	✓	0	0	?	0	✓	0	0	✓	✓	✓	0	✓	✓
SDO 3	To improve the health of the population	✓	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 4	To reduce the incidence of crime and the fear of crime	✓	0	✓	✓	✓	0	?	✓	✓	?	✓	0	✓	✓	0	0	✓	✓	✓	✓
SDO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	0	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	✓	✓	✓	✓
SDO 6	To reduce contributions to climate change	?	?	✓	✓	?	?	?	?	0	0	✓	✓	?	?	?	?	✓	✓	✓	✓
SDO 7	To improve the air quality in Southwark	?	?	✓	✓	?	?	?	?	✓	✓	✓	✓	?	?	?	?	✓	✓	✓	✓
SDO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	0	0	0	?	?	?	0	0	✓	✓	?	?	?	?	✓	✓	✓	✓
SDO 9	To encourage sustainable use of water resources	?	?	0	0	0	?	?	?	0	0	0	✓	?	?	?	?	✓	✓	✓	✓
SDO 10	To maintain and enhance the quality of land and soils	✓	✓	0	0	0	✓	✓	✓	0	✓	0	✓	✓	✓	✓	✓	✓	0	✓	✓
SDO 11	To protect and enhance quality of landscape and townscape	✓	✓	?	?	✓	?	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	✓	✓
SDO 12	To conserve and enhance the historic environment and cultural assets	?	?	?	?	✓	?	?	✓	✓	✓	0	✓	?	?	?	?	✓	?	✓	✓
SDO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	?	?	?	✓	✓	?	✓	✓	✓	?	✓	?	?	?	?	✓	✓	✓	✓
SDO 14	To reduce vulnerability to flooding	?	0	0	0	✓	?	?	0	?	✓	✓	✓	?	?	?	?	✓	✓	✓	✓
SDO 15	To provide everyone with the opportunity to live in a decent home	0	0	0	0	0	0	0	0	0	0	0	0	✓	✓	0	0	✓	✓	✓	✓
SDO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	?	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 17	To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	✓	?	?	0	0	✓	✓	✓	?	?	✓	0	✓	✓	✓	✓
KEY		✓	compatible			x	incompatible		0	no significant impact	?	dependent on implementation									

Commentary of results

S1	To create an accessible, distinctive and vibrant town centre at Canada Water, which is well connected into the surrounding street network. This will enhance the setting of Canada Water basin and create a range of shops, restaurants, community and leisure facilities within mixed use developments.
SDO6	To reduce contributions to climate change The impact of new development on climate change will need to be mitigated by incorporating energy efficient design and construction methods and renewable energy sources
SDO7	To improve the air quality in Southwark The impact of new development on air quality will need to be mitigated by incorporating energy efficient design and construction and promoting sustainable transport to and from developments
SDO8	To avoid waste and maximise, reuse or recycle waste arising as a resource New developments will need to minimise waste during construction and when complete
SDO9	To encourage sustainable use of water resources New developments will need to demonstrate efficient use of water
SDO12	To conserve and enhance the historic environment and cultural assets The impact of new development on the historic environment will need to be assessed through individual planning applications
SDO14	To reduce vulnerability to flooding The design of new developments will need to mitigate the risk of flooding
S2	To ensure that people who live and work on the wider peninsula have access to local facilities to meet their day-to-day needs.
SDO6	To reduce contributions to climate change If new local shopping facilities are provided, car parking should be minimised to ensure that this does not lead to more cars on the roads as this would have a negative impact on climate change. The impact of new development on climate change will need to be mitigated by incorporating energy efficient design and construction methods and renewable energy sources
SDO7	To improve the air quality in Southwark If new local shopping facilities are provided, car parking should be minimised to ensure that this does not lead to more cars on the roads as this would have a negative impact on air quality. The impact of new development on air quality will need to be mitigated by incorporating energy efficient design and construction and promoting sustainable transport to and from developments
SDO8	To avoid waste and maximise, reuse or recycle waste arising as a resource New developments will need to minimise waste during construction and when complete
SDO9	To encourage sustainable use of water resources New developments will need to demonstrate efficient use of water
SDO12	To conserve and enhance the historic environment and cultural assets The impact of new development on the historic environment will need to be assessed through individual planning applications
SDO13	To protect and improve open spaces, green corridors and biodiversity The impact of new development on the open spaces and biodiversity will need to be assessed through individual planning applications

T1	To use a range of measures, including public transport improvements, green travel plans, road improvements and restrictions on car parking to ease the impact of new development on the transport network and services.
SDO11	To protect and enhance quality of landscape and townscape
?	If road improvement measures are designed effectively they can improve the quality of the landscape and townscape
SDO12	To conserve and enhance the historic environment and cultural assets
?	If road improvement measures are designed effectively they can conserve and enhance the historic environment
SDO13	To protect and improve open spaces, green corridors and biodiversity
?	If open spaces and green corridors are used to improve the transport network this will have a positive impact. Green corridors and public footpaths could be included in green travel plans.
T2	To make the area more accessible, particularly by sustainable transport including walking, cycling and public transport.
SDO11	To protect and enhance quality of landscape and townscape
?	If more sustainable measures of transport are promoted this may result in more attractive walkways and cycleways therefore improving the quality of the landscape and townscape
SDO12	To conserve and enhance the historic environment and cultural assets
?	If more sustainable measures of transport are promoted this may result in more attractive walkways and cycleways which could conserve or enhance the historic environment
SDO13	To protect and improve open spaces, green corridors and biodiversity
?	If more sustainable measures of transport incorporate green links and corridors this will help to protect and improve open spaces and biodiversity.
T3	To use car parking in the town centre more efficiently by ensuring that shops and leisure facilities share parking facilities
SDO6	To reduce contributions to climate change
?	If car parking is shared effectively and more sustainable methods of transport are promoted in the area this may reduce the amount of cars in the area which would have a positive impact on climate change.
SDO7	To improve the air quality in Southwark
?	If car parking is shared effectively and more sustainable methods of transport are promoted in the area this may reduce the amount of cars in the area which would have a positive impact on air quality.
L1	To promote healthy lifestyles and make the area known for its excellent sports, leisure and entertainment facilities
SDO6	To reduce contributions to climate change
?	The impact of new leisure and entertainment facilities on climate change will need to be mitigated by incorporating energy efficient design and construction methods and renewable energy sources
SDO7	To improve the air quality in Southwark
?	The impact of new development on air quality will need to be mitigated by incorporating energy efficient design and construction and promoting sustainable transport to and from developments
SDO8	To avoid waste and maximise, reuse or recycle waste arising as a resource
?	New developments will need to minimise waste during construction and when complete
SDO9	To encourage sustainable use of water resources
?	New developments will need to demonstrate efficient use of water
SDO11	To protect and enhance quality of landscape and townscape
?	If new facilities are designed effectively this will improve the quality of the landscape and townscape

SDO12	To conserve and enhance the historic environment and cultural assets
?	If new facilities enhance the historic environment this will have a positive impact on this objective
SDO14	To reduce vulnerability to flooding
?	The design of new developments will need to mitigate the risk of flooding
SDO16	To promote sustainable transport and minimise the need to travel by car
?	New leisure facilities should ensure that sustainable modes of transport are promoted by minimising car parking and preparing green travel plans.
SDO17	To provide the necessary infrastructure to support existing and future development
?	New development will require the provision of new infrastructure but the exact extent is uncertain
L2	To promote arts, culture and tourism
SDO4	To reduce the incidence of crime and the fear of crime
?	This may increase the amount of people in the area therefore reducing crime and fear of crime. This depends on what type of facilities are introduced, their opening hours and their design.
SDO6	To reduce contributions to climate change
?	Any new arts, cultural or tourist facilities should ensure that sustainable modes of transport are promoted. This will reduce car use and reduce contributions to climate change. The impact of new facilities on climate change will need to be mitigated by incorporating energy efficient design and construction methods and renewable energy sources
SDO7	To improve the air quality in Southwark
?	The impact of new development on air quality will need to be mitigated by incorporating energy efficient design and construction and promoting sustainable transport to and from developments
SDO8	To avoid waste and maximise, reuse or recycle waste arising as a resource
?	New developments will need to minimise waste during construction and when complete
SDO9	To encourage sustainable use of water resources
?	New developments will need to demonstrate efficient use of water
SDO11	To protect and enhance quality of landscape and townscape
?	If new facilities are designed effectively this will improve the quality of the landscape and townscape
SDO12	To conserve and enhance the historic environment and cultural assets
?	If new facilities enhance the historic environment this will have a positive impact on this objective
SDO13	To protect and improve open spaces, green corridors and biodiversity
?	If new facilities enhance open spaces this will have a positive impact on this objective
SDO14	To reduce vulnerability to flooding
?	The design of new developments will need to mitigate the risk of flooding
SDO16	To promote sustainable transport and minimise the need to travel by car
?	Any new arts, cultural or tourist facilities should ensure that sustainable modes of transport are promoted by minimising car parking and preparing green travel plans.
SDO17	To provide the necessary infrastructure to support existing and future development
?	New development will require the provision of new infrastructure but the exact extent is uncertain

P1	To ensure the design, scale and location of new buildings help create streets and neighbourhoods which have a varied character. There should be no gated communities and the area's green spaces and heritage should be enhanced, especially the River Thames, the docks and the parks to create a distinctive sense of place.
SDO6	To reduce contributions to climate change
?	Any new buildings should ensure that sustainable modes of transport are promoted. This will reduce car use and reduce contributions to climate change. Energy efficiency measures should also be incorporated into the design.
SDO7	To improve the air quality in Southwark
?	The impact of new buildings on air quality will need to be mitigated by incorporating energy efficient design and construction and promoting sustainable transport to and from developments
SDO8	To avoid waste and maximise, reuse or recycle waste arising as a resource
?	New developments will need to minimise waste during construction and when complete
SDO9	To encourage sustainable use of water resources
?	New developments will need to demonstrate efficient use of water
P2	To create an attractive, safe, and secure public realm.
SDO14	To reduce vulnerability to flooding
?	In order for the public realm to be secure flood risk must be appropriately addressed in the design of new developments. The provision of grassed areas in the public realm can help to reduce surface water run-off and therefore reduce flood risk.
P3	To link the docks and parks in a network of open spaces which have a variety of functions, including recreation and children's play, sports facilities and nature conservation.
SDO 2	To improve the education and skill of the population
?	The provision of new facilities could include an educational benefit
SDO4	To reduce the incidence of crime and the fear of crime
?	The design of open spaces, recreation and children's play facilities can have an impact on crime and fear of crime. If these areas are well designed and used it can reduce crime and the fear of crime.
P4	To make the River Thames and its river front more accessible.
SDO13	To protect and improve open spaces, green corridors and biodiversity
?	Making the River Thames more accessible should improve open spaces and biodiversity but will be dependent on the design
H1	To create a mixed community by providing more housing choices and better homes of a high quality. There should be more affordable housing and different housing sizes including larger homes for families.
SDO6	To reduce contributions to climate change
?	The impact of new housing developments on climate change will need to be mitigated by incorporating energy efficient design and construction methods and renewable energy sources
SDO7	To improve the air quality in Southwark
?	The impact of new development on air quality will need to be mitigated by incorporating energy efficient design and construction and promoting sustainable transport to and from developments
SDO8	To avoid waste and maximise, reuse or recycle waste arising as a resource
?	New developments will need to minimise waste during construction and when complete
SDO9	To encourage sustainable use of water resources
?	New developments will need to demonstrate efficient use of water

SDO12	To conserve and enhance the historic environment and cultural assets
?	The impact of new development on the historic environment will be assessed through individual planning applications
SDO13	To protect and improve open spaces, green corridors and biodiversity
?	The impact of new development on open spaces and biodiversity will be assessed through individual planning applications
SDO14	To reduce vulnerability to flooding
?	The design of new developments will need to mitigate the risk of flooding
SDO17	To provide the necessary infrastructure to support existing and future development
?	New development will require the provision of new infrastructure but the exact extent is uncertain
H2	To focus higher densities in the action area core where there are town centre activities and good access to public transport.
SDO6	To reduce contributions to climate change
?	The impact of new development on climate change will need to be mitigated by incorporating energy efficient design and construction methods and renewable energy sources
SDO7	To improve the air quality in Southwark
?	The impact of new development on air quality will need to be mitigated by incorporating energy efficient design and construction and promoting sustainable transport to and from developments
SDO8	To avoid waste and maximise, reuse or recycle waste arising as a resource
?	New developments will need to minimise waste during construction and in operation
SDO9	To encourage sustainable use of water resources
?	New developments will need to demonstrate efficient use of water
SDO12	To conserve and enhance the historic environment and cultural assets
?	The impact of new development on the historic environment will be assessed through individual planning applications
SDO13	To protect and improve open spaces, green corridors and biodiversity
?	The impact of new development on open spaces and biodiversity will be assessed through individual planning applications
SDO14	To reduce vulnerability to flooding
?	The design of new developments will need to mitigate the risk of flooding
C1	To provide enhanced educational, health and community facilities which meet the needs of the growing population.
SDO6	To reduce contributions to climate change
?	The impact of new development on climate change will need to be mitigated by incorporating energy efficient design and construction methods and renewable energy sources
SDO7	To improve the air quality in Southwark
?	The impact of new development on air quality will need to be mitigated by incorporating energy efficient design and construction and promoting sustainable transport to and from developments
SDO8	To avoid waste and maximise, reuse or recycle waste arising as a resource
?	New developments will need to minimise waste during construction and when complete
SDO9	To encourage sustainable use of water resources
?	New developments will need to demonstrate efficient use of water
SDO11	To protect and enhance quality of landscape and townscape
?	If new facilities are designed effectively this will improve the quality of the landscape and townscape

SDO12	To conserve and enhance the historic environment and cultural assets
?	The impact of new development on the historic environment will be assessed through individual planning applications
SDO13	To protect and improve open spaces, green corridors and biodiversity
?	The impact of new development on open spaces and biodiversity will be assessed through individual planning applications
SDO14	To reduce vulnerability to flooding
?	The design of new developments will need to mitigate the risk of flooding
C2	To provide more local employment opportunities.
SDO6	To reduce contributions to climate change
?	The impact of new development on climate change will need to be mitigated by incorporating energy efficient design and construction methods and renewable energy sources
SDO7	To improve the air quality in Southwark
?	The impact of new development on air quality will need to be mitigated by incorporating energy efficient design and construction and promoting sustainable transport to and from developments
SDO8	To avoid waste and maximise, reuse or recycle waste arising as a resource
?	New developments will need to minimise waste during construction and when complete
SDO9	To encourage sustainable use of water resources
?	New developments will need to demonstrate efficient use of water
SDO11	To protect and enhance quality of landscape and townscape
?	If new facilities are designed effectively this will improve the quality of the landscape and townscape
SDO12	To conserve and enhance the historic environment and cultural assets
?	The impact of new development on the historic environment will be assessed through individual planning applications
SDO13	To protect and improve open spaces, green corridors and biodiversity
?	The impact of new development on open spaces and biodiversity will be assessed through individual planning applications
SDO14	To reduce vulnerability to flooding
?	The design of new developments will need to mitigate the risk of flooding
D2	To ensure that physical and social infrastructure needed to support growth at Canada Water is provided in a timely manner
SDO11	To protect and enhance quality of landscape and townscape
?	Care will need to be taken to ensure that the new infrastructure does not damage the quality of the landscape and townscape
SDO12	To conserve and enhance the historic environment and cultural assets
?	Care will need to be taken to ensure that the new infrastructure does not damage the historic environment and cultural assets

Coverage of SA Objectives ADD

Objective	Environmental	Social	Economic
SDO 1		✓	✓
SDO 2		✓	✓
SDO 3	✓	✓	✓
SDO 4	✓	✓	✓
SDO 5		✓	
SDO 6	✓	✓	✓
SDO 7	✓	✓	✓
SDO 8	✓		✓
SDO 9	✓	✓	✓
SDO 10	✓	✓	✓
SDO 11	✓	✓	✓
SDO 12	✓	✓	✓
SDO 13	✓	✓	✓
SDO 14	✓	✓	✓
SDO 15		✓	✓
SDO 16	✓	✓	✓
SDO 17	✓	✓	✓

Most of the objectives cover environmental, social and economic issues, either directly or indirectly. For example, Sustainability Objective 6 is directly aimed at reducing the impact of carbon dioxide emissions on the environment. However, there will also be social and economic benefits as more sustainable transport choices are being encouraged to encourage energy efficiency which in turn can have a positive impact on the health and quality of life of residents.

APPENDIX 5 Summary of Results: Issues and Options

Sustainability Objectives																
CWAAP Policies	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16
1 Shopping: A genuine town centre and local facilities																
1a Shopping	1	✓	0	0	0	X	0	X	X	0	✓	0	0	X	0	X
1a Shopping	2	✓	0	✓	✓	X	✓	X	X	0	✓	✓	0	X	0	X
1b Albion Street	1	✓	0	✓	0	X	0	X	X	0	✓	0	0	X	✓	0
1b Albion Street	2	✓	0	✓	0	X	✓	X	X	0	✓	0	0	X	✓	✓
Commentary	<p>- The construction of new shops is likely to have negative impacts on climate change, production of waste and the use and quality of water. Whilst the quantum of development is less in option 1, option 2 presents the opportunity to incorporate sustainable design and construction techniques to mitigate the impacts.</p> <p>- The proposed development is in a high flood risk area so could increase vulnerability to flooding without appropriate mitigation</p> <p>- The increase in shopping facilities could increase the amount of vehicular traffic but could be mitigated through sustainable transport measures such as reduced car parking and improved pedestrian/cycle routes and public transport provision.</p> <p>- The provision of new community facilities in option 2 will have a positive impact for health and social inclusion</p> <p>- Option 2 will also protect and enhance the character of the area and provide greater opportunities for people to live in a decent home</p>															
2 Transport: Improved Connections																
2a Walking & Cycling	1	0	0	✓	✓	0	✓	0	0	0	✓	0	0	0	0	✓
2a Walking & Cycling	2	0	0	✓	✓	0	✓	0	0	0	✓	0	0	0	0	✓
2b Public Transport	1	0	0	0	0	0	✓	0	0	0	0	0	0	0	0	✓
2b Public Transport	2	✓	0	0	0	0	✓	0	0	0	0	0	0	0	0	✓
2c Road Network & Parking	1	0	0	0	0	0	✓	0	0	0	0	0	0	0	0	✓
2c Road Network & Parking	2	✓	0	0	0	0	✓	0	0	0	0	0	0	0	0	✓
Commentary	<p>- The quantum of development in option 2 is more likely to bring benefits for public transport provision and improvements to the road network</p>															
3 Leisure: Improved A great place to visit, to relax in and have fun																
3a Leisure & entertainment	1	0	0	0	✓	0	0	0	0	0	✓	0	✓	0	0	0
3a Leisure and entertainment	2	✓	0	0	✓	X	0	X	X	0	✓	0	✓	X	✓	0
3b Tourism	1	0	0	0	0	X	✓	X	X	0	✓	✓	✓	X	0	0
3b Tourism	2	✓	0	✓	0	X	✓	X	X	0	✓	✓	✓	X	0	✓
Commentary	<p>- The provision of new leisure facilities and tourism attractions will lead to an increase in the amount of energy and water used and waste generated, mitigation will be necessary through suitable sustainable design and construction techniques</p> <p>- The proposed development is in a high flood risk area so could increase vulnerability to flooding without appropriate mitigation</p>															

Sustainability Objectives																
CWAAP Policies	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16
4 Places: Better and Safer Streets, Squares and Parks																
4a Building Heights	1	✓	0	✓	0	0	0	X	X	0	?	?	0	X	✓	✓
4a Buildings Heights	2	✓	0	✓	0	0	0	X	X	0	?	?	0	X	✓	✓
4b Network of Open Spaces	1	0	0	✓	✓	0	✓	0	0	✓	✓	✓	✓	✓	0	✓
4b Network of Open Spaces	2	0	0	✓	✓	0	✓	0	✓	✓	✓	✓	✓	✓	0	✓
4c Energy and Water	1	0	0	0	0	0	✓	0	✓	0	0	0	0	✓	✓	0
4c Energy and Water	2	0	0	0	0	0	✓	0	✓	0	0	0	0	✓	✓	0
Commentary																
- The provision of tall buildings will lead to an increase in the amount of energy and water used and waste generated, mitigation will be necessary through suitable sustainable design and construction techniques																
- The proposed development is in a high flood risk area so could increase vulnerability to flooding without appropriate mitigation																
- The impacts upon the quality of the landscape, townscape and cultural value will be dependent upon the design in implementation																
5 Homes: High Quality Homes																
5a Housing	1	✓	0	✓	0	0	0	X	X	0	✓	0	✓	X	✓	0
5a Housing	2	✓	0	✓	0	0	0	X	X	0	✓	0	✓	X	✓	✓
5b Affordable Housing	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5b Affordable Housing	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5c Bedroom Mix	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5c Bedroom Mix	2	0	0	0	✓	0	0	0	0	0	0	0	0	0	0	0
Commentary																
- The provision of new housing will lead to an increase in the amount of energy and water used and waste generated, mitigation will be necessary through suitable sustainable design and construction techniques																
- The proposed development is in a high flood risk area so could increase vulnerability to flooding without appropriate mitigation																
- The impact upon social inclusion will be dependent on the type and tenure of housing provided in implementation																
- The increase in housing could have an increase in the amount of traffic in the area. This could be mitigated through car clubs, reduced parking provision																
6 Community: Enhanced Social and Economic Opportunities																
6a Business floorspace & jobs	1	✓	✓	0	0	0	0	X	X	0	0	0	0	0	0	X
6a Business floorspace & jobs	2	✓	✓	0	0	0	✓	X	X	0	0	0	0	X	0	✓
6b Childrens services	1	✓	✓	0	✓	0	0	X	X	0	✓	0	0	X	0	0
No option	1															
6c Health		0	0	0	✓	0	0	X	X	0	0	0	0	X	0	0
No option																
6d Police		0	0	✓	0	0	0	0	0	0	0	0	0	X	0	0
No option																
6e Faith premises, youth etc.	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6e Faith premises, youth etc.	2	0	0	0	0	0	✓	X	X	0	0	0	0	X	0	0
Commentary																
- The provision of new business and community facilities will lead to an increase in the amount of energy and water used and waste generated, mitigation will be necessary through suitable sustainable design and construction techniques																
- The proposed development is in a high flood risk area so could increase vulnerability to flooding without appropriate mitigation																

APPENDIX 6

Summary of Results: Preferred Options

Compatibility of the Canada Water Preferred Options with sustainability objectives

The following matrices appraise the sustainability of each policy included in the Canada Water AAP Preferred Options paper, June 2009. The matrices provide details of the assessment of the policies that have been produced for public consultation in order to assist in the consideration of the impact of each policy on the sustainability objectives. This appraisal will also assist in the drafting the publication/submission version, which represents the next stage in the planning process.

The assessment involves the appraisal of the Canada Water Preferred Options against the Sustainability Appraisal objectives developed in the scoping document.

Positive, negative, uncertain and insignificant effects are considered. Where potential sustainability issues arise these are discussed in more detail in the supporting tables. This approach is designed to be iterative, with the option being refined following public consultation and taking account of the findings of the Sustainability Appraisal.

Sustainability Appraisal of Canada Water AAP: Preferred Options (see next page)

Canada Water AAP: Preferred Options Policies

Sustainability Objectives	Canada Water AAP: Preferred Options Policies																						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	?	✓	✓	✓	✓	✓	✓
SDO 2 To improve the education and skill of the population	✓	✓	-	✓	✓	-	-	-	-	-	✓	✓	✓	✓	-	-	✓	✓	✓	✓	✓	-	✓
SDO 3 To improve the health of the population	-	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 4 To reduce the incidence of crime and the fear of crime	?	✓	✓	✓	✓	✓	✓	✓	?	✓	✓	✓	✓	✓	✓	✓	-	✓	-	-	-	✓	✓
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	✓	✓	✓	✓	✓
SDO 6 To reduce contributions to climate change	X	?	✓	✓	✓	✓	✓	✓	✓	✓	X	?	?	?	?	?	?	X	X	X	X	X	X
SDO 7 To improve the air quality in Southwark	X	?	✓	✓	✓	✓	✓	✓	✓	✓	X	?	?	?	?	?	?	X	X	X	X	X	X
SDO 8 To avoid waste and maximise, reuse or recycle waste that does occur	X	?	-	?	?	-	-	-	-	-	X	?	?	?	?	-	-	X	X	X	X	X	X
SDO 9 To reduce the use of water and source water as locally as possible and protect water quality	X	?	-	?	-	-	-	-	✓	✓	X	?	?	?	?	?	-	X	X	X	X	X	X
SDO 10 To maintain and enhance soil quality	-	-	-	-	-	✓	-	-	-	-	?	?	?	?	?	✓	-	?	?	?	?	?	?
SDO 11 To protect and enhance the look and character of places	✓	-	✓	-	✓	✓	-	-	✓	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	?	?	?
SDO 12 To protect and improve the historic value of places	-	-	✓	?	✓	✓	-	-	-	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	?	?	?
SDO 13 To protect and improve open spaces, green corridors and biodiversity	-	-	-	-	?	✓	-	✓	✓	✓	✓	?	✓	✓	✓	✓	-	✓	✓	✓	✓	✓	✓
SDO 14 To reduce vulnerability to flooding	?	?	-	?	-	✓	-	-	✓	✓	?	?	?	?	?	?	-	X	?	X	?	?	?
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	-
SDO 16 To increase walking, cycling, public transport and reduce car journeys	?	✓	✓	✓	✓	✓	?	✓	✓	✓	✓	?	?	?	?	✓	?	?	?	?	?	?	?

1 Shopping in the town centre
2 Cafes and restaurants in the town centre
3 Important shopping parades
4 Small scale shops, cafes and restaurants outside the town centre
5 Markets
6 Walking and Cycling
7 Public Transport
8 The Road Network
9 Parking for town centre uses
10 Parking for residential development in the core area
11 Leisure and entertainment
12 Sports facilities
13 Arts, culture and tourism
14 Design principles for the town centre
15 Building heights in the core area
16 Open spaces
17 Energy
18 Housing
19 Jobs and business space
20 Schools
21 Young people
22 Health
23 Community Facilities

Key
Major positive
Minor positive
Major negative
Minor negative
Uncertain
No significant impact

**APPENDIX 7
Sustainability Appraisal of Submission Version of CWAAP**

Key

✓✓	major positive	XX	major negative	?	uncertain
✓	minor positive	X	minor negative	-	no significant impact

SA of Submission Version of the Canada Water AAP - Summary of Results

Sustainability Objectives	Canada Water AAP – Submission Version Policies																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 2 To improve the education and skill of the population	✓	✓	-	✓	✓	-	-	-	-	-	✓	✓	✓	✓	-	✓	✓	✓	-
SDO 3 To improve the health of the population	-	-	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	?	✓	✓
SDO 4 To reduce the incidence of crime and the fear of crime	?	✓	✓	✓	-	✓	✓	-	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	-	✓	✓
SDO 6 To reduce contributions to climate change	X	?	✓	✓	✓	✓	✓	✓	✓	X	?	?	?	✓	?	?	?	✓	-
SDO 7 To improve the air quality in Southwark	X	?	✓	✓	✓	✓	✓	✓	✓	X	?	?	?	✓	?	?	?	✓	-
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	X	?	-	?	?	-	-	-	-	-	?	?	?	-	?	?	?	-	-
SDO 9 To encourage sustainable use of water resources	?	?	-	?	-	-	-	✓	✓	✓	?	?	?	-	✓	✓	?	?	-
SDO 10 To maintain and enhance the quality of land and soils	✓	-	-	-	-	-	-	✓	✓	✓	?	✓	✓	✓	-	✓	✓	✓	-
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-
SDO 12 To conserve and enhance the historic environment and cultural assets	-	-	✓	?	?	✓	-	-	-	?	?	✓	✓	✓	✓	-	✓	✓	-
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	-	-	-	?	✓	-	✓	✓	?	✓	?	✓	✓	✓	✓	✓	✓	✓
SDO 14 To reduce vulnerability to flooding	?	?	-	?	-	-	-	✓	✓	?	?	?	?	✓	?	?	?	?	?
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	✓	✓	✓	✓	✓	✓	?	✓	✓	✓	?	?	✓	✓	✓	✓	✓	✓
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	-	-	-	✓	✓	✓	✓	?	?	?	?	✓	?	?	?	✓	-

- 1 Shopping in the town centre
- 2 Cafes and restaurants in the town centre
- 3 Important shopping parades
- 4 Small scale shops, restaurants and cafes outside the town centre
- 5 Markets
- 6 Walking and cycling
- 7 Public transport
- 8 Vehicular traffic
- 9 Parking for town centre uses
- 10 Parking for residential development in the Core Area
- 11 Leisure and entertainment
- 12 Sports facilities
- 13 Arts, culture and tourism
- 14 Streets and public spaces
- 15 Building blocks
- 16 Town centre development
- 17 Building heights on sites in and adjacent to the core area
- 18 Open spaces and biodiversity
- 19 Children's play space

Detailed SA results of revised Submission Version of the Canada Water AAP

Sustainability Objectives		Timescale				Commentary on Results
		1	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓		New shopping space and more shops will result in new job opportunities for local people and boost the local economy, addressing poverty and encouraging wealth creation. The feasibility study has shown there is capacity for around 35,000 sqm of new shopping space in the town centre
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓		The new jobs that will be provided will provide local opportunities for training in the workplace and potentially improve the skill base of the population
SDO 3 To improve the health of the population	-	-	-	-		No significant impact
SDO 4 To reduce the incidence of crime and the fear of crime	?	?	?	?		Improvements to the shopping environment in the town centre may result in more people using the town centre. If this happens then crime and the fear of crime may be reduced.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓		The 2009 retail study identified the need for better facilities in the borough. Creating a larger town centre with more shops will be likely to increase the number of local people visiting the centre. This will help to create more of a sense of place in the town centre and promote community cohesion.
SDO 6 To reduce contributions to climate change	X	X	X	X		The policy increases the amount of development in the area and CO2 emissions from construction and operation, which will have a negative impact on climate change. Provided that any new shopping developments incorporate energy efficiency measures and renewable energy where appropriate contributions to climate change will be minimised. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	X	X	X	X		Emissions as a result of construction and operation are likely to increase as a result of the amount of development. Provided that new shopping developments incorporate energy efficiency measures and renewable energy where appropriate the impact on air quality will be minimised. New shops are likely to increase the amount of visitors to the area but if the transport infrastructure is improved and car parking in the town centre is minimised this should not have a negative impact on air quality. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	X	X	X	X		The provision of new shops will increase the amount of waste in construction and operation. Provided that new shops incorporate waste minimisation measures both during and after construction this should ensure that waste is re-used or recycled. Large developments will be expected to prepare a waste management plan that sets out how waste will be dealt with. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	?	?	?	?		The provision of new shops will increase the amount of water used in construction and operation. Provided that new developments promote sustainable use of water resources the use of water should be reduced. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs

SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	New development will be on brownfield land. Where land is contaminated, suitable remediation will be needed before development can proceed
SDO 11 To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	✓✓	The town centre is currently not a very attractive place with limited character. The provision of new shops will enhance the look and character of the town centre over time. Further guidance on design can be found in the Design and Access SPD. The Southwark Design Review Panel will be used to assess the design quality of large development proposals
SDO 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-	-	The town centre is not within a conservation area and does not contain any listed buildings or archaeological priority zones therefore the provision of new shops will not have a significant impact on the historical environment.
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	✓	Development is concentrated in areas that are already used for retail rather than open space. New development could provide opportunities to improve links to open spaces, green corridors and enhance biodiversity. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 14 To reduce vulnerability to flooding	?	?	?	?	?	Development is situated in the flood zone. Core Strategy Policy 13 states that Southwark will allow development to occur in zones 2 and 3a, providing it is designed to be safe and resilient to flooding. It also requires development to reduce risk of flooding by reducing surface water run-off and using sustainable urban drainage systems. All planning applications will need to be accompanied by a flood risk assessment. Further guidance is set out in our Sustainable Design and Construction and Sustainability Assessments SPDs.
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact.
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	?	?	?	?	The increase of shops in the town centre may increase car journeys but the policy also states that the provision of new shops is subject to improvements in the transport infrastructure. Provided that these improvements promote sustainable forms of transport then this could have a positive impact on the area by reducing car parking space and car trips to the area.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	The increase in development will require new infrastructure to be provided but the exact extent is currently uncertain. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power and water can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		2	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	The provision of new cafes and restaurants will create more local job opportunities and boost the local economy in the long term.
SDO 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	✓✓	The provision of new cafes and restaurants will create more local jobs and provide more opportunities for training and increase local skills in the long term.
SDO 3 To improve the health of the population	-	-	-	-	-	No significant impact
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	The provision of more cafes and restaurants will result in more people using the town centre, resulting in more natural surveillance. This should help to reduce crime and the fear of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	More cafes and restaurants in the town centre will help to create more of a sense of place for local people resulting in improved community cohesion.
SDO 6 To reduce contributions to climate change	?	?	?	?	?	The policy is likely to result in an increase in the amount of CO2 emissions as a result of construction and operation, which will have a negative impact on climate change. Provided that new cafes and restaurants incorporate sustainable design and construction, renewable energy and promote sustainable modes of transport for visitors this should not increase contributions to climate change. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	?	?	?	?	?	The policy is likely to result in an increase in the amount of CO2 emissions as a result of construction and operation. Provided that new cafes and restaurants incorporate sustainable design and construction, renewable energy and promote sustainable modes of transport for visitors this should not reduce air quality. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	?	?	?	New cafes and restaurants are likely to result in an increase in waste in construction and operation, which can be addressed through suitable waste management techniques. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	?	?	?	?	?	New cafes and restaurants are likely to result in an increase in water use in construction and operation, which can be mitigated through water management and harvesting techniques. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	-	No significant impact.
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	The provision of new cafes and restaurants is likely to enhance the character and look of the town centre, creating a more vibrant and attractive environment. Further guidance on design can be found in the Design and Access SPD.

SDO 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-	-	The sites proposed in the town centre for cafes and restaurants are not within a conservation area and do not contain any listed buildings or archaeological priority zones therefore the provision of cafes and restaurants will not have a significant impact on the historical environment.
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	-	-	-	-	-	No significant impact.
SDO 14 To reduce vulnerability to flooding	?	?	?	?	?	Development is situated in the flood zone. Core Strategy Policy 13 states that Southwark will allow development to occur in zones 2 and 3a, providing it is designed to be safe and resilient to flooding. It also requires development to reduce risk of flooding by reducing surface water run-off and using sustainable urban drainage systems. All planning applications will need to be accompanied by a flood risk assessment. Further guidance is set out in our Sustainable Design and Construction and Sustainability Assessments SPDs.
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	New cafes and restaurants will be expected to minimise car parking or be car free. This will increase walking, cycling and public transport and reduce car journeys.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	The increase in development will require new infrastructure to be provided but the exact extent is currently uncertain. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power and water can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		3	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	The policy aims to protect important shopping parades outside of the town centre. This will help to protect existing businesses and retain jobs.	
SDO 2 To improve the education and skill of the population	-	-	-	-	No significant impact.	
SDO 3 To improve the health of the population	-	-	-	-	No significant impact	
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	The policy will maintain shopping parades on Albion Street and Lower Road encouraging people to visit these areas. This may help to reduce crime and fear of crime in these locations.	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	The protection of local shopping parades will promote community cohesion as it will retain importance local jobs and help to create a sense of place in these areas.	
SDO 6 To reduce contributions to climate change	✓	✓	✓	✓	The protection of local shopping parades will encourage people to walk or cycle to local shops as they are closer to housing and reduce the need to travel outside the borough. This will help to reduce car use and CO2 emissions	
SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	The protection of local shopping parades will encourage people to walk or cycle to local shops as they are closer to housing and reduce the need to travel outside the borough. This will help to reduce car use and emissions, improving air quality.	
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	No significant impact.	
SDO 9 To encourage sustainable use of water resources	-	-	-	-	No significant impact.	
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	No significant impact.	
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	The policy restricts the amount of fast food takeaways in important local shopping parades. Too many fast food takeaways can detract from the character and appearance of shopping parades so this policy is likely to have a positive effect.	
SDO 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	The policy restricts the amount of fast food takeaways in important local shopping parades. Too many fast food takeaways can detract from the historical character and appearance of shopping parades. There are several listed buildings on Albion Street so the policy will have a positive effect in the area.	
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	-	-	-	-	No significant impact.	
SDO 14 To reduce vulnerability to flooding	-	-	-	-	No significant impact.	
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact.	

<p>SDO 16 To promote sustainable transport and minimise the need to travel by car</p>	<p>✓ ✓</p>	<p>✓</p>	<p>✓ ✓</p>	<p>✓ ✓</p>	<p>✓ ✓</p>	<p>The policy protects importance local shopping parades. The provision of local shops will help to reduce car journeys and encourage walking and cycling.</p>
<p>SDO 17 To provide the necessary infrastructure to support existing and future development</p>	<p>-</p>	<p>-</p>	<p>-</p>	<p>-</p>	<p>-</p>	<p>No significant impact.</p>

Sustainability Objectives		Timescale				Commentary on Results
		4	S	M	L	
CWAAP Policy 4 Small scale shops, restaurants and cafes						
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	The policy aims to encourage small scale shops, cafes and restaurants for day to day needs. This will increase local jobs and boost the economy.
SDO 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	✓✓	The policy promotes new shops, cafes and restaurants in certain areas. This will increase local jobs and training opportunities.
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	The policy aims to provide local shops, cafes and restaurants. This will result in reduced car use and encourage walking and cycling therefore improving the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	The policy will increase shops, cafes and restaurant in certain areas encouraging activity. This may help to reduce crime and fear of crime in these locations.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	✓✓	The provision of new shops, cafes and restaurants outside the town centre will promote community cohesion as it will increase local jobs and help to create a sense of place in these areas.
SDO 6 To reduce contributions to climate change	✓	✓	✓	✓	✓	New shops and cafes outside the town centre will encourage people to walk or cycle to local facilities as they will be closer to housing. This will reduce car use, and related CO2 emissions.
SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	✓	The provision of local services will encourage people to walk or cycle to local facilities as they are closer to housing. This will reduce car use, improving air quality.
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	?	?	?	New facilities are likely to result in an increase in waste, in construction and operation, which can be addressed through suitable waste management techniques. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	?	?	?	?	?	New facilities are likely to result in an increase in water use in construction and operation, which can be mitigated through water management and harvesting techniques. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	-	No significant impact
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	The policy aims to provide more local shops and facilities which is likely to improve the character and look of these areas by providing a focal point. Further guidance on design is provided in the Design and Access SPD
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	?	The impact will be dependent on the design of new developments and their impact on the historical environment, which will be assessed by individual planning applications.
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	-	-	-	-	-	No significant impact

<p>SDO 14 To reduce vulnerability to flooding</p>	?	?	?	?	<p>Development is situated in the flood zone. Core Strategy Policy 13 states that Southwark will allow development to occur in zones 2 and 3a, providing it is designed to be safe and resilient to flooding. It also requires development to reduce risk of flooding by reducing surface water run-off and using sustainable urban drainage systems. All planning applications will need to be accompanied by a flood risk assessment. Further guidance is set out in our Sustainable Design and Construction and Sustainability Assessments SPDs.</p>
<p>SDO 15 To provide everyone with the opportunity to live in a decent home</p>	-	-	-	-	<p>No significant impact.</p>
<p>SDO 16 To promote sustainable transport and minimise the need to travel by car</p>	✓	✓	✓	✓	<p>The policy aims to increase access to local shops and other facilities. This will reduce car use and promote walking and cycling.</p>
<p>SDO 17 To provide the necessary infrastructure to support existing and future development</p>	-	-	-	-	<p>The increase in development will require new infrastructure to be provided but the extent of the provision for small shops is unlikely to be significant. .</p>

Sustainability Objectives		Timescale				Commentary on Results
		5	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	The provision of new markets will help to increase local jobs and boost the local economy.
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	✓	The provision of markets in the area will encourage the development of local skills.
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	The provision of local markets may help to encourage people to shops for goods more locally therefore reducing car use and increasing walking and cycling which will improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	-	No significant impact
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	The provision of new markets will provide more local employment opportunities and create more of a sense of place therefore promoting community cohesion.
SDO 6 To reduce contributions to climate change	✓	✓	✓	✓	✓	The provision of local markets may help to encourage people to shops for goods more locally therefore reducing car use and CO2 emissions.
SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	✓	The provision of local markets may help to encourage people to shops for goods more locally therefore reducing car use and improving air quality.
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	?	?	?	The amount of waste generated by markets can be significant. Appropriate controls and measures will need to be put in place to ensure waste is minimised and waste arsing are dealt with in the most sustainable way.
SDO 9 To encourage sustainable use of water resources	-	-	-	-	-	No significant impact
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	-	No significant impact
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	A new market will help to improve the look and character of the area, enlivening the area and reinforcing its identity
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	?	Depending on where the market is located and its design, it could help to improve the historic character of the area.
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	?	?	?	?	?	Depending on the setting of the market this could potentially improve an open space.
SDO 14 To reduce vulnerability to flooding	-	-	-	-	-	No significant impact
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact

SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	The provision of markets may encourage people to shop more locally therefore reducing car use and encouraging more sustainable transport modes.
SDO 17 To provide the necessary infrastructure to support existing and future development	-	-	-	-	-	No significant impact

Sustainability Objectives		Timescale				Commentary on Results
		6	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	-	-	-	-	No significant impact	
SDO 2 To improve the education and skill of the population	-	-	-	-	No significant impact	
SDO 3 To improve the health of the population	✓	✓	✓	✓	The policy aims to improve walking and cycling routes, which could help to improve the health of the population.	
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	Improvements to walking and cycling routes may include improvements to lighting and visibility. This will help to reduce crime and the fear of crime.	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	Encouraging walking and cycling and improving routes will help to promote alternative forms of transport., particularly for those on lower incomes and without access to a vehicle. Connectivity between neighbourhoods will also be improved	
SDO 6 To reduce contributions to climate change	✓	✓	✓	✓	The promotion of walking and cycling will help to reduce car use and CO2 emissions	
SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	The promotion of walking and cycling will help to reduce car use, improving air quality.	
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	No significant impact	
SDO 9 To encourage sustainable use of water resources	-	-	-	-	No significant impact	
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	No significant impact	
SDO 11 To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	Improvements to walking and cycling routes will improve the quality of the landscape and townscape by providing a safer, more accessible, comfortable and attractive environment	
SDO 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	Improvements to walking and cycling routes will improve access to the historic environment providing a safer and more attractive environment.	
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	Improvements to walking and cycling routes have the potential to improve open spaces and green corridors whilst protecting and enhancing biodiversity.	
SDO 14 To reduce vulnerability to flooding	-	-	-	-	No significant impact	
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact.	

<p>SDO 16 To promote sustainable transport and minimise the need to travel by car</p>	<p>✓✓</p>	<p>✓</p>	<p>✓✓</p>	<p>✓✓</p>	<p>✓✓</p>	<p>Encouraging walking and cycling and improving routes will increase walking and cycling and help to minimise the need to travel by car</p>
<p>SDO 17 To provide the necessary infrastructure to support existing and future development</p>	<p>✓✓</p>	<p>✓</p>	<p>✓✓</p>	<p>✓✓</p>	<p>✓✓</p>	<p>The provision of new and improved pedestrian and cycle routes will help accommodate the growth in population and number of visitors to the area, minimising impacts on the road network</p>

Sustainability Objectives		Timescale				Commentary on Results
		7	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	The policy aims to work with TfL to improve the frequency, quality and reliability of public transport in the area. This will help to improve the attractiveness of the area for businesses and inward investment. The area will also benefit from improved connectivity to services
SDO 2 To improve the education and skill of the population	-	-	-	-	-	No significant impact
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	Improving public transport in the area will help to minimise car use and reduce emissions and encourage people to walk or cycle to public transport provision such as bus stops or tube stations. This will improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	Increased usage of public transport will lead to more activity at public transport hubs, particularly in the evening. This coupled with improved lighting can help to reduce crime and fear of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	Improvements to public transport may help specific equalities groups who are unable to drive e.g. young people, low income groups.
SDO 6 To reduce contributions to climate change	✓	✓	✓	✓	✓	The promotion of public transport will help to minimise car use and reduce CO2 emissions
SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	✓	The promotion of public transport will help to minimise car use, improving air quality.
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	No significant impact
SDO 9 To encourage sustainable use of water resources	-	-	-	-	-	No significant impact
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	-	No significant impact
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	Improvements to the public transport provision will make the area more attractive to live and work, enhancing the quality of the townscape
SDO 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-	-	No significant impact
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	-	-	-	-	-	No significant impact
SDO 14 To reduce vulnerability to flooding	-	-	-	-	-	No significant impact
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact

<p>SDO 16 To promote sustainable transport and minimise the need to travel by car</p>	<p>✓✓</p>	<p>✓</p>	<p>✓✓</p>	<p>✓✓</p>	<p>Improvements to provision will help to increase the use of public transport and accessibility of the area, whilst minimising car journeys and congestion.</p>
<p>SDO 17 To provide the necessary infrastructure to support existing and future development</p>	<p>✓✓</p>	<p>✓</p>	<p>✓✓</p>	<p>✓✓</p>	<p>Improvements to provision will address the increase in demand as a result of the growth in population and number of visitors to the area</p>

Sustainability Objectives		Timescale				Commentary on Results
		8	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	Improvements to the road network will reduce traffic congestion in the area making it more efficient, safer and attractive for all users. Such improvements will help to retain business in the area as well as attract inward investment	
SDO 2 To improve the education and skill of the population	-	-	-	-	No significant impact	
SDO 3 To improve the health of the population	✓	✓	✓	✓	Individual developments will be expected to carry out transport assessments to demonstrate how their impacts can be mitigated and ensure adequate and safe servicing of sites. Improvements to the road network will reduce traffic congestion in the area, which could improve air quality and the health of the population.	
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	Improvements to the transport infrastructure will enable a safer, more attractive and accessible environment to be created, which can lead to a reduction in crime and fear of crime	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	Improvements to the road network will reduce traffic congestion in the area making it more efficient, safer and attractive for all users.	
SDO 6 To reduce contributions to climate change	✓✓	✓	✓✓	✓✓	Proposals will need to demonstrate through a transport assessment how they can mitigate their impact upon transport infrastructure by using a multi-modal study. Improvements to the highway network, pedestrian and cycle routes and public transport should encourage other modes of transport to the car, leading to a reduction in CO2 emissions and the contributions to climate change	
SDO 7 To improve the air quality in Southwark	✓✓	✓	✓✓	✓✓	Proposals will need to demonstrate through a transport assessment how they can mitigate their impact upon transport infrastructure by using a multi-modal study. Improvements to the highway network, pedestrian and cycle routes and public transport should encourage other modes of transport to the car, leading to an improvement in air quality as a result of lower emissions	
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓	✓✓	✓✓	Individual developments will be expected to carry out transport assessments to demonstrate how their impacts can be mitigated and ensure adequate and safe servicing of sites. A site servicing strategy should be provided as part of the transport assessment	
SDO 9 To encourage sustainable use of water resources	-	-	-	-	No significant impact	
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	Individual developments will be expected to carry out transport assessments to demonstrate how their impacts can be mitigated and ensure adequate and safe servicing of sites, this should include any pollution that may occur particularly as a result of surface water run-off	
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	Improvements to the road network will reduce traffic congestion in the area making it more efficient, safer and attractive for all users.	

SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	?	Individual developments will be expected to carry out transport assessments to demonstrate how their impacts can be mitigated and ensure adequate and safe servicing of sites, this should include any potential impacts on the quality of the landscape and townscape
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	?	?	?	?	?	Individual developments will be expected to carry out transport assessments to demonstrate how their impacts can be mitigated and ensure adequate and safe servicing of sites, this should include any potential impacts on the quality of the historic environment and cultural assets
SDO 14 To reduce vulnerability to flooding	-	-	-	-	-	No significant impact
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓✓	✓✓	✓✓	Proposals will need to demonstrate through a transport assessment how they can mitigate their impact upon transport infrastructure by using a multi-modal study. Improvements to the highway network, pedestrian and cycle routes and public transport should encourage other modes of transport to the car
SDO 17 To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	✓✓	Improvements to the transport infrastructure are required in order to accommodate the proposed growth. Proposals will need to demonstrate through a transport assessment how they can mitigate their impact upon transport infrastructure. Planning obligations will be sought to improve the highway network, upgrade pedestrian and cycle facilities and fund public transport improvements, where necessary.

Sustainability Objectives		Timescale				Commentary on Results
		9	S	M	L	
CWAAP Policy 9 Parking for Town Centre uses						
SDO 1 To tackle poverty and encourage wealth creation	✓	X	✓	✓	✓	The policy aims to encourage retail and leisure facilities in the town centre to share car parking facilities. This may have an initial negative impact as developers may see less car parking as a barrier to the viability of the scheme resulting in less inward investment. However in the long term the aim for the area is to balance demands for car parking more effectively and ensure that operators are able to meet peak demands.
SDO 2 To improve the education and skill of the population	-	-	-	-	-	No significant impact
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	If car parking is shared this will reduce the amount of car parking spaces in the area and minimise car use. This will improve the health of the population by encouraging walking and cycling and improving air quality.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	Currently the car parking facilities in the area are very spread out and isolated. This leads to increased crime and fear of crime particularly at night. Shared car parking facilities would create more of a presence in these spaces therefore reducing crime and the fear of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	Shared car parking facilities would make it easier for those equalities groups who rely on cars, such as disabled people and parents with children, to access more facilities in one trip.
SDO 6 To reduce contributions to climate change	✓	✓	✓	✓	✓	Shared car parking facilities will reduce the number of car parking spaces available therefore encouraging more sustainable forms of transport. This will help to reduce contributions to climate change.
SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	✓	Shared car parking facilities will reduce the number of car parking spaces available therefore encouraging more sustainable forms of transport. This will help to improve air quality.
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	No significant impact
SDO 9 To encourage sustainable use of water resources	✓	✓	✓	✓	✓	Less surface car parking will create fewer opportunities for surface water run-off of polluted water.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	Less surface car parking will create more opportunities for better use of the land
SDO 11 To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	✓✓	Encouraging shared car parking in the town centre will reduce the amount of surface car parks in the area. At the moment a large amount of the town centre is covered by surface car parks and this detracts from the look and character of the area. Shared car parking will help to improve the look and character of the town centre.
SDO 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-	-	No significant impact
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	✓	Less surface car parking in the town centre may create more opportunities for open spaces, green corridors and biodiversity.

SDO 14 To reduce vulnerability to flooding	✓	✓	✓	✓	✓	Less surface car parking in the town centre may create more opportunities for open spaces, green corridors and biodiversity. This will reduce surface water run-off and reduce vulnerability to flooding.
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓✓	✓✓	✓✓	Shared car parking facilities will reduce the number of car parking spaces available therefore encouraging more sustainable forms of transport such as walking, cycling and public transport and reducing the number of trips needed
SDO 17 To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	✓	The provision of shared parking facilities will improve the efficiency of car parks and ensure that facilities are in suitable locations, with appropriate management strategies, to ensure that existing and future needs are met

Sustainability Objectives		Timescale				Commentary on Results
		10	S	M	L	
CWAAP Policy 10 Parking for residential development in Core Area						
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	The policy aims to reduce car parking in new residential developments based on the current standards. This will ease traffic congestion in the area and may encourage businesses to locate here as the current traffic problems, which may act as a deterrent, will be reduced.
SDO 2 To improve the education and skill of the population	-	-	-	-	-	No significant impact
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	Reducing car parking in new residential developments should encourage people to walk and cycle more and minimise the use of the car resulting in less emissions, which will improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	?	?	?	?	?	Reducing car parking in new residential developments means that people will need to walk or cycle home. This may increase crime or fear of crime, particularly in the dark. Mitigation is proposed through improvements to walking and cycling routes and the use of secured by design principles
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	x	✓	✓	✓	Reducing car use in new developments may be problematic for certain groups, in particular families with young children. However in the long term community cohesion should be promoted by this approach as it will encourage more people to walk and cycle in the area creating more of a friendly environment and sense of place.
SDO 6 To reduce contributions to climate change	✓✓	✓	✓✓	✓✓	✓✓	Reduced car parking will encourage the use of more sustainable forms of transport. This will help to reduce the use of the car and contributions to climate change through lower CO2 emissions
SDO 7 To improve the air quality in Southwark	✓✓	✓	✓✓	✓✓	✓✓	Reduced car parking will encourage the use of more sustainable forms of transport. This will help to improve air quality.
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	No significant impact
SDO 9 To encourage sustainable use of water resources	✓	✓	✓	✓	✓	Reducing surface water run-off from less paved car parking areas will reduce water pollution
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	Less surface car parking will create more opportunities for better use of the land
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	Less residential car parking in the core area will provide opportunities to create a more attractive public realm.
SDO 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	✓	Less residential car parking in the core area will provide opportunities to create a more attractive public realm.
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	✓	Less residential car parking will provide opportunities to create more open spaces, green corridors and enhancements to biodiversity.

SDO 14 To reduce vulnerability to flooding	✓	✓	✓	✓	✓	Less residential car parking will reduce surface water run-off by reducing the amount of hard surfaces and allowing more opportunities for the creation and improvement of open spaces, green corridors and biodiversity.
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓✓	✓✓	✓✓	Reduced car parking will encourage the use of more sustainable forms of transport.
SDO 17 To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	✓	The policy seeks to encourage people to use sustainable modes of transport. The core area has good public transport services and therefore a maximum standard below the borough-wide standard is considered appropriate. To avoid car-parking over spill in to neighbouring streets the controlled parking zone will be extended

Sustainability Objectives		Timescale				Commentary on Results
		11	S	M	L	
CWAAP Policy 11 Leisure and entertainment						
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	This policy aims to encourage new leisure and entertainment uses in the town centre and protect existing uses. This will help to retain and create local jobs and boost the local economy.
SDO 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	✓✓	This policy aims to encourage new leisure and entertainment uses in the town centre and protect existing uses. This will help to retain and create local jobs and boost the local economy creating training and opportunities to improve skills.
SDO 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	✓✓	The provision of new leisure facilities will help to improve the health of the population as it will encourage more physical activity.
SDO 4 To reduce the incidence of crime and the fear of crime	✓✓	✓	✓✓	✓✓	✓✓	Encouraging more leisure and entertainment uses in the town centre will encourage more evening visitors to the town centre which should reduce crime and fear of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	✓✓	More leisure and entertainment uses will help to create local jobs and facilities creating more of a sense of place in the town centre. This will promote community cohesion.
SDO 6 To reduce contributions to climate change	X	X	X	X	X	The amount of new development will have a negative impact on climate change as the increase in energy consumption and demand will result in an increase in CO2 emissions in both construction and operation. Locating leisure and entertainment uses in the town centre, coupled with reduced car parking in the town centre will encourage people to use more sustainable forms of transport to help reduce contributions to climate change. Sustainable design and construction methods will also be required to mitigate the impacts of new development. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	X	X	X	X	X	The amount of new development will have a negative impact on air quality as a result of construction and operation and the potential increase in vehicular traffic. Locating leisure and entertainment uses in the town centre, coupled with reduced car parking in the town centre will encourage people to use more sustainable forms of transport to help improve the air quality. Sustainable design and construction methods will also be required to mitigate the impacts of new development. Further guidance is provided in the Sustainable design and Construction and Sustainability Assessment SPDs. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	X	X	X	X	X	New leisure and entertainment uses will result in an increase in waste arising as a result of construction and operation. Impacts will need to be mitigated through the adoption of new technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Sustainable design and construction methods and site waste management plans should be used. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	✓	New leisure and entertainment uses will result in an increase in water demand and usage. The sustainable use of water will be encouraged through the use of new technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs

SDO 10 To maintain and enhance the quality of land and soils	✓	?	✓	✓	New development will be provided on brown field land and will seek to improve the existing quality of the land. Where land may be contaminated as a result of previous uses, suitable remediation would be needed before development could proceed.
SDO 11 To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	Retaining existing leisure and entertainment uses and encouraging more of these types of uses will help to improve the quality of the townscape. Further guidance on design is set out in the Design and Access APD
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	New leisure and entertainment uses will need to be designed sensitively in relation to the historic character of the area, where applicable. Further guidance on suitable mitigation is provided in the Conservation Area Appraisals and Design and Access SPD
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	?	?	?	?	The development of new leisure facilities will need to include suitable mitigation measures to protect open spaces and enhance biodiversity. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 14 To reduce vulnerability to flooding	?	?	?	?	The development of new leisure and entertainment facilities in the flood zone is likely to increase vulnerability to flooding. Mitigation measures such as flood resistant design will need to be addressed in the design process including a flood risk assessment. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓✓	✓✓	Locating leisure and entertainment uses in the town centre, coupled with reduced car parking in the town centre and improved walking and cycling and public transport, should encourage people to use more sustainable forms of transport and minimise the need to travel by car.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	The increase in development will require new infrastructure to be provided but the exact extent is currently uncertain. The policy requires the development of new leisure and entertainment facilities in the town centre, which has already got good public transport capacity. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power and water can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		12	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	The policy supports improvements to sports facilities in the area including the refurbishment of seven islands leisure centre. Improvement of facilities may create more local jobs and boost the economy.
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	✓	Improvements to facilities will provide an opportunity for local schools and the community to make more use of the sports facilities in the area and may create more opportunities for training and skills development
SDO 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	✓✓	Improvements to existing sports facilities will create more opportunities for local people to participate in sport, improving health.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	Improved sports facilities will result in more activities for young people in the area. This could help to reduce crime and fear of crime
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	Improved sports facilities will have a positive impact for all the community and help to promote social inclusion and community cohesion.
SDO 6 To reduce contributions to climate change	?	?	?	?	?	Improving sports facilities may result in more development which could have a negative impact on climate change as a result of an increase in demand for energy both in construction and operation. Such impacts will need to be mitigated by sustainable design and construction techniques. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	?	?	?	?	?	Improving sports facilities may result in more development which could have a negative impact on air quality in both construction and operation, which will need to be mitigated by sustainable design and construction techniques. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	?	?	?	Improving sports facilities may result in more development which could have a negative impact on waste generated in construction and operation. Impacts will need to be mitigated through the adoption of new technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Sustainable design and construction methods and site waste management plans should be used. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	?	?	?	?	?	Improving sports facilities may result in more development, which will result in an increase in water demand and usage. The sustainable use of water will be encouraged through the use of new technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 10 To maintain and enhance the quality of land and soils	?	?	?	?	?	Improving sports facilities may result in more development on green field land, which could have a negative impact on soil quality however this will need to be mitigated by sustainable design and construction techniques. New development on brown field land will seek to improve the existing quality of the land. Where land may be contaminated as a result of previous uses, suitable remediation would be needed before development could proceed.

SDO 11 To protect and enhance quality of landscape and townscape	✓	?	?	✓	✓	Improving and providing new sports facilities may help to improve the character of the townscape, creating a more vibrant area. Further guidance on design is set out in the Design and Access SPD
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	?	Development of new or improved sports facilities could have a negative impact upon the historic environment depending on their design and location and will need to be designed sensitively in relation to the historic character of the area. Further guidance on suitable mitigation is provided in the Conservation Area Appraisals and Design and Access SPD
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	?	?	✓	✓	Improving sports facilities could increase access to and usage of open spaces for sports therefore enhancing their use. Care will be needed to ensure that biodiversity is protected and enhanced. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 14 To reduce vulnerability to flooding	?	?	?	?	?	Development of new or improved sports facilities within the flood zone could increase flood risk depending on their design and location. This will be assessed at the planning application stage when a flood risk assessment will be required. Mitigation measures such as flood resistant design will need to be addressed in the design process. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	Provided that improved facilities do not result in an increase in car parking and promote sustainable modes of transport then this policy should increase sustainable modes of transport as more sports facilities will be provided in the local area minimising the need to travel by car.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		13	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	The policy aims to promote arts, culture and tourism in the area and protect existing business and community uses in the Strategic Cultural Area. This policy will help to retain and create new jobs, in particular through new facilities at the docks and a new hotel in the town centre.
SDO 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	✓✓	The promotion of arts, cultural and tourism uses will create new local jobs and provide more job-related opportunities for education and training.
SDO 3 To improve the health of the population	✓	?	✓	✓	✓	The policy promotes water related leisure activities and the use of pedestrian and cycling links to enhance access to the docks and river, which could help to improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	?	✓	✓	✓	The promotion of arts, culture and tourism uses will encourage more people to use the area in the evening, which should help to reduce crime and fear of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	?	✓	✓	✓	The promotion of arts, cultural and tourism uses in the town centre will benefit all of the community, creating more of a sense of place and promoting community cohesion.
SDO 6 To reduce contributions to climate change	?	?	?	?	?	The creation of new facilities may increase energy consumption and CO2 emissions in construction and operation, however sustainable design and construction methods should be used to mitigate such impacts. New and improved facilities may also result in an increase of visitors and trips to the area. Sustainable modes of transport will need to be promoted to mitigate the impacts. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	?	?	?	?	?	The creation of new facilities may reduce air quality as a result of construction and operation, however sustainable design and construction methods should be used to mitigate such impacts. New and improved facilities may also result in an increase of visitors and trips to the area. Sustainable modes of transport will need to be promoted to mitigate the impacts. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	?	?	?	The creation of new facilities may increase the amount of waste that is generated however if sustainable design and construction methods are used and site waste management plans are implemented the impact will be mitigated. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 9 To encourage sustainable use of water resources	?	?	?	?	?	The creation of new facilities may increase water demand and usage. The sustainable use of water will be encouraged through the use of new technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 10 To maintain and enhance the quality of land and soils	✓	?	✓	✓	✓	New development on brown field land will seek to improve the existing quality of the land. Where land may be contaminated as a result of previous uses, suitable remediation would be needed before development could proceed

SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	The promotion of arts, culture and tourism uses will improve the look and character of the area, particularly St Mary's Conservation Area and South Dock Marina. Further guidance on design is set out in the Design and Access SPD
SDO 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	✓	The promotion of arts, culture and tourism uses will improve the look and character of the historic environment in St Mary's Conservation Area. Further guidance is provided in the Conservation Area Appraisals and Design and Access SPD
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	?	?	?	?	?	The use of the docks for water related leisure and tourism activities will help to protect and enhance open spaces (the docks are classed as open spaces) although some activities could have a negative impact on biodiversity. Any potential negative effects will be dealt with in the detailed planning applications.
SDO 14 To reduce vulnerability to flooding	?	?	?	?	?	Development of new or improved sports facilities within the flood zone could increase flood risk depending on their design and location. This will be assessed at the planning application stage when a flood risk assessment will be required. Mitigation measures such as flood resistant design will need to be addressed in the design process. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	?	?	?	?	New and improved facilities is likely to result in an increase of visitors and trips to the area. Sustainable modes of transport will need to be promoted to mitigate the impacts and minimise the use of the private car.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		14	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	This policy aims to create an attractive environment by linking spaces together and creating a defined town centre area. An improved environment will help attract more inward investment to the area.
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	✓	An improved environment will attract more inward investment into the area increasing opportunities for education and training.
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	The policy promotes the provision of direct, safe and attractive pedestrian and cycling routes from the town centre to open spaces, which could lead to improved health for the population.
SDO 4 To reduce the incidence of crime and the fear of crime	✓✓	✓	✓✓	✓✓	✓✓	By providing high quality, safe and inclusive public realm with an improved pedestrian environment and better walking and cycling routes, crime and fear of crime should be reduced.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	✓✓	Improving the environment will create a better sense of place and improve community cohesion.
SDO 6 To reduce contributions to climate change	✓✓	✓	✓✓	✓✓	✓✓	The policy promotes walking and cycling which should minimise car use and reduce CO2 emissions.
SDO 7 To improve the air quality in Southwark	✓✓	✓	✓✓	✓✓	✓✓	The policy promotes walking and cycling which should minimise car use and reduce CO2 emissions and improve air quality
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	No significant impact
SDO 9 To encourage sustainable use of water resources	-	-	-	-	-	No significant impact
SDO 10 To maintain and enhance the quality of land and soils	✓✓	✓	✓✓	✓✓	✓✓	High quality, safe and inclusive public realm will be provided and open space enhanced which will improve the quality of land and soil
SDO 11 To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	✓✓	This policy aims to create an attractive environment by linking spaces together, creating a defined town centre area and improved public realm, which will improve the quality of the landscape and townscape
SDO 12 To conserve and enhance the historic environment and cultural assets	✓✓	✓	✓✓	✓✓	✓✓	This policy aims to create an attractive environment by linking spaces together, creating a defined town centre area and improved public realm, which should conserve and enhance the historic environment
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓	✓✓	✓✓	✓✓	The policy aims to create a better environment by providing new routes and open spaces in the area. This will have a positive effect on open spaces, green corridors and biodiversity.
SDO 14 To reduce vulnerability to flooding	✓	✓	✓	✓	✓	The inclusion of new open space could reduce surface water run-off and the impact of flooding
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact

SDO 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓✓	✓✓	✓✓	The policy aims to improve walking and cycling routes in the area and create a better environment for pedestrians and cyclists.
SDO 17 To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	✓✓	The policy seeks to provide new and improved pedestrian links and green infrastructure

Sustainability Objectives		Timescale				Commentary on Results
		15	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	High quality, durable, robust and sustainable building materials that contribute to a sense of quality and permanence are to be used which should encourage inward investment and job opportunities	
SDO 2 To improve the education and skill of the population	-	-	-	-	No significant impact	
SDO 3 To improve the health of the population	-	-	-	-	No significant impact	
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	A legible street layout between mixed use blocks should make it easier for pedestrians and cyclists to get around and increase activity, which may reduce crime or fear of crime	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	-	-	-	-	No significant impact	
SDO 6 To reduce contributions to climate change	✓	✓	✓	✓	Sustainable building materials are to be used and design layouts that avoid creating a canyon effect – causing increases in temperature, pollution and wind speed – contributing to the urban heat island effect	
SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	Sustainable building materials are to be used and design layouts that avoid creating a canyon effect – causing increases in temperature, pollution and wind speed – contributing to the urban heat island effect	
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	✓	✓	✓	Sustainable building materials are to be used, which could encourage the reuse and recycling of products that would otherwise become waste	
SDO 9 To encourage sustainable use of water resources	-	-	-	-	No significant impact	
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	No significant impact	
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	High quality buildings with shifts in height, design and layout are to be created, which minimise the visual impact of car parking and create an attractive, legible town centre	
SDO 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	High quality buildings with shifts in height, design and layout are to be created, which minimise the visual impact of car parking and create an attractive, legible town centre	
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	High quality buildings with shifts in height, design and layout are to be created, which avoid the canyon effect and use sustainable building materials. Such solutions could include green links and the greening of buildings increasing biodiversity	
SDO 14 To reduce vulnerability to flooding	?	?	?	?	The design and use of materials could reduce surface water run-off and therefore vulnerability to flooding. Mitigation measures such as flood resistant design will need to be addressed in the design process. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs	

SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	The design and layout will create a more legible environment that is attractive to pedestrians and cyclists and minimises the need to travel by car
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		16	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	The encouragement of mixed use blocks in the town centre will encourage inward investment and the creation of job opportunities
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	✓	Development within the town centre may provide opportunities for training and new skills
SDO 3 To improve the health of the population	✓	-	✓	✓	✓	Increasing employment opportunities will help to improve people's quality of life, which should have a positive effect on the health of the population
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	The policy seeks to improve the public realm, activate street frontages and improve connections for pedestrians and cyclists, which should reduce crime and fear of crime
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	The provision of a new high street and improved town centre will create a better sense of place and community cohesion
SDO 6 To reduce contributions to climate change	?	?	?	?	?	Development will lead to an increase in energy demand and consumption, however, mixed use development increases opportunities for energy savings to be made in the operation of the buildings and in the number of trips that need to be made by car, resulting in lower CO2 emissions. Any impacts will need to be mitigated by sustainable design and construction techniques. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	?	?	?	?	?	Development will lead to an increase in energy demand and consumption, however, mixed use development increases opportunities for energy savings to be made in the operation of the buildings and in the number of trips that need to be made by car, resulting in lower CO2 emissions and improved air quality. Any impacts will need to be mitigated by sustainable design and construction techniques. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	?	?	?	Development will lead to an increase in waste in construction and operation. Any impacts will need to be mitigated by suitable waste management techniques and recycling facilities. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	✓	New development will increase water demand and usage. The sustainable use of water will be encouraged through the use of new technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	New development will be on brown field land and will seek to improve the existing quality of the land. Where land may be contaminated as a result of previous uses, suitable remediation would be needed before development could proceed
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	Development will redefine the character of the southern part of the Surrey Quays road as an integral part of the town centre, improve linkages and provide a new high street which will improve the quality of the townscape

SDO 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-	No significant impact
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	An open street environment is to be provided which may provide opportunities for green links and biodiversity that would not be achieved by a mall style environment
SDO 14 To reduce vulnerability to flooding	?	?	?	?	Development is in the flood zone. The design and use of materials could reduce surface water run-off and therefore vulnerability to flooding. Mitigation measures such as flood resistant design will need to be addressed in the design process. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓✓	✓✓	Mixed uses and improved pedestrian and cycle links are proposed which should help to minimise the need to travel and the use of the car
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		17	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	A range of building heights will create an area which is more interesting and distinctive, enables mixed use development, creates landmarks and attracts inward investment and a range of business opportunities
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	✓	A mix of uses and range of businesses will provide greater opportunities for training and skill development
SDO 3 To improve the health of the population	?	?	?	?	?	Building heights will need to be carefully managed to ensure that the impacts of overshadowing, loss of daylight and adverse wind conditions are mitigated, particularly in relation to the pedestrian environment and areas of open space
SDO 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	-	No significant impact
SDO 5 To promote social inclusion, equality, diversity and community cohesion	-	-	-	-	-	No significant impact
SDO 6 To reduce contributions to climate change	?	?	?	?	?	The height of buildings will have an impact on climate change and CO2 emissions. A heat island effect could be created. Developments will need to demonstrate how they can mitigate against any negative impacts on climate change. Increasing the density of developments in certain areas that are close to public transport links can help to reduce car use and reduce CO2 emissions. Any impacts will need to be mitigated by sustainable design and construction techniques. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	?	?	?	?	?	Higher density buildings tend to generate more heat and CO2 emissions reducing air quality. Sustainable design and construction methods will need to be used to mitigate such impacts. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	?	?	?	New development will increase the amount of waste generated. Any impacts will need to be mitigated by suitable waste management techniques and recycling facilities. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	✓	New development will increase water demand and usage. The sustainable use of water will be encouraged through the use of new technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	New development will be on brown field land and will seek to improve the existing quality of the land. Where land may be contaminated as a result of previous uses, suitable remediation would be needed before development could proceed
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	The policy aims to set clear guidelines about the height of buildings in the core area. However, parts of the core area are sensitive to tall buildings and particular care will need to be taken in these areas with buildings restricted to approx 10 storeys. The quality of the architecture will also need to be of the highest quality

SDO 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	✓	The policy aims to set clear guidelines about the height of buildings in the core area. However, parts of the core area are sensitive to tall buildings and particular care will need to be taken in these areas with buildings restricted to approx. 10 storeys. The quality of the architecture will also need to be of the highest quality
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	✓	The policy aims to set clear guidelines about the height of buildings in the core area. In particular the height of development around the Canada Water Basin and Russia Dock Woodland will be lower. This will help improve the setting of the open spaces.
SDO 14 To reduce vulnerability to flooding	?	?	?	?	?	Development is in the flood zone. The design and use of materials could reduce surface water run-off and therefore vulnerability to flooding. Mitigation measures such as flood resistant design will need to be addressed in the design process, irrespective of the height of the buildings. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	The height of buildings is linked to their proximity to public transport links. Taller buildings with higher densities will be located close to public transport links therefore encouraging more people to walk, cycle and use public transport, minimising the need to travel by car
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		18	S	M	L	
CWAAP Policy 18 Open Spaces and Biodiversity						
SDO 1 To tackle poverty and encourage wealth creation	✓	-	✓	✓	✓	Protecting and improving open space within the area will improve the quality of the environment and encourage inward investment
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	✓	Protecting and improving the open spaces in the area will provide opportunities for education and training. The designation of sites of importance for nature conservation call help to raise awareness of ecology and biodiversity issues helping to encourage the development of more skills in this area.
SDO 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	✓✓	The policy promotes the development of a network of open spaces and play areas. Better access to open spaces and recreation will help to improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	✓	Creating high quality open spaces and play facilities will increase the usage of these areas, increasing surveillance and reducing crime and fear of crime. Designating sites as SINCS can help to increase residents understanding of the importance of open spaces and increase the sense of pride in the area which may in turn help to reduce levels of crime and fear of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	✓✓	Protecting and improving open spaces in an area that is currently deficient will ensure more people have access to parks, gardens and recreation and meet the needs of a growing population in a built up area
SDO 6 To reduce contributions to climate change	✓	✓	✓	✓	✓	Protecting and improving open spaces will help to reduce contributions to climate change. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	✓	Protecting and improving open spaces will help to improve air quality. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	No significant link
SDO 9 To encourage sustainable use of water resources	?	?	?	?	?	More green spaces can help to reduce surface water run-off and improve water quality, however water will be needed for irrigation. The use of water will need to be controlled through appropriate management techniques. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	Improved open spaces may improve soil quality in the area, this will depend on how open spaces are managed to ensure conservation and protection of priority habitats. The designation of sites as SINCS can help to raise awareness of ecology and biodiversity issues which may result in the use of better management techniques for land and soils.
SDO 11 To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	✓✓	A high quality network of open spaces will enhance the quality and appearance of the area. Further guidance is provided in the Design and access SPD
SDO 12 To conserve and enhance the historic	✓✓	✓	✓✓	✓✓	✓✓	High quality open spaces will enhance the historic value of the area by improving their setting.

environment and cultural assets																	
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
SDO 14 To reduce vulnerability to flooding	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 17 To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
The policy aims to create a high quality network of open spaces. This will include green corridors and promote biodiversity. Important open spaces will be protected from inappropriate development. New development will be required to meet the needs of a growing population whilst avoiding harm to protected and priority species. The Southwark Open Spaces Strategy sets out a range of standards for the quality, design, quantity and accessibility of open space provision																	
More and improved green spaces will reduce surface water run-off from hard surfaces reducing flood risk.																	
No significant impact																	
Better links between open spaces will promote walking and cycling and reduce car journeys.																	
Protecting and improving open spaces will increase the green infrastructure provision and help to meet the demands associated with a growing population. In the identified areas of deficiency, there will be a requirement for new provision to be made to meet the benchmark standards for open space																	

Sustainability Objectives		Timescale				Commentary on Results
		19	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	-	✓	✓	Protecting and improving children's play space within the area will improve the quality of the residential environment and may encourage inward investment	
SDO 2 To improve the education and skill of the population	-	-	-	-	No significant impact	
SDO 3 To improve the health of the population	✓	-	✓	✓	An assessment of the existing provision of children's play spaces has identified areas of deficiency. Space needs to be provided to provide informal areas for play and recreation, which can have beneficial effects on health by encouraging children to take exercise	
SDO 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Improved facilities for older children will provide constructive activities for that may lead to reduced levels of crime and fear of crime	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	Improved facilities will provide significant benefits for young people but also contribute to better community cohesion	
SDO 6 To reduce contributions to climate change	-	-	-	-	No significant impact	
SDO 7 To improve the air quality in Southwark	-	-	-	-	No significant impact	
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	No significant impact	
SDO 9 To encourage sustainable use of water resources	-	-	-	-	No significant impact	
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	No significant impact	
SDO 11 To protect and enhance quality of landscape and townscape	-	-	-	-	No significant impact	
SDO 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-	No significant impact	
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	The provision of children's play space could enhance open space provision	
SDO 14 To reduce vulnerability to flooding	?	?	?	?	Development is in the flood zone. The design and use of materials could reduce surface water run-off and therefore vulnerability to flooding. Mitigation measures such as flood resistant design will need to be addressed in the design process. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.	

SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	The provision of local facilities will reduce the need to travel and minimise the use of the car
SDO 17 To provide the necessary infrastructure to support existing and future development	-	-	-	-	-	No significant impact

Sustainability Objectives		Timescale				Commentary on Results
		20	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	By creating more energy efficient buildings, energy costs will be reduced, which will help to address the issue of fuel poverty. The availability of efficient buildings will also attract inward investment
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	✓	The use of new technologies in the local area can help improve the education and skill base of the population.
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	More energy efficient building will help reduce fuel poverty and improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	-	No significant impact
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	Improving the energy efficiency of buildings will help to reduce bills for people on lower incomes such as the elderly.
SDO 6 To reduce contributions to climate change	✓✓	✓	✓✓	✓✓	✓✓	The amount of development will increase the demand for energy and carbon emissions. New development will be required to reduce carbon emissions though implementing the energy hierarchy. The introduction of a district heating system will improve energy efficiency and result in less CO2 emissions. Development will need to be designed according to sustainable design and construction techniques. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	✓	The aim of the policy is to reduce energy used by new developments and minimise CO2 emissions. This will help to improve air quality.
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	No significant impact
SDO 9 To encourage sustainable use of water resources	-	-	-	-	-	No significant impact .
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	-	No significant impact.
SDO 11 To protect and enhance quality of landscape and townscape	?	?	?	?	?	New technologies, for example wind turbines or solar panels could have a detrimental impact on the appearance and character of the area. Care will need to be taken on the design and location, which will be assessed through the detailed planning applications. Further guidance can be found in the Design and Access SPD and Sustainable Design and Construction SPD
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	?	New technologies, for example wind turbines or solar panels could have a detrimental impact on the appearance and character of the area. Care will need to be taken on the design and location, which will be assessed through the detailed planning applications. Further guidance can be found in the Design and Access SPD and Sustainable Design and Construction SPD

SDO 13 To protect and enhance open spaces, green corridors and biodiversity	-	-	-	-	No significant impact
SDO 14 To reduce vulnerability to flooding	-	-	-	-	No significant impact
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	New homes will be more energy efficient reducing energy costs for residents.
SDO 16 To promote sustainable transport and minimise the need to travel by car	-	-	-	-	No significant impact
SDO 17 To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. The district heating network will meet the infrastructure needs for the area. Southwark will use s106 planning obligations to require and major developments to connect to the network where feasible. Funding for the network will be provided from the Renewable Obligation Certificates, potential funding generated through "allowable solutions", as well as s106 planning obligations (in cases where developments are unable to meet CO2 reduction targets through on-site measures).. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		21	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Development will include 2,500 new homes which will provide high quality housing for the local community and newcomers to support the growing population. The provision of new homes will also require the need for new services and facilities, which will result in new job opportunities. <u>The inclusion of residential room size standards will result in a high standard of living accommodation helping to encourage more people to move to area as well as improving opportunities for existing local residents.</u>	
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	Local job and training opportunities will be created in the construction and maintenance of new homes which will provide opportunities to improve the skills of the population.	
SDO 3 To improve the health of the population	✓	✓	✓	✓	The development of high quality housing should lead to improvements in the health of the population, by creating decent homes. <u>The inclusion of residential room size standards will result in a high standard of living accommodation which may result in improvements in health.</u>	
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	The creation of new homes and communities will increase the population of the area creating more activity, which could reduce levels of crime and fear of crime. <u>A higher quality of living accommodation can result in people having more pride in their local area which can in turn reduce levels of crime and fear of crime.</u>	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	The provision of new housing responds to the need identified within the Strategic Housing Market Assessment and Housing Requirements Studies. The provision of new housing will be balanced against the need to provide for other activities such as shopping and office, which will promote better community cohesion. <u>By setting out minimum room size standards, the AAP will encourage a wider mix of accommodation helping to meet the needs of different residents which will lead to increased social cohesion.</u>	
SDO 6 To reduce contributions to climate change	X	X	X	X	Increasing the amount of housing in the area will increase energy use in both construction and operation, however, all new development will be expected to minimise energy use and reduce CO2 emissions. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs	
SDO 7 To improve the air quality in Southwark	X	X	X	X	Increasing the amount of housing in the area will increase energy use and CO2 emissions in both construction and operation which will have a negative impact on air quality, however, all new development will be expected to minimise emissions that have an adverse impact on air quality. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs	
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	X	X	X	X	Increasing the amount of housing in the area will increase waste, however, all new development will be expected to minimise waste in construction and operation. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs	
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	New development will increase water demand and usage. The sustainable use of water will be encouraged through the use of new technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.	
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will be on brown field land and will seek to improve the existing quality of the land. Where land may be contaminated as a result of previous uses, suitable remediation would be needed before development could proceed	

SDO 11 To protect and enhance quality of landscape and townscape	?	?	?	?	?	?	The impact of new housing on the appearance and character of places will be dependent on the design. If new developments are designed well they will enhance the look and character of the area. Further guidance is provided in the Design and Access SPD
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	?	?	The impact of new housing on the historic value of places will be dependent on the design. If new developments are designed well they could enhance the historic character of the area. Further guidance is provided in the Design and Access SPD and Conservation Area Appraisals
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	✓	✓	No new housing is proposed on open spaces and new development may create opportunities to create additional open spaces and green corridors through design and Section 106 contributions to the public realm.
SDO 14 To reduce vulnerability to flooding	X	X	X	X	X	X	Development is in the flood zone. The design and use of materials could reduce surface water run-off and therefore vulnerability to flooding. Mitigation measures such as flood resistant design will need to be addressed in the design process. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	✓✓	✓✓	Development will include 2,500 new homes which will provide high quality housing for the local community increasing the opportunity for people to live in a decent home. <u>By setting out minimum room size standards, the AAP will encourage a wider mix of accommodation helping to meet the needs of different residents and ensuring more people have the opportunity to live in a decent home.</u>
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	✓	Increasing the amount of housing in the area could lead to an increase in cars and traffic, however most of the new housing is located in the core area where there is good accessibility to public transport facilities. All new housing developments will also be subject to reduced car parking standards, which aim to minimise car use and promote more sustainable forms of transport. Including minimum room size standards will help to increase the provision of larger dwellings enable families to stay in the local area, this could reduce the need to travel as people have more opportunity to stay in the same area as their relatives and friends.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		22	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	Development in the AAP area will provide a minimum of 875 new affordable homes. In schemes of 10 or more homes at least 35% of homes must be affordable, with 70% social rented and 30% intermediate. The Affordable Housing Viability Study has identified that this amount of provision is deliverable. The provision of affordable housing will help to provide in an increased housing choice enabling a more mixed community, tackling poverty and encouraging wealth creation
SDO 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	✓✓	Local job and training opportunities will be created in the construction and maintenance of new homes which will provide opportunities to improve the skills of the population.
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	The provision of new 875 new affordable homes will increase the number of decent homes in the area. Existing housing that does not meet the decent home standards will be refurbished. The improvement in the quality of the housing will have beneficial impacts for the health of the population
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	The creation of new homes and communities will increase the population of the area creating more activity, which could reduce levels of crime and fear of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	✓✓	The provision of affordable housing will help to provide a more mixed and balanced community at Canada Water that is more socially inclusive
SDO 6 To reduce contributions to climate change	X	X	X	X	X	Increasing the amount of housing in the area will increase energy use in both construction and operation, however, all new development will be expected to minimise energy use and reduce CO2 emissions. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	X	X	X	X	X	Increasing the amount of housing in the area will increase energy use and CO2 emissions in both construction and operation which will have a negative impact on air quality, however, all new development will be expected to minimise emissions that have an adverse impact on air quality. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	X	X	X	X	X	Increasing the amount of housing in the area will increase waste, however, all new development will be expected to minimise waste in construction and operation. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	✓	New development will increase water demand and usage. The sustainable use of water will be encouraged through the use of new technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	New development will be on brown field land and will seek to improve the existing quality of the land. Where land may be contaminated as a result of previous uses, suitable remediation would be needed before development could proceed
SDO 11 To protect and enhance quality of landscape and townscape	?	?	?	?	?	The impact of new housing on the appearance and character of places will be dependent on the design. If new developments are designed well they will enhance the look and character of the area. Further guidance is provided in the Design and Access SPD

SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	The impact of new housing on the historic value of places will be dependent on the design. If new developments are designed well they could enhance the historic character of the area. Further guidance is provided in the Design and Access SPD and Conservation Area Appraisals
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	No new housing is proposed on open spaces and new development may create opportunities to create additional open spaces and green corridors through design and Section 106 contributions to the public realm.
SDO 14 To reduce vulnerability to flooding	X	X	X	X	Development is in the flood zone. The design and use of materials could reduce surface water run-off and therefore vulnerability to flooding. Mitigation measures such as flood resistant design will need to be addressed in the design process. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	The provision of new 875 new affordable homes will increase the number of decent homes in the area. Existing housing that does not meet the decent home standards will be refurbished.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	Increasing the amount of housing in the area could lead to an increase in cars and traffic, however most of the new housing is located in the core area where there is good accessibility to public transport facilities. All new housing developments will also be subject to reduced car parking standards, which aim to minimise car use and promote more sustainable forms of transport.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		CWAAP Policy 23 Family Homes				Timescale		
		23	S	M	L	Commentary on Results		
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓		The Strategic Housing Market Assessment and Housing requirements Study showed that there is a need for family housing across all tenures. By providing more family housing within the area it will reduce the need for families to live in overcrowded or unsuitable homes and provide opportunities for families of all incomes to live in the area – thereby tackling poverty and encouraging wealth creation		
SDO 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓		Local job and training opportunities will be created in the construction and maintenance of new homes and facilities which will provide opportunities to improve the skills of the population.		
SDO 3 To improve the health of the population	✓	✓	✓	✓		The provision of more family housing will reduce problems of over crowding and unsuitable housing, improving the health of the population		
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓		The creation of new homes and communities will increase the population of the area creating more activity, which could reduce levels of crime and fear of crime.		
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓		The provision of more family housing across all tenures will maximise the diversity of housing choice and enable families to stay within the area, promoting community cohesion		
SDO 6 To reduce contributions to climate change	X	X	X	X		Increasing the amount of housing in the area will increase energy use in both construction and operation, however, all new development will be expected to minimise energy use and reduce CO2 emissions. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs		
SDO 7 To improve the air quality in Southwark	X	X	X	X		Increasing the amount of housing in the area will increase energy use and CO2 emissions in both construction and operation which will have a negative impact on air quality, however, all new development will be expected to minimise emissions that have an adverse impact on air quality. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs		
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	X	X	X	X		Increasing the amount of housing in the area will increase waste, however, all new development will be expected to minimise waste in construction and operation. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs		
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓		New development will increase water demand and usage. The sustainable use of water will be encouraged through the use of new technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.		
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓		New development will be on brown field land and will seek to improve the existing quality of the land. Where land may be contaminated as a result of previous uses, suitable remediation would be needed before development could proceed		
SDO 11 To protect and enhance quality of landscape and townscape	?	?	?	?		The impact of new housing on the appearance and character of places will be dependent on the design. If new developments are designed well they will enhance the look and character of the area. Further guidance is provided in the Design and Access SPD		

SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	The impact of new housing on the historic value of places will be dependent on the design. If new developments are designed well they could enhance the historic character of the area. Further guidance is provided in the Design and Access SPD and Conservation Area Appraisals
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	No new housing is proposed on open spaces and new development may create opportunities to create additional open spaces and green corridors through design and Section 106 contributions to the public realm.
SDO 14 To reduce vulnerability to flooding	X	X	X	X	Development is in the flood zone. The design and use of materials could reduce surface water run-off and therefore vulnerability to flooding. Mitigation measures such as flood resistant design will need to be addressed in the design process. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	The provision of new family housing across all tenures will increase the opportunity for people to live in a decent home
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	Increasing the amount of housing in the area could lead to an increase in cars and traffic, however most of the new housing is located where there is good accessibility to public transport facilities. All new housing developments will also be subject to reduced car parking standards, which aim to minimise car use and promote more sustainable forms of transport.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		CWAAP Policy 24 Density of Residential Development			
		24	S	M	L
			Commentary on Results		
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Higher densities are focussed in the town centre area and areas with good public transport services with much of the area designated as a suburban density zone. The higher densities in the core area will help to create a genuine town centre and encourage inward investment and support for facilities and services.
SDO 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	Local job and training opportunities will be created in the construction and maintenance of new homes and facilities which will provide opportunities to improve the skills of the population.
SDO 3 To improve the health of the population	✓	✓	✓	✓	Locating higher densities in the core area close to public transport services will minimise the need to travel by car, provide greater opportunities for walking and cycling and improve air quality and, which will improve the health of the population
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	Increasing the density will create more activity in the town centre which should result in reduced levels of crime and fear of crime
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	Increased densities will bring more people to live in the area which will provide a more vibrant, diverse town centre
SDO 6 To reduce contributions to climate change	?	?	?	?	Although the energy demand needed for the quantum of development will have a negative impact upon emissions, increasing the mix and density in the area will reduce the need to travel and increase the viability of district heat networks. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	?	?	?	?	Increasing the amount of housing in the area will increase energy use and CO2 emissions in both construction and operation which will have a negative impact on air quality. However, the need to travel and the related emissions will be reduced. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	?	?	Increasing the amount of housing in the area will increase waste, however, all new development will be expected to minimise waste in construction and operation. The increase in density may make the introduction systems such as vacuum waste more viable. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	New development will increase water demand and usage. The sustainable use of water will be encouraged through the use of new technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	Increased densities on brown field land will reduce pressure on land elsewhere in the borough. Where land may be contaminated as a result of previous uses, suitable remediation would be needed before development could proceed
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	Taller, higher density buildings are focused in the town centre. As development moves away from the core the height and density will reduce accordingly to reflect the character of the surrounding area. Further guidance is provided in the Design and Access SPD

SDO 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	✓	Taller, higher density buildings are focused in the town centre. As development moves away from the core the height and density will reduce accordingly to reflect the character of the surrounding area. Designating the area as part of the suburban zone will reduce the scale of new development which will help to protect the existing historic environment and cultural assets. Further guidance is provided in the Design and Access SPD and Conservation Area Appraisals
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓	✓✓	✓✓	✓✓	Increased densities on brown field land will reduce pressure on open spaces and green corridors. Designating the area as part of the suburban zone will reduce the scale of new development which will help to protect the existing open spaces, green corridors and biodiversity and may allow for the creation of new open spaces as part of new development.
SDO 14 To reduce vulnerability to flooding	X	X	X	X	X	Development is in the flood zone. The design and use of materials could reduce surface water run-off and therefore vulnerability to flooding. Mitigation measures such as flood resistant design will need to be addressed in the design process. Reducing the scale of development in a flood risk area is in line with advice set out in PPS25. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	✓✓	Increased densities will result in more housing being provided in the area increasing the opportunities for everyone to live in a decent home. Designating the area as part of the suburban zone will reduce the scale of new development and help to promote larger dwelling sizes which will help to ensure more people can afford to live in suitable accommodation in the area.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	Locating higher densities in the core area close to public transport services will minimise the need to travel by car and provide greater opportunities for walking and cycling. However designating the area as part of the suburban zone could mean that the reduction in the scale of new development may not lead to the reductions in travel by car that could be achieved through higher scale developments.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	New development will place an increased demand upon the infrastructure. However, increased densities will increase the viability of infrastructure networks and services. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		25	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	The policy seeks to promote a business cluster in the area, through the provision of around 12,000 sqm of new office and light industrial space in order to meet the needs identified within the Employment Land review. The business cluster will provide flexible business space, creating more opportunities for local jobs and encouraging inward investment and wealth creation.
SDO 2 To improve the education and skill of the population	✓✓	✓✓	✓✓	✓✓	✓✓	The provision of more business space will create more jobs and opportunities for education and training. Training and employment opportunities created by new development will be targeted towards local people and businesses
SDO 3 To improve the health of the population	✓	-	✓	✓	✓	The policy aims to provide more business space and create more local jobs. Increasing employment opportunities will help to improve people's quality of life, which should have a positive effect on the health of the population
SDO 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	✓	Creating a new business cluster and more jobs will result in more people using the area and passing through, which is likely to reduce crime and fear of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	✓✓	The creation of more local jobs will help to reduce social inequalities and promote social inclusion, equality, diversity and community cohesion
SDO 6 To reduce contributions to climate change	X	X	X	X	X	Increasing the amount of businesses in the area will increase energy use overall however all new development will be expected to minimise energy use and reduce CO2 emissions. Further guidance on energy efficient design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	X	X	X	X	X	Increasing the amount of businesses in the area will increase the impact on air quality in construction and operation. However, focusing the development in an accessible location will help to reduce reliance on the car and the related traffic emissions. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	X	X	X	X	X	Increasing the amount of businesses in the area will increase waste however all new development will be expected to minimise waste generated in construction and operation. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	✓	New development will be expected to encourage the sustainable use of water resources through the use of technologies such as sustainable urban drainage systems and grey water recycling. As new systems become more readily available the performance is likely to improve
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	New business uses will be provided on brown field land. If land is contaminated as a result of previous uses, suitable remediation will be needed before development can commence
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	The impact of new business space on the look and character of places will be dependent on the design. If new developments are designed well they will enhance the look and character of the area. Further guidance is provided in the Design and Access SPD

SDO 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	✓	The impact of new businesses on the historic value of places will be dependent on the design. If new developments are designed well they could enhance the historic character of the area. New development will need to show the impacts upon the preservation or enhancement of the area. Further guidance is provided in the design and Access SPD and Conservation area Appraisals
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	✓	No new business space is proposed on open spaces and new development may create opportunities to create additional open spaces and green corridors through design and Section 106 contributions to the public realm. Priorities for open space are set out in Southwark's Open Space and Biodiversity strategies
SDO 14 To reduce vulnerability to flooding	?	?	?	?	?	Development will occur in the flood zone. Flood risk assessments and the identification of suitable mitigation measures will need to be included as part of the planning application. Further guidance on mitigations such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	?	?	?	?	Increasing the amount of business space in the area could lead to an increase in cars and traffic however all new development will be subject to specific car parking standards and is located in area of good public transport, which should minimise car use and promote more sustainable forms of transport.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		26	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	?	✓	✓	✓	A new secondary school is proposed as well as the possible addition of new primary school places. This will provide more opportunities for the local population to acquire skills and encourage wealth creation in the long term.
SDO 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	✓✓	The provision of a new secondary school and additional primary school places will have a positive effect on the education and skills of the population and its anticipated growth.
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	The policy aims to provide a new school in the area. This will have an indirect impact on the health of the population as people who have access to a good education are often in better health.
SDO 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	-	No significant impact
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	A new school will benefit the whole community, promoting community cohesion and providing a new focal point for the area.
SDO 6 To reduce contributions to climate change	X	X	X	X	X	The provision of a new school will increase energy use overall however all new development will be expected to minimise energy use and reduce CO2 emissions. Further guidance on energy efficient design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	X	X	X	X	X	The provision of a new school will increase the impact on air quality in construction and operation. However, focusing the development in an accessible location will help to reduce reliance on the car and the related traffic emissions. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	X	X	X	X	X	The provision of a new school will increase waste, however all new development will be expected to minimise waste generated in construction and operation. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	✓	New development will be expected to encourage the sustainable use of water resources through the use of technologies such as sustainable urban drainage systems and grey water recycling. As new systems become more readily available the performance is likely to improve.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	The sites proposed for development of new schools are already brownfield sites so soil quality should not be reduced and offer the opportunity for improvements to be made
SDO 11 To protect and enhance quality of landscape and townscape	?	?	?	?	?	The impact of new schools on the character and appearance of places will be dependent on the design. If new developments are designed well they will enhance the look and character of the area. Further guidance is provided in the Design and Access SPD
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	?	The impact of new schools on the historic value of places will be dependent on the design. If new developments are designed well they could enhance the historic character of the area. New development will need to show the impacts upon the preservation or enhancement of the area. Further guidance is provided in the design and Access SPD and Conservation area Appraisals

CWAAP Policy 26 Schools

SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	No new schools are proposed on open spaces and new development may create opportunities to create additional open spaces and green corridors through design and Section 106 contributions to the public realm.
SDO 14 To reduce vulnerability to flooding	X	X	X	X	Development will occur in the flood zone. Flood risk assessments and the identification of suitable mitigation measures will need to be included as part of the planning application. Further guidance on mitigations such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs. Specific measures are required to reduce flood risk for schools as they are classified as a vulnerable use because children will be in the building.
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	?	?	?	Building new schools in the area could lead to an increase in cars and traffic however all new development will be subject to specific car parking standards, which aims to reduce car use and will seek to promote more sustainable forms of transport. School travel plans will be required.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		27	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	The policy aims to locate new community facilities together where there is an identified need for new services. New facilities may create local job opportunities.
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	✓	New community facilities may create opportunities for education and training opportunities.
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	The policy seeks to protect existing community facilities, this will include health centres, which will have a positive impact on health.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	More centrally located community facilities will create more activity in places which can help to reduce crime and fear of crime
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	✓✓	Protecting existing community facilities and providing new services will benefit all equalities groups and promote community cohesion. Facilities will be provided where there is a clear requirement and an identified body who will manage them on a viable basis
SDO 6 To reduce contributions to climate change	X	X	X	X	X	The provision of new community facilities will increase energy use overall however all new development will be expected to minimise energy use and reduce CO2 emissions and the sharing of facilities is to be encouraged where possible. Further guidance on energy efficient design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	X	X	X	X	X	The provision of new community facilities will increase the impact on air quality in construction and operation. However, focusing the development in an accessible location will help to reduce reliance on the car and the related traffic emissions. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	X	X	X	X	X	The provision of new community facilities will increase waste, however all new development will be expected to minimise waste generated in construction and operation. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	✓	New development will be expected to encourage the sustainable use of water resources through the use of technologies such as sustainable urban drainage systems and grey water recycling. As new systems become more readily available the performance is likely to improve.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	The sites proposed for development are brown field sites so soil quality should not be reduced and offer the opportunity for improvements to be made
SDO 11 To protect and enhance quality of landscape and townscape	?	?	?	?	?	The impact of new community facilities on the character and appearance of places will be dependent on the design. If new developments are designed well they will enhance the look and character of the area. Further guidance is provided in the Design and Access SPD
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	?	The impact of new community facilities on the historic value of places will be dependent on the design. If new developments are designed well they could enhance the historic character of the area. New development will need to show the impacts upon the preservation or enhancement of the area. Further guidance is provided in the design and Access SPD and Conservation area Appraisals

SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	New development may create opportunities to create additional open spaces and green corridors through design and Section 106 contributions to the public realm.
SDO 14 To reduce vulnerability to flooding	X	X	X	X	Development will occur in the flood zone. Flood risk assessments and the identification of suitable mitigation measures will need to be included as part of the planning application. Further guidance on mitigations such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	The policy aims to locate all new community facilities close to one another in accessible locations, which should minimise the need to travel by car and encourage walking, cycling and the use of public transport.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		28	S	M	L	
CWAAP Policy 28 Early Years	SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	The policy aims to provide more pre-school places to meet the demands of the growing population in the area. The provision of pre-school facilities will provide the opportunity for people to go out to work and earn an income
	SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	Improving access to pre-school places will give people the opportunity to get involved in education or develop new skills
	SDO 3 To improve the health of the population	✓	✓	✓	✓	The provision of pre-school facilities will give parents the chance to work or do other activities such as sport, which could have a positive impact upon health
	SDO 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	No significant impact
	SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	The provision of pre-school facilities will provide opportunities for greater social inclusion particularly for people on low incomes
	SDO 6 To reduce contributions to climate change	✓	✓	✓	✓	The policy aims to co-locate facilities with other schools, which will reduce contributions to climate change in comparison with building stand alone facilities.
	SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	The policy aims to co-locate facilities with other schools, which will reduce the need to travel and the level of emissions improving air quality
	SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	?	?	The provision of new facilities will increase waste, however, the policy aims to co-locate facilities with other schools which could result in greater efficiencies. All new development will be expected to minimise waste generated in construction and operation. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
	SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	The provision of new facilities will increase water demand, however, the policy aims to co-locate facilities with other schools which could result in greater efficiencies. New development will be expected to encourage the sustainable use of water resources through the use of technologies such as sustainable urban drainage systems and grey water recycling. As new systems become more readily available the performance is likely to improve.
	SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	The sites proposed for developments are brown field sites so soil quality should not be reduced and offer the opportunity for improvements to be made
	SDO 11 To protect and enhance quality of landscape and townscape	?	?	?	?	The impact of new facilities on the character and appearance of places will be dependent on the design. If new developments are designed well they will enhance the look and character of the area. Further guidance is provided in the Design and Access SPD
	SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	The impact of new facilities on the historic value of places will be dependent on the design. If new developments are designed well they could enhance the historic character of the area. New development will need to show the impacts upon the preservation or enhancement of the area. Further guidance is provided in the design and Access SPD and Conservation area Appraisals

SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	New development may create opportunities to create additional open spaces and green corridors through design and Section 106 contributions to the public realm
SDO 14 To reduce vulnerability to flooding	X	X	X	X	Development will occur in the flood zone. Flood risk assessments and the identification of suitable mitigation measures will need to be included as part of the planning application. Further guidance on mitigations such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	The policy aims to locate all new facilities close to one another in accessible locations, which should minimise the need to travel by car and encourage walking, cycling and the use of public transport.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		29	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	The policy aims to provide new health facilities to meet the needs of the growing population. Improved access to health services can have an indirect impact on the well-being of the population and ability to access jobs.
SDO 2 To improve the education and skill of the population	-	-	-	-	-	No significant impact.
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	The policy will have a positive effect on the health of the population as it will improve access to health facilities
SDO 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	-	No significant impact
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	The provision of new health facilities will benefit all equalities groups and promote community cohesion.
SDO 6 To reduce contributions to climate change	X	X	X	X	X	The provision of new health facilities will increase energy use overall however all new development will be expected to minimise energy use and reduce CO2 emissions. Further guidance on energy efficient design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 7 To improve the air quality in Southwark	X	X	X	X	X	The provision of new health facilities will increase the impact on air quality in construction and operation. However, focusing the development in an accessible location will help to reduce reliance on the car and the related traffic emissions. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	X	X	X	X	X	The provision of new health facilities will increase waste, however, all new development will be expected to minimise waste generated in construction and operation. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	✓	New development will be expected to encourage the sustainable use of water resources through the use of technologies such as sustainable urban drainage systems and grey water recycling. As new systems become more readily available the performance is likely to improve.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	The sites proposed for development are brown field sites so soil quality should not be reduced and offer the opportunity for improvements to be made
SDO 11 To protect and enhance quality of landscape and townscape	?	?	?	?	?	The impact of new facilities on the character and appearance of places will be dependent on the design. If new developments are designed well they will enhance the look and character of the area. Further guidance is provided in the Design and Access SPD
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	?	The impact of new facilities on the historic value of places will be dependent on the design. If new developments are designed well they could enhance the historic character of the area. New development will need to show the impacts upon the preservation or enhancement of the area. Further guidance is provided in the design and Access SPD and Conservation area Appraisals

SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	✓	New development may create opportunities to create additional open spaces and green corridors through design and Section 106 contributions to the public realm.
SDO 14 To reduce vulnerability to flooding	X	X	X	X	X	Vulnerable development will occur in the flood zone. Flood risk assessments and the identification of suitable mitigation measures will need to be included as part of the planning application. Further guidance on mitigations such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	?	?	?	?	The policy aims to locate new facilities in accessible locations, which should minimise the need to travel by car and encourage walking, cycling and the use of public transport. Building new health facilities in the area could lead to an increase in cars and traffic however all new development in the core area will be subject to specific car parking standards which aims to reduce car use and promote more sustainable forms of transport.
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		30	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	The regeneration of the area will create job opportunities and attractive inward investment
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	✓	The regeneration of the area will create opportunities for training and skill development
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	The creation of jobs, improved housing and facilities and reduction in poverty can lead to improvements in the health of the population
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	Encouraging more activity in the area and providing more jobs and facilities should help to reduce crime and fear of crime
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	The creation of jobs, improved housing and facilities and reducing poverty will promote social inclusion and the improved environment should lead to more community cohesion
SDO 6 To reduce contributions to climate change	?	?	?	?	?	Any new development will need to be built to reduce energy demand and improve efficiency, reducing CO2 emissions. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs. Improving pedestrian and cycle links should help to improve emissions from transport
SDO 7 To improve the air quality in Southwark	?	?	?	?	?	Any new development will need to be built to reduce energy demand and improve efficiency, reducing CO2 emissions. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs. Improving pedestrian and cycle links should help to improve emissions from transport and improve air quality
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	?	?	?	The amount of waste generated by markets can be significant. Appropriate controls and measures will need to be put in place to ensure waste is minimised and waste arisings are dealt with in the most sustainable way. Waste management techniques and recycling facilities will also be needed. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	✓	New development will be expected to encourage the sustainable use of water resources through the use of technologies such as sustainable urban drainage systems and grey water recycling. As new systems become more readily available the performance is likely to improve.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	The sites proposed for development are brown field sites so soil quality should not be reduced and offer the opportunity for improvements to be made
SDO 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	The viability of the shopping parade will be reinforced, improving the townscape, and the potential for a market investigated. Southwark will work leasees to improve the appearance of shop fronts. The impact of new facilities on the character and appearance of places will be dependent on the design. If new developments are designed well they will enhance the look and character of the area. Further guidance is provided in the Design and Access SPD

SDO 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	✓	The impact of new facilities on the historic value of places will be dependent on the design. If new developments are designed well they could enhance the historic character of the area. New development will need to show the impacts upon the preservation or enhancement of the area. Further guidance is provided in the design and Access SPD and Conservation area Appraisals
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	✓	New development may create opportunities to create additional open spaces and green corridors through design and Section 106 contributions to the public realm.
SDO 14 To reduce vulnerability to flooding	?	?	?	?	?	Development will occur in the flood zone. Flood risk assessments and the identification of suitable mitigation measures will need to be included as part of the planning application. Further guidance on mitigations such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	Pedestrian and cycle routes will be improved between the town centre, St Mary's conservation area and Rotherhithe station which should encourage more sustainable modes of transport and minimise the need to travel by car
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		Timescale				Commentary on Results
		31	S	M	L	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	Improvements to the area will create job opportunities and attractive inward investment	
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	Improvements to the area will create opportunities for training and skill development	
SDO 3 To improve the health of the population	✓	✓	✓	✓	Improvements to the environment including improved traffic movement and pedestrian and cycle routes should provide health benefits from lower pollution and increased opportunities for exercise	
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	The improved environment should lead to more activity and result in a reduction in crime and fear of crime	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	The improved environment should lead to better community cohesion	
SDO 6 To reduce contributions to climate change	✓	✓	✓	✓	The improvements to traffic movement and pedestrian and cycle links should help to reduce contributions to climate change	
SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	The improvements to traffic movement and pedestrian and cycle links should help to reduce contributions to climate change and air quality	
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	No significant impact	
SDO 9 To encourage sustainable use of water resources	-	-	-	-	No significant impact	
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	No significant impact	
SDO 11 To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	The improvements to the public realm and retail environment will enhance the quality of the landscape and townscape	
SDO 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-	No significant impact	
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	The improvements to the public realm and pedestrian and cycle routes provides opportunities for the enhancement of open spaces, green corridors and biodiversity	
SDO 14 To reduce vulnerability to flooding	-	-	-	-	No significant impact	
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact	

<p>SDO 16 To promote sustainable transport and minimise the need to travel by car</p>	✓	✓	✓	✓	✓	<p>The improvements to traffic movement and pedestrian and cycle links will encourage sustainable modes of transport and help to minimise the need to travel by car</p>
<p>SDO 17 To provide the necessary infrastructure to support existing and future development</p>	✓	✓	✓	✓	✓	<p>The improvements to traffic movement and pedestrian and cycle links will improve connections and make traffic movement more efficient</p>

Sustainability Objectives		32				Timescale			CWAAP Policy 32 Proposals Sites
		S	M	L	S	M	L	Commentary on Results	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	✓	✓	The regeneration of the area through the development of the proposals sites will create job opportunities and attractive inward investment	
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	✓	✓	✓	The regeneration of the area through the development of the proposals sites will create opportunities for training and skill development	
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	✓	✓	The creation of jobs, improved housing and facilities and reduction in poverty can lead to improvements in the health of the population	
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	✓	✓	Encouraging more activity in the area and providing more jobs and facilities should help to reduce crime and fear of crime	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	✓	✓	The creation of jobs, improved housing and facilities and reducing poverty will promote social inclusion and the improved environment should lead to more community cohesion	
SDO 6 To reduce contributions to climate change	X	X	X	X	X	X	X	New development will increase energy use overall, however all new development will be expected to minimise energy use and reduce CO2 emissions. Further guidance on energy efficient design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs	
SDO 7 To improve the air quality in Southwark	X	X	X	X	X	X	X	New development will increase the impact on air quality in construction and operation. However, focusing the development in an accessible location will help to reduce reliance on the car and the related traffic emissions. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs	
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	X	X	X	X	X	X	X	New development will increase waste, however, all new development will be expected to minimise waste generated in construction and operation. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs	
SDO 9 To encourage sustainable use of water resources	✓	?	?	?	✓	✓	✓	New development will be expected to encourage the sustainable use of water resources through the use of technologies such as sustainable urban drainage systems and grey water recycling. As new systems become more readily available the performance is likely to improve.	
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	✓	✓	✓	The sites proposed for development are brown field sites so soil quality should not be reduced and offer the opportunity for improvements to be made	
SDO 11 To protect and enhance quality of landscape and townscape	?	?	?	?	?	?	?	The impact of new development on the character and appearance of places will be dependent on the design. If new developments are designed well they will enhance the look and character of the area. The design of individual site proposals will be assessed through the planning application process. Further guidance is provided in the Design and Access SPD	
SDO 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	?	?	?	The impact of new development on the historic value of places will be dependent on the design. If new developments are designed well they will enhance the historic character of the area. New development will need to show the impacts upon the preservation or enhancement of the area. The design of individual site proposals will be assessed through the planning application process. Further guidance is provided in the design and Access SPD and Conservation area Appraisals	

SDO 13 To protect and enhance open spaces, green corridors and biodiversity	?	?	?	?	?	New development may create opportunities to create additional open spaces and green corridors through design and Section 106 contributions to the public realm. The design of individual site proposals will be assessed through the planning application process.
SDO 14 To reduce vulnerability to flooding	X	X	X	X	X	Development will occur in the flood zone. Flood risk assessments and the identification of suitable mitigation measures will need to be included as part of the planning application. Further guidance on mitigations such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	✓✓	New housing within development will address the need to meet the borough housing targets and should comply with policy on the type, mix and tenure of provision, in order to provide decent homes. The detail of individual site proposals will be assessed through the planning application process.
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	?	?	?	?	Increasing the amount of development in the area could lead to an increase in traffic, however, the location of development in accessible locations with good public transport links, cycle and pedestrian facilities and reduced car parking should promote sustainable modes of transport and minimise the need to travel by car
SDO 17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	?	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs.

Sustainability Objectives		33				Timescale			Commentary on Results
		S	M	L	S	M	L		
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	The use of S106 agreements will help to implement the strategic infrastructure that will be needed to enable the regeneration of the area, which will result in an improved environment and facilities and the attraction of inward investment	
SDO 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	S106 agreements will be used to fund the provision of schools, employment and training, which will lead to an improvement in these areas	
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	✓	✓	S106 agreements will be used to fund strategic transport infrastructure, which could result in an improvement in air quality by reducing reliance on the car, and the provision of health facilities which could result in an improvement in the health of the population	
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	✓	✓	The use of S106 agreements will help to implement the strategic infrastructure that will be needed to enable the regeneration of the area, which will result in an improved environment and facilities and a likely reduction in crime and fear of crime	
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	✓	✓	The use of S106 agreements will help to implement the strategic infrastructure that will be needed to enable the regeneration of the area, which will result in an improved environment and facilities for all the community	
SDO 6 To reduce contributions to climate change	✓	✓	✓	✓	✓	✓	✓	S106 agreements will be used where necessary to contribute to the implementation of the district heating network and mitigate the impact of development by meeting the energy targets on site	
SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	✓	✓	✓	S106 agreements will be used to fund strategic transport infrastructure, which could result in an improvement in air quality by reducing reliance on the car and encouraging more sustainable modes of transport	
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	-	-	The provision of suitable waste and recycling facilities will be addressed through the design stage rather than the use of S106 agreements. Further guidance on mitigation measures is set out in the Sustainable Design and Construction and Sustainability Assessment SPDs	
SDO 9 To encourage sustainable use of water resources	✓	✓	✓	✓	✓	✓	✓	S106 agreements will be used where necessary to fund water supply and drainage needs of new development, including the mitigation of impacts resulting from the development	
SDO 10 To maintain and enhance the quality of land and soils	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	S106 agreements will be used to improve significant areas of public realm and open spaces, which will have a positive impact upon the quality of land and soil	
SDO 11 To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	S106 agreements will be used to improve significant areas of public realm and open spaces, which will have a positive impact upon the quality of the landscape as a townscape	
SDO 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	✓	✓	✓	S106 agreements will be used to improve significant areas of public realm and open spaces, which is likely to have a positive impact upon the historic environment and cultural assets	
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	S106 agreements will be used to improve significant areas of public realm and open spaces, which will have a positive impact upon the quality of open space, green corridors and biodiversity	
SDO 14 To reduce vulnerability to flooding	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	S106 agreements will be used to improve significant areas of public realm and open spaces, which will reduce flood risk by reducing surface water run-off and the introduction of SUDS	

SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓✓	✓✓	S106 agreements will be used to fund strategic transport infrastructure, which will result in improved public transport, cycle and pedestrian facilities which will minimise the need to travel by car
SDO 17 To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	New development will place an increased demand upon the infrastructure. Developers will need to ensure that the existing infrastructure has capacity to meet the additional demands of the proposals. Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers will also need to continue to liaise with providers to ensure that power, water and transport can be supplied at the appropriate time to meet development needs. S106 agreements will be used to ensure the delivery of key infrastructure and to mitigate the impact of development

APPENDIX 8 Evidence Documents

Shopping
Southwark Retail Study 2009
Canada Water AAP Retail background paper 2010

Transport
Investing in Rotherhithe's Public Realm 2007
Canada Water Public Realm Improvements Study 2009
Development Impact Report 2009
Canada Water AAP Infrastructure background paper 2010

Places
Shopping Centre Feasibility Assessment 2009
Shopping Centre Viability Assessment 2009
Strategic Flood Risk Assessment 2008
Open Spaces Strategy 2009
Open Spaces Audit 2003
Canada Water Energy Study 2009
Canada Water St. George's Wharf Study 2010
Site Utilities Infrastructure Strategy 2005
Sustainability Scoping Report 2008
Canada Water AAP Urban Design background paper 2010
Canada Water AAP Delivery of Proposals Sites background paper 2010
Canada Water AAP Proposed Changes to the Proposals Map paper 2010

Canada Water AAP Infrastructure background paper 2010

Housing
Southwark Housing Requirements Study 2009
Strategic Housing Land Availability Assessment 2009
Southwark Development Capacity Assessment 2010
Affordable Housing Viability Study 2009
South East London Strategic Housing Market Assessment 2009
Canada Water AAP Housing background paper 2010

Community: Social and economic
Southwark Employment Land Review 2010
Canada Water AAP Infrastructure background paper 2010
Canada Water AAP Employment background paper 2010

S106
Canada Water AAP S106 Planning Obligations background paper 2010

Consultation
Market Link Research 2009
Cafe Conversations 2009
Submission Version Consultation Report 2010
Canada Water Consultative Forum Topic Papers 2001

Further details are available on the website: <http://www.southwark.gov.uk>

APPENDIX 9 Glossary

Air Quality Management Area (AQMA)

An area designated for action where it is predicted that the Air Quality Objectives in the Council's AQMA Plan will be exceeded.

Archaeological Priority Zones

The boundaries of Archaeological Priority Zones are designated on the Proposals Map. These are areas where there is potential for significant archaeological remains, and planning applications within these areas must be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

Biodiversity

The diversity or variety of plants and animals and other living things in a particular area or region. It encompasses landscape diversity, ecosystem diversity, species diversity, habitat diversity and genetic diversity.

Conservation Areas

An area of special architectural or historic interest designated by the local planning authority under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990, the character or appearance of which it is desirable to preserve or enhance.

Greenhouse gases

Those gases that contribute to climate change. In the UK, the most common greenhouse gas is carbon dioxide, which contributed around 77% of the UK's total emissions of greenhouse gases in 1990. Other greenhouse gases are methane (12% of total UK emissions), nitrous oxide (9%) and fluorinated gases (2.4%).

Local development framework (LDF)

A portfolio of local development documents, which will provide the framework for delivering the spatial planning strategy for the area.

London Plan

The strategic plan for the whole of London produced by the Mayor of London. The main purpose of the London Plan is to ensure that all the individual plans produced by the London boroughs work together to meet the priorities that are agreed for the whole London region. The Local Development Framework cannot contain strategies or policies that are not in general conformity with the London Plan.

Proposals maps

Illustrate the geographical extent of planning policies and designations.

Regional Spatial Strategy (RSS)

A spatial framework for a region over a 15 to 20 year period including policies for housing, environmental protection, transport and waste management. The London Plan is the Regional Spatial Strategy that with which Southwark Plan Policies should be consistent.

Renewable Energy

Energy derived from a source which is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material. Although not strictly renewable, geothermal energy is generally included.

Supplementary Planning Documents (SPD) or Guidance (SPG)
Guidance notes, additional and supplementary to the Unitary Development Plan, on how to implement the policies. They also contain background information applicants may find useful when preparing their planning applications.

Sustainability Appraisal/ Strategic Environmental Assessment A
systematic and interactive process undertaken during the preparation of a plan or strategy, which identifies and reports on the extent to which the implementation of the plan or strategy would achieve environmental, economic and social objectives by which sustainable development can be defined, in order that the performance of the strategy and policies is improved.

Sustainable Development

Development that contributes towards the principles of sustainability, that is, development that does not cause environmental damage, contributes to the local economy and meets the needs of the local community.

Unitary Development Plans (UDPs)

Statutory plans produced by each borough, which integrate strategic and local planning responsibilities through policies and proposals for the development and use of land in their area.

Southwark Plan See "Unitary Development Plans"

APPENDIX 10 Abbreviations

AAP	Area Action Plan
AQMA	Air Quality Management Area
CABE	Commission for Architecture and the Built Environment
DCLG	Department for Communities and Local Government
DETR	Department for Environment, Transport, and the Regions
DfT	Department for Transport
DPD	Development Plan Document
GLA	Greater London Authority
IMD	Index of Multiple Deprivation
LDD	Local Development Documents
LDF	Local Development Framework
ODPM	Office of the Deputy Prime Minister
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
SA	Sustainability Appraisal
SINC	Sites of Importance for Nature Conservation
SCI	Statement of Community Involvement
SDO	Sustainable Development Objective
SEA	Strategic Environmental Assessment
SOA	Super Output Areas
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
UDP	Unitary Development Plan

CANADA WATER AREA ACTION PLAN

~~Submission version~~

Further changes to the Canada Water AAP Publication/Submission Version
(Dwelling sizes and sites of importance for nature conservation)

STAGE 2 EQUALITIES IMPACT ASSESSMENT

No.	Title
Appendix A	Further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation)
Appendix B	Plan for publicising further changes to the Canada Water AAP Publication/Submission Version (Dwelling sizes and sites of importance for nature conservation)
Appendix C	Canada Water AAP sustainability appraisal
Appendix D	Canada Water AAP equalities impact assessment

**London Borough of Southwark
Planning Policy Team**

March 2010

March 2011

Structure of the document

This documents sets out the Stage two assessment of the equalities impacts assessment on the Canada water Area Action Plan. The Stage one scoping assessment is set out in Annex 1. The stage two assessment has taken account of stage one concerns and the preferred options report and has now been amended to assess two further changes to policies on room sizes and Sites of Importance for Nature Conservation

The document also sets out our vision and objectives for Canada Water in Annex 2. A list of related projects and EQIAs is set out in Annex 3 and Annex 4 provides a summary of the population characteristics in the AAP area

Note: Changes to the publication/submission draft EqIA are shown underlined and ~~scored~~ through.

Stage two: Assessment of Impacts

Part A: Feedback from the Equalities and Diversity panel

1. What feedback did the panel give you at stage one

The Stage 1 EQIA was considered by Equalities and Diversity Panel on 20 January 2009 and their comments are set out below. These were considered when preparing the Area Action Plan: Preferred Options report and Stage 2 of the EQIA.

- Disabled parking provision should be considered when proving new shops
- All new homes will be Lifetime Homes and 10% of all new homes will be wheelchair accessible
- Access to public toilets needs to be considered in new developments
- There are issues with young people in the area
- Provide new buildings for faith groups, especially ones that women are more likely to visit
- Option to create community hubs
- There are lots of young people in the area and the plan should consider providing jobs for them

The stage 2 EQIA for the preferred option report was considered by Equalities and Diversity Panel on 22 September 2009 and their comments are set out below. These were considered when preparing the Publication/submission Area Action Plan: Publications/submission and the revised stage 2 of the EQIA.

- We should ensure that public toilets are open all hours.
- Parking - further reference could be made to the need to ensure that car parking is safe, particularly for people with disabilities. This is especially important where basement or stacked car parks are provided.
- Generally, we should refer to "religious and belief" groups, rather than "faith" groups.
- We should not allocate sites specifically for religious/belief uses. New community facilities, such as schools, should be available for use hire outside school hours by all members of the community, including religious and belief groups.

As part of the Core Strategy preparation we carried out an EQIA at every stage. The Core Strategy was presented at Equalities and Diversity Panel on 17th November 2009. This included policy 7 referring to dwelling sizes and policy 12 setting out the designations of Sites of Importance for Nature Conservation (SINCs). It is therefore considered that the further changes to the Canada Water AAP have already been considered by the Equalities and Diversity panel and it is not necessary to seek further comments.

Part B: Purpose and aims of policy/strategy

2. What is the overall purpose of the policy/ strategy?

The Canada Water Area Action Plan, when adopted, will be part of Southwark's Local Development Framework. This will make it an important document which will be used for deciding what sort of development should take place within the Canada Water area, and when, where and how it should happen.

3. What are its aims?

The aims of the plan are set out in Appendix A of this report.

4. Could these aims be in conflict with the Council's responsibility to:

- Eliminate discrimination
- Promote equality of opportunity
- Promote community cohesion and good relations between different groups

The scoping report identifies a number of key considerations which have been acknowledged and addressed in the stage two assessment as follows:

Community and stakeholder involvement

The stage 1 EqIA highlighted the need to ensure that the methods used to consult and engage people in the preparation of the AAP are open accessible to all members of the community. To help address this issue the council prepared a consultation strategy which sets out the principles of how it will consult and the importance of reducing barriers to consultation. It emphasises that particular needs such as access, transport, childcare and translation need to be considered, as well as a strategy to broaden the appeal of consultation and make it attractive to a diverse range of people and groups. At each stage, participation will be monitored and analysed to see whether any particular groups have not been engaged and whether this can be addressed at the next stage.

At preferred option stage a variety of means were used to publicise, consult and engage with local people. These are described in detail in the Consultation Statement which accompanies the Publication/submission AAP and is summarised below:

- **Publicity:** Consultation on the AAP preferred option report was widely publicised using the following methods; mail-out to contacts on Southwark's Planning Policy database, documents available on Southwark's website, a newspaper advert, documents made available in libraries, area housing offices and council offices.
- **Events and exhibitions:** Public exhibitions were held to publicise the preferred option consultation at; Surrey Quays shopping centre. Officers also attended the following events to publicise the AAP; Youth Provider Network Event, Canada Water AAP Family Fun Day.
- **Stakeholder meetings:** Meetings were held with the following stakeholders; Canada Water Consultative Forum, Rotherhithe Community Council, Bermondsey and Rotherhithe Green Enthusiasts (BARGES).
- **Community Council:** Attended Rotherhithe Community Council on 15 September 2009.

The monitoring of consultation showed that wide range of groups and communities were involved at preferred option stage.

Housing

The Publications/submissions AAP aim is to provide new high quality homes in the AAP area suitable for a range of groups by developing particular sites in the area for housing. New housing developments will need to meet required policy standards for affordable housing, wheelchair accessible homes, family housing, public and private open space and children's play space. The types and size of homes will meet the needs of the local community.

The policy set out in the Publications/submission AAP is to require a minimum of 20% of family housing in the core area and a minimum of 30% of family housing in the suburban density zone. As a result more homes would have access to private gardens and courtyards. Increasing the amount of private amenity space available will benefit families and young children. Providing more houses will give more households their own front door and reduces common parts, and so generate more activity at street level and help create a safer environment. This should benefit those groups who can feel vulnerable, such as the young and elderly.

The approach taken forward in the Publications/submission AAP is to provide 35% affordable units per development. This is lower than the alternative option presented at Issues and Options stage (50%) which will have some impact on those groups who rely on affordable housing. However, this should be balanced against the benefits that will ensue from providing more family homes.

The policies in the core strategy require very high standards for all new housing delivered as part of the AAP. All new homes will be designed to Lifetime Homes Standards. They will be flexible enough to meet the changing lifetime needs of residents such as when people get older. For example, ensuring there is space to install a shower next to a downstairs toilet. Homes will be able to be altered and adapted to meet the needs of single people, older people, couples, large families and disadvantaged groups. This will prevent residents from having to move as their housing requirements change and will help to ensure that a sense of community is maintained amongst a long-term resident population.

At least 10% of all new homes will be designed to meet the needs of vulnerable groups such as the elderly and disabled including specialised housing schemes, providing appropriate level of support and homes designed for wheelchair users at each phase of the development. There will be a range of housing types in each development which will help to create a more mixed community. These policies will also apply in the AAP area.

The Canada Water AAP also includes a requirement for development in the area to meet minimum dwelling size standards. This will help to ensure a higher standard of living accommodation that will benefit all residents, in terms of the quality of accommodation provided, but in particular those with protected characteristics. Larger space requirements will help address issues of overcrowding. The proposed minimum dwelling sizes are split by household size, requiring a mix of different sized housing to be provided within schemes. This will help contribute to a more diverse housing supply to better responds to the varied needs of Canada Water's communities, and help support mixed and balanced communities. More variety in the size of homes will allow households to remain in their local area as their family size changes through different life stages. The space standards will have benefits to all the groups and in particular to groups with larger families which are often BME groups. They will also have a positive impact on people with disabilities by allowing more space for movement and living in the home.

However some groups may feel that the minimum dwelling size requirements do not go far enough to meet their specific needs such as parents with young children who may require more space for their children to play in, and elderly people who may spend more time in the home due to mobility restrictions. These standards are based on those in the Mayor's draft replacement London Plan 2009. In preparing the amendment to the Canada Water AAP we have had to weigh up larger house sizes with the need to meet our overall housing targets and the impact on building bulk and scale.

By improving the design standards within Canada Water there is a possibility that house prices could increase as developers may charge more for having to meet minimum space standards. This could prove problematic for certain groups who may then not be able to afford housing in their local area, particularly for lone parents, disabled people, the BME community, refugees and asylum seekers, and elderly people. However by setting out the standards clearly in our planning documents developers should be able to account for the cost of building larger homes in the price of purchasing land. Furthermore the Canada Water AAP also requires a minimum of 35% of housing to be affordable housing which will help to ensure that the new larger homes can be afforded by those in housing need.

Transport and Movement

The Publications/submission AAP approach is that the area is made highly accessible, particularly by public transport, walking and cycling, and that new development does not lead to an increase in traffic on the roads. Public transport quality and frequency should be improved, the road network should be changed to improve traffic flows, and greater use of public transport, walking and cycling should be sought through improved routes and reduced car parking in new developments. The safety, and perception of safety, should also be improved regarding existing and new walking and cycle routes.

In principle, this approach benefits all members of the community. Car ownership levels tend to be lower among the young and elderly. Therefore a policy which seeks to promote walking and cycling, creating routes which are safe from conflict with vehicles, which prioritises non-car users, and which also maximizes opportunities to use public transport should benefit these groups in particular, promoting inclusivity and equality of access to jobs and services.

It should be noted however that there are certain groups who may rely on using a car. This might include the elderly, people with disabilities and parents with young children. The Publications/submission AAP will seek to mitigate the impact of a general presumption in favour of low parking levels by prioritising parking for people with disabilities, even within what are otherwise in some cases "car free" developments in line with the parking standards set out in Saved Policy 5.7 of the Southwark Plan. New parking for town centre uses will be provided in basements within buildings or where appropriate above ground. This may have implications for safety of more vulnerable users. To mitigate this we require developers to submit a parking management strategy which should address safety issues among other issues.

It will also be very important that a reduction in car parking and promotion of sustainable modes of transport are undertaken in tandem with improvements in public transport and the public realm. While in theory promoting walking and cycling is beneficial to all users, if routes out of developments are poorly lit, secluded and at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups such as the elderly and young, people with disabilities, women and LGBT groups.

Employment

The aim of the Publications/submission AAP is to create a new business cluster in the area, around Harmsworth Quays print works. New office and light industrial units will be built on several sites around Harmsworth Quays. This will provide importance local jobs and training opportunities and reduce the need for local people to travel far to get to work.

Not all of the existing employment space will be reprovided (this was an option at Issues and Options stage), however by focusing on providing new office and light industrial units, more jobs will be created in the area compared to the re-provision of existing storage, warehouse and industrial units which tend to employ less people.

In principle, this approach benefits all as it will create local jobs which all members of the community will be able to access. Focusing on office and light industrial space instead of larger industrial units will provide more of a wide range of jobs for ~~different equalities groups~~ people with protected characteristics such as young people, women and disabled people who may be more likely to pursue jobs in office environments.

Employment and training opportunities created by new development will be targeted at local people. This will have a particularly positive effect on young people, particularly school leavers who live in the area and want to work locally.

Certain groups may experience discrimination in accessing employment opportunities such as a members of certain faith groups and members of the BME community (especially young black men) and disabled people. However by targeting employment and training opportunities at young people this can be mitigated against.

Design and Heritage

The Publications/submission AAP seeks to create more of a sense of place and a better environment in the town centre through the design of new development. This will be achieved by creating new streets and public spaces, safe walking and cycling routes, creating a new high street in the town centre and the implementation of other guidance relating to urban design.

The heritage of the area will be strengthened by the protection and enhancement of the St Mary's Conservation Area and increased use of the docks for leisure and tourist activities. This will benefit all members of the community who will have access to and will be able to enjoy these areas.

Improving the public realm through design will benefit all ~~equalities groups~~ people with protected characteristics, in particular certain groups may currently feel threatened walking through the area such as members of certain faith groups, members of the BME community, young people, older people and women. The public realm will need to take into account the specific needs of elderly, young and disabled people, benches and public toilets will be provided.

Open spaces

The Publications/submission AAP approach is that all development in the core area must provide high quality open spaces which are linked together and have different uses. Children's play areas should be provided as part of new housing developments. Improvements will also be made to existing open spaces in the area.

This will benefit all members of the community provided that the needs of different user groups are considered in the design and location of open spaces e.g. benches for elderly people, disabled access and children's play areas.

The provision of children's play space will have a particularly positive impact on children and families.

The revised Canada Water AAP will include the designation of three additional Sites of Importance for Nature Conservation. This will bring more protection to existing open spaces in the area and promote Canada Water as an area of significant ecological interest. By maintaining a network of well used, high quality open spaces this will benefit all residents including those with protected characteristics by ensuring everyone has access to outdoor space. This will especially benefit families with young children in the area who may use the open spaces for educational purposes. Supporting a network of open spaces will also help to promote sustainable modes of transport which may particularly benefit people on lower incomes who may not own cars or be able to afford public transport on a regular basis. Open spaces are also linked to improvements in the health of the population through improving air quality and encouraging more physical activity and this can have benefits for all people with protected characteristics.

The designation of sites as Sites of Importance for Nature Conservation will raise the profile of these areas in terms of their contribution to biodiversity and role as an ecological resource. This could potentially lead to increased tensions between different types of groups using the open spaces and it will be important to ensure that all groups, including those with protected characteristics have equal access without detracting from the quality of biodiversity in these areas.

Community facilities

The aim of the Publications/submission AAP is to provide facilities to support the growing population. This includes new health facilities, a new school, improved sports provision, leisure facilities and the protection of existing leisure facilities, youth provision and new community facilities.

The amount of shops in the town centre will also be increased, as will the number of cafés and restaurants. Local shopping parades on Albion Street and Lower Road will be protected and enhanced. New small-scale local shops, cafes and restaurants will be permitted in certain places outside of the town centre.

This approach will have a positive impact on all members of the community as access to local services help to create good community relations and improve satisfaction with the local area. Locating new community facilities together will have a positive impact on young people, the elderly and disabled people who may be less likely to have access to a car to get to different facilities.

Improved health facilities will have a positive impact on all members of the community and in particular, the elderly and families with young children. A new school, improved sports, leisure and young people's provision will have a very positive impact on young people but will also improve the lives of elderly people and women who may feel threatened by groups of young people congregating in the area.

Consideration was given to the requirement for increased public toilet provision in the area. However we consider that this would be a more appropriate requirement for our borough wide policies. The Southwark Plan currently requires public toilets to be provided in large developments. This approach will be carried forward in our Development Management DPD.

5. Does the documentation relating to this policy/strategy include specific reference to the Council's responsibility (as set out above) and a commitment to work to meet this?

While the council's responsibility for eliminating discrimination and promoting equality of opportunity and social cohesion are not specifically referred to in the Publications/submission AAP, the objectives of the AAP refer to the aim of creating a strong community in which the needs of all groups are taken into account.

The consultation strategy for the AAP does refer specifically to the need to ensure that in accordance with Southwark's Equalities and Human Rights Scheme ~~2005-2008~~ 2008-2011, the Equalities priorities groups are involved and that arrangements are made to include under-represented groups and individuals.

Part C: Application of this policy/strategy

6. What steps are you taking or will you take to ensure that the policy is or will be implemented consistently and fairly?

The draft AAP will contain a framework which will set out how the plan will be monitored as it moves into the implementation phase. The implementation is likely to take between 10 and 15 years and will require periodic monitoring. The AAP also provides an umbrella framework for a number of council strategies, including rehousing policies, the Southwark Schools for the Future for schools in the AAP area, and the employment and enterprise strategies where they relate to the AAP area. The equalities impacts of each of these strategies will need to be considered in more detail as implementation progresses.

Consultation on the AAP will be monitored at each stage of the plan preparation process to ensure that all groups will be engaged as effectively as possible. The consultation statement which accompanies the Publications/submission AAP contains more details on this. When the draft AAP is submitted to the Secretary of State, the council will also submit a consultation report demonstrating that the consultation which has been carried out meets statutory minimums and meets the requirements of Southwark's Statement of Community Involvement.

7. Could the way that this policy/strategy is being or will be implemented be discriminating against any particular individuals or groups or be potentially damaging to relations between different groups?

The Publications/submission AAP aims to contribute to eliminating discrimination, promoting equality of opportunity and promoting social cohesion and good community relations.

8. What changes could you make to either the policy/strategy itself or the way it is applied to improve the positive outcomes for all groups and to reduce or eliminate any negative outcomes?

In preparing the Publications/submission AAP, the findings of the EqlA scoping have been considered and the report has been prepared iteratively with the stage 2 EqlA. This stage 2 assessment recognises those areas where the AAP may have differential impacts and where appropriate mitigation measures are proposed to address these. The council has taken all representations on the preferred options into account. At this stage there is no further opportunity to adjust policies prior to the submission of the draft plan to the secretary of state. Comments received at this stage should only relate to the soundness of the AAP.

9. What information do you collect or do you plan to collect to monitor the impact of this policy/strategy on different groups?

As is noted above the council monitors participation in the AAP preparation process to ensure that all groups have the opportunity to be involved. Where there is evidence that some groups have not been engaged, the council can seek to address this at the next stage. The consultation that has been carried out will be reported in the consultation statement to be submitted to the secretary of state.

The council's team in the Analytical Hub prepares periodic updates on demographic changes in the population, including changes relating to ethnicity, age, and faith. The council also monitors economic activity, health and pupil attainment in schools. Biannually the council also commissions a residents' survey to ascertain how local people feel about their area and whether it is improving. These analyses are carried out at community council level. These analyses will be useful in determining the success of the AAP.

These analyses are also reported in the council's annual monitoring report which assesses the impact of all development in the borough. Once the AAP has been adopted, the AMR will report annually on the implementation of the AAP, using indicators such as new housing completed in the AAP area, social rented and intermediate housing completed, new retail and business space completed, including small business units, average household income, the percentage of residents who feel safe at night business start ups and the local employment rate.

As mentioned above, the AAP comprises an umbrella framework under which a number of strategies, including those of the council and its partners will be implemented. While organisations such as the PCT may have their own strategies for monitoring the impact of their policies on key equalities groups with protected characteristics, the preparation of the AAP may enable the council and PCT to identify a set of key indicators for the AAP area. These can inform the monitoring framework which is put in place to assess monitor and review the AAP.

The need to provide high quality schools is a key objective of the AAP and in this respect it seeks to support the Southwark Schools for the Future Programme and the Academies Programme. An EqlA has already been carried out for the SSF secondary schools programme, which assesses the impact on equalities up to outline business case stage. The council is also currently preparing an EqlA for the SSF primary schools programme and details of the monitoring framework will be identified as part of that process.

Annex 1: Stage One: Scoping

EQUALITIES IMPACT ASSESSMENT

Stage One: Scoping

1. What policy, strategy or plan is this assessment addressing?

The Canada Water Area Action Plan

The Canada Water Area Action Plan (AAP) will be a land use-planning framework for the Canada Water area, which will be used to plan, manage and facilitate change in the area in a sustainable way that will benefit the community and make the area a better place to live, work and visit. The AAP will potentially contain a number of planning policies on a variety of topics, such as housing, transport, employment, open space, community facilities and the environment. The policies will be specific to Canada Water and will focus on delivery and implementation.

The Canada Water AAP will be developed and prepared in accordance with statutory regulations and in close consultation with the local community. The policies in the Canada Water AAP must be in general conformity with national and regional guidance and policy and contribute towards meeting local needs. The council's policies and strategies must also be evidenced to ensure that they are robust, meet local needs and can be justified.

The vision and objectives of the Canada Water AAP are set out in annex 1 of this report.

2. Is this a new or an existing policy/strategy?

The Canada Water AAP will be a new policy document and will form part of the council's Local Development Framework, which will contain all the council's planning policies used to guide how land is used in the borough and in the determination of planning applications. Current planning policy for Canada Water exists in the Southwark Plan (the council's Unitary Development Plan), the Canada Water Supplementary Planning Document (2005) and the Canada Water Masterplan (2005). The Canada Water AAP will replace this existing policy and covers a wider area of the Rotherhithe peninsula.

3. If existing, has the policy/strategy already been reviewed under the previous EqIA programme? If so, what were the findings to come out of this and has the agreed action plan been implemented? What has changed since the last assessment was undertaken (in terms of context, nature of the policy/strategy or the type of people affected by the policy/ strategy).

This is the first stage in the preparation of the AAP and therefore this is the first opportunity to consider equalities impacts. The council did undertake an EqIA of the Southwark Plan, although this did not use the current methodology. Nevertheless it provides an indication of the likely impacts on Southwark's equality target groups. The findings are summarised below.

Key findings:

- Provision of small local businesses which are easily accessible by local communities encourages the closure of development gaps for the local communities through an increased sense of belonging, redressing disadvantage and equality of access to services.

- By ensuring that new developments are safe and secure, disadvantage is addressed, community relations are improved and equality of opportunity is promoted.
- Protection of residential accommodation reduces discrimination and promotes equality of opportunity through providing inclusive and accessible housing for communities within the borough.
- Provision of accommodation other than houses and flats recognises the diverse needs of communities within the borough and promotes equality of opportunity since communities that will benefit are frequently the marginalized.
- The protection of transport impacts creates a sustainable, inclusive and accessible borough for its residents, future residents, users and occupiers.
- Public transport improvements assist in the creation of an accessible and inclusive borough by focusing on sustainable forms of transport as well as being socially inclusive. Accessible and inclusive transport links promote equality of opportunity and prevent barriers of exclusion and discrimination.
- Mini cab offices in the borough make transportation in the borough accessible to those who may not have access to public transport or private car use.

More recently, the council has undertaken a stage 1 EqIA assessment of the Canada Water masterplan. The masterplan is not part of the borough's Local Development Framework (LDF), but was used to guide development in the core sites around Canada Water. It suggested that the key issues which need to be taken into consideration are that:

- While well serviced by transport, the tube stations in the Canada Water area have poor pedestrian access, and there are major barriers to pedestrian flow in the area.
- There is a need to increase affordable housing in the area.
- Despite the shopping centre, the overall area is poorly serviced by shops, leading to "draining of money to other areas" as local residents choose to shop in other areas.
- There was very little monitoring of earlier consultation processes which means that it is unclear which sections of the community were involved, and it is not possible to say if the most 'excluded' sections were able to influence the process. The consultative process should be examined, and issues such as the provision of language/interpreting support at events checked.
- There is also a need to monitor the ongoing impact of the regeneration as it takes place.

The scope of the AAP will be much broader than the masterplan. It also covers a wider area to ensure that the impacts of development on the core area are fully addressed.

Below is a list of strategies and policies that are related to the activities of the Canada Water Area Action Plan. The relevant findings are summarised at annex 2:

- Southwark 2016
- Local Implementation Plan for Transport (LIP)
- The Employment and Enterprise Strategy
- The Housing Strategy 2005-2010

4. What do you think are the main issues for your policy or strategy in relation to equality, diversity and social cohesion?

Community and Stakeholder Involvement

In preparing and developing the Canada Water AAP, the council will have to carry out consultation in accordance with statutory regulations and the Statement of Community Involvement, which sets out how and when Southwark Council will involve the community in the alteration and development of town planning documents and applications for planning permission. National policy states that local planning authorities should involve the community at an early stage in the process and should continue to involve the community throughout the process of preparing development plan documents using methods appropriate to the communities concerned (paras. 4.20 of PPS12). A demographic breakdown of residents on the peninsula is shown in annex 3. The council has prepared a consultation strategy for the AAP. This highlights a number of issues which are set out below:

Considerations:

- Certain groups may not be able to access information and consultations as easily as others i.e. disabled people, those who do not have English as their first language, young people, those who support vulnerable people such as women who are most likely to care for children, older people and those with limiting illnesses.
- People may not feel safe in attending public information or consultation events at certain times of the day, in particular after dark, such as older people and women
- Information may not be presented in a way that engages people effectively, such as material only printed in English, information is presented in a complicated format or language.
- Certain groups may not feel comfortable expressing their views in public due to fear of discrimination. These include LGBT community, faith groups, young people and the BME community.
- Certain groups may not understand what relevance the Canada Water AAP has to them and therefore they do not become involved in the process.
- People may misunderstand the purpose of the Canada Water AAP and what can be achieved which may result in tensions between groups if it does not deliver what they expect.
- Certain groups may have a negative perception of the council or disappointing experiences of community consultations which stop them becoming involved in the process.
- If people do not feel that they can access information at an early stage or have problems accessing it, they may become disillusioned in the process and lose interest i.e. BME groups, young and elderly people and disabled people.
- Some people may not be aware how to express their views or how these will feed into the process i.e. children and young people.
- There may be differences in the needs and aspirations between different groups which may result in conflict.
- People may feel as though certain groups are having a greater impact on how the AAP is developed which may increase tensions in the community.

Housing

Meeting housing need is one of the most challenging issues that national, regional and local government is faced with. Everyone should have the opportunity of a decent home. Housing should not reinforce social distinctions and should meet the housing needs of the whole community, creating mixed and inclusive communities and housing choice. Consideration should be given to the following when developing housing policies for Canada Water:

Considerations

- The plan could unintentionally fail to meet local housing needs by not providing the right housing type and mix for the local community which could intensify or result in overcrowding and poor quality accommodation which in turn disproportionately affects older people, the young and the BME community. An appropriate range of affordable, permanent and temporary accommodation may not be provided to meet the needs of specific user groups such as refugee and asylum seekers and travellers.
- The regeneration of Canada Water may result in a rise in house prices in Canada Water and housing may become unaffordable to those currently living in the area, especially, lone parents, disabled people, the BME community and elderly people. This may also result in a dilution of the community as people are forced to move out of the area as they no longer can afford to live there. People may view the Canada Water AAP as gentrification rather than regeneration.
- People currently living in the area may feel resentful towards large numbers of people moving in. This tension could be further exacerbated if people moving into the area buy up newer and higher quality housing.
- New housing may only cater for a broad market and fail to cater for the needs of specific groups such as disabled people, families with children, young people, and older people.
- People may feel that the needs of certain groups are being prioritised over others such as the need to have designated locations for Travellers and those with larger families.
- Redevelopment and regeneration of areas may result in the disruption of communities. This is particularly true in the case of estate renewal, where estates are redeveloped and residents re-housed outside the immediate vicinity.

Transport and Movement

National, regional and local policy states that sustainable methods of transport should be promoted. It is the intention that the capacity of public transport should be increased, the quality and integration of the transport system should be improved and a co-ordinated approach to improvements to transport integration and facilitating greater use of public transport, walking and cycling should be sought. In addition to seeking greater use of pedestrian and cycle routes, the safety and perception of safety should also be improved regarding existing and new routes. Consideration should be given to the following when developing transport policies for Canada Water:

Considerations

- Transport services and pedestrian/cycle routes may continue to feel unsafe for certain user groups. Some people may continue to feel unsafe when travelling on public transport or along pedestrian/cycle routes and fear for their personal safety such as women and young people or they fear discrimination such as members of the BME community, the LGBT community or people following a certain faith, such as Muslims and Sikhs.
- Older people and young people may not have the opportunity to be independently mobile if reliable, convenient, safe and cheap public transport is not made available to them. This could further exacerbate the need for parents and carers to continue to use unsustainable forms of transport, such as the car. This also puts pressure on ensuring the availability of accessible parking spaces in areas where required.
- Disabled access may be provided but it may be segregated from other access routes, which exacerbates separation and isolation from the rest of the community.
- Public transport could continue to be unaffordable to those on lower incomes such as the BME community, young people (i.e. those who do not have access to free travel)

refugees and asylum seekers. This may limit their job and further education opportunities and inclusion in the wider community. It may limit them to one particular area that cannot provide all of the facilities and opportunities they need

- People may have different priorities in terms of transport such as parents with children, disabled people and those on lower incomes. Tensions may arise if people think that the needs of any one user-group are being prioritised above their own.
- The fear of crime could continue to make people feel isolated if they do not feel safe travelling from their homes to use and enjoy facilities and services within the area i.e. women, members of the BME community, members of certain faith groups, young people, members of the LGBT community and older people.
- The needs of individuals and groups may not be taken into account when designing new open spaces and areas of the public realm and result in people not feeling safe to use them for pedestrian and cycle movement around the area.

Employment

The policies in the Canada Water AAP must be in accordance with national and regional guidance and policy and contribute towards meeting the aims and objectives of the council's community strategy whilst meeting local needs for employment in Canada Water. Through the development and implementation of the AAP, sites will be identified and improvements will be proposed for the growth and improvement of Canada Water's economy. This will lead to greater investment and lead to a growth in jobs in the area. Consideration needs to be given to identifying sites and developing policies to accommodate a range of employment premises and opportunities of different types and sizes and costs to meet the different needs of the community. Alongside developing employment opportunities, consideration should be given to providing the local community with the skills and education required to take advantage of new employment opportunities in the local and wider area. In developing employment policies for Canada Water, consideration should be given to the following:

Considerations

- People may feel excluded from new job opportunities created through the regeneration of the area such as women who can only work part time due to other commitments such as childcare. This could also exacerbate problems of child poverty in the area where this results in more households without an adult in employment.
- Certain groups may experience discrimination in accessing employment opportunities such as a members of certain faith groups and members of the BME community (especially young black men) and disabled people. The inability to access opportunities to work could further lead to poverty, social exclusion and isolation from the wider community.
- Local people may not have the skills to access job opportunities that are created through the regeneration of Canada Water and therefore will not benefit from these new opportunities. This could create tensions in the community if there continues to be a high level of unemployment.
- The AAP will need to ensure that a range of business units are provided so that small and medium enterprises (SMEs) are able to find space within the core area. BME businesses are strongly represented in SMEs in Southwark and the failure to provide space suitable for small businesses could have a significant impact on the BME community.
- SMEs can also be affected in other ways by development. It will be important to ensure that SMEs are able to compete for contracts to deliver goods and services which are generated in larger business hubs. Canada Water is located between Canary Wharf

and London Bridge where it is expected that 140,000 new jobs will be created by 2026. The AAP should consider how supply chains can be opened up to create business opportunities for locally based SMEs.

- There may be conflicting priorities for the expansion and control of the night time economy. Younger people may feel strongly that there is a need for a more vibrant night time economy, which could act as a way to make the town centre safer in the evening and at night by having an increased footfall at these times. Elderly people may feel threatened by this in terms of the people that the night time economy might attract and the noise that it will create.
- There may be physical barriers to jobs outside of the Canada Water area. Accessibility to these opportunities may be hindered by poor quality transport links in and out of the area. This may affect both existing and new residents, especially those with lower incomes.

Design and Heritage

The Canada Water area is expected to undergo significant change through the development and implementation of the Canada Water AAP. This will see increased investment and development activity, which provides significant opportunities to improve the built environment in the area. Consideration should be given to the following issues in the development and implementation of policies for design and heritage:

Considerations

- Design may also have an impact on social cohesion. Although the built environment around Canada Water is fairly bland and lifeless, the presence of the docks provides a link with the past and the area's heritage. Development will need to respect this heritage. Failure to do this could exacerbate the feeling that the incoming population are taking precedence over the needs of local people. It could also result in a feeling of alienation among groups who have lived in the area many years and particularly the elderly.
- If the public realm and the environmental quality of the area remain poor, certain groups may continue to feel threatened walking through the area such as members of certain faith groups, members of the BME community, young people, older people and women.
- The needs of certain groups may not be properly considered which may mean that they are unable to use the services and facilities in and around the area. For instance, older people may not be provided with basic facilities such as accessible and safe places to meet, public toilets and street furniture, such as benches, which provide a respite when using the town centre.
- The built environment and the public realm may ignore the needs of disabled people which results in creating barriers to inclusion in the wider community and opportunities to decent housing, jobs and access to leisure and community facilities. In contrast, the needs of disabled people may be considered but result in the public realm being designed in a way that segregates disabled people from the wider community.
- High quality design standards in the area may result in higher costs for SME businesses i.e. high quality shop fronts, which may threaten the viability of these businesses.
- The development of tall buildings and higher density residential schemes may reduce accessibility to private and communal open space, especially important for families with young children.

Open spaces

Through the development and implementation of the Canada Water AAP, the area will experience significant changes through growth in population, housing and employment. In addition to the overall quantity of open space, the location and use of the space is also important to ensure that they are accessible to all. The following considerations need to be taken into account when developing and implementing policies for open space within Canada Water:

Considerations

- The needs of different user groups may not be properly considered which will result in certain groups feeling excluded. This may occur where there are conflicting priorities of how the spaces should be used, i.e. elderly people and women may wish to use the space for informal recreation such as a meeting place whereas other groups, such as young people, may wish to use the space for more formal and active recreation. This may cause tensions between groups if it is perceived that one group's needs are being prioritised.
- The poor design of open spaces may make them feel unsafe and result in misuse. This may exclude certain groups as they may fear for their personal safety, such as women, members of the BME community, members of the LGBT community, members of different faith groups, older people. Poor design may also result in poor access and limit the use of these spaces for disabled people and mothers with children.
- Poorly designed and inaccessible open spaces in the area may restrict the ability for people to gain from the health benefits active recreation and the educational benefits of sporting activities or ecology, depending on the functionality of the open space. In addition, open spaces can act as a social meeting place and a deficit of open space could have a detrimental effect on inclusion and social cohesion.
- A lack of play space for children can have detrimental effects on their physical and mental development.

Community facilities

Through the development and implementation of the Canada Water AAP, the area will experience significant growth in population. The council will need to identify sites for and propose improvements to the community infrastructure to meet the additional needs of the whole community resulting from development. The following considerations will have to be taken into account when developing policies for community facilities in Canada Water:

Considerations

- A lack of adequate, accessible and affordable community facilities could act to isolate certain members of the community, such as women who may need a respite from supporting others such as children and those with limiting illnesses or older people who may live alone and need to interact with others.
- Tensions between certain groups may remain unresolved if there are no facilities for people to interact in informal surroundings. Social cohesion may be threatened by a deficit of community facilities in the area i.e. between different faith groups, BME groups and those who are unable to speak English.
- The EqIA undertaken for the masterplan noted that shopping provision does not adequately serve local needs. The majority of shops in the shopping centre are multiple stores. There are few independent outlets and therefore few local businesses trading in the core area. Consequently, the shopping offer does not reflect the diversity of the

area. Moreover, as is noted in the employment section, it fails to offer much opportunity to locally based SMEs.

- Social cohesion may be threatened by a lack of faith premises being available for the whole population of the area. BME groups may not be properly considered if faith premises are not provided for the full spectrum of religious beliefs. It should be noted that there are a number of faith premises in the AAP area including the Scandinavian churches, and the faith premises in Mulberry Business Park.
- People on lower incomes may feel isolated from the rest of the community if they are unable to access affordable leisure and community facilities. This may result in isolation and social exclusion.
- A lack of appropriate community facilities may create boredom through a lack of things to do. This could result in a rise in anti social behaviour problems, particularly with young people.
- The needs of certain groups may not be properly considered when deciding on the number and type of community facilities that are considered appropriate for the area. For instance the need for meeting places for older people, BME groups, faith groups and the need for high quality childcare and play, leisure, cultural and educational facilities for children and young people.
- If poorly designed and located, it may limit the use of these facilities. For instance, disabled people may not be physically be able to access the facilities, those on lower incomes may not be able to afford to use them, such as older people, young people and refugee and asylum seekers. Some people may not be able to travel distances due to other commitments, such as women with dependants.
- People having different priorities for the use of community facilities, i.e. for women it may be health and childcare, for young people it may be youth clubs and sporting facilities and for other groups it may be informal meeting places. Tensions could arise among different groups in the community if it is perceived that the needs of one group are being prioritised above others.
- Educational facilities need to be of a high standard and be available to all groups to use in flexible and coordinated ways as people will have different needs and uses for facilities. For example, schools are needed for the young population as well as the adult population seeking skills to improve access to employment. People may have different priorities for the use of educational facilities, i.e. for parents it may be before and after childcare, for young people it may be youth clubs and sporting facilities and for other groups it may be informal meeting places or temporary places of worship. Tensions could arise among different groups in the community if it is perceived that the needs of one group are being prioritised above others.

Annex 2: Our vision and objectives for Canada Water

3.1 What we are trying to achieve

3.1.1 Successful places where people want to live, work and visit include good housing, safe and attractive public realm, good connections, successful schools, shops, health and leisure facilities. It is important that we develop a strong vision and set of objectives for the area. The vision and objectives have been derived from our Sustainable Community Strategy, Southwark 2016, the Southwark Plan, the core strategy and what local people have told us in the past. We have used the vision and objectives to guide and help assess the options for development in the area and help select the preferred options.

Vision:

We are working with the local community, landowners, and developers to transform Canada Water into a town centre as set out in the Canada Water Area Action Plan. Our aim is to make best use of the great opportunity to create a new destination around the Canada Water basin which combines shopping, civic and leisure, business and residential uses to create a new heart for Rotherhithe.

We want to strengthen Canada Water's role as a shopping destination, expanding the amount of retail space by around 35,000sqm and providing a much more diverse range of shops than at present, including a new department store and independent shops. The action area's core will provide at least 2,500 high quality new homes, which will be accommodated in generally mixed use development. Office development will provide much needed space for local occupiers and, together with retail development, will generate around 2,000 new jobs.

Existing facilities in the town centre are currently separated and poorly linked, being built originally to serve car-borne visitors. Development in the town centre will contribute towards creating an open environment with a high street feel, and high quality public realm and open spaces. We want to make better use of car parking, ensuring that it is shared between town centre uses. The centre must reach out to the wider Rotherhithe area, ensuring that it is accessible, particularly on foot, by bicycle and by public transport. In addition we will work with Transport for London to improve the road network around Lower Road.

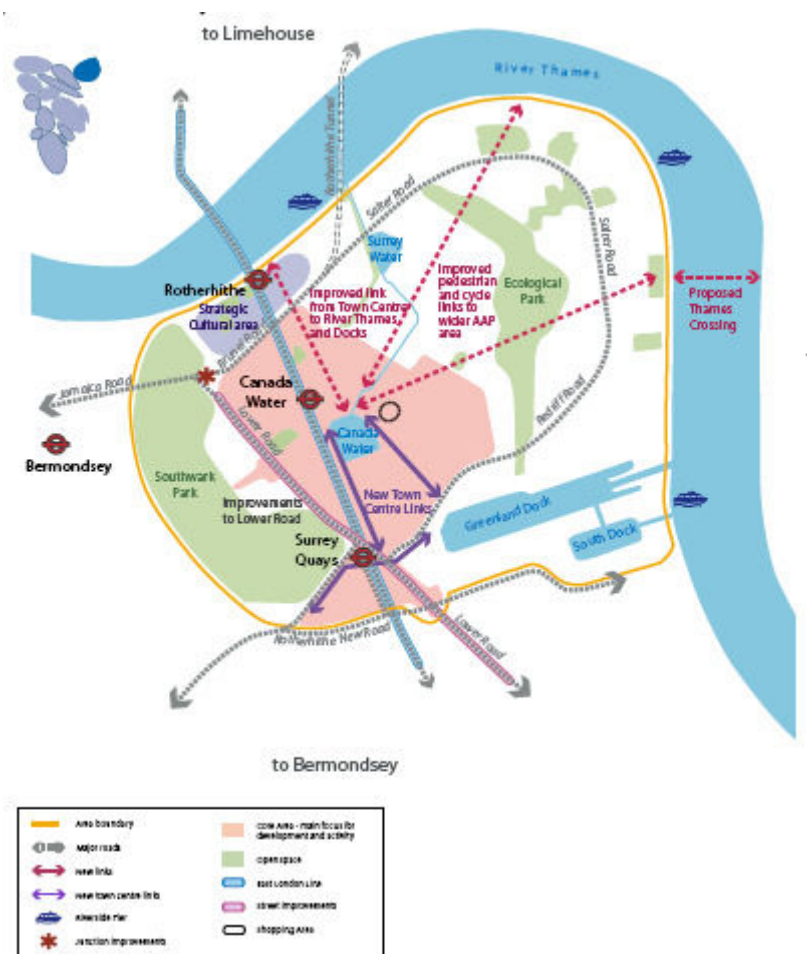
Outside the town centre and core area of the AAP, development will be less dense and should reflect the leafy and suburban character of much of the area.

Rotherhithe should be a desirable place to live, particularly for families, and promote healthy lifestyles. To help achieve this, we will build a new secondary school to complement existing schools in the area. Across the AAP area, development will contribute to achieving a great network of parks and open spaces which, together with the docks and the River Thames, can help make Rotherhithe known as an attractive destination to visit, relax in and have fun.

We are working with Lewisham Council to make sure we have a joined up approach to future development and improvements to Rotherhithe.

3.2.4 Our vision for the area is expressed spatially on the key diagram. The key diagram is a graphical representation of the main elements of the vision, such as improvements to transport infrastructure and the creation of a new town centre, to be delivered in the area.

Figure 1: Canada Water AAP key diagram



3.2 The themes and objectives (how we will achieve our vision)

3.2.1 To help achieve our vision, we have set out strategic objectives for the AAP. The objectives relate directly to the vision and have been shaped in the light of consultation that has been carried out both during the AAP preparation process and before. They have also been designed to help deliver key elements of other strategies and policies, including our Sustainable Community Strategy and the core strategy. The objectives have been tested using our sustainability appraisal to make sure that they are working together to create a sustainable place.

3.2.2 In addition to establishing a clear direction for future development, the objectives have also been used to create more detailed day-to-day policies for the AAP and make sure that these are focused on our key aims. In part 4 of the AAP, we show how the objectives relate directly to the AAP policies.

3.2.3 We have grouped the objectives and the policies that follow from them into the following themes

- Theme 1: Shopping: A genuine town centre and neighbourhood hub
- Theme 2: Transport: Improved connections
- Theme 3: Leisure: A great place to visit, to relax in and have fun
- Theme 4: Places: Better and safer streets, squares and parks
- Theme 5: Housing: Providing more and better homes
- Theme 6: Community: Enhanced social and economic opportunities

Theme 1: Shopping: A genuine town centre and neighbourhood hubs.

- S1: To create an accessible, distinctive and vibrant town centre at Canada Water which is well connected into the surrounding street network. This will enhance the setting of Canada Water basin and create a range of shops, restaurants, community and leisure facilities within mixed use developments.
- S2 To ensure that people who live and work on the wider peninsula have access to local facilities to meet their day-to-day needs.

Theme 2: Transport: Improved connections.

- T1 To use a range of measures, including public transport improvements, green travel plans, road improvements and restrictions on car parking to ease the impact of new development on the transport network and services.
- T2 To make the area more accessible, particularly by sustainable transport including walking, cycling and public transport.
- T3 To use car parking in the town centre more efficiently by ensuring that shops and leisure facilities share parking facilities

Theme 3: Leisure: A great place to visit, to relax in and have fun

- L1 To promote healthy lifestyles and make the area known for its excellent sports, leisure and entertainment facilities.
- L2 To promote arts, culture and tourism.

Theme 4: Places: Better and safer streets, squares and parks

- P1 To ensure the design, scale and location of new buildings help create streets and neighbourhoods which have a varied character. There should be no gated communities and the area's green spaces and heritage should be enhanced, especially the River Thames, the docks and the parks to create a distinctive sense of place.
- P2 To create an attractive, safe, and secure public realm.
- P3 To link the docks and parks in a network of open spaces which have a variety of functions, including recreation and children's play, sports facilities and nature conservation.
- P4 To make the River Thames and its river front more accessible.
- P5 To reduce the impact of development on the environment and help tackle climate change, air quality, pollution, waste and flood risk.

Theme 5: Housing: Providing more and better homes

- H1 To create a mixed community by providing more housing choices and better homes of a high quality. There should be more affordable housing and different housing sizes including larger homes for families.
- H2 To focus higher densities in the action area core where there are town centre activities and good access to public transport.

Theme 6: Community: Enhanced social and economic opportunities

- C1 To provide more and improved educational, health and community facilities which meet the needs of the growing population.
- C2 To provide more local employment opportunities.

Annex 3: Related projects and EQIAs

The Southwark Plan

Key findings:

- Provision of small local businesses which are easily accessible by local communities encourages the closure of development gaps for the local communities through an increased sense of belonging, redressing disadvantage and equality of access to services.
- By ensuring that new developments are safe and secure, disadvantage is addressed, community relations are improved and equality of opportunity is promoted.
- Protection of residential accommodation reduces discrimination and promotes equality of opportunity through providing inclusive and accessible housing for communities within the borough.
- Provision of accommodation other than houses and flats recognises the diverse needs of communities within the borough and promotes equality of opportunity since communities that will benefit are frequently the marginalized.
- The protection of transport impacts creates a sustainable, inclusive and accessible borough for its residents, future residents, users and occupiers.
- Public transport improvements assist in the creation of an accessible and inclusive borough by focusing on sustainable forms of transport as well as being socially inclusive. Accessible and inclusive transport links promote equality of opportunity and prevent barriers of exclusion and discrimination.
- Mini cab offices in the borough make transportation in the borough accessible to those who may not have access to public transport or private car use.

Core strategy

Key findings:

- By requiring the maximum amount of affordable housing possible across the whole of the borough, this should have a positive impact on all equality groups and help to promote equality of opportunity by offering affordable housing across the whole of Southwark.
- Allowing student housing only in the town centres and in areas with good access to public transport services, this may promote cohesion between different groups as student housing will be located in the areas most suitable to accommodate it.
- Setting out criteria for how we may allocate gypsy and traveller sites in the future may improve community cohesion and good relation by making sure that new sites are located in suitable areas.
- Protecting employment sites should have a positive impact on discrimination and opportunity by increasing the amount of jobs in the borough and protecting the jobs already there. Through our employment and enterprise strategies we will work to ensure that these jobs are suitable for all of the different groups in the community.
- The Core Strategy aims to facilitate a network of community facilities that meet the needs of local communities. This should help to improve community cohesion and ensure that community facilities are easily accessible so that everyone can benefit from access to a range of community facilities.

Southwark 2016

Key findings:

- Migration in and out of the borough is high: this makes it difficult to measure the success of interventions (because the beneficiaries may have moved on and another, more

disadvantaged group, taken their place). It is also makes it more difficult to predict the composition of the borough over the next 10 years.

- Southwark's population will continue to grow so that by 2016 it could be between 286,000 and 301,000. That means anything from 14,000 to 20,000 more households than in 2001.
- By 2016 around 43% of the population is expected to be from black and minority ethnic backgrounds, with many different faiths and cultures.
- Southwark's population ranges from those who enjoy significant affluence to those in severe poverty. Southwark is becoming more socially and geographically divided.
- We have a 10% gap in the numbers of people of working age (16-74) in Southwark who are in employment compared to the national average. In that age group, 65% have no or first level NVQ qualifications, rising to over 80% for people of Bangladeshi and Black Caribbean origin.
- 39% of local authority homes and 40% of private rented properties do not yet meet the decent homes standard.

Local Implementation Plan for Transport (LIP)

Key findings:

- Factors such as age and level of deprivation can increase the risk to people's road safety.
- Access to employment can be affected by journey time to travel to work.
- As a person ages and mobility decreases the importance of being able to access their surrounding environment and public transport grows considerably and inaccessible transport can be a major isolating factor.
- Accessibility transport planning should be used to: maximise independence and access to key services; establish transport standards; and assess, prioritise and meet the needs for all.
- The walking plan should be used to promote initiatives that aim to improve the physical environment, such as improved surfacing, removal of street clutter, improvements to street lighting while also providing additional footways.
- Route management strategies on the strategic road network should comprise measures to improve efficiency and safety by reducing traffic speeds and providing for improved pedestrian safety.

Employment and enterprise strategies

Key findings:

- Overall in both the UK and Southwark the employment rate of BME people is lower than that of white British people.
- Overall in the UK and Southwark the employment rate of women is lower than that of men. Barriers include limited access to affordable and flexible childcare and caring responsibilities.
- Young people (16-24) and older people (50+) in the working age group tend to experience specific barriers to employment related to their age.

Housing Strategy 2005–2010

Key findings:

- 39% of vulnerable people are currently living in non-decent private accommodation in which older people are over represented.
- 28.6% of council households contain a member defined as having special needs. 60% of BME residents of Southwark have council tenancies.
- 6,345 private sector homes contain a vulnerable person and are non-decent.
- Families with young children, pensioners and disabled people are more likely to suffer from fuel poverty. Of private sector housing assessed as non-decent, 80% fail the standard on

thermal comfort. The lowest SAP ratings are experienced by Chinese, Vietnamese and pensioner households.

Annex 4: Population characteristics in the AAP area

Characteristic	Issues for consultation
<p>Age¹</p> <ul style="list-style-type: none"> • 15% of the residents are under 15 years old, compared to 18% in Southwark. • 43% of residents are under 30 years old, compared to 41% across Southwark. • 10% of residents are over 65 years old, the same as across Southwark. This will 	<ul style="list-style-type: none"> • Younger people may not be aware of the planning system are unable to attend meetings in the evening, yet they are an important voice. Consultation will need to target youth, this could include attending schools and youth forums in the area and using techniques that would appeal to young people. • Older people may not feel safe to attend meetings in the evening or there may be a lack of respect for their views. Meetings should be held at accessible times and information be provided in easily accessed locations. Groups that represent the interests of older people should also be targeted.
<p>Ethnicity</p> <ul style="list-style-type: none"> • At the 2001 Census 77% of residents identified as White, compared to 63% across Southwark • 13% identified as Black/Black British, compared with 26% across Southwark • 3% identified as Asian and 4% as Chinese, which is close to the Southwark average. 	<ul style="list-style-type: none"> • Minority ethnic groups may fear discrimination and be reluctant to voice their opinion. English may not be their first language. Translators and interpreters may be required. Information should avoid jargon and legal terms. Groups that represent ethnic groups in the area should be targeted.
<p>Country of birth</p> <ul style="list-style-type: none"> • At the 2001 Census, 21% of residents identified as being born outside the UK and the republic of Ireland, compared with 27% in Southwark. Languages spoken include French, Spanish, Chinese and Vietnamese. 	<ul style="list-style-type: none"> • At the very least, all written information will include details of the council's interpreter and translation service but in appropriate circumstances information will be translated into languages spoken locally.
<p>Religion</p> <ul style="list-style-type: none"> • At the 2001 Census, 65% of people identified as being Christian, which is close to the Southwark average. • 4% identified as being Muslim compared to 7% across Southwark, • There were a very small number of people identifying as Buddhist, Hindu or Jewish 	<ul style="list-style-type: none"> • The needs of different religious groups may not be well understood and there may be restrictions on how certain individuals can get involved. There may also be fear of discrimination preventing people having their say. Contact with faith groups and forums will be important as well as holding events at accessible times and in appropriate venues.
<p>Lone parents</p> <ul style="list-style-type: none"> • At the 2001 Census, 8% of households in the area were lone 	<ul style="list-style-type: none"> • Lone parents may not be able to afford child minding to attend meetings. A variety of consultation

Characteristic	Issues for consultation
parent households with dependent children, compared with 10% across Southwark.	techniques should be used. Another option is to provide childcare at meetings or reimburse part of the cost of childcare and travel for the low waged.
People with disabilities <ul style="list-style-type: none"> • At the 2001 Census, 13% of people in the area identified as being disabled (having a limiting long term illness). This compares to 16% across Southwark. 	<ul style="list-style-type: none"> • Venues for meetings and exhibitions will need to be accessible. Information will need to be provided in a variety of formats such as audio, large print. Sign-language interpreters may also be needed at meetings.
Employment <ul style="list-style-type: none"> • At the 2001 Census, 4.5% of people identified as being unemployed, compared to 6% in Southwark. • Most of those in employment had full time jobs, however 6.5% of residents were in part-time work. • 10% of people identified as being students, compared to 13% across Southwark. • 27% of residents were not economically active, compared to 34% in Southwark. • 6% of people are retired, compared to 8% across Southwark. • May 2007 data from the Department of Works and Pensions reveals approximately 14% of residents in the area are claiming income benefits of some kind. 	<ul style="list-style-type: none"> • The unemployed or low waged may not be able to afford to travel to meetings or obtain information. Information should be provided free of charge to all residents. An option is to reimburse residents for travel to meetings if they are low waged. • Shift workers may not be able to come to meetings during the evenings, a variety of meetings times should be used. This could also include lunch time events for workers. • Information should be available outside business hours. Email will provide an effective way of communicating with people outside of business hours.
Neighbourhoods <ul style="list-style-type: none"> • Rotherhithe can be broken into smaller neighbourhoods with distinct characteristics. • Previous consultation has showed differences in views between people living in Surrey Docks ward (with a higher proportion of young professionals) and Rotherhithe ward (with more long term residents, social renters, manual workers and benefit recipients). 	<ul style="list-style-type: none"> • Residents living in different parts of Rotherhithe may have different needs and aspirations for the local area, which will need to be considered in preparing the Canada Water Area Action Plan. • Consultation may need to be tailored to match the concerns and priorities of people living in different parts of Rotherhithe.

Appendix A

The update to the Residential Design Standards Supplementary Planning Document

Appendix A for Planning Committee Report and
Cabinet Report:
Amendment to Residential Design Standards
Supplementary Planning Document

Planning Committee: 21 March 2011
Cabinet: 22 March 2011

Appendix A	The update to the Residential Design Standards Supplementary Planning Document
Appendix B	The consultation plan
Appendix C	The Equalities Impact Assessment

**Draft Residential Design Standards
Supplementary Planning Document**

March 2011 ~~September 2008~~

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1. INTRODUCTION

1.1 Role and Purpose of the Supplementary Planning Document (SPD)

The purpose of this supplementary planning document (SPD) is to set out the standard of design expected from residential development in Southwark. This will ensure all residential developments including new dwellings, extensions, alterations and conversions are sustainable and of a high standard of design. The SPD provides a framework to ensure that all residential development is liveable, accessible and does not have a negative impact on the amenity, privacy and aesthetics of the surrounding area. It will ensure that all residential development results in a pleasant living environment. The SPD has the following objectives:

1. To provide a clear set of standards to guide the design of residential development
2. To provide design guidelines for a wide range of dwelling types required to meet housing need
3. To ensure a high standard of housing for all new residential developments

This document provides ~~more~~ detailed guidance to the Core Strategy and saved policies of the Southwark Plan. ~~We are updating the Southwark Plan setting out new policies and strategies for issues such as affordable housing, employment and planning areas as places in a Core Strategy. This means that the guidance in this document will be updated as the new core strategy is prepared. The Core Strategy is where all of the important decisions will be made about the type of development that is allowed to improve places in Southwark.~~ This SPD is not creating policy. ~~It is providing more detailed guidance to policies in the Southwark Plan. We are updating it to take into account recent changes to housing policy introduced through the Core Strategy.~~ It may be changed soon as we continue to update our housing policies through area action plans and other planning documents so please make sure that you check on the website to find out whether any new guidance has taken the place of this document at <http://www.southwark.gov.uk/ldf/YourServices/planningandbuildingcontrol/planningpolicy>.

The SPD will be a material consideration and will have significant weight in the determination of a planning application. The SPD principally provides further information on the following Core Strategy and saved Southwark Plan policies:

- Strategic Policy 5 – Providing new homes
- Strategic Policy 7 – Family homes
- Strategic Policy 8 – Student homes
- Strategic Policy 12 – Design and conservation
- Saved Southwark Plan Policy 3.2 – Protection of Amenity
- Saved Southwark Plan Policy 3.11 – Efficient Use of Land
- Saved Southwark Plan Policy 3.12 – Quality in Design
- Saved Southwark Plan Policy 3.14 – Designing out Crime

- ~~Policy 4.1 – Density of Residential Development~~
- [Saved Southwark Plan](#) Policy 4.2 – Quality of Residential Development
- [Saved Southwark Plan](#) Policy 4.3 – Mix of Dwellings
- [Saved Southwark Plan](#) Policy 4.5 – Wheelchair Affordable Housing
- [Saved Southwark Plan](#) Policy 4.7 – Non Self-Contained Housing for Identified User Groups

A full summary of the relevant policies is contained in section 5.

The SPD applies to new residential development, conversions of existing dwellings and extensions or alterations to existing homes and covers the following:

- General principles applying to all development
- Standards specific to certain types of residential development in addition to the general principles
- Guidelines for housing meeting specific needs

Where applicants cannot achieve the appropriate standard, they must justify this and demonstrate why not and show the measures taken to compensate for this. This would normally be done through the Design and Access Statement.

1.2 Related planning documents

This SPD should be used along with other planning documents that provide guidance on other aspects of housing and sustainable development, including:

- Affordable Housing Supplementary Planning Document (2008): this document explains the council's approach to securing affordable housing. [We are consulting on an update to this SPD.](#)
- Sustainable Design and Construction Supplementary Planning Document ([2009Draft](#)): this document explains how new development should be designed and built so that it has a positive impact on the environment, including energy, water use, pollution, waste, flood risk and biodiversity
- Sustainability Assessment Supplementary Planning Document ([2009Draft](#)): this document explains what information will be required to demonstrate the environmental impact of a development and how these will be balanced with social and economic impacts
- Design and Access Statements Supplementary Planning Document (2007): this document explains how to prepare design and access statements, which need to be submitted with most planning applications
- Heritage and Conservation Supplementary Planning [Document Guidance](#) (Draft [2002](#)): this document explains the approach taken to protecting and enhancing the borough's areas of historic importance, listed buildings and conservation areas
- Area action plans and supplementary planning documents relating to specific areas and sites. These will identify more specific standards and guidance for housing in specific areas. The standards may be

different for each area. Applicants need to check the relevant area specific supplementary planning document or area action plan. The areas covered by area action plans are: [Elephant and Castle](#), Peckham [and Nunhead](#), Aylesbury, and Canada Water. [Area Site](#) specific SPDs cover ~~a larger number of areas including~~ [Bankside](#), [Borough and London Bridge](#), [Elephant and Castle](#), Camberwell, [Dulwich](#) and the Old Kent Road.

1.3 Key considerations

This section covers some of the key considerations that applicants will have to consider when designing proposals for general needs residential development with regard to [strategic policies 5 and 7 of the Core Strategy](#) and [saved policies 4.1, 4.2 and 4.3 of the Southwark Plan](#). Applicants should also refer to other policies and guidance in the development plan, this SPD and other SPDs that are relevant to their development. Housing for specific user groups is covered in section 4 of this SPD. We suggest you engage with our development [management control planning](#) team at an early stage to ensure the application complies with our policies and provides a high quality of design.

For all residential development does the development:

- Fall within the appropriate residential density range?
- Meet the criteria of what is considered to be a development of exemplary design or of achieving high quality living accommodation as set out in section 2.2 if the development is in [an opportunity area or action area core-a Public Transport Accessibility Zone and above 700 hr/ha?](#)
- Meet the [minimum dwelling sizes](#) and minimum [room sizes floor areas](#) set out in section 2.3 of this SPD?
- Meet lifetime homes as set out in section 2.9 of this SPD?
- Meet standards of privacy and outlook as set out in section 2.8 of this SPD?
- Meet standards of daylight and sunlight as set out in section 2.7 of this SPD?
- Have adequate levels of ventilation as set out in sections 2.1, 2.4 and 2.7 of this SPD?
- Meet amenity space standards as set out in section 2.6 of this SPD?
- Is the development designed to be safe and secure as outlined in section 2.7 of this SPD?
- Limit the impact of pollution? Refer to the Sustainable Design and Construction SPD for more information.

For major residential development (those over 10 units) does the development?

- Have [at least 60% a majority](#) of units [suitable for three or more occupants \(that have containing two or more bedrooms\)?](#)
- Include studio flats? If so are these limited to 5% of the total number of dwellings? Note that studio flats are not considered suitable for affordable housing provision.
- Include a minimum of 10% of units that are suitable for wheelchair users in line with guidance set out in section 2.10 of this SPD?
- ~~Is the development over 15 units? If so, Provide the minimum amount of family homes do at least 10% of the units have three or more bedrooms~~ with direct access to private outdoor space as set out in sections [2.3](#), 2.6, 3.1 and 3.24?

2. GENERAL PRINCIPLES APPLYING TO ALL RESIDENTIAL DEVELOPMENT

2.1 What do these standards apply to?

These standards apply to all residential development, including new dwellings, conversions, extensions and alterations. Additional standards may also apply depending on the type of development and these are set out in section 3. These standards are for general needs housing. Specialist housing is dealt with in section 4.

Where an application for planning permission will increase the total amount of development on a site to more than 10 dwellings, the development will be considered as a major development and the standards within this SPD and the [Core Strategy and saved policies of the](#) Southwark Plan relating to major developments will apply. This will be the case for:

- Sites that are artificially sub-divided. In these circumstances the proposals will be judged as to whether or not a development makes the best use of land through the efficient use of land policy and by applying appropriate density levels based on the context and character of the surrounding development and public transport accessibility levels.
- Phased development. In these circumstances where the development is clearly part of the first phase of a larger development which is over 10 units, it will be considered as a major application and the residential design standards for major developments will be applied. Where a phased development with planning permission is subsequently amended and the total units are increased, the council will also apply the residential design standards for major developments.
- Additional units added through supplementary planning applications or a subsequent application on an adjoining site or through a mixed use scheme. In these circumstances where there is an extant planning permission and a fresh planning permission is submitted for a revised scheme taking the total units above 10 units, the residential design standards for major applications will be applied.

The council will seek to ensure that proposals deliberately designed to circumvent the threshold of 10 units will not be accepted.

2.2 Density Standards

Density is a measure of the amount of residential accommodation on a development site and is calculated by dividing the number of habitable rooms in a development by the net area of the site (measured in sqm).

It is important that the appropriate amount of residential development occurs in appropriate places. Making efficient use of land to provide new homes, jobs and services, without building on open space, is important. The right level of density ensures efficient use of land without negative impacts on the environment. New residential development must take into account the local character and context of the area so that it fits in with its surroundings and

does not have a negative impact on amenity and traffic. High quality landscaping can help to mix a range of densities together.

[Strategic Policy 5 of the Core Strategy The Southwark Plan](#) sets out density ranges for different zones in Southwark zones. [The detailed boundaries of the zones are shown on the proposals map](#). These [density ranges](#) are guides to the efficient use of land in different areas based on the general character of the area and its accessibility to public transport. The density ranges are set out in table 1. The Central Activities Zone and Urban Zone tend to be characterised by flats, maisonettes and terraced housing. The Suburban Zone generally contains a more open character, with larger gardens and houses rather than flats. Section 3 of this SPD contains further guidance specific to these types of residential development.

[Guidance on how to calculate density is set out in Appendix 2.](#)

Table 1 – Residential density standards

DENSITY ZONE	HABITABLE ROOMS PER HECTARE
Central Activity Zone	650 to 1100 habitable rooms/hectare
Urban Zone	Medium density- 200 to 700 habitable rooms/hectare in areas with predominantly four or more storeys and a public transport accessibility level of 4 to 6; Lower density— 200 to 450 habitable rooms/hectare in areas with predominantly two to three storeys and a public transport accessibility level of 2 to 3.
Suburban Zone (North, Middle and South)	200 to 350 hr/h
Public Transport Accessibility Zones (Canada Water, Walworth Corridor, Bermondsey and Peckham)	May exceed 700 hr/h if the development provides: an exemplary standard of design, with an excellent standard of living accommodation; and a significant contribution to environmental improvements in the area particularly relating to public transport/cycle/pedestrian movement, safety and security and public realm improvements.

~~Table 1~~ [Strategic Policy 5 states highlights](#) that higher density residential development may be suitable in [opportunity areas and action area cores](#) ~~public transport accessibility zones~~ where an exemplary standard of design and an excellent standard of living environment can be demonstrated. For the development to be considered as being of an exemplary standard of design and having an excellent standard of living environment, applicants will be

expected to demonstrate that their proposed schemes exceed the residential design standards set out in this SPD, specifically they will be expected to:

- Significantly exceed minimum floorspace standards
- Provide for bulk storage
- Include a predominance of dual aspect units in the development
- Exceed the minimum ceiling height of 2.3 metres required by the Building Regulations
- Have natural light and ventilation in kitchens and bathrooms
- Exceed amenity space standards
- Meet good sunlight and daylight standards
- Have excellent accessibility within dwellings including meeting Lifetime Homes standards
- Minimise corridor lengths by having an increased number of cores
- Minimise noise nuisance in flat developments by stacking floors so that bedrooms are above bedrooms, lounges are above lounges etc.
- Obtain Secured by Design certification
- Have exceptional environmental performance that exceeds the standards set out in the Sustainable Design and Construction Supplementary Planning Document. This will include designing an energy efficient development, using long lasting building materials and reducing water consumption. See the Sustainable Design and Construction Supplementary Planning Document for further guidance.
- Maximise the potential of the site as demonstrated in the applicant's Design and Access Statement. See the Design and Access Statements Supplementary Planning Document for further guidance.
- Make a positive contribution to local context, character and communities, including contributing to the streetscape.

2.3 Different sized dwellings/dwelling mix

The [Core Strategy Southwark Plan](#) and the London Plan require development to cater for the range of housing needs in the area. [This includes providing a mix of housing sizes and types for different sized households.](#) To identify housing need in the borough we commission a [Housing Needs Survey Requirements Study roughly every five years. These surveys are carried out using assessment methods that comply with government guidance.](#) The most recent survey carried out was in [2009 2003 and this was updated in 2006](#). In terms of housing mix, the key findings of the survey were that:

- There is a significant shortfall of housing in the borough
- There is a general need for more family housing in the borough [across all tenures for larger sizes households](#)
- ~~The greatest need in the private housing sector is for one and two bedroom properties~~
- ~~The greatest need in the affordable housing sector is for three bedroom properties~~

[Strategic Policy 7 of the Core Strategy sets out dwelling mix requirements for schemes of 10 or more units. We also set out area-specific requirements in the area action plans. These requirements are set out below with guidance on](#)

the household sizes needing to be accommodated. The level of family housing we require is based on the density of development and the ability of development to provide amenity space for families. Major new and converted housing developments (developments of over 10 units) will need to cater for these needs by providing a mix of self-contained dwelling types and sizes for different household sizes, as follows:

- a minimum of 60% of dwellings suitable for three or more occupants (containing two or more bedrooms)
- a maximum of 5% of dwellings as studio flats
- minimum amount of dwellings suitable for at least five occupants (with a mix of 3, 4 or 5 bedrooms) with directly accessible amenity space in line with the following:
 - a minimum of 10% of dwellings in potters Field, London Bridge, Elephant and Castle opportunity area and the north of Blackfriars Road;
 - a minimum of 20% of dwellings in the urban density zone and the Central Activities Zone, except where set out above;
 - a minimum of 30% of dwellings in the suburban density zone;
- Other than studio flats which must be private, homes of all sizes should provide a mix of private, social and intermediate housing.

The requirement for family homes is illustrated on Figure 1:

Area action plan policies set out housing mix requirements that take precedence over the family housing policy in the core strategy. These are:

- Aylesbury Core Action Area Core:
 - A maximum of 3% studios all in private tenure;
 - at least 70% of dwellings to have two or more bedrooms;
 - at least 20% of dwellings have three bedrooms;
 - at least 7% of dwellings have four bedrooms; and
 - at least 3% of dwellings have five or more bedrooms
- Canada Water Action Area Core:
 - a minimum of 20% of dwellings to have 3, 4 or 5 bedrooms (suitable for at least five occupants) in the Canada Water action area core
- Peckham and Nunhead Action Area Core:
 - We will consider whether we will vary the level of family housing through the preferred options consultation. In the meantime we will apply the requirements for the urban density zone, set out above.

Exceptions may be made where:

- A scheme is designed to meet specific housing need such as supported housing, as set out in section 4
- A mix of dwelling sizes would be inappropriate due to the location of the site, its external environment or the limitations of the site itself. Applicants must justify why the appropriate dwelling mix cannot be met. This should be justified through the applicant's Design and Access Statement.

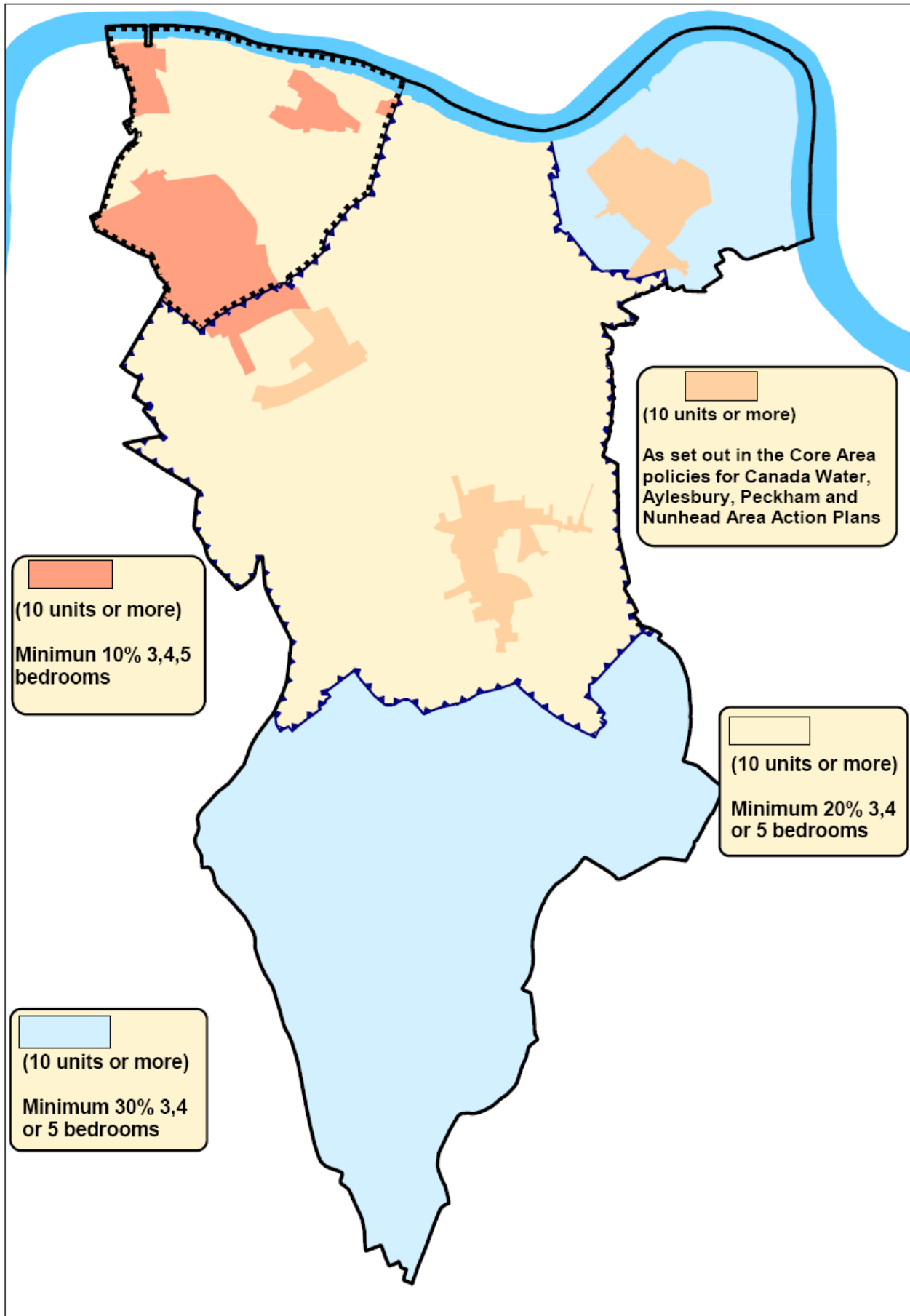


Figure 1 – Family Home Zones

The council will expect major new residential development and conversions to include a mix of self-contained dwelling types and sizes, including that:

- The majority of units should have two or more bedrooms
- Developments of 15 or more dwellings should provide at least 10% of the units with three or more bedrooms with direct access to private outdoor space. These units can be defined as family units. The required amenity space standards are set out in sections 2.6, 3.1, 3.2, 3.3 and 3.4
- No more than 5% of the total dwelling units are studio flats. Studio flats do not meet affordable housing need and will not be considered as such. See the draft Affordable Housing SPD for more information
- Major developments provide at least 10% of units as suitable for wheelchair users.

2.43 Minimum floor areas for different sized dwellings

Strategic Policy 7 of the Core Strategy highlights the importance of ensuring that all new development is of a high quality with good living conditions.

Minimum floor area standards ensure an adequate amount of space is provided in residential development to achieve a pleasant and healthy living environment. This is also a priority for the Mayor, who, through the London Plan and London Housing Design Guide, will require minimum space standards in order to make new homes provide good living conditions for different sized households.

We have adopted minimum floor area standards for Aylesbury with the area action plan. For other areas we will apply the standards in this SPD until replaced by area action plans and other development plan documents.

Table 2 sets out the minimum overall dwelling sizes we expect all development to meet. These are minimum standards which developers are encouraged to exceed. They are in line with the requirements of the draft replacement London Plan and are based on the number of people expected to live in a home. This means developers should state the number of occupiers a home is designed to accommodate. Across a scheme, the mix of dwelling types should cater for the full range of household sizes. We will assess this using the average dwelling sizes set out in Table X.

Table 2: Minimum dwelling size standards for new development

<u>Development type</u>	<u>Dwelling type (bedroom/persons)</u>	<u>Essential GIA (sq m)</u>
<u>Flats</u>	<u>Studios</u>	<u>36</u>
	<u>1b2p</u>	<u>50</u>
	<u>2b3p</u>	<u>61</u>
	<u>2b4p</u>	<u>70</u>
	<u>2b average</u>	<u>66</u>
	<u>3b4p</u>	<u>74</u>

<u>Development type</u>	<u>Dwelling type (bedroom/persons)</u>	<u>Essential GIA (sq m)</u>
	3b5p	86
	3b6p	95
	3b average	85
	4b5p	90
	4b6p	99
	4+b average	95
2 storey houses	2b4p	83
	3b4p	87
	3b5p	96
	3b average	92
	4b5p	100
	4b6p	107
	4+b average	104
3 storey houses	3b5p	102
	4b5p	106
	4b6p	113
	4+b average	110
When designing homes for more than six persons developers should allow approximately 10 sq m per extra person.		

Table [32](#) sets out the minimum floor areas for dwellings based on the number of bedrooms. These are minimum floor areas and applicants should seek to provide larger floor areas in developments where possible.

For the purposes of affordable housing calculations, habitable rooms exceeding 27.5 sqm will be counted as two rooms. See the Affordable Housing Supplementary Planning Document for further information.

Table [32](#) –Minimum floor areas in sqm

DWELLING SIZE	STUDIO	1 BED	2 BED	3 BED	4 BED
DOUBLE BEDROOM		12	12	12	12
SINGLE BEDROOM			7	7	7
LIVING ROOM (WHERE EATING AREA IS IN THE LOUNGE)		16	17	18	19
KITCHEN (WITH EATING AREA IN THE LOUNGE)		6	7	8	8
KITCHEN DINER (EATING AREA IN THE		9	11	11	12

DWELLING SIZE	STUDIO	1 BED	2 BED	3 BED	4 BED
KITCHEN DINER)					
LIVING ROOM (WHERE EATING AREA IS IN THE KITCHEN DINER)		13	13	15	15
OPEN PLAN DEVELOPMENT (WHERE KITCHEN/DINER IS COMBINED WITH THE LIVING ROOM)		24	27	30	
BATHROOM/ WC (COMBINED)	3.5	3.5	3.5	3.5	3.5
STORAGE FLOOR AREA	1	1.25	1.75	2.25	2.75
OVERALL FLOOR AREA	32.5	45	60	75	90

Table [32](#) sets out the minimum floor requirements for open plan units. It is recommended that rooms are separated within a unit where possible, particularly for social housing where there are frequently more people living in the dwelling. A larger room size is required for open plan units to allow some separation within the room (especially between cooking and living) and to allow more space as everyone in the dwelling will be using that same one room.

For studio flats there needs to be sufficient separation between the cooking and sleeping areas.

See section 3.5 of this SPD for further information on the larger room sizes required for social rented affordable housing.

All residential development needs to provide storage space to meet the likely needs and requirements of potential occupiers. Table [32](#) sets out the minimum requirements for storage for each sized dwelling. Applicants must ensure that there is storage space for the following:

- Refuse storage. Internal space for storage of waste should be provided within kitchens (in cupboards) or close to kitchens in utility rooms or connected garages. This should have a minimum capacity of 30 litres and be able to store at least three bins for different types of waste. No bin should be smaller than seven litres
- General household items such as vacuum cleaners in all dwellings and buggies in dwellings with two or more bedrooms
- Food and kitchen storage, including space for electrical machines
- Storage for tools etc for household, garden or vehicle/bicycle maintenance, especially where no garage is provided

In larger developments basements can provide additional capacity for storage and this should be considered.

Building Regulations require a minimum headroom of 2.3 metres. Exceptions may be considered in circumstances where the proposal is to convert an existing building into a flat, providing all the other appropriate residential design standards in this SPD are met.

Habitable rooms in attics should have a minimum room height of 2.3 metres over at least half of the habitable floor area. Any floor area where the ceiling height is less than 1.5 metres will not count towards the habitable floorspace.

2.54 Internal Layout of Dwellings

The following requirements should be applied:

- All habitable rooms should have access to natural daylight. Rooms should be designed to take advantage of natural sunlight and ventilation, as set out in section 2.7
- Principal living rooms and bedrooms should not be served only by roof lights and should have vertical windows for outlook
- All new residential development for general needs housing should be completely self-contained with the living room, kitchen, bathroom, WC and bedrooms adequate in size for their intended use, in accordance with the minimum standards set out in table 32
- Wherever practical all new dwellings should be provided with an entrance lobby or hall in order to conserve energy and ensure that entry is not directly onto a flight of stairs
- Access to bedrooms and bathrooms should be from a circulation area (i.e. entrance hall or lobby) and not solely off another room
- Kitchens may be located off living or dining rooms where means of escape in case of fire is satisfactory
- All bathrooms, WCs and kitchens should have adequate ventilation
- It is recommended that dwellings with two double bedrooms have a separate WC and bathroom. Dwellings with three or more bedrooms should have a second WC with a hand wash basin
- All affordable dwellings with three or more bedrooms should have a kitchen that is separate from the living room.

2.5 Different sized dwellings/dwelling mix

~~The Southwark Plan and the London Plan require development to cater for the range of housing needs in the area. To identify housing need in the borough we commission a Housing Needs Survey roughly every five years. These surveys are carried out using assessment methods that comply with government guidance. The most recent survey carried out was in 2003 and this was updated in 2006. In terms of housing mix, the key findings of the survey were that:~~

- ~~• There is a significant shortfall of housing in the borough~~
- ~~• There is a general need for more family housing in the borough~~
- ~~• The greatest need in the private housing sector is for one and two bedroom properties~~
- ~~• The greatest need in the affordable housing sector is for three bedroom properties~~

~~Major new and converted housing developments (developments of over 10 units) will need to cater for these needs. The council will expect major new residential development and conversions to include a mix of self-contained dwelling types and sizes, including that:~~

- ~~• The majority of units should have two or more bedrooms~~
- ~~• Developments of 15 or more dwellings should provide at least 10% of the units with three or more bedrooms with direct access to private outdoor space. These units can be defined as family units. The required amenity space standards are set out in sections 2.6, 3.1, 3.2, 3.3 and 3.4~~
- ~~• No more than 5% of the total dwelling units are studio flats. Studio flats do not meet affordable housing need and will not be considered as such. See the draft Affordable Housing SPD for more information~~
- ~~• Major developments provide at least 10% of units as suitable for wheelchair users.~~

~~Exceptions may be made where:~~

- ~~• A scheme is designed to meet specific housing need such as supported housing, as set out in section 4~~
- ~~• A mix of dwelling sizes would be inappropriate due to the location of the site, its external environment or the limitations of the site itself. Applicants must justify why the appropriate dwelling mix cannot be met. This should be justified through the applicant's Design and Access Statement.~~

2.6 Outdoor Amenity Space

All new residential development must provide an adequate amount of useable outdoor amenity space. The nature and scale of the amenity space should be appropriate to the location of the development, its function and the character of the area within which it is situated. For example development designed for families will need to include private gardens and play areas whereas for 1 bed flats, balconies and more generic communal areas may be more appropriate.

In most developments there should be a mixture of both private and communal amenity space. Private amenity space is space specific for one dwelling and can be accessed only by the people living within that dwelling. It is particularly important for family housing in order to provide a safe outdoor area for children to play in. It can take the form of private gardens, balconies, terraces and roof gardens. Juliet balconies are not considered as amenity space as they do not add useable space to the development. Access to private amenity space should not be from the bedroom.

Communal amenity space is shared space for use by everyone within the development. It can take the form of a communal garden or roof garden. All residents should have access to communal amenity space where it is provided.

Section 3 sets out the specific outdoor amenity space requirements for different types of residential development. These standards are in addition to the general standards set out in this section.

Where it is not possible to provide an adequate amount of outdoor amenity space in accordance with section 3 of this SPD and the [saved](#) Southwark Plan policy 4.2, the applicant must justify why this cannot be achieved through the Design and Access Statement. Where developments are within immediate proximity of a substantial area of public open space, accessibility to the open space, combined with better outlook, may justify less amenity space as part of the development. In these circumstances a planning contribution may be required instead to provide off-site public amenity space (see the Section 106 Supplementary Planning Document).

Planning applications should show the areas allocated to future residents for outdoor amenity space. Details of access to and boundary treatments must also be provided with the planning application. It is important to indicate the extent of private ownership (such as by walls, fences, railings, gates, signage, paving) to define the boundary between public and private space.

In calculating amenity space the following will not be counted:

- Shared surfaces
- Driveways
- Vehicle parking areas or hard standing
- Cycle parking areas
- Footpaths
- Servicing areas
- Refuse storage areas

The elements of amenity space to be included in the amenity space calculation will depend upon the design and layout of the proposed development. Any exception to the above will need to be justified in the Design and Access Statement.

2.7 Daylight and sunlight

Residential developments should maximise sunlight and daylight, both within the new development and to neighbouring properties. Development should seek to minimise overshadowing or blocking of light to adjoining properties. A lack of daylight can have negative impacts on health as well as making the development gloomy and uninviting.

Maximising sunlight and daylight also helps to make a building energy efficient by reducing the need for electric light and meeting some of the heating requirements through solar gain. The orientation of buildings can maximise passive solar gain to keep buildings warm in winter and cool in summer. See the Design and Access Statements Supplementary Planning Document and the Sustainable Design and Construction Supplementary Planning Document for further information.

Developments should meet site layout requirements set out in the Building Research Establishment (BRE) Site Layout for Daylight and Sunlight – A Guide to Good Practice (1991). In particular the following minimum tests need to be applied to avoid the unacceptable loss of daylight and/or sunlight resulting from a development, including new build, extensions and conversions.

Daylight and sunlight tests on the impact of the new development on neighbouring properties

Daylight tests

This test should be used where the proposed development faces the affected window of the neighbouring property:

1. Draw a line at 25 degrees upwards from the centre of the affected window;
2. If the proposed development is higher than this 25 degree line, there may be an unacceptable loss of daylight to the affected window.

This test should be used where the proposed development is at right angles to the affected window of the neighbouring property:

1. Draw a line at 45 degrees upwards from the centre of the affected window;
2. Draw a line at 45 degrees sideways from the centre of the affected window.

If the proposed development is both higher and wider than these 45 degree lines, there may be an unacceptable loss of daylight to the affected window.

Sunlight tests

This test should be used where any part of the proposed development lies to the south of the affected window of the neighbouring property, between due east and due west:

- Draw a line at 25 degrees upwards from a point two metres above ground level,

If the proposed development is higher than this 25 degree line, there may be an unacceptable loss of sunlight to the affected window.

Daylight and sunlight tests for adequate daylight and sunlight in the new dwelling

Internal natural daylight tests to proposed residential development

All development must have acceptable natural daylight and ventilation to all habitable rooms to the following standards:

- An area of glazing which is equivalent to at least 10% of the internal floorspace of each habitable room must be provided.
- An area of glazing that is capable of being opened, equivalent to at least 5% of the internal floorspace of each habitable room must be provided to allow adequate ventilation to each room.

For rooms below the external ground level:

- Draw a line at 30 degrees upwards from a point 2 metres above the floor level of the room, and in front of the basement window

If the street or garden outside is higher than this 30 degree line then there is unlikely to be adequate natural daylight to the room and it is unlikely to be acceptable.

If the proposed development fails any of these tests, further investigation and evidence may be required in order to assess whether an unacceptable loss of daylight and/or sunlight will occur. The evidence should be prepared by a suitably qualified professional and must be in accordance with the BRE guidance. The cost of any further investigation and evidence must be met by the applicant.

Additional tests

In addition to the BRE tests, to ensure that natural light and ventilation are maximised, all residential developments should meet the following requirements:

- At least one main wall with a window should face within 90 degrees of due south
- North facing gardens should be avoided
- Garages should be situated to the north of houses to maximise daylight and sunlight to the rest of the dwelling
- Taller buildings should be sited to the north of the development, with low rise at the south to maximise daylight and sunlight penetration to the development
- Where possible, living rooms should face the southern or western parts of the sky and kitchens towards the north east
- In order to make the most of solar gain through passive solar energy the main solar collecting glazing should face within 30 degrees of due south
- The council encourages dwellings to be dual aspect in terms of having multiple windows looking in more than one direction. This allows more light into the dwelling and allows cross ventilation. Where dual aspect cannot be provided for example in flat developments due to problems of overlooking neighbours, the applicant must prove that the single aspect is of a standard not inferior to multiple aspects and that a high quality of design is still achieved (through the Design and Access Statement). The Sustainable Design and Construction SPD provides further guidance on locating windows away from busy roads and railways to minimise noise and pollution to the development
- New development should not cause excessive overshadowing of existing communal amenity spaces or neighbouring properties.
- No new development should result in the complete loss of sunlight to an existing adjoining property.

2.8 Privacy and security

House and flat developments should be arranged to safeguard the amenity and privacy of occupiers and neighbours. New development, extensions, alterations and conversions should not subject neighbours to unacceptable noise disturbance, overlooking or loss of security. See the Sustainable

Design and Construction Supplementary Planning Document for further guidance on how to reduce disturbance from noise and the specific standards which must be met.

To prevent unnecessary problems of overlooking, loss of privacy and disturbance, development should achieve the following distances:

- A minimum distance of 12 metres at the front of the building and any elevation that fronts onto a highway
- A minimum distance of 21 metres at the rear of the building

Where these minimum distances cannot be met, applicants must provide justification through the Design and Access Statement.

Developments should seek to improve community safety and crime prevention. This may include designing developments so that open spaces are overlooked by windows, avoiding dark secluded areas and buildings face onto streets. This may include obtaining Secured by Design certification. Council owned developments and developments carried out by Registered Social Landlords are required to obtain Secured by Design certification.

2.9 Lifetime Homes

All new residential development should be built to Lifetime Homes standards. Lifetime Homes are ordinary homes designed to accommodate the changing needs of occupants throughout their lives. Habinteg Housing Association's Lifetime Homes standards are nationally recognised standards to raise the standard of housing. Lifetime Homes are based around meeting 16 design features. Ideally all 16 design features will be met or exceeded, to reach Lifetime Homes standards to benefit everyone and help residents remain in their communities. Where it is not possible for all 16 features to be met due to site constraints, applicants should provide details of which standards can not be met and justify the reasons for each through their Design and Access Statement. Those standards that can be achieved should still be met. The 16 Lifetime Homes features are set out in the table 3. Should the Habinteg House Association update the Lifetime Homes Standards after the adoption of this document, the council will use the updated standards. The Lifetime Homes standards are available from <http://www.lifetimehomes.org.uk>

Table 3– Lifetime Homes Standards

	Lifetime Home feature	Requirement	Stated specifications and dimensions to conform
1	Car Parking	Where car parking is adjacent to the home, it should be capable of enlargement to attain 3.3m width.	The general parking space width of 2400mm must have a grass verge or path 900mm wide running beside to enable the hard landscaping to have an overall width of 3300mm at a later date.
2	Access from	The distance from the car	A level approach is

	Car Parking	parking space to the home should be kept to a minimum and should be level or gently sloping.	<p>preferable. Where topography prevents this, a maximum gradient on an individual slope is permissible as follows:</p> <p>1:12 if the slope is less than 5m; 1:15 if it is between 5m – 10m; 1:20 where the slope is more than 10m.</p> <p>There must be top, bottom and intermediate 1200mm clear landings. Paths should be a minimum 900mm wide.</p>
3	Approach	The approach to all entrances should be level or gently sloping.	The specification for Criterion 2 gives the definition of gently sloping.
4	External Entrances	All entrances should be illuminated, have level access over the threshold and have a covered main entrance.	The threshold upstand should not exceed 15mm.
5	Communal Stairs	Communal stairs should provide easy access and, where homes are reached by a lift, it should be fully accessible.	<p>Communal stairs: Uniform rise not more than 170mm, uniform going not less than 250mm. Handrails extend 300mm beyond top and bottom step, handrail height 900mm from each nosing.</p> <p>Lifts: Clear landing entrances minimum 1500mm x 1500mm Minimum internal dimensions 1100mm x 1400mm Controls between 900 – 1200mm from floor and 400mm from the lift's internal front wall.</p>

6	Doorways & Hallways	The width of internal doorways and hallways should conform to Part M, except that when the approach is not head on and the hallway width is 900mm, the clear opening width should be 900mm rather than 800mm. There should be 300mm nib or wall space to the side of the leading edge of the doors on entrance level.	Front door: Clear opening width of 800mm, with a 300 nib to the side of the leading edge. Internal + Back doors: Clear opening width of 750mm / corridor or passageway width 900mm if the approach is head-on or 1200mm when the approach in not head-on, clear opening width 775mm / corridor 1050mm when the approach is not head on, 900mm / 900mm corridor when the approach is not head on. Doors on the entrance level should have a 300mm nib to the leading edge.
7	Wheelchair Accessibility	There should be space for turning a wheelchair in dining areas and living rooms and adequate circulation space for wheelchairs elsewhere.	A turning circle of 1500mm or a turning ellipse of 1700mm x 1400mm is required in living rooms and dining areas.
8	Living Room	The living room should be at entrance level.	Living room at entrance level.
9	Two or more storey requirements	In houses of two or more storeys, there should be space on the entrance level that could be used as a convenient bed space.	A space on the entrance level that could conveniently be used as a bed-space.
10	WC	In houses with three bedrooms or more there should be a wheelchair accessible toilet at entrance level with drainage provision enabling a shower to be fitted in the future. In houses with two bedrooms the downstairs toilet should conform at least to	The drainage for the future shower should be provided in all dwellings. For dwellings with 3 or more bedrooms or on one level, the WC must be fully accessible. A wheelchair user should be able to close the door from within and achieve side transfer from a wheelchair to one

		Part M.	side of the WC. There must be 1100mm clear space to the front of the bowl. The shower provision must be within the closet or adjacent to the WC. A Part M WC is adequate for dwellings on 2 or more storeys with 1 or 2 bedrooms.
11	Bathroom & WC Walls	Walls in the bathroom and WC should be capable of taking adaptations such as handrails.	Wall reinforcements (if required) should be located between 300 and 1500mm from the floor.
12	Lift Capability	The design should incorporate provision for a future stair lift and a suitably identified space for a through the floor lift from the ground floor to the first floor, for example to a bedroom next to the bathroom.	There must be a minimum of 900mm clear distance between the stair wall (on which the stair lift would normally be fixed) and the edge of the opposite handrail/balustrade. Unobstructed 'landings' are needed at the top and bottom of the stairs
13	Main Bedroom	The design and specification should provide a reasonable route for a potential hoist from a main bedroom to the bathroom.	Technological advances in hoist design mean that a straight run is no longer required.
14	Bathroom Layout	The bathroom should be designed for ease of access to the bath, WC & wash basin.	Although there is not a requirement for a turning circle in bathrooms, sufficient space should be provided so that a wheelchair user can conveniently use the bathroom and gain side access to the WC.
15	Window Specification	Living room window glazing should begin no higher than 800mm from the floor level and windows should be easy	People should be able to see out of the window whilst seated. Wheelchair users should be able to operate at least one

		to open/operate.	window in each room.
16	Fixtures & Fittings	Switches, sockets, ventilation and service controls should be at a height usable by all (i.e. between 450 and 1200mm from the floor).	This applies to all rooms, including the kitchen and bathroom

2.10 Wheelchair housing

Lifetime Homes are suitable for many older people and the vast majority of disabled people but they are not designed to meet the additional spatial requirements for wheelchair users. There remains a shortage of housing suitable for wheelchair users across London and wheelchair housing has been identified as a key housing need in Southwark. The London Plan and the [saved](#) Southwark Plan [policy 4.3](#) require at least 10% habitable rooms or units of major new residential development (10 units or more) to be designed to be wheelchair accessible.

Wheelchair housing in affordable housing schemes

The greatest need is for more affordable wheelchair housing. To incentivise the development of such units, for every affordable housing unit which complies with the wheelchair design standards, one less affordable habitable room will be required than otherwise stated in [Strategic Policy 6 of the Core Strategy Policy 4.4 of the Southwark Plan](#).

The London Borough of Greenwich has developed the 'Greenwich Standard', known as the South East London Housing Partnership Wheelchair Housing Design Guidelines, which is a nationally recognised best practice standard for wheelchair housing. It incorporates and builds on the nationally recognised Habinteg Wheelchair Housing Design Guide and the Housing Corporation's Scheme Development Standards. This SPD adopts the South East London Housing Partnership Wheelchair Housing Design Guidelines to be used as Southwark's guidelines for wheelchair design guidelines. New developments must meet this standard unless site constraints such as topography prevent the standard from being met. Where this is the case the council will require justification as to why the standard cannot be met. The standard covers the following 15 areas:

1. Moving around outside
2. Using outdoor space
3. Approaching the home
4. Negotiating the entrance door
5. Entering and leaving, dealing with callers
6. Negotiating the secondary door
7. Moving around inside/storing things
8. Moving between levels
9. Using living spaces
10. Using the kitchen
11. Using the bathroom and shower room

12. Using bedrooms
13. Operating doors
14. Operating windows
15. Controlling services

Please refer to the following link to the full adopted standard:

<http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/planningpolicy/rdsspd.html>

3. STANDARDS SPECIFIC TO CERTAIN TYPES OF RESIDENTIAL DEVELOPMENT IN ADDITION TO THE GENERAL STANDARDS

These standards apply in addition to the general standards set out in section 2 and relate to different types of residential development.

3.1 New houses (Detached, semi-detached and terrace)

Outdoor amenity space

New housing must provide private amenity space. The majority of space should be located at the rear of the property and should not be overlooked from public areas nor should it adversely affect the privacy and amenity of neighbours. New housing should provide:

- A minimum of 50 sqm private garden space. The garden should be at least 10m in length
- The private garden should extend across the entire width of the dwelling
- Measures to secure safety and security of habitable rooms on the ground floor

3.2 New flat developments

Outdoor amenity space

All flat developments must provide some form of outdoor amenity space. This must include communal amenity space and where possible private amenity space.

All flat developments must meet the following minimum standards and seek to exceed these where possible:

- 50 sqm communal amenity space per development
- For units containing three or more bedrooms, 10 sqm of private amenity space
- For units containing two or less bedrooms, 10 sqm of private amenity space should ideally be provided. Where it is not possible to provide 10 sqm of private amenity space, as much space as possible should be provided as private amenity space, with the remaining amount added towards the communal amenity space requirement. For example, if a private balcony of 3 sqm can be provided, 7 sqm should be added onto the communal amenity space
- Balconies, terraces and roof gardens must be a minimum of 3 sqm to count towards private amenity space.

All amenity space must be intrinsic to the design of the development. Care must be taken so that private amenity space such as roof terraces and balconies does not adversely affect neighbouring residents' privacy or sunlight. Roof gardens should be located appropriately to avoid problems of overlooking. Screens and landscaping can be used to help overcome problems of overlooking. Wherever possible larger units should be provided at ground level, to ensure access to private amenity space. Units designed as family units should be provided at the ground level. This enables children to

have direct access to outdoor amenity space and reduces potential access problems of carrying children or push chairs up flights of stairs. Applications with family units away from the ground floor should provide justification through the Design and Access Statement of how families benefit from access to good quality amenity space and that families continue to have access to private space and play areas.

Communal amenity areas should meet the following standards:

- They should be located towards the rear of the property or as an inner courtyard
- They must be designed appropriately to be used by all the residents
- Dwellings within the development should overlook the amenity space to increase passive surveillance and make the amenity space a safe place for residents to use
- All units in the development must have access to the communal amenity area

In addition to the communal amenity space requirements, children's play areas should be provided in all new flat developments containing the potential for 10 or more child bed spaces. This is a requirement from London Plan Policy 3D.13 and the Mayor's Supplementary Planning Guidance on Providing for Children and Young People's Play and Informal Recreation. This is calculated on the basis that:

For private and intermediate housing:

- 2 bedroom houses or flats create 0.11 child bed spaces per unit
- 3 bedroom houses or flats create 0.42 child bed spaces per unit
- 4 bedroom houses or flats create 0.98 child bed spaces per unit

For social for rent housing:

- 2 bedroom houses or flats create 0.40 child bed spaces per unit
- 3 bedroom houses or flats create 1.88 child bed spaces per unit
- 4 bedroom houses or flats create 1.9 child bed spaces per unit.

A minimum of 10 sqm of play space per child bedspace should be provided within the development. Play areas should be overlooked by nearby housing. A management and maintenance scheme of the play area is required to be provided by the applicant establishing the management and maintenance regime for the children's play area.

3.3 Conversions

Permission will not be granted for the conversion of a single dwelling house of 130 square metres or less original net internal floorspace into 2 or more dwelling units. This is to protect small family homes with gardens for which there is a known need in the borough. Net internal floorspace excludes space that cannot be used, such as internal walls, under stairs and chimneys as well as all shared spaces within developments such as shared corridors, lobbies and stairwells.

Outdoor amenity space

Proposals for conversions should meet the amenity space requirements set out in sections 2.6, 3.1 and 3.2 for all developments (housing and flat developments).

Daylight and sunlight

Basements and roof spaces (lofts/attics) with poor access to natural light and ventilation should not be made into separate units but should be combined with the adjoining floor as part of a maisonette or duplex flat. There needs to be adequate natural light.

3.4 Extensions to existing residential dwellings

The General Permitted Development Order sets out the types of development for which planning permission is not required. This is called permitted development rights. Planning permission is not required for many alterations and small extensions to single family houses. However, purpose built flats and houses converted into flats have no permitted development rights and planning permission is always required. The Government's free booklet "Planning: A Guide for Householders" is available from www.communities.gov.uk or from Southwark Council's development ~~management control~~ team on 020 7525 5438.

Outdoor amenity space

- Any extension should not reduce the outdoor amenity space associated with the dwelling to less than half of its original size and the remaining amenity space must be at least the minimum standards set out in sections 2.6, 3.1, 3.2, 3.3 and 3.4
- Extensions should not adversely affect the privacy or amenity of neighbours and adjoining occupiers

Design and appearance

All extensions should:

- Harmonise with the scale and architectural style of the original building
- Harmonise with the character of the area, including respecting the historic pattern of the surrounding area
- Be successfully integrated with their surroundings. The extension should read as if it were part of the original dwelling. Where a different approach is taken, the design and composition should be successful. It should retain or restore existing features that are important elements in the townscape or that contribute to the architectural integrity of proportions of a building or group of buildings
- Not unacceptably affect the amenity of neighbouring properties. This includes privacy, outlook, daylight and sunlight
- Not be of a size or scale that would visually dominate neighbouring properties
- Be subordinate to the original building. The extension should play a "supporting role" to the original dwelling in terms of location, form and scale. Any extension should not dominate the original building and should be set back from the principal elevations

- Not compromise any rooms in the existing house. No habitable room should become completely internal without a window
- Use materials that match those in the original house and the surrounding areas. Windows and doors should be of a similar pattern and align with existing windows and door openings where possible.

In some circumstances a contrasting modern design can be successful. Applicants are strongly encouraged to discuss this with planning officers.

When adding additional floors to existing dwellings, rooms should be vertically stacked to minimise noise disturbance between floors or flats e.g. bedroom above bedroom, lounge above lounge. Developments should also have adequate sound-proofing.

Rear extensions

Rear extensions are often the most practical and appropriate way to extend a dwelling. However, if poorly designed they can have a negative impact on the property or neighbouring properties especially in terms of outlook, daylight and sunlight.

They should:

- Generally, for most smaller terraced and semi-detached houses, be limited to a single-storey in height and must respect existing building heights.
- The eave level and ridge level must be no higher than the highest part of the roof
- 3 metres is usually the maximum depth that can be added without harm to neighbours and preventing a feeling of enclosure
- Should not exceed 3 metres in height to prevent a feeling of enclosure
- Respect the design and windows features of the host building

If the existing garden is already only a minimum size as set out in section 3.1 and 3.2, a rear extension will probably not be suitable for the property.

Conservatories

Conservatories are generally rear extensions and the above guidance should be applied to these. In addition, conservatories should be

- To rear or side of the dwelling
- A separate room from the main dwelling so that they can be closed off
- At ground or basement level

Side extensions

Side extensions should:

- Be subsidiary to the main building
- If the side extension is proposed to be more than single storey, the upper floor should be set back from the side building line
- Have roofs that match those of existing buildings in terms of roof shapes and pitches

- Avoid the infilling of gaps between properties, where this is an important townscape feature

Front extensions

Front extensions are rarely acceptable due to their impact on the appearance of the building and townscape. Applicants are strongly encouraged to seek the advice of a planning officer if designing front extensions.

Roof Extensions

Roof design is very important as it will determine the overall shape of an extension.

Roof extensions will not be permitted in the following circumstances:

- Where additional floors in any form would harm the architectural integrity of a building or the unity of a group
- Where roof extensions cut through ridge or hip lines
- On buildings which are the same height or significantly higher than their neighbours, especially those which have been extended in the past
- On buildings and in terraces which are completed compositions or which have existing mansards or roof storeys
- Where the varied skyline of a terrace or group of buildings is of interest and should be maintained
- Where the building has roofline features which were designed to be seen against the sky
- Where it would unbalance the proportions of the building
- Where there is an unbroken run of butterfly roofs
- Where the roofline is exposed to long views from public spaces and a roof extension in any form would have a detrimental impact on that view
- Where important historic roof forms would be lost
- No roof extensions above the height of the ridge of the main roof

Roof extensions and alterations should

- Be pitched rather than flat as they are more efficient with rainwater and usually easier to integrate its design
- Be similar to that on adjoining properties
- Preserve the characteristic features of the roof such as chimney stacks and chimney pots
- Preserve the external expression of party and rear walls and variations of roof line and pitch
- Roof lights set into the roof slope are favoured over dormer windows where possible.
- Roof lights should be fitted flush (parallel) with the roof to avoid clutter on the front of the building
- There should be a maximum of two roof lights to front roof slope
- In conservation areas, roof lights need to be in keeping with the style of the conservation area and be flush with the roof plane

Roof window extensions

- Dormer window extensions should normally be confined to the rear elevation of dwellings with pitched roofs. They should be only at the rear of the dwelling. Dormer windows would only be allowed at the front of a dwelling if they are an established part of the streetscape or they would have no impact on the streetscape.
- Dormer windows should generally be set down from the ridge of the main house, in from either side of the roof slope and in from the eaves.
- Dormer window extensions should not dominate the rear elevation of the property. They should be designed to sit well within the original roof slope remaining around the whole dormer. As a minimum they should be set up 0.5 metres from the gutterline and set 0.5 metres down from the ridge.
- Dormer windows should not normally be wider than they are high nor should they occupy more than 20% of the area of the roof.

We encourage the installation of green and brown roofs and walls. Green and brown roofs and walls are 'living' roofs and walls that can benefit the environment by enhancing biodiversity and reducing flood risks whilst providing a high standard of insulation. See the Sustainable Design and Construction SPD for further information on green roofs.

Conservation Areas and Listed Buildings

Guidance within this section on conservation areas and listed buildings is in addition to the guidance in the rest of this SPD. Residential development within conservation areas and on listed buildings requires additional guidance to ensure conservation of the historic environment, as set out in [saved](#) policies within the Southwark Plan.

Applications for extensions to listed buildings or within conservation areas are also required to submit a Design and Access Statement. See the Design and Access Statements SPD for more information on what needs to be included in a design and access statement.

Some properties within the borough are covered by an Article 4 direction, made under the Town and Country Planning General Development Order 1988 (as amended) in order to control development where the character of an area of acknowledged importance would be threatened. Article 4 direction removes permitted development rights to undertake certain works without planning permission.

Within Conservation Areas development should preserve or enhance the character or appearance of the area. Proposed development on listed buildings should preserve the building and its features of special architectural or historic interest. Planning permission may be required for alterations and extensions which would not be required outside of conservation areas and listed buildings. In particular, there are no permitted development rights for roof alterations in conservation areas, and planning permission is always

required. Listed buildings and Conservation Areas may also need Listed Building Consent and Conservation Area Consent respectively. Development must not compromise the historic and architectural integrity of the buildings.

Special consideration should be given to the following design matters:

- Established character
- Appearance
- Materials
- Boundary details
- Streetscene
- Significant trees

Extensions and alterations within conservation areas need to:

- Respect the context of the Conservation Area, having regard to the content of Conservation Area Appraisals
- Use high quality materials that complement and enhance the conservation area
- Do not involve the loss of existing traditional features of interest which make a positive contribution to the character or appearance of the conservation area
- Do not introduce design details or features that are out of character with the area such as the use of windows and doors made of aluminium, uPVC or any other non-traditional material.

Extensions and alterations to listed buildings need to ensure that

- There is no loss of important historic fabric
- The development is not detrimental to the special architectural or historical interest of the building
- The development relates sensitively and respects the period, style-detailing and context of the listed building
- Existing detailing and important late additional features of the buildings are preserved, repaired or, if missing, replaced.

Complete loss of a front garden will not be permitted in Conservation Areas or a Listed Building. Front gardens should be consistent with the building line of adjoining buildings and townscape features.

3.5 Affordable Housing

Design of affordable housing

The same minimum design considerations will be applied to the affordable housing as to the open market housing. Where affordable housing is required in residential development the affordable housing must be integrated with market housing in terms of access and design as far as is practical. Failure to do so goes against the principle of creating mixed and balanced communities and reinforces social exclusion.

It is recognised that management and maintenance issues associated with the affordable housing may impact on the level of integration that can be

achieved whilst still ensuring affordability, particularly in flat developments. These issues will be considered in the determination of planning applications.

The physical integration of affordable housing among market housing, or 'pepper-potting' can cause difficulties in terms of the affordability of service charges, which may result in the units no longer being considered affordable as costs are taken into account when assessing the level of affordability. Where 'pepper-potting' can not be designed in a way to reduce the potential for high service charges in the affordable housing, it will be discouraged. It is sometimes easier to manage housing that is grouped together, for example in flat developments it is often more practical to integrate affordable housing by vertically grouping market and affordable housing to ensure that service charges are kept at affordable rates. However, this does not mean that there should be a marked difference in the quality and design of the affordable units.

Applicants are strongly encouraged to work closely with a partner Housing Association or Registered Social Landlord to employ their skills and experience at an early stage of design to ensure that future effective management and maintenance of the affordable scheme can be properly considered and that the design of the development is cost efficient.

In addition to the standards set out in this SPD, it is recommended that all affordable housing is designed to meet the [design and sustainability standards set out by the Homes and Communities Agency \(HCA\). From April 2011, all London-based schemes receiving HCA funding will be expected to meet the standards in the Mayor's Interim London Housing Design Guide. The HCA have published an interim framework for how they will apply the Mayor's standards - Housing Corporation's Design and Quality Standards and Housing Quality Indicators](#) (refer to Appendix 3 for the website addresses). [A final design standards framework will be published by April 2012. All schemes receiving funding from the Housing Corporation will be required to meet these standards.](#)

3.6 Other alterations to dwellings and gardens

Alterations to the External Appearance

Alterations to the exterior finish of dwellings should respect the character of the building and townscape and retain original features wherever possible. New windows and doors should match existing or in the case of older buildings, original design, and be in proportion to the design of the building.

Garden structures and fences

Proposals must consider location of garden buildings such as sheds and greenhouses so that they minimise the impact on neighbouring properties. Garden buildings should be located to the rear of properties. The building materials used must respect the existing buildings and the overall character of the area. Garden buildings should minimise any impact on trees.

Front gardens, walls, fencing and railings should be sympathetic to the character of the building and garden and normally no higher than 1 metre. Original railings should be retained where possible. In general, rear garden walls and fences should not exceed 2 metres to protect views and daylight.

Porches

Porches should be in proportion to the size and character of the dwelling. Porches should meet design requirements for extensions, as set out in section 3.4. They should take into account the most appropriate position, size, shape and height to complement existing buildings and harmonise with the architectural style. They should not project beyond a bay window. Floorspace of the porch should not exceed 2 sqm.

Satellite dishes

Satellite dishes can be visually obtrusive. They should be located at the rear of the property and where they cannot be seen from the street and cannot be seen against the sky. They should be positioned where their visual impact on the appearance of the building is minimal. Suitable sites could include within concealed roof slopes, on rear extensions or elevations, behind chimney stacks, on back ends of garages or in the garden. Satellite dishes will not be permitted on the front elevations of buildings within conservation areas or on listed buildings.

Satellite dishes should be:

- As small in size and as few in number as possible
- Shared by as many users as is feasible to avoid clutter. In most cases only one satellite dish per building will be approved. Communal telecommunications must be provided for all major developments.
- Located as unobtrusively as possible
- Of a colour and design to blend in with their background
- Located so as not to interfere with doors or windows of neighbouring properties
- Removed as soon as they become obsolete

3.7 Living above shops and other commercial properties

The upper storeys of shops and other commercial buildings offer opportunity for residential development. Living above shops and commercial buildings can increase the vitality of an area and provide surveillance outside of normal business hours. Encouraging more people to live in town and local centres increases the viability of centres and reduces the need to travel by car as centres have good transport links and there are increased opportunities for walking and cycling.

The council supports the retention or conversion of floorspace above shops for residential uses to provide additional and varied housing choice.

The following points must be considered when assessing an application for living above shops or commercial properties

- The amenity of residents and occupiers, or of the surrounding area
- Sound proofing measures for the residential units.

[Saved](#) Policy 3.2 of the Southwark Plan protects the amenity of residents and occupiers including disturbance from noise. The Sustainable Design and Construction SPD provides further guidance and requirements on how to reduce disturbance from noise.

3.8 Infill development

Infill development occurs where there is redevelopment of sites located between existing property frontages, and where any new buildings should normally continue the lines of existing development to each side.

The proposal needs to show how the proposed housing responds to the site and its surroundings. The building alignment, design and massing needs to be within the context of existing neighbouring properties. The height and scale of neighbouring properties must also be respected.

3.9 Backland development

Backland development sites are those located predominantly to the rear of existing dwellings. Development on such sites includes garden buildings such as sheds and greenhouses, and new residential units (also refer to section 3.6 above). Backland development predominantly occurs in the gardens of the surrounding houses but can also occur in garage courts and located between two streets.

Backland development, particularly for new residential units, can have a significant impact on amenity, neighbouring properties and the character of an area. To minimise impact on the surrounding area and neighbouring amenity, proposals for backland development need to consider the following:

- Development must not be more intensive than the existing development on the adjoining street frontage. Frequently backland development is single storey so as not to impose on the surrounding area. Backland development should echo the characteristics of existing neighbours
- The degree of overlooking to neighbouring gardens must be minimised
- Spacing between facing windows of habitable rooms. There should be no windows on the boundary between the backland development and existing properties to protect neighbours' privacy
- As far as possible the orientation of backland development should relate to that of the existing surrounding buildings i.e. dwelling backs facing dwelling backs and fronts facing fronts. Windows should look into the proposal site, rather than outwards where possible
- Possible noise nuisance
- Possible vehicular fumes
- Impact on natural habitat including trees, vegetation and wildlife
- Backland development must integrate with existing landscape features.
- Access to the new backland development including vehicular, pedestrian and cyclists. It must be of adequate width to allow vehicular access to the development site as appropriate. This includes access for servicing and emergency services
- There must be space within the backland development for refuse storage and access for collection of the refuse
- Maximising security and surveillance through design.

3.10 Mixed–use development

Housing may be provided as part of a mixed use development. This is most likely in local policy areas, town centres, main road frontages and on major development sites. It can bring vitality and viability to an area by reducing the need to travel between different activities and improve safety and security by improving surveillance outside of normal business areas. Mixed use development can also assist in making the best use of scarce land by utilising the airspace above commercial buildings.

All mixed use development should:

- Be of a high quality design
- Ensure that the residential and other land uses are appropriately separated to ensure the amenity of all occupiers of the site. There should be separate entrances and separate waste and recycling storage provision
- Comply with the standards within this SPD for residential flat development

3.11 Live-work units

Live-work units are properties specifically designed for dual use, combining both residential and employment space.

Live-work units offer environmental benefits such as reducing the need to travel to work. However there must be a clear definition between the two types of use.

4. HOUSING MEETING SPECIFIC NEEDS

4.1 In addition to general needs housing, there are a number of other housing types that cater for the specific needs of certain members of the community such as the elderly, people with mental or physical disabilities, young people and students. These types of housing include:

- Sheltered housing
- Supported housing
- Student accommodation

These specialist housing types can be both self-contained, such as flats, and non self-contained, such as hostels, houses in multiple occupation and cluster flats. In non self-contained accommodation facilities such as kitchens, bathrooms and lounges are usually shared.

In most cases these types of housing are designed to meet the specific needs of the user group they are intended to accommodate and therefore do not meet general needs housing because they are not necessarily permanent housing and are only available to a specific user group. For these reasons general policy requirements relating to housing mix and affordable housing will not normally be applied to these types of housing (refer also to the Affordable Housing Supplementary Planning Document).

Although our Housing Needs Survey suggests that there is no identified need for these types of housing, it is recognised that new developments may be required for certain user groups if a local need arises. To ensure that housing for specific needs does not prejudice opportunities for general needs housing (both market and affordable housing), applicants will be required to demonstrate that there is a local need for such housing. In addition applicants will be asked to provide information on their experience of delivering and managing high quality schemes of the relevant type of specialist housing.

All schemes for specialist housing should be designed and constructed to accommodate the specific requirements of the intended residents. Where possible, schemes should also be designed to be easily adapted to general needs housing in the event they become surplus to requirements.

Applicants are strongly encouraged to discuss proposals for housing for specific user groups at an early stage with both our planning and housing officers.

4.2 Sheltered Housing and Supported Housing

Sheltered housing and supported housing give people with specific needs the opportunity to live independently or with a degree of independence in a safe and secure environment, including:

- people with physical disabilities
- older people with extra care needs and those who need support to manage their own homes
- people with mental health needs

- people with learning disabilities
- people leaving care and those setting up in new tenancies
- people with alcohol and/or substance misuse problems
- people fleeing domestic violence
- homeless people in temporary accommodation
- people at risk of offending
- people with HIV or AIDS.

Sheltered and supported housing can be in the form of hostels, residential care and nursing homes. Accommodation can be temporary or permanent and is usually in the form of small self-contained flats or non-self contained accommodation in the form of single rooms in a complex, with shared facilities.

Applications for special needs housing should meet the following minimum standards:

- Self contained flats or studio rooms with their own bathrooms and fitted kitchens should meet the minimum standards set out in table 2
- Single rooms should provide a minimum size of 7.5 sq m
- Laundry facilities should be located on site and be accessible to all residents
- A communal lounge of an appropriate size should be provided that is accessible to all residents
- Communal gardens should be provided at a minimum of 50 sqm plus an additional 6.5sqm per person. Details of the maintenance arrangements of communal gardens should be included with the application
- One guest room should be provided per 20 residents. The guest room should include a washbasin
- Details of long-term management and maintenance arrangements together with details of safety and security measures should also be submitted with the application including supervision arrangements and intercom and alarm systems
- All habitable rooms should have access to natural daylight. Rooms should be designed to take advantage of natural sunlight and ventilation, as set out in section 2.7
- All bathrooms, WCs and kitchens should have adequate ventilation.
- Internal space for storage of waste should be provided within kitchens (in cupboards) and should have a minimum capacity of 30 litres and be able to store at least three bins for different types of waste. No bin should be smaller than seven litres

4.3 Student housing

Student housing can be in the form of halls of residence, cluster flats or self-contained units. To ensure that the appropriate levels of student accommodation are supplied in the borough without prejudicing the development of general needs housing, planning applications for student accommodation will have to be accompanied with evidence that there is an identified [local](#) need for this type of housing, including:

- A letter from a recognised [local](#) educational establishment
- Confirmation that the accommodation will be affordable to the identified user group
- Details of security arrangements
- Details of the long-term management and maintenance arrangements of the student accommodation.

All student accommodation should be located in areas that are easily accessible to public transport and have a public transport accessibility level of 4 and above.

5. PLANNING POLICY CONTEXT

The residential design standards SPD has been developed within the context of national, regional and local planning frameworks.

5.1 National planning guidance

The principal Planning Policy Statements (PPSs) [and Planning Policy Guidance notes \(PPGs\)](#) that relate to this SPD are as follows:

- PPS1: Delivering Sustainable Development (2005)

PPS 1 sets out the government's vision for planning, with sustainable development at the core of the planning system. It requires residential development to be sustainable

- PPS3: Housing (~~2006~~ 2010)

PPS 3 seeks to ensure that there is a wide range of housing available to meet all the needs of the community, and that sustainable, inclusive mixed communities are created.

5.2 Regional planning guidance

Chapter 3 of the London Plan focuses on housing. There are also a number of regional Supplementary Planning Guidance notes which focus on housing. The key policies of the London Plan 2008 (consolidated with alterations since 2004) – the Mayor's Spatial Development Strategy, and key SPGs relating to this SPD are as follows:

- London Plan Policy 3A.A Housing Choice (2008)

Policy 3A.A states that local authorities should seek to ensure that:

- i. New developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups, such as students, older people, families with children and people willing to share accommodation
- ii. Councils should ask for housing to be built to 'Lifetime Homes' standards
- iii. Ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users

- London Plan Policy 3A.5 Large residential developments (2008)

Policy 3A.5 states that boroughs should encourage proposals for large residential developments.

- London Plan Policy 3A.10 Special needs and specialist housing (2008)

Policy 3A.10 states that policies should provide for special needs housing, including sheltered housing with care support, staffed hostels and residential care homes.

- London Plan Policy 3D.13 Children and young people's play and informal recreation strategies

This ensures that all children have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision.

- London Plan Policy 4B.1 Design principles for a compact city (2008)
Policy 4B.1 sets out the design principles boroughs should seek to ensure developments follow, including maximising the potential of sites and ensuring sustainability.

- London Plan Policy 4B.1 Maximising the potential of sites (2008)
Policy 4B.1 sets out the residential density ranges to ensure boroughs are maximising the potential of sites in accordance with policies on transport, local context and design.

- London Plan Policy 4B.5 (2008)
Policy 4B.5 requires developments to meet the highest standards of accessibility and inclusion. It requires local authorities to adopt the principles of inclusive design by requiring developments to be able to be used by as many people as possible with the ability to offer freedom to participate equally in the development's mainstream activities.

- London Plan Policy 4B.6 Sustainable design and construction (2008)
Policy 4B.6 ensures that future developments meet the highest standards of sustainable design and construction, including ensuring developments are comfortable and secure for users.

- Accessible London: Achieving an Inclusive Design SPG (2004)
The SPG reiterates policy 3A.A in the London Plan, with Implementation Point 13 requiring 10% of new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users

- Housing SPG (2005)
The SPG sets out guidance on many issues, including housing choice and mix, housing density and decent homes in order to ensure a sustainable and high quality housing supply. It also provides guidance on affordable housing, which is expanded upon in Southwark's draft Affordable Housing SPD.

- Providing for Children and Young People's Play and Informal Recreation SPG (March 2008)
This draft SPG sets a benchmark minimum of 10 sqm per child of play space. Paragraph 4.47 states that where child occupancy is expected to be in excess of 10 children, the Mayor will expect provision to be made on-site. For smaller schemes it may be off-site.

[The Mayor has also recently consulted on a draft replacement London Plan \(2009\). This has undergone an Examination in Public and is expected to be adopted in late 2011.](#)

5.3 Local planning guidance

The SPD provides further guidance to the policies set out in the [Core Strategy \(2011\)](#) and [saved policies of the](#) Southwark Plan (2007). In particular it

provides further clarity on the following strategic and development control policies:

The SPD expands on the strategic policies of the [Core Strategy Southwark Plan](#) as set out below:

- [Strategic Policy 5 – Providing new homes](#)

[This policy sets out overall targets for housing in Southwark and the residential density ranges that development in different parts of the borough need to meet.](#)

- [Strategic Policy 7 – Family homes](#)

[This policy sets out the dwelling mix requirements for residential development in different parts of the borough.](#)

- [Strategic Policy 8 – Student homes](#)

[This policy sets out requirements for new student housing schemes, including appropriate locations and the requirement for affordable housing.](#)

- [Strategic Policy 12 – Design and conservation](#)

[This policy sets out our overall strategy for ensuring new development is of high design quality and contributes to creating good quality places.](#)

- ~~SP1 Sustainability, equality and diversity~~
- ~~SP2 Participation~~
- ~~SP3 Quality and Accessibility~~
- ~~SP10 Development impacts~~
- ~~SP11 Amenity and environmental quality~~
- ~~SP13 Design and heritage~~
- ~~SP14 Sustainable buildings~~
- ~~SP17 Housing~~

The SPD expands on the [saved policies in the Southwark Plan development control policies](#) set out below:

- Policy 1.6 Live-Work Units

The policy sets out the criteria that must be met for live/work units to be permitted.

- Policy 3.2 Protection of Amenity

The policy sets out that planning permission will not be granted where it will cause a loss of amenity including disturbance from noise.

- Policy 3.11 Efficient Use of Land

The policy sets out how developments should ensure that they maximise the efficient use of land whilst also protecting a number of other factors including amenity and design.

- Policy 3.12 Quality in Design

The policy sets out that developments should achieve a high quality of both architectural and urban design in order to create attractive, high amenity environments. It also states that a Design Statement must be submitted with planning applications.

- Policy 3.13 Urban Design

The policy sets out the principles of good design to include height of buildings, site layout and inclusive design.

- Policy 3.14 Designing out Crime

This policy states that development should be designed to improve community safety and crime prevention.

- ~~Policy 4.1 Density of Residential Development~~

~~The policy sets out the residential density ranges that applicants need to comply with, setting out different ranges for the different zones of the borough (Central Activity Zone, Urban Zone, Suburban Zone and Public Transport Accessibility Zones)~~

- Policy 4.2 Quality of Residential Accommodation

The policy sets out the requirements for residential developments as:

- i. achieve good quality living conditions; and
- ii. include high standards of:
 - Accessibility, including seeking to ensure that all new housing is built to Lifetime Homes standards;
 - Privacy and outlook;
 - Natural daylight and sunlight;
 - Ventilation;
 - Space, including suitable outdoor/green space;
 - Safety and security; and
 - Protection from pollution, including noise and light pollution.

- Policy 4.3 Mix of Dwellings

The policy sets out the need to provide a mix of dwelling sizes and types to cater for Southwark's housing needs. ~~It states that~~ This will include

- ~~i. The majority of units should have two or more bedrooms, and developments of 15 or more dwellings will be expected to provide at least 10% of the units with three or more bedrooms with direct access to private outdoor space; and~~
- ~~ii. The number of studio flats must not exceed 5% of the total number of dwelling units within a development. Studio flats are not suitable for meeting affordable housing need; and~~
- ~~iii. at least 10% of all major new residential developments should be suitable for wheelchair users, except where this is not possible due to the physical constraints of the site.~~

- Policy 4.5 – Wheelchair Affordable Housing

The policy states that for every affordable housing unit which complies with the wheelchair design standards, one less affordable habitable room will be required than otherwise ~~required by policy stated in policy 4.4~~ (on general affordable housing requirements).

- Policy 4.7 – Non-Self-Contained Housing for Identified User Groups

The policy sets out when new development providing non-self contained residential accommodation will normally be permitted.

APPENDIX 1**WHEELCHAIR DESIGN STANDARDS**

See appendix 1 of the following link for the council's wheelchair design standards. [We will keep this updated with the latest published standards.](#)

<http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/planningpolicy/rdsspd.html>

APPENDIX 2

CALCULATING DENSITY

There are three density standards for residential development within Southwark which are based on the general character of the area and its accessibility by public transport. The three areas of Central Activities Zone, Urban Zone and Suburban Zones (North, Middle and South) lie in broad bands across the borough. Density may vary at discrete locations in opportunity areas and action area cores. These zones reflect the Density Location and Parking Matrix in the London Plan.

A2.1 Central Activities Zone

This density applies to the area within the Central Area Activities Zone as defined in the London Plan and on the Proposals Map. This area has excellent public transport accessibility, and is already characterised by larger scale development.

Within this zone, developments should achieve densities of 650 to 1100 *habitable rooms* per hectare. Development could typically be 6 to 8 storeys high, however there will be sites where taller buildings are appropriate. -The type of development will usually be flats, and will often be part of a mix of uses.

Within this zone, it is particularly important to find imaginative ways to provide amenity space for residents. Roof terraces, winter gardens, atria, decked gardens over car parking and generous balconies should be integrated into the overall design where appropriate.

A2.2 Urban Zone

The Urban Zone includes the majority of the borough. The zone is characterised by lower-scale development, often with an established grain of Victorian and Edwardian terraces, broken up by post-war estates, *town centres* and some newer housing development.

Within this zone, developments should achieve densities of 200 to 700 *habitable rooms* per hectare.

It is important that the design and scale of development within this zone responds positively to the local context. Appropriate density ranges are related to location, setting in terms of existing building form and massing, and the index of public transport accessibility. In many cases the most efficient development of a site will be flats, maisonettes and terraced houses rather than semi-detached, detached or linked houses with gardens. In these developments, larger units should be provided at ground floor level wherever possible, to ensure access to private outdoor amenity space. Alternatively, where there is commercial development on the ground floor, access to private outdoor amenity space should be provided above it at first floor level. Imaginative solutions should be found to provide outdoor amenity space for all residents, including those outlined in the Central Activities Zone above. In

addition, loft spaces should be used, wherever possible, to increase the amount of internal residential floorspace.

A2.3 Suburban Zone

Housing within this zone should retain a more open character, with larger gardens often associated with houses rather than flats. Within this zone, developments should achieve densities of 200 - 350 *habitable rooms* per hectare.

A2.4 Opportunity Areas and Action Area Cores

As well as the three main density zonings, we have been identified opportunity areas and action area cores. These are areas that have better access to public transport, significant potential for new development and investment, and a *mixed use* character including retail development. These are at Bankside, Borough and London Bridge, Elephant and Castle, Canada Water, Aylesbury and Peckham and Nunhead.

Within these areas, densities may exceed those for the Urban Zone on some sites where the increased scale of development is appropriate in terms of design and amenity. Where the Urban Zone densities are exceeded, the development must provide:

- An exemplary standard of design, with an excellent standard of living accommodation; and
- A significant contribution to environmental improvements in the area, particularly relating to public transport/cycle/pedestrian movement, safety and security and *public realm* improvements.

A.2.5 Density Calculations

The following guidance advises how densities should be calculated, both for residential developments, and also *mixed use* developments that include an element of residential:

- i. For residential-only development, density is the number of *habitable rooms* divided by the site area.

Summary Calculation:

$$D = HR/Ha$$

(Density = *Habitable rooms* per Hectare);

- ii. For mixed-use development where the majority of floorspace is residential the calculation should be:

The non-residential floorspace, divided by 27.5sqm, plus;

The number of residential *habitable rooms*;

All divided by the site area.

Summary calculations

$$D = (NRsqm/27.5) + HR/Ha);$$

(Density = Non-Res floorspace divided by 27.5sqm, plus the number of residential *Habitable rooms*,

all divided by size in hectares).

27.5sqm is the average area required to create one *habitable room*, including shared circulation space, and non-*habitable rooms*.

iii. For mixed-use development where the majority of floorspace is non-residential a method of calculation should be agreed with the LPA to illustrate how the development meets saved policy 3.11 and the contribution to housing delivery.

In cases (ii) and (iii) comparison with the density levels in A2.1, A2.2, A2.3 and A2.4 will take into account the form of the development and the relevant advice on plot ratios in the London Plan.

APPENDIX 2**CONTACTS****ACCESS**

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DESIGN AND CONSERVATION

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ENVIRONMENTAL HEALTH

~~Environment and Leisure Department Bill Legassick 020 7525 4253~~

OPEN SPACE

~~Environment and Leisure Department, LBS, Head of Parks 020 7525 0874~~

PUBLIC REALM

~~Environment and Leisure Department, LBS Head of Infrastructure 020 7525 2091~~

ARCHAEOLOGY

~~Regeneration Department, LBS Archaeology Officer 020 7525 2963~~

PLANNING OBLIGATIONS/ S106

~~Monitoring Officer 020 7525 5443~~

PLANNING AND EXECUTIVE COMMITTEE CLERK

~~Strategic Services, LBS Committee Clerk 0207 525 7055~~

PLANNING APPLICATIONS

~~Regeneration Department, LBS Duty Officer Helpline 020 7525 5403~~

PLANNING POLICY

~~Policy Officer 0207 525 5644~~

APPENDIX 3 FURTHER INFORMATION

National policy and guidance

Building Research Establishment, 1991 *Site Layout for Daylight and Sunlight – A Guide to Good Practice*

[Housing Corporation, February 2011, *New Interim Funding Design and Sustainability Standards for London* See](#)

<http://www.homesandcommunities.co.uk/public/documents/HCA-London-Design-Standards-Prospectus-Feb11.doc>

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[Part M: Access to and use of buildings of the Building Regulations 2000 \(2004 Edition\) See \[www.planningportal.gov.uk/uploads/br_PDF_ADM_2004.pdf\]\(http://www.planningportal.gov.uk/uploads/br_PDF_ADM_2004.pdf\)](#)

[Department for Communities and Local Government Office of the Deputy Prime Minister, 2005 *PPS 1: Delivering Sustainable Development* See](#)

<http://www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement>

[Department for Communities and Local Government, 2006 *Code for Sustainable Homes* See \[http://www.planningportal.gov.uk/uploads/code_for_sust_homes.pdf\]\(http://www.planningportal.gov.uk/uploads/code_for_sust_homes.pdf\)](#)

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<http://www.communities.gov.uk/archived/publications/planningandbuilding/codeguide>
<http://www.communities.gov.uk/publications/planningandbuilding/codeguide>

[Department for Communities and Local Government, 2006 *June 2010 PPS 3: Housing* See](#)

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[Planning and Compulsory Purchase Act, 2004 See](#)

www.opsi.gov.uk/index.asp?id=1500620

[Stephen Thorpe and Habinteg Housing Association, 2006 *The Wheelchair Housing Design Guide*](#)

Town and Country Planning (General Development Procedure) (Amendment) (England) Order, 2006 See www.opsi.gov.uk/SI?si2006/20061062.htm

Lifetime Homes Standards See <http://www.lifetimehomes.org.uk/>

Commission for Architecture and the Built Environment *Building for Life*
<http://www.buildingforlife.org/>

Regional policy and guidance

Mayor of London, ~~2008~~ ~~2004~~ *The London Plan (consolidated with alterations since 2004)*. – *Spatial Development Strategy for Greater London* See
www.london.gov.uk/mayor/strategies/sds/index.jsp
<http://www.london.gov.uk/thelondonplan/>

Mayor of London, 2009, *draft replacement London Plan*, see
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Mayor of London, 2005 *Housing Supplementary Planning Guidance* See
http://www.london.gov.uk/mayor/strategies/sds/spg_housing.jsp
<http://legacy.london.gov.uk/mayor/strategies/sds/docs/spg-housing.pdf>

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Mayor of London, ~~March 2008~~ ~~October 2006~~ *Providing for Children and Young People's Play and Informal Recreation Draft Supplementary Planning Guidance* See
<http://www.london.gov.uk/mayor/strategies/sds/spg-children-recreation.jsp>
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London Borough of Southwark, 2009 *2005 Southwark Housing Strategy 2009-2016* See http://www.southwark.gov.uk/download/3092/southwark_housing_strategy_2009_to_2016

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London Borough of Southwark, 2008 *2007-Draft Affordable Housing SPD* See http://www.southwark.gov.uk/info/200151/supplementary_planning_documents_and_guidance

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London Borough of Southwark, 2010, *Core strategy housing background papers:* http://www.southwark.gov.uk/downloads/download/1968/core_strategy_background_papers

APPENDIX 4

GLOSSARY

Accessibility is defined as the methods by which people with a range of needs especially those from the six equality target groups (race, gender, age, faith, sexuality and disability) find out about and use services and information. For disabled people, access in London means the freedom to participate in the economy, in how London is planned, in the social and cultural life of the community, as well as physical access. The term is also used to describe how easy a location is to get to by public or private transport

Affordable housing Housing that is accessible to those households who cannot otherwise afford the cheapest habitable dwelling with the same number of habitable rooms, available anywhere within the borough at market price. This category includes low-cost homes, shared ownership schemes and key worker housing.

Amenity Pleasant or advantageous features enjoyed by a property or occupier which can be affected by certain development proposals. Development can improve amenity as well as harm it.

Area Action Plans

Area Action Plans provide the framework for areas where significant change or conservation is needed and should have a strong focus on implementation. They should: deliver planned growth areas, stimulate regeneration, protect areas sensitive to change, resolve conflicting objectives in areas subject to development pressures, or focus the delivery of area based regeneration initiatives.

Article 4 Direction

These directions are made under the 1988 Planning General Development Order. They remove normal 'permitted development rights' to undertake certain works without planning permission.

Building Regulations Sets standards for the design and construction of buildings to ensure the safety and health of people in or about those buildings.

Cluster flat Non self-contained accommodation for temporary occupation by a specific user group such as students or nurses, where living and kitchen facilities are shared by a number of households.

Conservation Area An area of special architectural or historic interest designated by the local planning authority under the provisions of the Planning (Listed Buildings and Conservation areas) Act 1990, the character or appearance of which it is desirable to preserve or enhance.

Density A measure of the intensity of development of a residential site.

Development As defined by Section 55 of the Town and Country Planning Act 1990, development means carrying out building, engineering, mining or other operations in, on, over or under land, or changing the use of buildings or land.

Disabled Person The Disability Discrimination Act (DDA) 1995 defines a disabled person as someone with a 'physical or mental impairment which has a substantial

and long term adverse effect on his/her ability to carry out normal day-to-day activities'.

Energy efficiency Making the best or more efficient use of energy in order to achieve a given output of goods or services, and of comfort and convenience. This does not necessitate the use of less energy.

Environment Surrounding area or conditions in which something exists or lives.

Habitable room A room within a dwelling, the main purpose of which is for sleeping, living or dining. It is any room with a window that could be used to sleep in, regardless of what it is actually used for. This excludes toilets, bathrooms, landings, halls and lobbies, and also excludes kitchens with an overall floor area of less than 11 square metres.

Household One person living alone or a group of people (who may or may not be related) living or staying temporarily at the same address with common housekeeping.

Lifetime Homes are ordinary homes designed to accommodate the changing needs of occupants throughout their lives, particularly loss of mobility.

Live-work units A dual use unit comprising separate but interconnected B1 use class and a residential dwelling. Both units must be able to operate in isolation.

Local Development Framework (LDF) A portfolio of documents including **Supplementary Planning Documents**, Development Plan Documents such as a Core Strategy and proposals maps, and the **Statement of Community Involvement**. Together the portfolio of documents cover the whole borough and give comprehensive policy coverage at a detailed level.

London Plan A strategic plan for the whole of London produced by the Mayor of London. The main purpose of the London Plan is to ensure that all the individual plans produced by the London boroughs work together to meet the priorities that are agreed for the whole London region. The **Local Development Framework** cannot contain strategies or policies that are not in general conformity with the London Plan.

Major developments Any residential or mixed use development creating 10 or more dwellings, or if that is not known, where the site area is 0.5 hectares or more. For other types of development, a major development is one where the floorspace to be built is 1000 square metres or more, or the site area is 1 hectare or more.

Mixed use Development comprising one or more activities within the same building or site, or across sites in close proximity to one another.

Mobility Impaired Includes any person who may or may not be disabled, but has an impaired ability to access buildings, structures, or move within public areas. This can include those using child prams/buggies or shopping trolleys.

Non self-contained accommodation Residential accommodation where occupiers of different households share living, kitchen or bathroom facilities.

Proposals maps illustrate the geographical extent of planning policies and Designations.

Public Transport Accessibility Zones Areas within the Urban or Suburban Zones, which have better access to public transport, significant potential for new development and interest, and a mixed use character including significant retail development.

Regional Spatial Strategy (RSS) is a spatial framework for a region over a 15 to 20 year period including policies for housing, environmental protection, transport and waste management. The **London Plan** is the Regional Spatial Strategy that Southwark Plan Policies should be consistent with.

Renewable Energy Energy derived from a source which is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material. Although not strictly renewable, geothermal energy is generally included.

Secured by Design A police initiative to encourage the building industry to adopt crime prevention measures in development design to assist in reducing the opportunity for crime and fear of crime, creating safer and more secure environments. Secured by Design is endorsed by the Association of Chief Police Officers and has the backing of the Home Office Crime Reduction Unit. It was drawn up in consultation with the Department of Transport, Local Government and the Regions.

Studio flat A no bedroom residential unit which has a separate bathroom and kitchen but shared bedroom and living area.

Supplementary Planning Documents (SPD) or Guidance (SPG) Guidance notes, additional and supplementary to the **Unitary Development Plan**, on how to implement the policies. They also contain background information applicants may find useful when preparing their planning applications.

Sustainability Appraisal/ Strategic Environmental Assessment A systematic and interactive process undertaken during the preparation of a plan or strategy, which identifies and reports on the extent to which the implementation of the plan or strategy would achieve environmental, economic and social objectives by which sustainable development can be defined, in order that the performance of the strategy and policies is improved.

Sustainable Development Development that contributes towards the principles of sustainability. That is, development that does not cause environmental damage, contributes to the local economy and meets the needs of the local community.

Unitary Development Plans (UDPs) Statutory plans produced by each borough which integrate strategic and local planning responsibilities through policies and proposals for the development and use of land in their area.

Southwark Plan See “Unitary Development Plans”

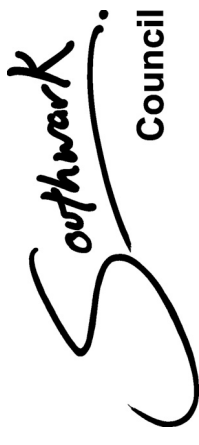
Appendix B

The update to the Residential Design Standards Supplementary Planning Document

Appendix B for Planning Committee Report and Cabinet Report:
Amendment to Residential Design Standards Supplementary Planning Document

Planning Committee: 21 March 2011
Cabinet: 22 March 2011

Appendix A	The update to the Residential Design Standards Supplementary Planning Document
Appendix B	The consultation plan
Appendix C	The Equalities Impact Assessment



LOCAL DEVELOPMENT FRAMEWORK

CONSULTATION PLAN:

**Draft update to the Residential Design Standards
Supplementary Planning Document
March 2011**

London Borough of Southwark

1. Introduction

Our Sustainable Communities Strategy (Southwark 2016) sets out the key objective of making the borough a better place for people. To meet this objective we want to provide more and better homes to meet the needs of our community. Our planning policies help us to do this.

We have prepared an update to the adopted Residential Design Standards supplementary planning document (2008).. Supplementary Planning Documents (SPDs) sit within a set of planning documents called the local development framework. Within the local development framework, the saved Southwark Plan policies and our area actions plans set out the overarching strategic planning policies for Southwark. SPDs provide further guidance and information on implementing these policies. This supplementary planning document further supports these strategic policies by providing further guidance on how we can ensure new development is built to a high quality of design with good living conditions.

Once adopted, the update will replace section 2.3 on minimum dwelling sizes of the adopted Residential Design Standards SPD and will insert an additional appendix 2 on calculating density. The updated dwelling space standards will ensure that all new development is built to a high quality of design with good living conditions. They will help to ensure that an adequate amount of space is provided to create pleasant and healthy living environments. It will ensure that there is sufficient space for everyone in the home to have space to play, work and study, and for privacy and quiet whilst also having sufficient space for storage and circulation within the home. The update on calculating density will ensure that developers are clear on how to calculate density in mixed use schemes.

2. How we are consulting on the update to the SPD

This consultation plan sets out the consultation we are planning to carry out on the draft updates to the SPD. This is in accordance with our adopted Statement of Community Involvement (2008), which explains how we will consult the community in the preparation of planning policy documents. The following sections set out how we plan to meet the minimum statutory consultation requirements and how we will exceed these requirements where appropriate.

Once we have finished consulting on the updates to the SPD we will collate all the responses we receive and see whether we need to amend the SPD to take into account the responses. We will provide officer comments on all the responses we receive which will set out whether we have changed the SPD to reflect the response, and will explain our reasoning for why we have/have not amended the SPD. The SPD will then be taken to our Cabinet for adoption. We will provide Cabinet with a consultation statement setting out a summary of the responses we receive and how we have taken the comments into consideration, and also a statement showing how we have met the requirements of our Statement of Community Involvement. We will also provide them with the original responses and our officer comments on these responses.

This consultation plan should be read alongside the following documents:

- The draft updates to the Residential Design Standards SPD 2011
- This sets out the new overall dwelling sizes table to replace section 2.3 of the 2008 adopted Residential Design Standards SPD and inserts an appendix 2 to set out how to calculate density.
- The Equalities Impact Assessment
- This assesses the likely impact of the updates to the SPD on the nine protected characteristics groups (age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation). It looks at the impact of the SPD in relation to equality, diversity and social cohesion.

All of these documents can be found on our website at:

http://www.southwark.gov.uk/info/200151/supplementary_planning_documents_and_guidance/1253/residential_design_standards_spd
They will also be available in all of our libraries and locations listed in appendix A.

3. The timetable and methods of consultation

Consultation timeframe

We have found that the statutory six weeks consultation period is too short for effective consultation on planning policy documents. We will therefore carry out a period of minimum of six weeks informal consultation in addition to the statutory six week formal consultation period. This is set out in our Statement of Community Involvement. We do this in order to make sure there is enough time for you to read the SPD and submit comments. Informal consultation begins at least 5 working days before the SPD goes to our Planning Committee for comment.

Informal consultation begins on the 11 March 2011 and ends of the 21 April 2011.
Formal consultation begins on the 22 April and ends on the 2 June 2011.

All responses must be received by 5pm on Thursday 2 June 2011.

Consultation methods

The tables below set out the different consultation methods we propose to use. We hope to consult with as many people as possible, from a range of groups, organisations and areas in Southwark. We aim to engage with many different groups and individuals within Southwark so that the final SPD reflects the needs and aspirations of our diverse community. If you would like us to attend your community meeting to discuss the SPD please let us know.

We set out the statutory minimum required to meet Government regulations and the further methods additional to the statutory requirements that we propose to carry out. We set out dates where we have meetings confirmed. We also set out the key consultee group that the consultation method is aimed at.

Please check our website for an up-to-date list of dates of meetings and events.

http://www.southwark.gov.uk/info/200151/supplementary_planning_documents_and_guidance/1253/residential_design_standards_spd

Table 1
Statutory consultation

METHOD OF CONSULTATION	CONSULTEE	DATE	COMMENTS
Place update to the SPD and supporting documents on the council's website	All	11 March 2011	Our website will continually be updated. The update to the SPD (with any changes from Planning Committee and Cabinet if necessary) will be available on our website by the start of the formal consultation period.
Put the update to the SPD and supporting documents in libraries, one stop shops, area housing offices and the Town Hall. List of places to view the documents is set out in appendix A.	All	By 22 April 2011	
Press notice in local newspaper advertising consultation beginning of formal consultation on the SPD.	All	By 22 April 2011	This will be in the Southwark News.
Mail-out to all statutory consultees on planning policy database	All on planning policy consultee database (see list in appendix B.)	By 22 April 2011	

Table 2
Additional consultation

METHOD OF CONSULTATION	CONSULTEE	DATE	COMMENTS
<p>Mail-out to all non-statutory consultees on planning policy database. This will set out the timescale for consultation and how people can comment on the update to the SPD. The letter will also invite local groups to contact us if they would like us to attend their community meeting to discuss the SPD.</p>	<p>All on planning policy consultee database (see list in appendix B.)</p>	<p>By 22 April 2011</p>	
<p>Attend all community councils to provide a presentation, workshop or a stall on the update to the SPD.</p>	<p>All who attend community councils.</p>	<p>Between 11 March and 2 June 2011</p>	<p>The full list of the 8 community councils and the meeting agendas can be found at: http://modern.gov.southwarksites.com/ieDochoHome.aspx?bcr=1</p>
<p>Presentation and discussion at Southwark Housing Association Group (SOUHAG)</p>	<p>Registered Providers operating in Southwark.</p>	<p>16 March 2011</p>	
<p>Presentation and discussion at Southwark Strategic Housing Partnership (SSHP). This is a sub-group of Southwark Alliance (our Local Strategic Partnership)</p>	<p>Members of SSHP which include Registered Providers, private landlords and leaseholders.</p>	<p>22 March 2011</p>	
<p>Landowners and developers event. This is an event for landowners and developers that we are holding to discuss planning and regeneration.</p>	<p>Landowners and developers within Southwark.</p>	<p>Date to be confirmed</p>	
<p>Attend local community events</p>	<p>Community groups and individuals</p>		<p>Please contact us if you would like us to attend</p>

one of your community meetings.			
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4. How to comment on the SPD

We welcome your comments on the update to the Residential Design Standards SPD and the supporting documents. Please contact us if you would like to know more about the SPD or to find out more about our consultation.

All comments must be received by **5pm on Thursday 2 June 2011**.

Representations should be made using our online response form found at our website: http://www.southwark.gov.uk/info/200151/supplementary_planning_documents_and_guidance/1253/residential_design_standards_spd

If you do not have internet access, representations can be made using the standard response form sent to:

Alison Squires
Team Leader
Planning Policy
Regeneration and neighbourhoods
FREEPOST SE1919/14
London SE17 2ES
planningpolicy@southwark.gov.uk

Tel: 0207 525 5471
Fax: 0207 084 0347

Appendix A

List of locations where the update to the SPD and supporting documents can be viewed

Council offices (Opening times 9am-5pm Monday-Friday)

Town Hall - Peckham Road, London, SE5 8UB

Libraries (Opening times listed individually below)

Blue Anchor Library - Market Place, Southwark Park Road, SE16 3UQ
(Monday, Tuesday and Thursday 9am to 7pm, Friday 10am to 6pm, Saturday 9am to 5pm)

Brandon Library - Maddock Way, Cooks Road, SE17 3NH
(Monday 10am to 6pm, Tuesday and Thursday 10am to 7pm, Saturday 10am to 5pm)
Camberwell Library - 17-21 Camberwell Church Street, SE5 8TR
(Monday, Tuesday and Thursday 9am to 8pm, Friday 10am to 6pm, Saturday 9am to 5pm)

Dulwich Library - 368 Lordship Lane, SE22 8NB
(Monday, Wednesday, Thursday and Friday 9am to 8pm, Tuesday 10am to 8pm, Saturday 9am to 5pm Sun 12pm to 4pm)

East Street Library - 168-170 Old Kent Road, SE1 5TY
(Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)

Grove Vale Library - 25-27 Grove Vale, SE22 8EQ
(Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)

John Harvard Library - 211 Borough High Street, SE1 1JA
(Monday, Tuesday, Wednesday and Thursday, Friday 9am to 7pm, Saturday 9am to 5pm)

Kingswood Library - Seeley Drive, SE21 8QR
(Monday and Thursday 10am to 2pm, Tuesday and Friday 2pm to 4pm, Sat 1pm to 5pm)

Newington Library - 155-157 Walworth Road, SE17 1RS
(Monday, Tuesday and Friday 9am to 8pm, Wednesday and Thursday 10am to 8pm, Saturday 9am to 5pm, Sunday 10am to 4pm)

Nunhead Library - Gordon Road, SE15 3RW

(Monday, Tuesday and Thursday 10am to 7pm, Friday 10am to 6pm, Saturday 10am to 5pm)

Peckham Library - 122 Peckham Hill Street, SE15 5JR

(Monday, Tuesday, Thursday and Friday 9am to 8pm, Wednesday 10am to 8pm, Saturday 10am to 5pm, Sunday 12pm to 4pm)

Rotherhithe Library - Albion Street, SE16 7HY

(Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)

Area Housing Offices

(Open 9am- 5pm Monday - Friday)

Nunhead and Peckham Rye - 27 Bournemouth Road, Peckham, SE15 4UJ

Dulwich - 41-43 East Dulwich Road, SE22 9BY

Borough and Bankside - Library Street Borough, London, SE1 0RG

Camberwell - Harris Street, London, SE5 7RX

Rotherhithe - 153-159 Abbeyfield Road, Rotherhithe, SE16 2LS

(Open Saturday, 9am to 1pm)

Peckham -122 Peckham Hill Street, London SE15 5JR

(Open 8.30am to 4.45pm Monday - Friday, Saturday 8.30am to 2.45pm)

Walworth - The Municipal Buildings, 151 Walworth Road, London SE17 1RY

One Stop Shops

(Open 9am-5pm Monday – Friday)

Peckham - 122 Peckham Hill Street, London, SE15 5JR ***(Saturday 9am to 1pm Peckham only)***

Walworth - 151 Walworth Road, London, SE17 1RY

Bermondsey -17 Spa Road, London, SE16

APPENDIX B- LIST OF CONSULTTEES

* Please note this list is not exhaustive and also relates to successor bodies where re-organisations occur.

Statutory

We must consult the following specific consultation bodies in accordance with The Town and Country Planning (Local Development) (England) Regulations 2004 and The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

- British Telecommunications
- Bromley Council
- Corporation of London
- English Heritage (London Region)
- Environment Agency
- Government Office for London
- Greater London Authority
- Lambeth Council
- Lewisham Council
- LFEDA
- London Development Agency
- Natural England
- Secretary of State
- Secretary of State for Transport
- Thames Water Property Services
- The Coal Authority
- Southwark Primary Care Trust

Any of the bodies from the following list who are exercising functions or a function in the borough:

1. Person to whom a licence has been granted under section 7 (2) of the Gas Act 1986
2. Sewage undertakers
3. Water undertakers.

- Any person to whom the electronic communalisations code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003

- Any person who owns or controls electronic communications apparatus situated in any part of the borough,

Local consultees

All Councillors

- Liberal
- Labour
- Conservatives
- Green Party

Voluntary organisations and community groups

- Aaina Women's Group
- Abbeyfield Society
- ABC Southwark Housing Co-op
- Aborigine
- ACAPS
- Access London
- Action Southwark
- ADDACTION - Maya Project
- Adult Education
- Advice UK London Region
- AFFORD
- Agenda for Community Development
- Albert Academy Alumni Association
- Albert Association
- Albrighton Cricket Club
- Alcohol Counselling & Prevention Services - 1
- Alcohol Counselling & Prevention Services - 2
- Alcohol Recovery Project
- Alcohol Recovery Project
- Alleen Community Centre Association
- Alone in London
- Anada Fund
- Anchor Sheltered Housing
- Apex Charitable Trust Ltd
- Art in the Park
- ARTLAT
- Artsline
- Artstree / Oneworks
- Ashbourne Centre
- Association of Waterloo Groups
- ATD Fourth World
- Aubyn Graham (The John Graham Group)
- Aylesbury Academic Grassroots
- Aylesbury Day Centre

- Aylesbury Everywomen's Group
- Aylesbury Food and Health Project
- Aylesbury Healthy Living Network
- Aylesbury Learning Centre
- Aylesbury NDC
- Aylesbury Nutrition Project
- Aylesbury Plus SRB
- Aylesbury Plus Young Parent Project
- Aylesbury Sure Start
- BAKOC
- Beacon Project
- Bede Café Training
- Bede House Association and Education Centre
- Bede House Community Development Womens Project
- Bells Garden Community Centre
- Beornund Community Centre
- Bermondsey and Rotherhithe Development Partnership
- Bermondsey Artists Group
- Bermondsey Citizens Advice Bureau
- Bermondsey St Area Partnership
- Bermondsey St Community Association
- Bermondsey Street Area Partnership
- Bermondsey Street Association
- Blackfriars Advice Centre
- Blackfriars Settlement (Community Care Team)
- Blackfriars Work Centre
- Blue Beat Community Centre
- Blue Beat Police Centre
- Blue Elephant Theatre Company
- Book-Aid International
- Borough Community Centre
- Borough Music School
- Borough Partnership Team, Southwark Police Station
- Bosco Centre
- Bradford Club in Peckham
- Breast Cancer Campaign
- Bredinghurst (day and residential)
- British Film Institute
- Brook Advisory Centre
- Bubble Youth Theatre & Adult Drama
- Burgess Park (Colts) Cricket Club
- Camberwell Advocacy Office
- Camberwell Arts Week
- Camberwell Community Forum
- Camberwell Credit Union
- Camberwell Green Magistrates Court
- Camberwell Grove
- Camberwell ME Support Group
- Camberwell Police Station 212a
- Camberwell Rehabilitation Association
- Camberwell Society
- Camberwell Supported Flats
- Camberwell Working Party
- Cambridge House & Talbot
- Cambridge House Advocacy Team
- Cambridge House Legal Centre
- Canada Water Campaign
- Canada Water Consultation Forum
- Carers Support Group
- Cares of Life
- Carnival Del Pueblo
- Castle Day Centre
- CDS Co-operatives
- Centre Point (40)
- Chair - Dulwich Sector Working Group
- Charterhouse - in- Southwark
- Cheshire House(Dulwich)
- Cheshire House(Southwark)
- Childcare First
- Childcare Support
- Childminding Project
- Children's Rights Society
- Choice Support Southwark
- Choices
- Chrysalis
- Citizen Advice Bureau - Peckham
- Clublands
- Coin Street Community Builders
- Coin Street Festival and Thames Festival
- Colby Road Daycare Project
- Colombo Street Sports and Community Centre
- Committee Against Drug Abuse
- Communicate User Group
- Community Alcohol Service

- Community Care Choices
- Community Drug Project
- Community Metamorphosis
- Community Music Ltd
- Community of DIDA in the UK
- Community Radio Station
- Community Regeneration
- Community Support Group
- Community TV Trust
- Confederation of Passenger Transport UK
- Connect
- Consumers Against Nuclear Energy
- Contact A Family In Southwark
- Cooltan Arts
- Corazon Latino
- Cornerstone Community Project
- Council of Igbo Communities
- CRISP / LSE / Balance for Life
- Crooke Green Centre Association
- Crossways Centre
- Crossways Housing
- CWS Southeast Co-op
- Delfina Studios Trust
- Detainee Support & Help Unit
- Diamond Project
- Divine Outreach Community Care Group
- Dockland Settlement
- Dominica Progressive Charitable Association
- Drugs Apogee
- Drum
- Dulwich Credit Union
- Dulwich Festival
- Dulwich Hamlet Supporters Trust
- Dulwich Helpline
- Dulwich Orchestra
- Dulwich Society
- East Dulwich Society
- East Dulwich Womens Action
- ECRRG
- Education 2000 Project
- Education Action Zone
- Education Links
- Education Support Centre
- Elephant Enterprises
- Elephants Links Project Team
- Elibariki Centre
- Employing People Responsibly
- Empowerment Projects Trust
- Encore Club
- Environmental Computer Communications
- Equinox
- ESOL Project
- Evelina Children's Hospital Appeal
- Evelyn Coyle Day Centre
- EYE (Ethio Youth England)
- Faces in Focus (TIN)
- Fair Community Housing Services
- Fairbridge in London
- Fairbridge South London
- Families Experiencing Drug Abuse
- Fast Forward
- First Place Children and Parents Centre
- First Tuesday Club
- Five Bridges Centre
- Five Steps Community Centre
- Flex-Ability
- Fortress Charitable Trust
- Foundation for Human Development/ Free Press Europe
- Friends of East Dulwich Station
- Friends of Fast Forward
- Funding Advice Consultancy & Training Service
- Garden House Project
- Gateway Project
- Gateway Training Centre
- GEMCE
- Globe Education Centre
- Gloucester Grove Community Association
- Goose Green Centre
- Goose Green Lunch Club
- Grange Rd Carers Support Group
- Greenhouse Trust
- Gye Nyame for Performing Arts
- Habitat for Humanity Southwark
- Herne Hill Society

- Holmhurst Day Centre (Social Services)
- HOURBank
- Ideas 2 Vision
- ILETO
- In Tolo Theatre
- Independent Adoption Service
- Independent Advocacy Service
- Inner City Link
- Inspire
- Integratus
- International Family Welfare Agency
- International Shakespeare Globe Centre Ltd
- Isigi Dance Theatre Company
- JAA
- Jennifer Cairney Fundraiser
- John Paul Association
- Joshua Foundation Superkid
- Jubilee Renewal Projects
- Jump
- Juniper House Co-op
- Kairos Community Trust
- Kaizen Initiative
- Keyworth
- Kick Start
- Kite
- Lady of Southwark
- Lambeth Crime Prevention Trust
- Lambeth MIND
- Laura Orsini (New Group)
- Level Ltd
- Lewisham & Southwark Jobshare Project
- Liberty Club
- Life Builders
- Lighthouse Informal Learning & Support Project
- Lighthouse Developments Ltd.
- Linden Grove Community Centre
- Links Community Hall
- Living in Harmony
- Local Accountancy Project (LAP)
- London Roses Community Services
- London Thames Gateway Forum
- London Voluntary Service Council
- Lorels Broadcasting Service
- Lorraine Drop - In
- M. Hipro Words
- Magdalen Tenants Hall
- Manna Group
- Manna Society and Day Centre
- Marsha Phoenix Memorial Trust
- Mecower
- Media Action
- Meeting Point
- Members of Elephant Links
- Milewalk Project
- Millennium Reachout
- Mine Watch
- Morena
- Moses Basket Charity Care Organisation
- Multiskills Training & Recruitment
- MultisoSoc
- Myasthenia Gravis Association
- NAS International Charity
- New Generation Drug Agency
- New Peckham Varieties @ Magic Eye Theatre
- New Unity Centre Association (NUCA)
- Next Step Project
- North Lambeth Day Centre (BEDS)
- North Peckham Project
- North Southwark Community Care Support Project
- North Southwark Community Development Group
- North Southwark EAZ
- North-West Quadrant Community Development Network
- Nouvel Act
- Nunhead Community Forum
- Oasis Mentoring
- Oasis Trust
- OFFERS
- Old Kent Road Community Training Centre
- Omolara Sanyaolu Open Arms Foundation
- Only Connect
- Opendoor
- Opendoor Community Support Team
- OTDOGS
- Outset

- Outset Jobsearch Project
- Oval House Workshop
- Oxford and Bermondsey Club Forum
- Pachamama
- Panda London
- Papa Mandela London Project
- Parent Talk
- Parents Association
- Patchwork HA
- Pathways Trust
- Peckham Area
- Peckham Befrienders
- Peckham CAB
- Peckham Day Centre
- Peckham Open Learning Centre
- Peckham Pop-In
- Peckham Society
- People Care Association
- People to People
- Peoples Association in Southwark
- Phoenix House
- Pierres Vivantes Charity
- Pitt Street Association
- Plunge Club
- Pneumonia Community Link
- Pool of London Partnership
- Positive Education Learning Centre
- Premier Self Defence
- Prisoners Families & Friends Service
- Psychosynthesis and Education Trust
- Publication
- Pumphouse Educational Museum
- Queens Road Parents & Carers Support Group
- Queensborough Community Centre
- Radiant Idea
- RAP Academy
- Realise IT Network
- Redriff Community Association
- Right Lines
- Rimin Welfare Charity Association
- Rise and Shine
- Rockingham Community Association
- Rockingham Community Centre
- Rockingham Management Committee
- Rockingham Women's Project
- Rolston Roy Art Foundation
- Rotela Tech Ltd
- RPS Rainer Housing
- RSPCA
- Ruban Educational Trust
- S.E. Lions Football Club
- Saffron Blue Promotions
- Sarcoidosis & Interstitial Lung Association
- SASS Theatre Company
- SAVO
- SCA Renew
- Scoglio Arts @ Community Centre
- SCOPE
- SCREEN
- SE5 Alive
- SELAH Social Action Network
- Selcops
- SETAA, Aylesbury Learning Centre
- Seven Islands Leisure Centre
- Seven Islands Swimming Club
- SGI-UK
- Shaka
- Shakespeare's Globe
- Shep-Su Ancestral Design
- Sicklenemia
- Silwood Family Centre
- Sirewa Project
- SITRA
- SKILL
- South Bank Employers' Group
- South Bermondsey Partnership
- Southside Rehabilitation Association
- Southwark Adult Education
- Southwark Alarm Scheme
- Southwark Alliance Partnership Team
- Southwark Arts Forum
- Southwark CABX (Citizens Advice Bureaux) Service
- Southwark Carers
- Southwark Cares Incorporated

- Southwark Caring Housing Trust
- Southwark Community Care Forum
- Southwark Community Development Agency
- Southwark Community Drugs Project
- Southwark Community Team
- Southwark Community Youth Centre & Arts Club
- Southwark Congolese Centre
- Southwark Consortium
- Southwark Co-op Party
- Southwark Co-operative Development Agency
- Southwark Council Benefits Campaign
- Southwark Dial-a-Ride
- Southwark Domestic Violence Forum
- Southwark Education & Training Advice for Adults (SETAA)
- Southwark Education and Cultural Development
- Southwark Education Business Alliance
- Southwark Habitat for Humanity
- Southwark Heritage Association
- Southwark Law Centre
- Southwark Libraries
- Southwark LSP/Alliance
- Southwark Mediation Centre
- Southwark Mind
- Southwark Model Railway Club
- Southwark Mysteries Drama Project
- Southwark Park Day Centre
- Southwark Park Group
- Southwark Playhouse
- Southwark Police & Community Consultative Group
- Southwark Social Services
- Southwark Trade Union Council
- Southwark Trade Union Support Unit
- Southwark Unity
- Southwark User Group
- Southwark Victim Support
- Southwark Women's Support Group
- SPAM
- Speaking Up
- Sports Action Zone
- Sports Out Music In
- Spreading Vine
- Springboard Southwark Trust
- Springboard UK
- Springfield Lodge
- St Clements Monday Club
- St Georges Circus Group
- St Jude's Community Centre
- St Matthew's Community Centre
- St. Martins Property Investment Ltd.
- Starlight Music Project
- STC Working Party
- Stepping Stones
- Surrey Docks Carers Group
- Sustainable Energy Group
- Swanmead
- Tabard Community Committee
- Tai Chi UK
- TGWU Retired
- Thames Reach
- The Black-Eyed Peas Project
- The British Motorcyclists Federation
- The Liveness Museum
- The Prince's Trust
- The Shaftesbury Society
- The Southwark Mysteries
- Three R's Social Club
- Thresholds
- Tideway Sailability
- Tokei Martial Arts Centre
- Tomorrow's Peoples Trust
- Tower Bridge Magistrates Court
- Trees for cities
- Trios Childcare Services
- Turning Point
- Unite
- United Colour & Naylor House Crew
- Urban Research Lab
- URBED
- Vauxhall St Peters Heritage Centre
- Victim Support Southwark
- Voice of Art
- Voluntary Sector Support Services
- Volunteer Centre Southwark
- Volunteers in Action

- Volunteers in Action Southwark
 - Wakefield Trust
 - Walworth Triangle Forum
 - Waterloo Breakaway
 - Waterloo Community Counselling Project
 - Waterloo Community Regeneration Trust
 - Waterloo Sports and Football Club
 - Waterloo Time Bank
 - Way Forward
 - WCDG
 - Welcare Mothers Group
 - West Bermondsey '98
 - West Bermondsey Community Forum
 - Wickway Community Association
 - Wild Angels
 - Willowbrook Centre
 - Windsor Walk Housing
 - Woman of Peace Counselling Group
 - Women Development Programme
 - Women in Harmony
 - Women's Ivory Tower Association
 - Women's Self-Development Project
 - Womens Worker
 - Woodcraft Folk
 - Workers Educational Ass.
 - Working with Men
 - XL Project
 - Young Carers Project
 - Young Womens Group AAINA
- Major landowners and development partners in the borough**
- Businesses**
- 7 Star Dry Cleaners
 - A & J Cars
 - A J Pain
 - A R London Builders
 - ABA (International) Ltd
 - Abbey Rose Co Ltd
 - Abbey Self Storage
 - Abbeyfield Rotherhithe Society Ltd
 - ABS Consulting
- Academy Costumes Ltd
 - Accountancy Business Centre
 - Ace
 - Ace Food
 - Addendum Ltd
 - Albany Garage
 - Alex Kennedy
 - Alfa Office Supplies
 - Alpha Employment Services
 - Alpha Estates
 - Alpha Logistics & Securities Ltd
 - AM Arts
 - AMF Bowling Lewisham
 - Anchor at Bankside
 - Andrews & Robertson
 - Angle's Hair Centre
 - Anthony Gold, Lerman & Muirhead
 - Archer Cleaners
 - Architype Ltd
 - Archival Record Management plc
 - Argent Environmental Services
 - Argos Distributors Ltd
 - Arts Express
 - ARUP - Engineering Consultants
 - ATAC Computing
 - Auditel
 - Austins
 - Australia and New Zealand Banking Group Ltd
 - Azhar Architecture
 - Bankside Business Partnership
 - Bankside Theatre
 - Bankside Traders Association
 - Barclays Bank PLC
 - Barratt East London
 - Barrie Howard Shoes
 - Barton Willmore
 - Baxhor Travel Ltd
 - BBI
 - BBW Solicitors
 - Beaumont Beds Ltd
 - Bedford Hill Gallery & Workshops Ltd
 - Bells Builders Merchants (Dulwich) Ltd

- Bells Play Group
- Bellway Homes
- Bermondsey Goode Foods
- Bert's Fish Bar
- Big Box Productions Ltd
- Big Metal
- Bims African Foods
- Black Business Initiative
- Blackfriars Wine Bar/Warehouse
- Blakes Menswear
- Bloy's Business Caterers
- Boots the Chemist
- Boyson Car Service
- Bramah Museum
- Brian O'Connor & Co
- Britain at War Experience
- Brixton Online Ltd
- Brockwell Art Services
- Brook Advisory Centre
- Brook Street Bureau
- Brunel Engine House Exhibition
- BTA
- BTCV Enterprises Ltd
- Bubbles
- Burnet, Ware & Graves
- Bursand Enterprises
- C Demiris Laboratory Services Ltd
- C Hartnell
- C S M L (Computer Systems & Network Solutions)
- Caitlin Wilkinon MLIA (Dip)
- Calafield Ltd
- Camberwell Arts
- Camberwell Traders Association
- Cap UK, Confederation of African People
- Capital Careers
- Capital Carers
- Cascade Too Florist
- CB Richard Ellis Ltd
- CD Plumbers
- CGMS Consulting
- Charterhouse in Southwark
- Childsplay
- Choice Support
- Chris Thomas Ltd
- Cicely Northcote Trust
- Citiside Plc
- City Central Parking
- City Cruises PLC
- CityLink
- Claybrook Group Ltd
- Clean Up Services
- Cleaning Services (South London) Ltd
- Clearaprint
- Club Copying Co Ltd
- Cluttons
- Colliers CRE
- Colorama Processing Laboratories Limited
- Colworth House Ltd
- Community Radio Broadcasting
- Consultants at Work
- Consumers Food and Wine
- Continental
- Continental Café
- Copy Copy
- Copyprints Ltd
- Cosmic Training & Information Services
- CTS Ltd (Communication & Technical Services Ltd)
- Cuke Bar
- Cyclists Touring Club
- Cynth-Sinclair Music Venue
- Cyril Silver & Partners LLP Surveyors
- D E Cleaning Service
- David Trevor- Jones Associates
- Davis Harvey & Murrell Ltd
- Davy's of London (WM) Ltd
- Delta Security UK Limited
- Development Planning Partnership
- Dickens Developments
- District Maintenance Ltd
- Doble, Monk, Butler
- Dolland and Aitchison
- Dolphin Bay Fish Restaurant
- Donaldsons
- Donaldson's Planning

- Douglas Jackson Group
- DPDS Consulting Group
- Dr J Hodges
- Dransfield Owens De Silva
- Driscoll House Hotel
- Drivers Jonas
- Drivers Jonas
- Dulwich Books
- Dulwich Chiropody Surgery
- Dulwich Hamlet Football Club
- Dulwich Sports Club
- Dulwich Village Traders Association
- Duncan Vaughan Arbuckle
- Duraty Radio Ltd
- Dynes Self-Drive Cars
- Eagle Speed Car Services
- East Street Traders
- Easyprint 2000 Ltd
- ECRRG
- Edita Estates
- Edwardes of Camberwell Ltd
- Elephant Car Service
- Eminence Promotions
- Emma & Co Chartered Accountants
- EMP plc
- Employment Service
- English Partnerships (London and Thames Gateway)
- Equinox Consulting
- Etc Venues Limited
- Euroclean Services
- Euro-Dollar Rent-a-Car
- Express Newspapers/United Media Group Services Ltd
- Ezekiel Nigh Club
- F & F General Merchants
- F A Albin & Sons Ltd
- F W Woolworth plc
- Feltbrook Ltd
- Field & Sons
- Fillocraft Ltd
- Finishing Touches
- Firstplan
- Flint Hire & Supply Limited
- Florence Off-Licence & Grocery
- Focus Plant Ltd
- Foster-Berry Associates
- Franklin & Andrews
- Friends Corner
- Fruiterers & Florist
- G Baldwin & Co
- G M Imber Ltd
- G Worrall & Son Ltd
- GAAD Support Services
- General Commercial Enterprises
- George Yates Estate Office Ltd
- GH Commercial
- Gisella Boutique & Design Workshop
- Glaziers Hall Ltd
- Glenn Howells Architects
- Godwin Nede & Co
- Golden Fish Bar
- Gowers Elmes Publishing
- Grace & Mercy Fashion
- Graphic House
- Gregory Signs
- Gretton Ward Electrical Ltd
- Guy's & St Thomas' NHS Foundation Trust
- Haime & Butler
- Hair and Beauty
- Hair Extension Specialist
- Hairports International
- Hall & Dougan Management
- Harvey's Catering & Equipment Hire Ltd
- Hayward Brothers (Wines) Ltd
- HCS Building Contractors
- Heartbeat International
- Hepburns
- Herne Hill Traders Association
- Hollywood Nails
- Home Builders Federation
- Hopfields Auto Repairs
- Hopkins, Williams, Shaw
- HSBC PLC (Southwark Area)
- Hygrade Enterprises
- Hygrade Foods Ltd

- Iceland Frozen Foods Plc
- Icenl Projects Ltd
- Imperial War Museum
- Implement Construction Ltd
- Indigo Planning
- IPC Magazines Ltd
- Isaac & Co
- Isambard Environmental
- J K Computers Ltd
- J R Davies Associates
- J Sainsbury plc
- Jade Catering Services
- Jani-King (GB) Ltd
- Jay Opticians
- Jet Reproprint
- JETS
- JK Computers
- Jones Yarrell & Co Ltd
- Juliets
- Kalmars
- Kalpna Newsagent
- Kamera Obscura
- Kellaway's Funeral Service
- Ken Creasey Ltd
- King Sturge
- Knight Office Supplies Ltd
- Kumasi Market
- L Tagg Sewing Machines
- Lainco, Lainco
- Lambert Smith Hampton
- Lambrucus Ltd
- Land Securities
- Lane Heywood Davies
- Lanes Butchers Ltd
- Leslie J Sequeira & Co
- Lex Volvo Southwark
- Life Designs
- Light Projects Ltd
- Lloyds Bank plc
- Local Recruitment Brokerage Ltd
- Londis & Jamaica Road Post Office
- London & City Central
- London Bridge Dental Practice
- London Bridge Hospital
- London Builders Merchants
- London Dungeon
- London Self-Storage Centre
- London Tile Warehouse
- London West Training Services
- London's Larder Partnership
- Look Good Design
- Lord Nelson
- Louise Moffatt Communications
- Lovefinders
- Lucy's Hairdressing Salon
- LWTS Ltd
- M & D Joinery Ltd
- M Armour (Contracts) Ltd
- M H Associates
- M H Technical Services
- M V Biro / Bookbiz
- Mackintosh Duncan
- Magreb Arab Press
- Malcolm Judd & Partners
- MARI
- Marks and Spencer Plc
- Marrs & Cross and Wilfred Fairbairns Ltd
- Matthew Hall Ltd
- Mayflower 1620 Ltd
- McCarthy & Stone
- MCQ Entertainments Ltd
- Metrovideo Ltd
- Michael Dillon Architect & Urban Designer
- Minerva PLC
- Ministry of Sound
- Miss Brenda Hughes DMS FHC/IMA FBIM Cert. Ed.
- MK1 Ladies Fashion
- Mobile Phone World Ltd
- Mono Consultants Limited
- Montagu Evans
- Motability Operations
- movingspace.com
- Mulcraft Graphics Ltd
- Myrrh Education and Training

- Nabarro Nathanson
- Nandos
- Nathaniel Lichfield & Partners Ltd
- National Provincial Glass Co Ltd
- National Westminster Bank plc
- Neil Choudhury Architects
- Network Rail
- Nevins Meat Market
- New Dome Hotel
- New Future Now
- New Pollard UK
- New Start Up
- Ngomatiya Gospel Record Production
- Nicholas D Stone
- Nichols Employment Agency
- Norman W Hardy Ltd
- Nutec Productions
- & S Builders
- OCR (Quality Meats) Ltd
- Office Angels
- Oliver Ashley Shoes
- Olley's Traditional Fish & Chips
- On Your Bike Ltd
- Over-Sixties Employment Bureau
- P J Accomodation
- Panache Exclusive Footwear
- Patel, K & S (Amin News)
- Paul Dickinson & Associates
- Peabody Pension Trust Ltd
- Peabody Trust
- Peacock & Smith
- PEARL
- Peppermint
- Peterman & Co
- Phil Polglaze
- Philcox Gray & Co
- Pillars of Excellence
- Pizza Hut
- Planning & Environmental Services Ltd
- Planning Potential
- Pocock Brothers Ltd
- Port of London Authority
- Potter & Holmes Architects
- Precision Creative Services
- Premier Cinema
- PricewaterhouseCoopers
- Primavera
- Prodigy Ads
- Prontaprint
- Purser Volkswagen
- Q2 Design
- Quarterman Windscreens Ltd
- Quicksilver
- R B Parekh & Co
- R J Parekh & Co
- R Woodfall, Opticians
- Rajah Tandori and Curry
- Ranmac Employment Agency
- Ranmac Security Ltd
- Rapleys LLP
- Red Kite Learning
- Redder Splash
- Reed Employment
- Richard Harrison Architecture, Trafalgar Studios
- Richard Hartley Partnership
- Rive Estate Agents
- Rizzy Brown
- RK Burt & Co Ltd
- Robert O Clotley & Co
- Rodgers & Johns
- Rodney Radio
- Roger Tym & Partners
- Roosters Chicken and Ribs
- Rose Bros
- Roxlee the City Cobbler
- Roy & Partners
- Roy Brooks Ltd
- Royal Mail
- RPS Planning Transport and Environment
- Rusling, Billing, Jones
- S & S Dry Cleaners
- S C Hall & Son
- S T & T Publishing Ltd
- Sainsbury's plc

- Salon 3A Unisex Hairdressing
- Samuel Brown
- Savages Newsagents
- Savills Commercial Limited
- SCEMSC
- Scenic Art
- SEA / RENUÉ
- Sea Containers Services Ltd
- SecondSite Property Holdings
- Service Point
- Sesame Institute UK
- SETAA
- Shalom Catering Services
- Shopping Centres Ltd (Surrey Quays)
- Simpson Millar (incorporating Goslings)
- Sinclair Robertson & Co Ltd
- Sitec
- Skalps
- Smile Employment Agency
- Softmetal Web Designer
- South Bank Employers Group
- South Bank Technopark
- South Central Business Advisory Centre
- South East Cars
- South Eastern Trains
- South London Press Ltd
- Southern Railway
- Southwark & Kings Employees Credit Union Ltd.
- Southwark Association of Street Traders
- Southwark Chamber of Commerce
- Southwark Credit Union
- Southwark News
- Spaces Personal Storage
- Spacia Ltd
- St. Michael Associates
- Stage Services (London) Ltd
- Start Consulting
- Stephen Michael Associates
- Steve Cleary Associates
- Stitches Marquee Hire
- Stream Records
- Stroke Care
- Studio 45
- Studio 6
- Summer Type
- Superdrug Stores Plc
- Supertec Design Ltd
- TA Property Consultants
- Tangram Architects & Designers
- Tate Modern
- Taxaccount Ltd
- Terence O'Rourke
- Tesco Stores Ltd
- Tetlow King Planning
- The Bakers Oven
- The Chapter Group PLC
- The Clink & Bankside Co Ltd
- The Clink Prison
- The Design Museum
- The Dulwich Estates
- The Edge Couriers
- The Financial Times
- The Hive
- The Mudlark
- The New Dome Hotel
- The Old Operating Theatre
- The Peckham Experiment
- The Stage Door
- The Surgery
- Thermofrost Cryo plc
- Thomas & Co Solicitors
- Thrifty Car Rental/Best Self Drive Ltd
- Timchart Ltd
- Tito's
- TM Marchant Ltd
- Tola Homes
- Tom Blau Gallery
- Toucan Employment
- Tower Bridge Travel Inn Capital
- Trade Winds Colour Printers Ltd
- Trigram Partnership
- Turning Point - Milestone
- Two Towers Housing Co-Op
- United Cinemas International (UCI)

- United Friendly Insurance PLC
- Unity Estates
- Venters Reynolds
- Victory Stores
- Vijaya Palal
- Vinopolis
- W Uden & Sons Ltd
- Wallace Windscreens Ltd
- Walsh (Glazing Contractors) Ltd
- Walter Menteth Architects
- Wardle McLean Strategic Research Consultancy Ltd
- Watson Associates
- West & Partners
- Wetton Cleaning Services Ltd
- WGI Interiors Ltd
- White Dove Press
- Whitehall Clothiers (Camb) Ltd
- Wilkins Kennedy
- William Bailey, Solicitors
- Wing Tai Super Market
- Workspace Group
- Workspace Ltd (C/o RPS PLC)
- Xysystems Ltd
- Yates Estate
- Yinka Bodyline Ltd

Environmental

- Bankside Open Spaces Trust
- Dawson's Hill Trust
- Dog Kennel Hill Adventure
- Dulwich Allotment Association
- Dulwich Society Wildlife Committee
- Friends of Belair Park
- Friends of Burgess Park
- Friends of Geraldine Mary Harmsworth Park
- Friends of Guy Street Park
- Friends of Honor Oak Recreation Ground
- Friends of Nunhead Cemetery
- Friends of Nursery Row Park
- Friends of Peckham Rye
- Friends of Potters Field Park
- Friends of Southwark Park

- Groundwork Southwark
- Lamlash Allotment Association
- Lettsom Garden Association
- London Wildlife Trust
- National Playing Fields Association
- Nature Park
- North Southwark Environmental Network
- One Tree Hill Allotment Society
- Rotherhithe & Bermondsey Allotment Society
- Southwark Biodiversity Partnership
- Southwark Friends of the Earth
- Surrey Docks City Farm
- Victory Community Park Committee
- Walworth Garden Farm

Black and Minority Ethnic groups

- Afiya Trust
- African Research & Information Bureau (ARIB)
- African Child Association
- African Children and Families Support
- African Community Development Foundation
- African Community Link Project
- African Elders Concern
- African Foundation For Development
- African Graduate Centre
- African Heritage Association
- African Inform
- African Root Men's Project (ARMPRO)
- African Regeneration Association
- African Research
- African's People's Association
- African Women's Support Group
- Afro-Asian Advisory Service
- Afro-Caribbean Autistic Foundations
- Ahwazi Community Association
- AKWAABA Women's Group
- Alliance for African Assistance
- Amannagwu Community Association UK
- Anerley French & Swahili Club
- Anti-Racist Alliance
- Anti-Racist Integration Project
- Arab Cultural Community

- Arab Cultural Community
- Asian Society
- Asra Housing Association
- Association of Minority
- Association of Sri Lankans in UK
- Association of Turkish Women
- Aylesbury Turkish Women's Group
- Aylesbury Turkish Women's Project
- Bangladeshi Women's Group
- Bengali Community Association
- Bengali Community Development Project
- Bengali Women's Group
- Bhagini Samaj Women's Group
- Birlik Cemiyet Centre
- Black Awareness Group
- Black Cultural Education
- Black Elderly Group Southwark
- Black Elders Mental Health Project
- Black Organisation for Learning Difficulties
- Black Parents Network
- Black Training Enterprise Group
- Cara Irish Housing Association
- Caribbean Ecology Forum
- Caribbean Women's Network
- Carr-Gomm Society Limited
- Centre for Inter-African Relations
- Centre for Multicultural Development and Integration
- Charter for Non-Racist Benefits
- Chinese/Vietnamese Group
- Confederation of Indian Organisations (U.K.)
- Daryeel Somali Health Project
- Educational Alliance Africa
- Eritrean Community Centre
- Eritrean Education and Publication Trust
- Ethiopian Refugee Education & Careers Centre
- Ethno News
- French Speaking African General Council
- Ghana Refugee Welfare Group
- GHARWEG Advice, Training & Careers Centre
- Great Lakes African Womens Network
- Greek Community of South London
- Gulu Laity Archdiocesan Association
- Here & There - Somali Training Development Project
- Igbo Tutorial School
- Integration Project for the Francophone African Community
- International Ass of African Women
- International Association for Sierra Leoneans Abroad
- Irish Families Project
- Irish in Britain Representation Group
- Istrinsabbha-Sikh Women's Group
- Ivorian Social Aid Society
- Mauritius Association
- Mauritius Association of Women in Southwark
- Mercylane Africa Trust (UK)
- Mitali Asian Women's Project
- Multi- Lingual Community Rights Shop
- RCA/ Southwark Irish Pensioners Project
- Rockingham Somali Support
- Rondaiya Phillipino-UK
- Sidama Community in Europe
- Sierra Leone Community Forum
- Sierra Leone Muslim Women Cultural Organisation
- Society of Caribbean Culture
- Somali Community
- Somali Community Association in Southwark
- Somali Counselling Project
- Somali Group
- Somali Health and Education Project
- Somali Mother Tongue & Supplementary Class
- Somali Project
- Somali Women & Children's Project
- South East Asian Elderly
- South London Arab Community Group
- Southwark African Support Services
- Southwark Asian Association
- Southwark Bhagini Samaj
- Southwark Chinese Women's Group
- Southwark Cypriot & Turkish Cultural Society
- Southwark Cypriot Day Centre & Elders Group
- Southwark Cypriot Turkish Association
- Southwark Ethnic Alliance
- Southwark Ethnicare Project
- Southwark Irish Festival
- Southwark Irish Forum

- Southwark Multicultural Link in Education
 - Southwark Race and Equalities Forum
 - Southwark Somali Advisory Forum c/o CIDU
 - Southwark Somali Refugee Council
 - Southwark Somali Union
 - Southwark Travellers Action Group
 - Southwark Turkish & Cypriot Group
 - Southwark Turkish Association and Community Centre
 - Southwark Turkish Education Group
 - Southwark Turkish Perkulunler Cultural Ass.
 - Southwark United Irish Community Group
 - Southwark Vietnamese Chinese Community
 - Southwark Vietnamese Refugee Association
 - Strategic Ethnic Alliance
 - Sudanese Welfare Association
 - Suubi-Lule African Youth Association
 - The Burrow & Carragher Irish Dance Group
 - Uganda Refugee Art & Education Development Workshop
 - UK Ivorian Space
 - Union of Ivorian Women
 - Urhobo Ladies Association Ltd
 - Vietnamese Women's Group
 - Vishvas
 - Walworth Bangladeshi Community Association
 - West African Community Action on Health & Welfare
 - West Indian Standing Conference
 - Women of Nigeria International
 - Yemeni Community Ass.
- Religious**
- Apostolic Faith Mission
 - Bermondsey Methodist Central Hall
 - Bethel Apostolic Ministerial Union
 - Bethnal Apostolic Ministerial Union
 - Brandon Baptist Church
 - British Red Cross
 - Celestial Church of Christ
 - Christ Church (Barry Road)
 - Christ Church Southwark
 - Christ Intercessor's Network
 - Christian Caring Ministries Trust
 - Christian Life Church
 - Christway Community Centre
 - Church of St John the Evangelist
 - Churches Community Care Project
 - Crossway United Reformed Church
 - Daughters of Divine Love Training Centre
 - Dulwich Islamic Centre
 - Elephant & Castle Mosque
 - English Martyrs Church
 - Finnish Church in London
 - Fountain of Life Ministries
 - Gospel Faith Mission
 - Grove Chapel
 - Herne Hill Methodist Church
 - Herne Hill United Reformed Church
 - Holy Ghost Temple
 - Jamyang Buddhist Centre
 - Mary's Association
 - Metropolitan Tabernacle
 - Muslim Association of Nigeria
 - New Peckham Mosque & Muslim Cultural Centre
 - Norwegian Church
 - Our Lady of La Salette & St Joseph
 - Pakistan Muslim Welfare
 - Peckham St John with St Andrew
 - Pembroke College Mission
 - Salvation Army
 - Sasana Ramsi Vihara
 - Seal of Rastafari
 - Single Parents Holistic Ministry
 - Sisters Community Delivery Health
 - Sisters of the Sacred Heart
 - South East Catholic Organisation
 - South East London Baptist Homes
 - South East Muslim Association
 - South London Industrial Mission
 - South London Tabernacle Baptist Church
 - South London Temple
 - Southwark Cathedral
 - Southwark Churches Care
 - Southwark Diocesan Housing Association
 - Southwark Hindu Centre
 - Southwark Islam Cultural Trust

- Southwark Multi-Faith Forum c/o CIDU
 - Southwark Muslim Council & Dulwich Islamic Centre
 - Southwark Muslim Forum
 - Southwark Muslim Womens Association
 - Southwark Muslim Youth Project
 - Southwark Salvation Army
 - St Anne's Church, Bermondsey
 - St Anthony's Hall
 - St Christopher's Church (Pembroke College Mission)
 - St Georges Roman Catholic Cathedral
 - St Giles Church
 - St Giles Trust
 - St Hughs Church
 - St John's Church, Peckham
 - St Mary Magdalene Church - Bermondsey
 - St Mary's Greek Orthodox Church
 - St Matthews at the Elephant
 - St Peters Church
 - St. Johns Church, Goose Green
 - St. Jude's Community Centre
 - St. Matthew's Community Centre
 - St. Michael's Vicarage
 - Sumner Road Chapel
 - Swedish Seaman's Church
 - Taifa Community Care Project
 - The Church Commissioners
 - The Church of the Lord (Aladura)
 - The Rectory
 - Tibetan Buddhist Centre
 - Trinity In Camberwell
 - Vineyard Community Church
 - Walworth Methodist Church
- Residents and resident's groups**
- Abbeyfield T&RA
 - Acorn T&RA
 - Adams Gardens T&RA
 - Alberta T&RA
 - Alvey T&RA
 - Applegarth House T&RA
 - Applegarth TMO
 - Astbury Road T&RA
 - Atwell T&RA
 - Aylesbury T&RA
 - Baltic Quay Residents and Leaseholders
 - Barry Area T&RA
 - Bellenden Residents Group
 - Bermondsey Street T&RA
 - Bermondsey Street TA.
 - Bonamy & Bramcote Tenants Association
 - Borough and Scovell T&RA
 - Brandon T&RA
 - Brayards Rd Estate TRA
 - Brencley Gardens T&RA
 - Bricklayers Arms T&RA
 - Brimtonroy T&RA
 - Brook Drive T&RA
 - Browning T&RA
 - Brunswick Park T&RA
 - Buchan T&RA
 - Camberwell Grove T&RA
 - Canada Estate T&RA
 - Caroline Gardens T&RA
 - Castlemead T&RA
 - Cathedral Area RA
 - Champion Hill T&RA
 - Comus House T&RA
 - Conant T&RA
 - Congreve and Barlow T&RA
 - Consort T&RA
 - Cooper Close Co-op T&RA
 - Cossall T&RA
 - Crawford Road T&RA
 - Crosby Lockyer & Hamilton T&RA
 - Croxted Road E.D.E.T.R.A
 - Delawyk Residents Association
 - Delawyk T&RA
 - D'Eynsford Estate T&RA
 - Dickens T&RA
 - Dodson & Amigo T&RA
 - Downtown T&RA
 - Draper Tenants Association
 - East Dulwich Estate T&RA
 - East Dulwich Grove Estate T&RA

- Elephant Lane Residents Association
- Elizabeth T&RA
- Elmington T&RA
- Esmeralda T&RA
- Four Squares T&RA
- Gateway T&RA
- Gaywood Estate TA
- Gaywood T&RA
- George Tingle T&RA
- Gilesmead T&RA
- Glebe North and South T&RA
- Gloucester Grove T&RA
- Goschen T&RA
- Grosvenor T&RA
- Grove Lane Residents Association
- Haddonhall Residents TMO
- Haddonhall Tenants Co-op
- Halimore TA
- Harmsworth Mews Residents Association
- Hawkstone T&RA
- Hayles T&RA
- Heygate T&RA
- House Buildings T&RA
- Juniper House T&RA
- Keetons T&RA
- Kennington Park House T&RA
- Kinglake T&RA
- Kipling T&RA
- L T&RA
- Lant T&RA
- Lawson Residents Association
- Lawson T&RA
- Leathermarket JMB
- Ledbury T&RA
- Lettsom T&RA
- Library Street Neighbourhood Forum
- Longfield T&RA
- Lordship Lane & Melford Court T&RA
- Magdalene Tenants & Residents Association
- Magdalen T&RA
- Manchester House T&RA
- Manor T&RA
- Mardyke House T&RA
- Mayflower T&RA
- Meadow Row T&RA
- Metro Central Heights RA
- Millpond T&RA
- Neckinger Estate T&RA
- Nelson Square Gardens T&RA
- Nelson Square Community Association
- New Camden T&RA
- Newington T&RA
- Northfield House T&RA
- Nunhead Residents Association
- Oliver Goldsmith T&RA
- Osprey T&RA
- Parkside T&RA
- Pasley Estate T&RA
- Pedworth T&RA
- Pelier T&RA
- Penrose T&RA
- Plough and Chiltern T&RA
- Puffin T&RA
- Pullens T&RA
- Pullens Tenants Association
- Redriff Tenants Association (Planning)
- Rennie T&RA
- Rochester Estate T&RA
- Rockingham Management Committee
- Rockingham TRA
- Rodney Road T&RA
- Rouel Road Estate T&RA
- Rye Hill T&RA
- Salisbury Estate T&RA
- Sceaux Gardens T&RA
- Setchell Estate T&RA
- SHACCA T&RA
- Silwood T&RA
- Southampton Way T&RA
- Southwark Group of Tenants Assc
- Southwark Park Estate T&RA
- St Crispins T&RA
- St James T&RA
- Styles House T&RA

- Summer Residents T&RA
 - Surrey Gardens T&RA
 - Swan Road T&RA
 - Sydenham Hill T&RA
 - Tabard Gardens Management Co-op
 - Tappesfield T&RA
 - Tarney Road Residents Association
 - Tenant Council Forum
 - Thorburn Square T&RA
 - Thurlow T&RA
 - Tooley Street T&RA
 - Trinity Newington Residents Association
 - Two Towers T&RA
 - Unwin & Friary T&RA
 - Webber and Quentin T&RA
 - Wendover T&RA
 - West Square Residents' Association
 - Wilsons Road T&RA
 - Winchester Estate TA
 - Wyndam & Comber T&RA
- Housing**
- Affinity Sutton
 - Central & Cecil Housing Trust
 - Dulwich Right to Buy
 - Excel Housing Association
 - Family Housing Association Development
 - Family Mosaic
 - Habinteg
 - Hexagon - Southwark Women's Hostel
 - Hexagon Housing
 - Hexagon RSL
 - Home-Start
 - Housing for Women
 - Hyde RSL
 - Lambeth & Southwark Housing Society
 - London & Quadrant Housing Trust
 - Love Walk Hostel
 - Metropolitan Housing Trust
 - Octavia Hill Housing Trust
 - Peabody Estate (Bricklayers)
- Pecan Limited
 - Rainer South London Housing Project
 - Sojourner Housing Association
 - South East London Housing Partnership
 - Southern Housing Group
 - Southwark & London Diocesan H A
 - Southwark Park Housing
 - Stopover Emergency & Medium Stay Hostels
 - Wandle RSL
- Education/young persons**
- 8th East Dulwich Brownies
 - Active Kids Network
 - After School Clubs
 - All Nations Community Nursery
 - Alliance for African Youth
 - Amott Road Playgroup
 - Anti-Bullying Campaign
 - Aylesbury Early Years Centre
 - Aylesbury Plus SRB Detached Project: Youth Club
 - Aylesbury Youth Centre
 - Aylesbury Youth Club
 - Bede Youth Adventure
 - Bermondsey Adventure Playground
 - Bermondsey Community Nursery
 - Bermondsey Scout Group
 - Bethwin Road Adventure Playground
 - Blackfriars Housing for Young
 - Blackfriars Settlement Youth Club
 - British Youth Opera
 - Camberwell After-School Project
 - Camberwell Choir School
 - Camberwell Scout Group
 - Cambridge House Young People's Project
 - Camelot After School Club
 - Caribb Supplementary School and Youth Club
 - Caribbean Youth & Community Association
 - CASP Playground
 - Charles Dickens After School Clubs
 - Chellow Dene Day Nursery
 - Child and Sound

- Children's Day Nursery
- Community Education Football Initiative
- Community Youth Provision Ass.
- Copleston Children's Centre
- Dyason Pre-School
- Early Years Centre
- Early-Birds Pre-School Playgroup
- East Dulwich Adventure Playground Association
- East Dulwich Community Nursery
- Ebony Saturday School
- Emmanuel Youth & Community Centre
- First Steps Montessori Playgroup
- Founder Union of Youth
- Future Generation Youth Club
- Garden Nursery
- Geoffrey Chaucer Youth Club
- Goose Green Homework Club
- Grove Vale Youth Club
- Gumboots Community Nursery
- Guys Evelina Hospital School
- Half Moon Montessori Playgroup
- Happy Faces Playgroup Under 5's
- Hatasu Students Learning Centre
- Heartbeat After School Project
- Heber After School Project
- Hollington Youth Club
- Joseph Lancaster After School Club
- Justdo Youth Network
- Ketra Young Peoples Project
- Kids Are Us Play centre
- Kids Company
- Kinderella Playgroup
- Kingsdale Youth Centre
- Kingswood Elfins
- Lawnside Playgroup
- Linden Playgroup
- Louise Clay Homework Club
- Millwall Community Sports Scheme
- Mint Street Adventure Playground
- Mission Youth Centre
- Mother Goose Nursery
- NCH Action for Children Eye to Eye Meditation
- Nunhead Community Education Service
- Nunhead Green Early Years
- Odessa Street Youth Club
- Peckham Drop in Creche
- Peckham Park After School Club
- Peckham Rye After School Care
- Peckham Settlement Nursery
- Peckham Town Football Club
- Pembroke House Youth Club
- Pickwick Community Centre & Youth Club
- Playshack Playgroup
- Rainbow Playgroup
- Reconcillors Childrens Club
- Riverside After School Club
- Rockingham Asian Youth
- Rockingham Community Day Nursery
- Rockingham Estate Play
- Rockingham Playgroup
- Rotherhithe Community Sports Project
- Sacred Heart Pre-School Day Care
- Salmon Youth Centre
- Save the Children Fund
- Scallywags Day Nursery
- Scarecrows Day Nursery
- Sesame Supplementary School
- Sheldon Health Promotion Toddlers Group
- Sixth Bermondsey Scout Group
- Somali Youth Action Forum
- South London Children's Scrap Scheme
- South London Scouts Centre
- Southwark Catholic Youth Service
- Southwark Childminding Association
- Southwark Children's Foundation
- Southwark Community Planning & Education Centre
- Southwark Opportunity Playgroup
- Southwark Schools Support Project
- Southwark Somali Homework Club
- Springboard for Children
- St Faiths Community & Youth Association
- St Giles Youth Centre
- St John's Waterloo YC
- St Marys Pre-School

- St Peters Monkey Park
- St. George's Youth Project
- St. Peter's Youth & Community Centre
- Surrey Docks Play Ass.
- Tabard After School Project
- Tadworth Playgroup
- Tenda Road Early Years Centre
- The Ink Tank Arts and Crafts After School Kids Club
- Trinity Child Care
- Tykes Corner
- Union of Youth
- Upstream Children's Theatre
- Westminster House Youth Club
- YCGN UK (Youth Concern Global Network)
- YHA Rotherhithe
- Youth Concern UK
- Anando Pat Community School
- Archbishop Michael Ramsey Sixth Form Centre
- Beormund School
- Butcher CoE School
- British School of Osteopathy
- Brunswick Park Primary
- Cathedral School
- Cobourg Primary School
- Crampton Primary
- Crampton School (Parents)
- Dachwyng Supplementary School
- Dulwich College
- Dulwich Hamlet Junior School
- Dulwich Village CE Infants School
- Dulwich Wood School
- Emotan Supplementary School
- English Martyrs RC School
- Eveline Lowe School
- Friars School
- Gabriel Garcia Marquez School
- Geoffrey Chaucer School
- Gharweg Saturday School
- Gloucester Primary
- Goodrich Primary
- Grange Primary
- Institute of Psychiatry
- James Allen's Girls School
- Kingsdale School
- Kinmore Way Nursery School
- Lighthouse Supplementary School
- Little Saints Nursery School Ltd
- London College of Printing
- London School of Law
- London South Bank University
- Morley School
- Mustard Seed Pre-School
- Nell Gwynn School
- Notre Dame RC
- Pui-Kan Community Chinese School
- Robert Browning Primary School
- Sacred Heart School
- South Bank University
- Southwark College (Southampton Way)
- Southwark College (Surrey Docks)
- Southwark College (Waterloo)
- Southwark College Camberwell Centre
- St Anthony's RC
- St Francesa Cabrini RC
- St Francis RC
- St George's Cathedral
- St George's CE
- St John's CE School
- St Josephs Infants School
- St Josephs RC School
- St Judes CE School
- St Olave's & St Saviour's Grammar School Foundation
- St Paul's Primary School
- St Peter's Walworth CE School
- St Saviour's & St Olave's CE
- St. George the Martyr School
- Surrey Square Infant and Junior School
- The Archbishop Michael Ramsey Technology College
- The Charter School
- Townsend Primary School
- Victory Primary School
- Walworth Lower School
- Walworth Upper School
- Waverley Upper School

- Whitefield Pre-school
 - Whitstable Early Years Centre
- Health**
- Alzheimer's Disease Society
 - Bermondsey & Rotherhithe Mental Health Support Group
 - Community Health South London
 - Daryeel Health Project
 - Dyslexia Association of London
 - Guys and St. Thomas' Hospital Trust
 - Health Action Zone
 - Health First
 - Hospital and Prison Action Network
 - London Dyslexia Association
 - London Ecumenical Aids Trust
 - LSL Health Alliance
 - Maudsley Befrienders & Volunteers
 - Maudsley Social Work Team
 - Maudsley Volunteers
 - Mental Health Project
 - Oasis Health Centre
 - Phoenix Women's Health
 - Southwark Health Alliance
 - Southwark HIV & Aids Users Group
 - Southwark Phoenix Women's Health Organisation
 - St Christopher's Hospice
 - Terence Higgins Trust
 - Aylesbury Health Centre
 - Aylesbury Medical Centre
 - Bermondsey & Lansdowne Medical Mission
 - Blackfriars Medical Centre
 - Borough Medical Centre
 - Camberwell Green Surgery
 - CHSL NHS Trust
 - Elm Lodge Surgery
 - Falmouth Road Group Practice
 - Guy's and St Thomas' NHS Foundation Trust
 - Maudsley Hospital
 - Old Kent Road
 - Parkside Medical Centre
 - Princess Street Health Centre
 - SHA Strategic Health Authority Southside

- The Diffley Practice
 - The Grange Road Practice
 - Townley Clinic
 - Walworth Clinic
 - Walworth Road Health Centre
- Transport**
- Green Lanes & REPA
 - Lambeth and Southwark Community Transport (LASCOT)
 - Living Streets
 - London Cycling Campaign
 - London Transport Users Committee
 - Southwark Community Transport
 - Southwark Cyclists
 - Southwark Living Streets
 - Southwark Pedestrian Rights Group
 - Southwark Transport Group
 - SUSTRANS

Pensioners/older people

- Age Concern Carers Support Group
- Age Concern Southwark Community Support
- Age Concern Southwark Primary Care Project
- Age Concern Southwark: Head Office
- Association of Greater London Older Women (AGLOW)
- Aylesbury Pensioners Group
- Bermondsey Care for the Elderly
- Bermondsey Pensioners Action Group
- East Dulwich Pensioners Action Group
- East Dulwich Pensioners Group
- Fifty+ Activity Club
- Golden Oldies Club
- Golden Oldies Community Care Project
- Golden Oldies Luncheon Club
- Local Authority Elderly Home
- Old Age Directorate
- Over 50's Club
- Pensioners Club
- Pensioners' Forum
- Pensioners Pop-In (Borough Community Centre)
- Rockingham Over 50's

- Rotherhithe Pensioners Action Group
- South Asian Elderly Organisation
- Southwark Black Elderly Group
- Southwark Irish Pensioners
- Southwark Muslim Pensioners Group
- Southwark Pensioners Action Group
- Southwark Pensioners Centre
- Southwark Pensioners Forum
- Southwark Turkish Elderly

Disability

- Action for Blind People
- Action for Blind People (Training Centre)
- Action for Dysphasic Adults
- Age Concern Southwark Black Elders Mentally Frail
- Bede Learning Disabilities Project
- Cambridge House Literacy Project
- Handicapped Playground Ass
- IBA for Children & Adults with Mental & Physical Disabilities
- KesKidee Arts for Disabled People
- Latin American Disabled People's Project
- Organisation of Blind African Caribbeans
- Sainsbury's Centre for Mental Health
- Sherrie Eugene Community Deaf Association
- Southwark Disabilities Forum c/o CIDU
- Southwark Disablement Association
- Southwark Multiple Sclerosis Society
- Southwark Phoenix and Leisure Club for People with Disabilities

Refugee Groups/Recent Immigrants

- Refugee Housing Association
- Refugee Youth
- South London Refugee Youth
- Southwark Day Centre for Asylum Seekers
- Southwark Refugee Artists Network
- Southwark Refugee Communities Forum
- Southwark Refugee Education Project
- Southwark Refugee Project
- The Refugee Council

- Lesbian, gay, bisexual and transgender Southwark LGBT Network

Other Consultees

- Age Concern
- British Waterways, Canal owners and navigation authorities (Port of London)
- Centre for Ecology and Hydrology
- Southwark Chamber of Commerce
- Church Commissioners
- Commission for Architecture and the Built Environment
- Commission for New Towns and English Partnerships
- Crown Estate Office
- Civil Aviation Authority
- English Partnerships
- Commission for Racial Equality
- Department of the Environment, Food and Rural Affairs
- Southwark Primary Care Trust
- Regional Public Health Group - London
- Diocesan Board of Finance
- Disability Rights Commission
- Disabled Persons Transport Advisory Committee
- H.M Prison Service
- Highways Agency
- Home Office
- Electricity, Gas, Telecommunications Operators
- National Grid
- Council for the Protection of Rural England
- London Wildlife Trust
- Royal Society for the Protection of Birds
- Equal Opportunities Commission
- Fire and Rescue Services
- Friends of the Earth Southwark
- Forestry Commission
- Freight Transport Association
- Gypsy Council
- Health and Safety Executive
- Help the Aged
- Housing Corporation
- Learning and Skills Council
- Southwark Equalities Council
- Regional Housing Boards
- Railfreight Group

- Road Haulage Association
- House Builders Federation
- Traveller Law Reform Coalition
- London Transport Buses
- London Underground
- National Disability Council Secretariat
- National Grid Company Plc.
- National Playing Fields Association
- Network Rail
- Police/Crime Prevention
- Port of London Authority
- Post Office Property Holdings
- Southern Railway
- Sport England - London Region
- Thameslink Trains
- Transport for London
- Women's National Commission
- Southwark Volunteer Centre

Appendix C

The update to the Residential Design Standards Supplementary Planning Document

Appendix C for Planning Committee Report and
Cabinet Report:
Amendment to Residential Design Standards
Supplementary Planning Document

Planning Committee: 21 March 2011
Cabinet: 22 March 2011

Appendix A	The update to the Residential Design Standards Supplementary Planning Document
Appendix B	The consultation plan
Appendix C	The Equalities Impact Assessment

LOCAL DEVELOPMENT FRAMEWORK



Equalities Impact Assessment

**Draft amendments to the Residential Design Standards
Supplementary Planning Document
March 2011**

London Borough of Southwark

Equalities Impact Assessment

1. What policy, strategy or plan is this assessment addressing?

This is the Equalities Impact Assessment (EqIA) for the draft amendments to the Residential Design Standards Supplementary Planning Document (SPD) (March 2011). The SPD and all the supporting documents can be found on our website at:

www.southwark.gov.uk/planningpolicy

The Residential Design Standards Supplementary Planning Document (SPD) was adopted in September 2008. It sets out the council's required design standards for residential development. The SPD was originally prepared to provide guidance to the housing policies in the Southwark Plan, which was adopted in July 2007. The SPD will provide a framework to ensure that all new housing development is accessible and of a high quality, and does not have a negative impact on the amenity, privacy and aesthetics of surrounding areas.

Since the SPD was adopted, we have prepared new planning policy through the Core Strategy (due to be adopted in April 2011). The Mayor has also prepared new regional planning policies through the draft replacement London Plan (2009). Parts of the Southwark Plan are now out of date and are no longer being used, having been replaced by the Core Strategy and London Plan.

2. Is this a new or an existing policy/strategy?

We are proposing a number of amendments to the existing adopted Residential Design Standards SPD. These amendments are needed to take into account changes in national, regional and local policies and guidance. In particular it needs to take into account changes to our policies through our core strategy and our area action plans for Aylesbury and Canada Water.

The SPD forms part of the council's Local Development Framework, which contains all of the council's planning policies used to guide how

land is used in the borough and in the determination of planning applications.

Existing policy for residential design standards is contained within our Core Strategy, the London Plan and the policies in the Southwark Plan we are still using (the “saved” policies). The SPD sites below these documents and provides detailed guidance to support the policies in them. It does not change or create new policy. This extra detail helps us apply our policies and make decision on planning applications.

3. If existing, has the policy/strategy already been reviewed under the previous EqIA programme? If so, what were the findings to come out of this and has the agreed action plan been implemented? What has changed since the last assessment was undertaken (in terms of context, nature of the policy/strategy or the type of people affected by the policy/ strategy).

We carried out an equalities impact assessment as part of the preparation of the current adopted 2008 Residential Design Standards SPD. The EQIA looked at both the impacts of the SPD consultation and impacts associated with the implementation of the SPD. At the scoping stage we identified a number of possible issues ensuring the design standards reflected a diversity of needs whilst also not making housing overly expensive and difficult to deliver. Stage 2 of the EQIA highlighted that overall the SPD would have positive impacts on the equality target groups by requiring a higher quality of design for residential development.

The only potential short fall identified was a possibility that having more design quality requirements may increase the cost of housing, making it unaffordable to some groups. However, affordable housing (social rented and intermediate housing) must be affordable to people within a threshold of incomes (as set by the Mayor) and so this should continue to ensure equality. Furthermore, there are many other factors affecting house prices, including availability of supply and mortgage requirements. Developers would be expected to factor in the requirements of policy into the cost of purchasing sites.

We also set out how we would ensure the SPD was applied consistently and fairly including through ensuring our planning permissions are granted in accordance with our policies and monitoring the impact of the SPD. From our Annual Monitoring Report (09/10) we can see that the amount of family homes delivered in Southwark is increasing. In the year 2009/10 17% of new housing was family housing (36% of social rented housing was family housing). We need to keep monitoring this to see how the higher targets introduced through the Core Strategy are met. In the year 2009/10 there was also a higher proportion of housing meeting Lifetime Homes Standards (20% more than the previous year). However 2% less homes met wheelchair accessibility standards. We need to keep this under review. We are also looking at ways that we can monitor the Building for Life Standard.

We also carried out equalities impact assessments of the Southwark Plan, core strategy, the Aylesbury Area Action Plan and the Canada Water Area Action Plan. This SPD provides further guidance and information to the policies in all four development plan documents. We have reviewed these as part of the preparation of the SPD and this has fed into section 4 of this EQIA. The Equalities Impact Assessments for these documents can be viewed on our website at:

www.southwark.gov.uk/planningpolicy

The scoping stage of the Core Strategy EqIA identified the following potential issues relating to the design quality of residential development:

- Ensuring there is an adequate supply of housing suitable for wheelchair users. Without this, disabled people may not be housed in dwellings that meet their needs.
- Access to specialist housing such as care homes and supported housing. This is likely to have the greatest impact on elderly people and people with disabilities.
- As part of the core strategy we will look at how we can successfully create mixed communities with a range of housing types and tenures. This should help to improve social cohesion.
- By improving areas, there is always the likelihood that house prices will rise which may cause conflict between groups. For example new people may move into the area and be able to

- afford the new housing whilst existing groups may have to continue to live in less desirable housing.
- The core strategy includes issues and options to improve the quality of future housing. This should have a positive impact on all groups.
 - We may encourage more or less family housing in different areas. When we encourage a higher amount of family housing, this will have a positive impact on certain groups such as religious and ethnic groups who are more likely to have larger families. It may have a less positive impact on groups who are more likely to live alone and do not want family housing.
 - People currently living in the area may feel resentful towards large numbers of people moving in. This tension could be further exacerbated if people moving into the area buy up newer and higher quality housing.
 - New housing may only meet the needs of some people, and other people may feel it does not meet their needs and that other groups are being prioritised over their needs. This could cause tension between different groups.
 - Communities may be split up by regeneration which could have a negative impact on all the equality groups.

The adopted Residential Design Standards SPD 2008 provided guidance solely on the Southwark Plan policies. The draft amendments to the SPD provides guidance on the new documents within the Local Development Framework as well as the saved Southwark Plan policies.

The amendments can be summarised as follows:

- Correct references to policies by adding in new Core Strategy policies and removing reference to Southwark Plan policies no longer being used.
- Factual update of the information on density standards, to reflect new Core Strategy density policy
- Adding in an appendix setting out how density is calculated. This has been carried over from the Southwark Plan.
- Adding in additional guidance on minimum dwelling sizes – these are in line with those proposed in the London Plan and Mayor's London Housing Design Guide.

We included minimum dwelling sizes in the final draft of our Core Strategy, along with increased requirements for family housing. The Core Strategy EqIA highlighted the positive impacts that the housing policies would have. In particular the type and size of homes being required better reflected the housing needs of the residents living in Southwark. The core strategy seeks to promote a range of housing types, increasing the provision of family accommodation in the borough. The dwelling mix is derived from Southwark's borough-wide housing needs assessment.

The EqIA of the London Plan found that the housing policies, which includes minimum dwelling sizes would lead to more diverse housing supply in London to help meet the varied requirements of its different communities. It found that requiring more family housing would help reduce overcrowding, which data shows is more acute amongst deprived areas and BME communities.

Since we adopted the 2008 SPD, the new Equalities Act 2010 was passed on 8 April 2010, and came into effect from October 2010. The Government has also recently consulted on a new public sector duty which is due to come into effect in April 2011. This introduces nine characteristics that we should look at. The previous legislation required us to look at the impacts of our policies and SPD on the six equalities target groups.

Due to the changes in legislation and our changed planning policies since the preparation of the 2008 SPD we feel it is necessary to carry out a new EQIA for the draft amendments to the Residential Design Standards SPD 2011.

4. What do you think are the main issues for your policy or strategy in relation to equality, diversity and social cohesion?

We are looking at the impact of the draft amendments to the Residential Design Standards SPD on the nine characteristics in accordance with the new Act and duty:

- Age
- Disability

- Gender re-assignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

We have identified potential barriers that could prevent our nine protected characteristic groups from benefitting fully from the SPD. This scoping stage highlights the main issues of the SPD on equality, diversity and social cohesion.

The barriers we have identified could create differential impacts on certain groups and reduce social cohesion. We also have identified how the SPD may have positive impacts on these groups and how it may improve social cohesion. We have tried to minimise the negative impacts and maximise the positive impacts through the SPD and its preparation. Following consultation on the draft amendments and the scoping of this EqIA we will consider whether there is anything further we can do within the SPD to maximise positive impacts and minimise negative impacts.

These impacts can be split into two categories

1. Impacts created through the production of the draft amendments in terms of public consultation
2. Impacts associated with the implementation of the draft amendments and the detailed information and guidance within the SPD.

4.1 Impacts associated with consultation on the draft amendments to the Residential Design Standards SPD

There are a number of barriers associated with consultation on all our planning policy documents which may create problems for social cohesion. It is important that everyone is offered the ability to be involved in the preparation of the SPD and that the final document reflects the views of our diverse community. We have prepared a consultation plan for the SPD which aims to do this. The plan sets

out how we plan to consult the local community, developers, landowners, Registered Providers and other stakeholders. After the 12 week consultation period we will prepare a consultation statement which will set out the findings of our consultation including a summary of the representations received. We will provide officer comments on all the responses we receive explaining why we have/have not amended the SPD to reflect the comments. We will also provide information on the methods of consultation we used and how these were effective in consulting with our diverse community. This will help us to continually monitor and adapt our consultation methods and techniques to try and be as effective as possible and reach as many different groups as possible.

This is in accordance with our Statement of Community Involvement (SCI). Our SCI sets out how and when we will involve the community in the development of planning documents and applications for planning permission. Within the SCI, we have identified barriers to involving equalities target groups and ways to overcome them. These include English not being someone's first language, problems accessing information, people not feeling safe attending evening meetings and the documents using too much jargon. We have tried to tailor our consultation to try and overcome as many of these barriers as possible. This includes writing in plain English and providing a glossary, offering translation services where required, and attending community meetings when requested. Please refer to Appendix A of this document for the full list of barriers to consultation. We have considered this comprehensive list as part of the preparation of the draft amendments.

Our Annual Monitoring Report also looks at the effectiveness of our consultation and whether we need to change how we consult on our policy documents. As part of the preparation of the Annual Monitoring Report we carry out a survey asking everyone on our mailing list what they think of our consultation and how we could make it more effective. The results of this are reported in our Annual Monitoring Report, and helps inform us how to improve our consultation on future planning documents.

4.2 Impacts associated with the objectives and implementation of the draft SPD amendments

The content of the SPD

The Core Strategy sets out our overall strategy to provide good quality homes that meet a wide range of needs. Most of the guidance in the adopted SPD remains current and line with the overarching strategy, policies in our saved Southwark Plan policies and area action plans.

The key change that we are considering is the introduction of minimum dwelling sizes. The other amendments are factual updates to correct policy references and summaries of current policies. These new policies have already been subject to EqlA as set out in Section 3.

The possible impacts and issues of the draft amendments to the SPD

The overall aim of the SPD is to raise the quality of residential development for everyone in the borough. This should produce a positive impact for all of the community.

The proposed minimum dwelling sizes are split by household size, requiring a mix of different sized housing to be provided within schemes. This will help contribute to a more diverse housing supply to better responds to the varied needs of Southwark's communities, and help support mixed and balanced communities. More variety in the size of homes will allow households to remain in their local area as their family size changes through different life stages. This will have benefits to all the groups.

The SPD provides guidance on the mix of different sized units. The Core Strategy and area action plans have already increased the requirement for family homes. Combined with these requirements, the proposed standards will help address issues of overcrowding to by increasing the space requirements in new homes. This will have a positive impact on certain groups, especially those with larger families which are often BME groups.

However some groups may feel that the minimum dwelling size requirements do not go far enough to meet their specific needs such as parents with young children who may require more space for their children to play in, and elderly people who may spend more time in the home due to mobility restrictions. These standards are based on those to be adopted by the Mayor. In preparing the draft amendments we have had to weigh up larger house sizes with the need to meet our overall housing targets and the impact on building bulk and scale.

By improving the design standards within the borough there is a possibility that house prices could increase as developers may charge more for having to meet minimum space standards. This could prove problematic for certain groups who may then not be able to afford housing in their local area, particularly for lone parents, disabled people, the BME community, refugees and asylum seekers, and elderly people. However by setting out the standards clearly in our planning documents developers should be able to account for the cost of building larger homes in the price of purchasing land.

5. What happens next

We are consulting on the EQIA alongside the SPD. Following consultation we will look at the feedback we receive on the EQIA and the SPD and feed this into the preparation of the final SPD and part B and C of the equalities and impact assessment.

APPENDIX A: Barriers to community involvement with different equalities target groups and how to overcome them
(extract from Southwark Statement of Community Involvement (January 2008))

1. Voluntary groups and organisations – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
The voluntary sector in Southwark is made up of around 18,000 individuals delivering services through 1,600 organisations, groups and projects. In 2001-2 Southwark Council supported around 300 voluntary and community groups with an investment of around £10m in grant-aid, service agreements and contracts.	<p>These barriers are generic barriers faced by many voluntary groups.</p> <ul style="list-style-type: none"> • Need for prior knowledge and experience; • Jargon and legal terms; • Other funding commitments and priorities than planning; • Lack of time; and • Knowledge of how and where to access information. 	<ul style="list-style-type: none"> • Provision of information and training about planning focused on these groups; • Ensure that a range of community involvement methods are used that are accessible to these groups; • Make sure that groups are added on to relevant mailing lists; and • Hold/attend meetings at appropriate times that are accessible to these groups. • Translators and interpreters to be used where appropriate.

2. Community groups and organisations – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Southwark is lucky in having a large number of community groups that are involved with a diverse range of	<p>These barriers are generic barriers faced by many community groups:</p> <ul style="list-style-type: none"> • Need for prior knowledge and 	<ul style="list-style-type: none"> • Provision of information and training in planning focused on these groups; • Ensure that a range of community

<p>issues.</p>	<p>experience;</p> <ul style="list-style-type: none"> • Jargon and legal terms; • Lack of time; • Other priorities than planning; • Accessing information barriers. 	<p>involvement methods are used that are accessible to these groups;</p> <ul style="list-style-type: none"> • Make sure that groups are added on to relevant mailing lists; and • Hold/attend meetings at times that are accessible to these groups. • Translators and interpreters to be used where appropriate.
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3. Business – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>There are 11 000 businesses in Southwark. These range from large international and national organisations to small family owned businesses. Approximately 96% of the total businesses in Southwark comprise less than 50 employees of which, approximately 20% are Black and Minority Ethnic businesses. Many businesses are members of Southwark Chamber of Commerce and other local groupings.</p>	<ul style="list-style-type: none"> • Accessing information outside of business hours (this is particularly a problem for small businesses); • Attending community meetings that do not address their needs; • Not understanding planning influences on their issues; • Other priorities than planning. 	<ul style="list-style-type: none"> • Ensuring that information is available at places which are open outside of normal office hours; • Hold/attend meetings at times that are accessible; and • Provide information and training focused at businesses. • Translators and interpreters to be used where appropriate.

4. Environmentalist and amenity groups – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>A wide range of people express</p>	<ul style="list-style-type: none"> • Other priorities than planning; 	<ul style="list-style-type: none"> • Provide information to ensure these

<p>their concern for their environment through membership groups such as Friends of the Earth or Greenpeace. Some of these larger organisations have active local branches. Some people get involved in local groups with the aim of protecting or improving a particular area or amenity such as the Friends of Burgess Park or the Dulwich Society.</p>	<ul style="list-style-type: none"> • Attending community meetings that do not address their issues; Jargon and legalistic terms; and • May not be aware of how other planning issues may affect their area of interest. 	<p>groups are aware of how planning influences their area;</p> <ul style="list-style-type: none"> • Use plain English; and • Translators and interpreters to be used where appropriate. .
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5. Neighbourhood, tenants and residents groups – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>There are approximately 232 neighbourhood, tenants and residents groups in Southwark. Many are formally consulted by us to provide residents views about social and private housing. These groups meet, many of them very regularly, to discuss matters affecting the local area including estate improvements.</p>	<ul style="list-style-type: none"> • Other priorities than planning; • Suffer from ‘consultation fatigue’ as they get consulted on a number of our initiatives and programmes; • Need prior understanding and knowledge of planning issues; and • Finding the time to get involved in planning. 	<ul style="list-style-type: none"> • Coordinate consultation between different parts of the council to ensure that groups are not overwhelmed with consultations; • Make sure that groups are added on to relevant mailing lists; • Provide focused information; and • Hold/attend meetings at accessible times. • Translators and interpreters to be used where appropriate.

6. Health organisations – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation

<p>Health service organisations provide important services to the community. Formal structures can be used to consult and gain feedback from local health organisations on how healthy living issues and requirements might influence or affect planning.</p>	<ul style="list-style-type: none"> Limited time to access and absorb detailed planning information; Other priorities than planning; and May not understand how planning impacts on health. 	<ul style="list-style-type: none"> Hold/attend meetings at appropriate times; and Ensure that information is easily accessible, relevant and understandable. Translators and interpreters to be used where appropriate.
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7. Transport organisations – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>Transport for London and the public transport providers are statutory consultees. There are smaller local groups that are interested in the improvement of cycling, walking and public transport infrastructure.</p>	<ul style="list-style-type: none"> Other priorities than planning; and May not be aware of how other planning issues may affect their area of interest. 	<ul style="list-style-type: none"> Provide information to ensure these groups are aware of how planning affects them. Translators and interpreters to be used where appropriate.

8. Refugee and Asylum seekers – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>The Southwark Refugee Communities Forum (SRCF) was established by Refugee Community Organisations (RCO) in 2003 to enable the voices of refugees themselves to be heard. The membership of SRCF currently</p>	<ul style="list-style-type: none"> Need for prior knowledge and experience English may not be their first language Other priorities than planning Discrimination Lack of knowledge of how and 	<ul style="list-style-type: none"> Avoid jargon and ensure that all information is given in plain English Ensure that all written information is available in different languages Provide information and training that is focused on these groups Use a range of community

<p>includes 28 Southwark-based Refugee Community Organisations. An estimated 7,000 people from refugee backgrounds across Southwark are in direct contact with SRCF members and participate in their activities on a regular basis.</p>	<p>where to access information</p> <ul style="list-style-type: none"> • Difficult to gain access to these groups, as they may not be recognised local community groups on our database 	<p>involvement methods to ensure that they are accessible to all.</p> <ul style="list-style-type: none"> • Source local knowledge about how to engage groups and those for our mailing lists. • Translators and interpreters to be used where appropriate.
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9. Individuals and groups from other boroughs – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>A number of issues in Southwark have an impact on our neighbouring boroughs such as Lambeth and Lewisham. Groups and residents that are on the borders of Southwark should be included in matters that affect them.</p>	<ul style="list-style-type: none"> • Need for prior knowledge and experience; • Other priorities in their own borough and other than planning; English as a first language; and • Lack of knowledge of how and where to access information. 	<ul style="list-style-type: none"> • Provision of information in appropriate locations; • Hold/attend meetings/events at appropriate locations that are accessible and appropriate to these groups. • Translators and interpreters to be used where appropriate.

10. Residents and individuals (including newcomers to the borough) – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>Residents and individuals in the borough may not belong to a specific group, but it is important that they are able to engage and get involved with issues and decisions that impact on them.</p>	<ul style="list-style-type: none"> • Need for prior knowledge and experience; • Jargon and legal terms; • English may not be their first language; • Discrimination; 	<ul style="list-style-type: none"> • Provision of information and training in planning focused on these groups; • Ensure that a range of community involvement methods are used that are accessible; • Source local knowledge about how to

	<ul style="list-style-type: none"> • Problems accessing information; • Other priorities than planning; and • Lack of knowledge of how and where to access information. 	<ul style="list-style-type: none"> • engage individuals; and • Add onto our mailing lists. • Translators and interpreters to be used where appropriate.
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11. Black and minority ethnic groups (including travellers and gypsies) - Equalities Target Group – Race

Description	Barriers to involvement	Measures to overcome barriers to consultation
Southwark is a very ethnically diverse borough. As a result there are many established and new groups and organisations that address issues relevant to each different community.	<ul style="list-style-type: none"> • Jargon and legal terms; • Need for prior knowledge; • English may not be the first language; • Other priorities than planning; • Discrimination; • Problems accessing information; • We may not be aware of their existence. 	<ul style="list-style-type: none"> • Avoid jargon; Use plain English; • Translators and interpreters to be used where appropriate. • Training groups in planning and council officers in understanding equality and diversity issues; • Coordinate council consultations; • Range of involvement methods; and • Gain local knowledge about how to engage groups; and • Add to mailing lists.

12. Religious groups - Equalities Target Group –Faith/Belief

Description	Barriers to involvement	Measures to overcome barriers to consultation
organisations are a valuable consultation link due to their very strong links to local communities. groups have a contribution to make to social inclusion and community	<ul style="list-style-type: none"> • Needs not being understood; • Need for prior knowledge and experience; • English may not be their first language; 	<ul style="list-style-type: none"> • Avoid jargon; Use plain English; • Translators and interpreters to be used where appropriate. • Training groups and individuals in planning and

<p>cohesion that is separate from promoting religion. As they are involved in running community services, community development and leadership representing community interests.</p>	<ul style="list-style-type: none"> • Other priorities than planning; • Discrimination; • Accessing information; and • May not understand how planning affects their group. 	<ul style="list-style-type: none"> • Training council officers to understand and belief issues; • Coordinate our consultations; • Range of involvement methods; and • Gain local knowledge about how to engage groups; and • Add to mailing lists.
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13. Older people Forum's Equalities Target Group – Age

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>Pensioner forums help represent older people's views and are able to represent many local people over particular issues that are affected by planning.</p>	<ul style="list-style-type: none"> • Older people may not feel safe attending meetings in the evenings; • A lack of respect for their views; and • Lack of knowledge of how and where to access information; • Other priorities than planning. 	<ul style="list-style-type: none"> • Provision of information in appropriate locations; • Hold/attend meetings/events at accessible times; • We listen to the views and feedback ; and • Make information relevant. • Translators and interpreters to be used where appropriate.

14. Education and young people - Equalities Target Group – Age

Description	Barriers to involvement	Measures to overcome barriers to consultation
<p>Schools, colleges, learning institutions and youth agencies are important aspects of the community, particularly as finding ways of involving young people have been identified as a priority by a large</p>	<ul style="list-style-type: none"> • May not be aware of the impact planning can have on them and/or how they can have an input; • English may not be a first language; and 	<ul style="list-style-type: none"> • Provide information that is focused at young people; • Attend schools and after-school centres and local youth forums to consult them on planning issues; • Translators and interpreters to be

number of people	<ul style="list-style-type: none"> • May not be able to attend meetings in the evenings or during the day in term time. • Other priorities than planning. 	<ul style="list-style-type: none"> • used where appropriate; and • Hold/attend meetings/events at accessible times.
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15. Disability Forum - Equalities Target Group – Disability

Description	Barriers to involvement	Measures to overcome barriers to consultation
This forum helps to identify planning issues including safety, access and housing from the perspective of disabled people.	<ul style="list-style-type: none"> • Venues for meetings may not be accessible; and • Written or verbal material is not always appropriate. • Other priorities than planning. 	<ul style="list-style-type: none"> • Hold/attend meetings/events at accessible locations; and • Ensure that all written information is available in different formats such as Braille, large print and audio. • Translators and interpreters to be used where appropriate.

16. Lesbian, gay, bisexual and transgender - Equalities Target Group – Sexuality

Description	Barriers to involvement	Measures to overcome barriers to consultation
The Southwark Anti Homophobic Forum (SAHF) is the longest established LGBT Forum of its kind and works to meet the needs of the LGBT community in key areas including education, safety in the home, the streets and housing. The	<ul style="list-style-type: none"> • Do not feel secure in raising LGBT issues at open events; • Other priorities than planning; 	<ul style="list-style-type: none"> • Hold specific LGBT consultation events; • Avoid jargon and use plain English; • Hold/attend meetings/events at convenient times and ensure that the venue is accessible and a safe environment.

<p>Southwark LGBT Network is a social support group for LGBT people and their friends who live and work in Southwark.</p>		<ul style="list-style-type: none">• Translators and interpreters to be used where appropriate.
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