

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 12² 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 CDA130³⁰ 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 CDA163⁴⁶.

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 CABI 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 (E) Change (CH)	Proposed change (deleted text is struck-through and new text is underlined)	Reason for change	Representation Ref 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 proposed" 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): This <u>These</u> 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. <u>The supporting documents are available at http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/planningpolicy/corestrategy.html</u> <u>The full evidence base is available at http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/planningpolicy/researchandinformation/</u>	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: <u>There are a number of environmental targets. These may be updated and will be found at www.southwark.gov.uk/corestrategy</u>	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: <u>"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."</u>	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/policy/ figure	Errata (E) Change (CH)	Proposed change (deleted text is struck-through and new text is underlined)	Reason for change	Representation Ref 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 18th-26th 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 115% 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	<u>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.</u>	TfL suggested that on pages 20-21 there should be further mention of underground stations.	565	CDAI3	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 <u>6</u> 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	

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 Ref No. Addressed	Core document number where relevant	Date of proposed change	Replaces previous proposed change?
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 Conserve and enhance heritage assets and wider historic environment</u> 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 <u>proposed major town centre</u> . 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. <u>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.</u> 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	

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 Ref No. Addressed	Core document number where relevant	Date of proposed change	Replaces previous proposed change?
					health because everyone has access to good health, sports and leisure facilities, and open spaces. The policies related to this theme are STP1, STP2, SP1, <u>SP2, SP3, SP4, SP5, SP7, SP11, SP12, SP13</u> and SP14."					
TOC18	AC03	31	Strategic Objective 2F	Ch	Amend wording of Strategic Objective 2F as follows: Southwark's <u>heritage assets and wider historic environment</u> historic buildings will be Protected <u>conserved</u> and <u>enhanced</u> improved, particularly in conservation areas.	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, <u>local stakeholders</u> 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, <u>or (where appropriate) the community infrastructure levy or equivalent.</u>	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 • <u>425,000-530,000sqm additional business floorspace between 2011-2026</u>	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 <u>London Plan</u> 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	

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 Ref No. Addressed	Core document number where relevant	Date of proposed change	Replaces previous proposed change?
		75			evidence at the <u>London Plan</u> EIP to demonstrate that we can meet this target.	Plan EIP. Change made in response to rep 75.				
TOC25	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	
TOC26	PC04	40	Strategic Targets Policy 2	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC27	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 <u>and respect local and historic context...</u>	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	
TOC28	AC06	38	Strategic Targets Policy 2		<ul style="list-style-type: none"> "Aylesbury 4200 new homes (<u>including around 1450 net new homes</u>) 	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	
TOC29	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 <u>London Plan</u> 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	
TOC30	PC04	40	Central Activities Zone vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC31	PC04	41	Bankside, Borough and London Bridge vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC32	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, <u>665** affordable housing units</u> and around 25,000*** new jobs by 2026.	To increase the clarify of the area visions. These are the same targets that are already in policy 6.			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 Ref No. Addressed	Core document number where relevant	Date of proposed change	Replaces previous proposed change?
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.	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	Bankside and Borough Vision: Insert the following text at end of sixth paragraph on page 42: <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	London Bridge Vision: Insert the following text at end of third paragraph on page 43: <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 <u>a minimum 1400** affordable housing units by working with the</u>	To increase the clarify 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	Insert the following text at the end of the second 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>	To make the vision consistent with Policy 12. This is in response to reps 770, 779 and 220.	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: <u>We will set out in detail which sites are appropriate, sensitive and inappropriate for</u>	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	

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 Ref No. Addressed	Core document number where relevant	Date of proposed change	Replaces previous proposed change?
					<u>tall buildings through the supplementary planning document/opportunity area framework.</u>			English Heritage		
TOC42	AC10	44	Amend the third paragraph	CH	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. 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.	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.	570	CDAI3	12 July 2010	
TOC43	PC02	44	Elephant & Castle vision	Ch	We are working with the local community, Greater London Authority, businesses including <u>local traders...</u>	Add in reference to 'local traders' to ensure consideration is given to local traders.			20 July 2010	
TOC44	TOC14	44	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 <u>London Plan</u> EIP to demonstrate that	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	

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 Ref No. Addressed	Core document number where relevant	Date of proposed change	Replaces previous proposed change?
					we can meet this target.					
TOC45	TOC25	41	Figure 13: Elephant & Castle Opportunity Area	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	
TOC46	PC14	45	Figure 13	Ch	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.	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	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC48	TOC19	46	2 nd paragraph	Ch	.Canada Water Action Area vision ..which will be accommodated in generally mixed use development. <u>The action area will provide at least 875*** affordable housing units.</u> Office development....	To increase the clarify 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>	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	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>	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 <u>London Plan</u> 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	

Table of changes reference	Previous reference number	Page	Paragraph/policy/ figure (and Rotherhithe)	Errata (E) Change (CH)	Proposed change (deleted text is struck-through and new text is underlined)	Reason for change	Representation Ref No. Addressed	Core document number where relevant	Date of proposed change	Replaces previous proposed change?
			(and Rotherhithe)		consistency between the different diagrams. These are set out in appendix E to this table of changes.					
TOC53	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: Figure 16: Peckham and Nunhead	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	Rep 71 –		26 March	

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					These are set out in appendix G to this table of changes.	71) suggested that we include diagrams on the sub-areas.	GOL		2010	
TOC75	PC04	54	Lordship Lane town centre vision	Ch	Put area vision in grey box	To clarify what is policy.			20 July 2010	
TOC76	TOC23	54	Area visions	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, <u>Camberwell</u> , Old Kent Road and Canada Water to very high <u>standards</u> .	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 <u>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.</u>	To include reference to all members of the community			22 July 2010	
TOC79	PC16	57	Strategic Policy 1	Ch	Following last paragraph <u>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</u>	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	To fully reflect the cross-cutting approach to health.			30 July 2010	
TOC80	PC20	58	Figure 17	Ch	Add in walking and cycling network	To provide further clarity			21 July 2010	
TOC81	TOC28	59	Policy 5 after 1 st sentence of 7 th paragraph,	Ch	Insert wording: <u>"Encouraging active travel and reducing traffic levels and speeds will have positive health impacts for improved air quality, safer</u>	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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					<u>roads and encouraging physical activity and successful communities."</u>					
TOC82	PC19	62	Strategic Policy 2	Ch	By requiring transport assessments in line with Policy 3C.2 <u>matching development to transport capacity</u> 3C.1 integrating transport and development	Correct typo in Policy 3C.2.			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 <u>London Plan</u> 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. <u>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.</u>	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: <u>"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</u>	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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					<u>takeaways in the development management DPD and area action plans.</u>					
TOC88	TOC29	70	Policy 4	Ch	Change heading from Places to Learn and Enjoy to <u>Places for learning, enjoyment and healthy lifestyles.</u>	This would be more inclusive of health. This is in respond to rep 809.	Rep 809 – NHS Southwark		26 March 2010	
TOC89	PC34	70	Strategic Policy 4	Ch	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. <u>Development will help create safe, healthy and mixed communities.</u> "	to clearly reflect the objectives to create safe, healthy and mixed communities.			30 July 2010	
TOC90	PC35	70	Strategic Policy 4	Ch	Under 'We will do this by', amend sixth bullet point to read: " <u>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.</u> Encouraging a healthy lifestyle by supporting the retention and improvement of facilities which promote healthy lifestyles and which promote healthy ways to travel."	refer to role development needs to play in addressing health issues and link to reference to health impact assessment on page 73.			30 July 2010	
TOC91	TOC30	70	Policy 4, we will do this by 7 th bullet	Ch	<u>"in partnership with NHS Southwark"</u>	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	
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, <u>court facilities</u> , places of worship and children's play areas as required by London Plan 3A.18	To provide clarity on the challenges of providing premises for diverse needs			29 July 2010	
TOC93	PC26	71	Strategic policy 4		In 4 th paragraph, insert penultimate sentence. <u>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.</u>	Add sentence about the meeting wide range of needs of equalities / income groups as per SP1			22 July 2010	
TOC94	PC25	71	Strategic Policy	Ch	At the bottom of the 4 th paragraph	Reference to encouraging community			22 July 2010	

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			4		<u>We will encourage better use of 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. 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>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.</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 <u>and</u> 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 • <u>Places used for or in connection with public worship or religious instruction</u>	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 • <u>Public halls and exhibition halls</u> • <u>Law courts</u> • <u>Facilities for the provision of education</u>	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, <u>new infrastructure to allow local health services to grow and adapt to meet future population health needs,</u> 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	

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					with London Plan Policy 3A.21 Locations for health care."					
TOC100	PC27	73	Strategic policy 4	Ch	After 2 nd paragraph <u>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.</u>	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	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: Providing 24,450 <u>net</u> new homes between 2011 and 2026.	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 (<u>including around 1450 net new homes</u>),(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.	To be consistent with the proposed amended Figure 14 page 47			28 July 2010	
TOC105	PC36	75	Strategic policy 5	Ch	The density of developments being within the range set out below Density for both residential and mixed-use development will need to be within the following ranges: <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	

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					<u>residential uses:</u>					
TOC106	TOC14	75	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 <u>London Plan</u> 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	***Our target is in general conformity with the adopted London Plan 2008. We will provide evidence at the <u>London Plan</u> 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	
TOC108	TOC36	76	Policy 5 Figure 20 Housing trajectory	Ch	Updated housing trajectory to cover the 15 years of the core strategy. The revised trajectory is set out in appendix 1 to this table of changes.	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	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</u> , and creating places where people want to live	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 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>	<u>To clarify that Policy 3.11 will continue to be used alongside Policy 5 of the Core Strategy</u>			28 July 2010	
TOC111	PC38	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 currently set out in Section 2.2 of our Residential Design Standards SPD 2008. We may review and update this through our will</u>	To clarify where the existing Exemplary Standard of Design is set out.			28 July 2010	

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					be set out in detail in our Development Management Development Plan Document.					
TOC112	DELETED									
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. <u>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. 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 <u>London Plan</u> 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 <u>a minimum of 8558 net</u> affordable housing units between 2011 and 2026 • Providing <u>a minimum of 665</u> affordable housing units in Bankside, Borough and London Bridge Opportunity Area between 2011 and 2026. • Providing <u>a minimum of 1400</u> 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	

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					Elephant and Castle housing sites between 2011 and 2026. <ul style="list-style-type: none"> Providing <u>a minimum</u> of 875 affordable housing units in Canada Water Action Area between 2011 and 2026. 					
TOC118	AC19	78	Strategic Policy 6	Ch	<ul style="list-style-type: none"> Requiring a minimum of 35% affordable housing units on developments with 10 or more units within Bankside, Borough and London Bridge opportunity area***. Requiring a minimum of 35% affordable housing units on development of 10 or more units outside the opportunity and action area/action area cores.**** We will set minimum affordable housing unit percentages for Canada Water and Peckham and Nunhead action area cores and the Old Kent road and Camberwell action areas in area action plans. <p>Developments of 10 or more units must provide a mix of housing as set out in figure 22 (REVISED FIGURE 22 in appendix J)</p>	<p>To provide clarity on the percentage of affordable housing required in the Elephant and Castle Opportunity area. This percentage is the same as the numerical figure set out in the policy. This changes addresses part of objection 648.</p> <p>The map has been updated to replace figure 22: Affordable and private housing requirements. This is set out in appendix J of this table of changes.</p>	648 (part) 93 (part)	CDAI7 Statement of common ground between the council and Richard Lee CDAI8 statement of Common Ground between the council and Jerry Flynn	2 July 2010	AC16 replaces TOC38
TOC119	PC41	79	Strategic Policy 6	Ch	<p>'We are doing this because', paragraph 2</p> <p>We will set out <u>Our</u> required split between social rented and intermediate housing <u>is being saved in Policy 4.4 of the Southwark Plan. We may review and update this through our Housing Development Plan Document.</u> 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 is being saved in Policy 4.4 of the Southwark Plan. This will help to meet some of the need identified....</p>	To make clearer the link to Policy 4.4			28 July 2010	
TOC120	PC40	79	Strategic Policy 6	Ch	<p>Under 'we are doing this because' 2nd paragraph</p> <p>The same 35% minimum affordable housing policy will apply to both new and replacement housing. <u>We have a strategic priority to encourage as much affordable housing to be</u></p>	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			28 July 2010	

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					<u>built as possible. To enable us to measure our success we have set an overall minimum target of 8558 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 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.</u>	affordable housing across the borough to which the gross area targets will contribute. All the targets are minimums which we will seek to exceed.				
TOC121	TOC14	79	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 <u>London Plan</u> 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	
TOC122	TOC39	80	Strategic Policy 6	Ch	Insert at end of 2 nd para: “ <u>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.</u> ”	We suggest the following wording could be useful as a factual update. This is in response to rep 810.	Rep 810 – NHS Southwark		26 March 2010	
TOC123	PC51	80	Strategic Policy 6	E	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, <u>Nunhead</u> , South Bermondsey and the Lane.	To clarify that Nunhead is included as shown on the map.			6 August 2010	
TOC124	TOC14	81	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 <u>London Plan</u> 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	
TOC125	PC10	82	Strategic Policy 7	Ch	Under “How we will achieve our vision to improve places” add:	To fully reflect the cross-cutting approach to health.			30 July 2010	

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					SO 1C: Be healthy and active					
TOC126	TOC34	82 and 83	Policy 7	Ch	<ul style="list-style-type: none"> At least 20% 3, 4 or 5 bedrooms in the urban zone and the Central Activities Zone except 35where set out above. At least 20% of units with <u>3,4, or 5 bedrooms in the Canada Water Action Area core</u> At least 30% 3,4 or 5 bedrooms in the suburban zone <p>NB Canada Water action plan 'action area core' will be inserted once the Canada Water action area publication/submission version has been adopted for consultation</p>	Canada Water Area Action was approved by Council Assembly on 27 January 2010 whilst the core strategy consultation was already underway. Canada Water Area Action Plan and replaces the draft wording in the core strategy at the time of consultation.			26 March 2010	
TOC127	PC50	82	Strategic Policy 7	E	Amend Figure 23 'how this will look' This is set out in appendix K of this table of changes.	To be consistent with the proposed amended Figure 14 page 47			28 July 2010	
TOC128	PC48	83	Policy 7	Ch	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. <u>We also need to provide larger 2 bedroom units as they often house families due to the affordability of larger homes.</u> We will work with the local community, government, the Greater London Authority, registered social landlords and private developers to do this.	To explain our justification to provide 2 bedroom units. Our evidence base shows there is a large need for more family housing in Southwark. To help meet this need we also need to provide more 2 bedroom units for occupation by smaller families. The 70sqm minimum floor area for 2 bedroom units will help to ensure that the 2 bedroom units are large enough to be occupied by families, and will help reduce overcrowding.			30 July 2010	
TOC129	PC47	84	Policy 7	Ch	We are doing this because Insert 2 nd Paragraph This requirement is set out in our Residential Design Standards supplementary planning document. New housing developments must also provide <u>additional</u> communal play areas for children, as required by the Mayor's	To clarify that the communal play space is additional to the provision of private amenity space			30 July 2010	

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					Supplementary Planning Guidance					
TOC130	PC46	84	Policy 7	Ch	We are doing this because Insert, 3 rd paragraph 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. <u>Our Residential Design Standards SPD (Table 2) sets out minimum floor sizes, including individual room sizes. Policy 7 replaces these overall minimum floor sizes and the individual rooms sizes may be reviewed and updated in the Housing Development Plan Document.</u> This is also a priority for the Mayor...	To make clear the link with the Residential Design standards SPD and Housing DPD			30 July 2010	
TOC131	AC21	86	Policy 8. Our approach is		Development will meet the needs of local universities and colleges for new student housing whilst balancing the building of student homes with other types of housing such as affordable housing and family housing.	Set out in the statement of common ground which has been agreed between the Council and the GLA.		CDAI9 Statement of common ground between the GLA and the council: student housing	2 July 2010	
TOC132	AC20	86	Policy 8: We are doing this because		Since 2005 8 there have been four significant planning permissions for student housing. If these are all built they will provide 979-1796 new student bedrooms. Had these been developed for general needs housing, approximately 360-703 new homes would have been built of which, at least 343 246 would have been affordable homes and at least 98 45 would have been family homes.	Update to reflect student planning applications as set out in the Southwark Student Housing Study (CDH28). This also replaces table of changes reference 86 of the March 2010.			2 July 2010	AC18 replaces TOC40
TOC133	AC22	87	Policy 8 "we are doing this because" section of policy 8.		"By requiring an element of affordable housing or a contribution to affordable housing (<u>as conventional affordable housing as defined in the fact box on page 80</u>) for <u>from</u> student accommodation schemes we can make sure we work towards meeting the needs for both student accommodation and affordable accommodation."	To make the policy more clear that it is referring to affordable conventional housing and not affordable student housing.	119 (part) 50 (part)	CDAI7 Statement of common ground between the council and Richard Lee CDAI8 statement of common ground between the	2 July 2010	

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								council and Gregory Flynn		
TOC134	AC23	87	paragraph 2	CH	By requiring a section 106 agreement we can make sure that the environmental, economic, <u>transport</u> , cultural and social impacts of the development are minimised. This meets the Transport for London objection to include transport in the list rather than to cover this issue under environmental issues.	In order to achieve clarity as to the impacts to be addressed in connection with student housing development (and all types of major development) TfL has asked for reference to be made specifically to transport impacts as well as the other forms of impact which are relevant to such development.	581	CDAI3	12 July 2010	
TOC135	PC42	88	Strategic Policy 9	Error	Under 'we will do this by', 2 nd bullet point, 2 nd sub bullet point: - The impact on the local environment and the character	Typo			28 July 2010	
TOC136	TOC41	88	Figure 24	Er	Amend legend to read <u>Traveller and Gypsy Sites</u> . This is set out in appendix L to this table of changes.	This was requested through the Equalities and Diversity Panel.			26 March 2010	
TOC137	PC43	89	Strategic Policy 9	Ch	Under 'We are doing this because', The criteria set out in this policy will make sure that future sites are suitably located to provide accommodation for Traveller and Gypsies whilst also being in keeping with the surrounding area and neighbouring land uses. <u>Planning permission will be granted provided that these criteria are met.</u> We will manage the need for provision of new Traveller and Gypsy...	To be more consistent with paragraph 2, Annex C of ODPM Circular 01/2006 'Planning for Gypsy and Traveller Caravan sites'			28 July 2010	
TOC138	TOC42	89	Policy 9. Last sentence	Er	We will <u>continue</u> to protect these sites to make sure they remain as homes for Travellers and Gypsies.	Typo as picked up through rep 612.	Rep 612 – Southwark Travellers Action Group		26 March 2010	
TOC139	TOC43	90	Policy 10. Policy objectives	Er	Include the following objective: <u>SO 1A: Create employment and link local people to jobs</u>	Mistakenly missed out of policy 10.			26 March 2010	
TOC140	PC23	91	Strategic Policy 10	Ch	Amend to read: Fact Box: Business Space For the purposes of this policy the term	To provide further clarity on the definition of business space in the policy			21 July 2010	

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					business space refers to <u>space used by B</u> use classes					
TOC141	PC22	92	Strategic Policy 10	Ch	Amend third paragraph to: Released sites will be used for a variety of uses, including office and light industrial uses, residential, and community uses, <u>and social infrastructure, including the police and emergency services.</u>	To strengthen the reference to social infrastructure			21 July 2010	
TOC142	PC11	94	Strategic Policy 11	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	
TOC143	AC24	94	Policy 11	Ch	Amend Bullet point 2 of Policy 11 as follows: "Protecting woodland and trees and improving the overall greenness of places, including through promoting <u>green corridors</u> , gardens and local food growing."	To make clearer the distinction between green links and green corridors as per Mayor's 2002 Biodiversity Strategy.	183	CDAI17 Statement of common ground between council and Friends of Nursery Row Park	2 July 2010	
TOC144	PC56	94	Strategic Policy 11		Amend bullet point 3 as follows: "Promoting and improving access to and links between open spaces, <u>including green chains.</u> "	To be consistent with the terminology used in the London Plan. This will replace suggested change AC25			27 July 2010	AC25
TOC145	AC26	95	Policy 11 "We are doing this because"	Ch	Add bullet after Policy 11 under "We are doing this because": <u>May have historic significance or provide the setting for heritage assets.</u>	Provide clarity on links between open spaces and heritage.	209, 226	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	TOC45
TOC146	PC53	95	Strategic Policy 11	Ch	Amend fourth paragraph under "We are doing this because" as follows: In Southwark this is being achieved in a number of ways, including giving formal protection to over 599ha of open space <u>through the Southwark Plan policies 3.25 - 3.27 which we are saving until we review them through the Development Management DPD. Through our Residential Design Standards SPD and Sustainable Design and Construction SPD we also set out guidance</u>	To make clear the framework of local development documents that help implement our strategy for open spaces.			27 July 2010	

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					<u>for controlling the design of new development to make sure enough open space is provided. We are also saving our design and conservation policies in the Southwark Plan which support our approach to,</u> as well as protecting and improving the greenness of areas through conservation areas and tree preservation and by new landscaping and planting schemes. <u>Our area action plans and area-based SPDs also provide more detail on our approach to open spaces in different places, including schedules of key projects needed to address needs and deficiency.</u>					
TOC147	PC54	95	Strategic Policy 11	Ch	In last paragraph amend first sentence as follows: Southwark's <u>2010</u> Open Spaces Study (2009) looks at the supply of open spaces in the borough. <u>It sets out information on the quality and need for open spaces and identifies areas of deficiency using the London Plan Public Open Space hierarchy.</u>	Clarify evidence base provided by the Open Spaces Study.			27 July 2010	
TOC148	PC55	96	Strategic Policy 11	Ch	Amend second paragraph as follows: New development needs to make a positive contribution to Southwark's green space network to support a growing population. <u>Our Residential Design Standards SPD sets out requirements for housing to provide amenity space on site. Through our S106 Planning Contributions SPD we set out our approach to delivering improvements to open spaces through planning contributions and project banks. This includes negotiating additional contributions in areas of open space deficiency.</u> In a very urban area like Southwark creating large new spaces can be challenging. Alongside the Open Spaces Study we are developing an Open Spaces Strategy (2010) that <u>will</u> sets out a range of actions for <u>addressing deficiency</u> , supporting growth and <u>positively contributing</u> to the open space network. This is focused on improving the quality of existing spaces so that they can be better used, merging or improving links	To make clear our approach to delivering our open space strategy.			27 July 2010	

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					between smaller spaces so that people have easy access to a range of activities and facilities, removing barriers to accessing spaces so more people can use them, and planting street trees to help green areas and provide habitat. We will work with the community including Friends Of Groups, the GLA, Groundwork UK, developers, landowners and business improvement districts to implement to Open Space Strategy. <u>Within our area action plans, SPDs and development management DPD we will set out standards and actions for how we will address open space deficiency and the needs of a growing population in different areas. This will be informed by our Open Spaces Strategy.</u>					
TOC149	AC27	96	Fact Box: Sites of Importance for Nature Conservation (SINCs)	E	Amend last sentence to read: "We have identified 77 <u>74</u> SINCs on the proposals map covering more than <u>500ha</u> 513ha... "	Correction			2 July 2010	
TOC150	TOC46	96	Policy 11	Ch	Add to the last paragraph: We will identify further green chasing through planning documents including the area action plans for Aylesbury, Canada Water, Old Kent Road, Camberwell and Peckham and Nunhead. <u>This will build on the work and achievements of local groups to develop green links, including East Walworth Green Links, Bankside Urban Forest, Southwark Living Streets and Southwark Cyclists BARGES.</u>	Recognise work of local groups to promote green links, to support deliverability of this policy. This is in response to rep 183.	Rep 183 – Friends of Nursery Row Park		26 March 2010	
TOC151	PC52	97	Strategic Policy 11	Ch	Under "We are doing this because" insert the following after the second paragraph: <u>Local food growing and composting help promote healthy lifestyles and reduce the environmental impact of food consumption.</u> We are looking at ways to encourage local food growing <u>and composting</u> in Southwark, including how existing spaces may be used. It will be important for new development to include opportunities for local food growing, community gardening <u>and composting</u> where possible. We will prepare detailed design	To make clearer the importance of local food growing and composting. This will replace previous proposed change AC28.			27 July 2010	AC28

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					policies covering this.					
TOC152	PC57	97	Strategic Policy 11		Insert new paragraph after last paragraph <u>Geodiversity influences our landscapes and heritage. It is the variety of rocks, minerals, fossils, soils and landscapes, together with the natural processes that form them. Within Southwark, we do not have any nationally or regionally important geological sites. Dulwich Mill Pond could have local geological importance. We already protect this as MOL and SINC. A Geodiversity Action Plan is being developed for London by the London Geodiversity Partnership. This will help us prepare detailed policies and guidance on how development should consider geodiversity.</u>	To make clear how PPS9 and London plan geodiversity policies apply in Southwark.			29 July 2010	
TOC153	PC12	98	Strategic Policy 12	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	
TOC154	AC29	98	Policy 12	Ch	Amend first bullet point of Policy 12 as follows: Expecting development to preserve <u>conserve</u> or enhance <u>the significance of</u> Southwark's <u>heritage assets, their settings and wider</u> historic environment, including conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens, <u>world heritage sites</u> and scheduled monuments.	To be consistent with PPS5.	207, 771, 772	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	TOC47
TOC155	AC30	98	Policy 12	Ch	Amend third bullet point of Policy 12 as follows: Making sure that the height and design of development protects <u>conserves</u> and enhances strategic views and is appropriate to its context, <u>the historic environment</u> and important local views.	To be consistent with PPS5.	208, 771	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	TOC48
TOC156	AC31	98	Policy 12	Ch	Amend fourth bullet point as follows: Requiring tall buildings to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. Appropriate Locations where tall buildings could go are in	To provide more clarify on approach and be consistent with CABE/English Heritage Tall Buildings Guidance.	772, 227	CDAI 13 Statement of common ground between council and	12 July 2010	

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					London Bridge.....			English Heritage		
TOC157	TOC49	98	Figure 27	Ch	Amend figure to show St Paul's Cathedral and the World Heritage Sites of Tower of London and Palace of Westminster. This is set out in appendix M of this table of changes.	English Heritage requested this be shown. This is in response to rep 215.	Rep 215 – English Heritage		26 March 2010	
TOC158	TOC50	98	Figure 27	Ch	Amend figure to show the new adopted Kings Reach conservation area and amendment to Bermondsey conservation area. This is set out in appendix M of this table of changes.	12 January 2010 Planning Committee approved these conservation areas. These will be factual updates to the figure 27.			26 March 2010	
TOC159	AC32	98	Figure 27	E	Add Dulwich Village Archaeological Priority Zone to map. This is set out in appendix M of this table of changes.	Dulwich Village Archaeological Priority Zone is missing from the map			2 July 2010	
TOC160	PC70	100	Strategic Policy 12	Ch	Add in reference to London Plan policy in last sentence; This is in line with London Plan policies 4B.8, 4B.9, 4B.11 and 4B.13	Factual update as the London Plan policy is relevant to this policy.	CDCS1		27 July 2010	
TOC161	PC72	100	Strategic Policy 12	Ch	Change first sentence of Factbox: Southwark Design Review Panel The council have established an external 'design review panel' to provide advice on large scale proposals. To: The council have established an <u>independent</u> 'design review panel' to provide advice on large scale proposals.	Updated to provide clarity			27 July 2010	
TOC162	PC69	100	Strategic Policy 12	Ch	Amend wording of the first sentence, paragraph 5; Policy 4B.9 of the London Plan indicates the Mayor's positive approach to the construction of tall buildings...	Updated to provide clarity			27 July 2010	
TOC163	AC33	101	Policy 12 "We are doing this because"		Amend text after Policy 12 as follows: In the wrong locations tall buildings can be overbearing and out of character. They also need very good access to public transport to support the numbers of people who live and	To provide more clarity on approach and be consistent with CABE/English Heritage Tall Buildings Guidance.	772, 227	CDAI 13 Statement of common ground between	12 July 2010	TOC51

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					<p>work in them. For these reasons we are focusing tall buildings in the area <u>the locations that could accommodate tall buildings are limited to the area</u> around London Bridge Station east of Borough High Street, Elephant and Castle and the northern end of Blackfriars Road. The core part of Peckham, Canada Water and Aylesbury action areas could also be suitable for tall buildings as these areas also have good transport links and have large development opportunities. However, there are likely to be areas sensitive to tall buildings within all the above locations and <u>we will work with the GLA, English Heritage and CABE to prepare detailed guidance for appropriate tall building locations, heights and design in planning documents covering each of these areas, taking into account characteristics that may make them sensitive to tall buildings, including heritage assets and wider historic context.</u></p> <p>In other areas are sensitive to tall buildings are not appropriate <u>because they are not very built up, do not have good public transport access, are covered by conservation areas or have other heritage asset implications.</u></p>			council and English Heritage		
TOC164	AC34	101	Fact Box: Tall buildings	Ch	<p>Amend the definition of tall buildings as follows: Tall buildings are those which are higher than 30 metres (or 25 metres in the Thames Policy Area) <u>and/or which significantly change the skyline</u>. 30 metres is approximately the height of a 10 storey block of flats or a 7-10 storey office building. In areas which have a low scale character, any building that is significantly higher than surrounding buildings will be regarded as a tall building even if it is lower than 30 metres.</p>	To be consistent with CABE/English Heritage Guidance on tall buildings.	773	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	
TOC165	PC13	102	Strategic Policy 13	Ch	<p>Under "How we will achieve our vision to improve places" add: SO 1C: Be healthy and active</p>	To fully reflect the cross-cutting approach to health.			30 July 2010	
TOC166	TOC52	102	Policy 13		<p>Amend 4th bullet point as follows:</p> <ul style="list-style-type: none"> Increasing recycling and composting, <u>minimising waste</u>, reducing landfill and making more use of waste as a resource. 	To update the figures based on new information. This is in response to reps 66, 677, 559	Rep 66 – GOL Rep 677 and 559 –		26 March 2010	

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					By 2015 we will be recycling and composting at least 45% of municipal waste, <u>50% by 2020 and aspiring to achieve 60% by 2031.</u> And by 2025 <u>at least 70% of commercial and industrial waste.</u> We are aiming to meet the Mayor's target of recycling or reusing 95% of construction, excavation and demolition waste by 2020.		GLA			
TOC167	PC66	102	Strategic Policy 13	Ch	6 th bullet point under "We will do this by" <ul style="list-style-type: none"> Working jointly with Bromley, Bexley, Greenwich and Lewisham to collectively manage more of our waste and <u>We will</u> meet the London Plan waste apportionment target set for Southwark of managing at least 243,000 tonnes of waste by 2016 and at least 275,000 tonnes by 2021 and at least 343,000 tonnes by 2031. <u>We will implement this though a DPD and our Waste Management strategy.</u> We are building a state of the art resources centre at Old Kent Road to help us meet this target and together with Bromley, Bexley, Greenwich and Lewisham. <u>We</u> have set aside enough facilities and land to make sure we can fully meet our targets. 	To remove reference to the other South east London boroughs.				TOC52
TOC168	TOC53	102	Policy 13	Ch	Bullet 8: Setting high standards <u>and supporting measures</u> for reducing air, land, <u>water</u> , noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work. This includes making sure developments are designed to cope with climate conditions as they change during the development's lifetime.	Thames Water, the Environment Agency and Government Office for London set out that we should provide more support for measures to reduce water pollution, such as the Thames Tunnel (reps 756 and 22)	Rep 756 - Environment Agency Rep 22 – Thames Water Utilities		26 March 2010	
TOC169	PC62	103	Strategic Policy 13	Ch	Insert new sentence after third paragraph <u>Through schemes like Peckham Low Carbon Zone and other energy efficiency programmes we will target the retro-fitting of existing buildings in the borough. We will investigate how this could be supported through measures such as community energy funds.</u>	To provide reference to retro-fitting			29 July 2010	

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TOC170	PC59	105	Strategic Policy 13	Ch	After first sentence, first paragraph insert new text: <u>The way we manage waste should follow the waste hierarchy, which means reducing, reusing, recycling and recovering.</u>	To ensure reference to the waste hierarchy is included			29 July 2010	
TOC171	PC60	105	Strategic Policy 13	Ch	End of first paragraph insert new text: <u>Our Waste Management Strategy sets out a sustainable approach to dealing with waste from different sources across the borough</u>	To provide further clarity			29 July 2010	
TOC172	PC63	105	Strategic Policy 13	Ch	Third paragraph Policy 4A.25 of the London Plan states that boroughs can collaborate by pooling their apportionment requirements. To make sure we meet our targets we have prepared a Joint Waste Technical Paper with Bromley, Bexley, Greenwich and Lewisham which we will agree with the Mayor and Government Office for London. This provides the detail of how working together we will meet our apportionment target, including which sites and what types of facilities we will use to do this. It demonstrates that there is enough combined capacity across these boroughs to meet the Mayor's target for these boroughs. The Joint Waste Technical Paper covers the period up to 2025 and shows that we will continue to meet the apportionment target beyond 2020.	To remove reference to the Joint Waste Technical Apportionment paper			29 July 2010	TOC52
TOC173	PC67	105	Strategic Policy 13	Ch	Fourth paragraph This will be investigated further in the Joint Waste Technical Paper along with a DPD setting out details of how the remaining land at Old Kent Road will be developed to help us meet our target.	To remove reference to the Joint Waste Technical Apportionment paper				TOC52
TOC174	PC68	105	Strategic Policy 13	Ch	Fourth paragraph There will be enough land left to allow us to expand the waste processing facilities so that we can process at least 286,200 <u>256,000</u> tonnes of waste per annum in total on the site until 2020, though changing technology and	To reflect changes to the apportionment capacity as agreed with the GLA.				

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					falling levels of waste may mean this is not required to meet our apportionment target.					
TOC175	PC58	106	Strategic Policy 13	Ch	Include new reference in text after first paragraph: <u>We will work with the Mayor to plan for the storage and treatment of hazardous waste in London in accordance with Policy 4A.29</u>	To be consistent with Policy 4A.29 of the London Plan			29 July 2010	
TOC176	TOC54	106	Policy 13	E	After third paragraph, insert: <u>As outlined in the Thames River Basin Management Plan, Thames Water is developing plans for a Thames Tunnel, a scheme to reduce and limit pollution from the sewerage system for the whole of London, in order to comply with EU Urban Waste Water Treatment Directive (1991).</u>	Correct reference to role of Thames Tunnel in reducing water pollution. This is in response to reps 22, 135 and 757).	Rep 22 – Thames Water Utilities, Rep 135 – Camberwell New Road Regenerations, Rep 757 – Environment Agency		26 March 2010	
TOC177	TOC55	107	Policy 13	E	Delete: 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. However the levels of growth expected in Southwark will require new development to be properly designed so as not to increase the risk of flooding in local areas.	Correct reference to role of Thames Tunnel in reducing water pollution. This is in response to reps 22, 135 and 757.	Rep 22 – Thames Water Utilities, Rep 135 – Camberwell New Road Regenerations, Rep 757 – Environment Agency		26 March 2010	
TOC178	PC61	108	Strategic Policy 13	Ch	Under heading 'Targets': Delete 'must' Amend wording: These are the targets development must <u>will be expected to meet</u>	To be consistent with PPS1 in terms of flexibility			29 July 2010	
TOC179	PC65	108	Strategic Policy 13	Ch	Policy 13 Page 108 Under Targets, add new bullet point: • <u>"New health facilities must be BREEAM "excellent" and any refurbishment should achieve BREEAM "very good."</u>	To be consistent with Department of Health requirements for new healthcare buildings.			30 July 2010	

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TOC180	TOC56	110	Policy 14	Ch	Amend 5 th bullet point as follows: Working with infrastructure providers to identify and deliver elements of infrastructure <u>required</u> to support growth and <u>deliver environmental improvements at the right time</u>	Ensure policy recognises that infrastructure is not just required to support growth.			26 March 2010	
TOC181	PC73	112	Strategic Policy 14	Ch	Amend wording under heading <i>Infrastructure</i> , 4 th paragraph: New development in the borough needs to be supported by adequate infrastructure. This includes social infrastructure such as schools, health, <u>facilities for the emergency services, including the police,</u> and other community facilities, transport infrastructure, green infrastructure such as park and open spaces, and energy, telecoms and utilities infrastructure.	To strengthen the reference to social infrastructure			27 July 2010	
TOC182	TOC57	113	Implementation: we are doing this because: planning obligations	Ch	Through implementing this SPD we secure financial contributions to mitigate the impacts of development. <u>We will be updating and revising this SPD during 2010.</u> Our most recent...	The Local Development Scheme has subsequently been agreed with Government Office for London. This includes a new section 106 planning obligations SPD.			26 March 2010	
TOC183	TOC58	113	Implementation: we are doing this because: planning obligations	Ch	Our most recent section 106 Annual Monitoring Report shows that we secured <u>negotiated</u> approximately £23,716,807 <u>£45 million during 2008-2009.</u> 2007-08. £19,381,738 has already been committed or spent of which large amounts of the money (£17,694,667) was spent in- <u>Of this money, the highest £15,239,405 was secured from Bankside and Borough, with significant sums coming from Bermondsey, Walworth and Rotherhithe.</u>	The 2008/2009 section 106 Report is now available and this section should be updated to reflect this.			26 March 2010	
TOC184	TOC59	114	Table 1	Er	Insert the following title for table 1. <u>Table 1 – Delivery and implementation plan for improving our places by policy</u>	Printing error. The title was mistakenly missed off the page.			26 March 2010	
TOC185	TOC60	114-173	Implementation, delivery and infrastructure tables 1 and 2	Ch	Within the heading of PHASING, insert the following wording PHASING (ongoing unless specified.) <u>(Where it has been demonstrated that new infrastructure is required to enable this to proceed this is set out below.)</u>	Government Office for London (reps 60 and 800) set out that we should be more specific in when infrastructure is essential for the development.	Rep 60 and 800 - GOL		26 March 2010	

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TOC186	PC33	121	Strategic Policy 4	Ch	Amend section 'Who will be involved': Government, Southwark Council, Southwark Schools for the future, Local communities, Southwark Alliance, Primary Care Trust, Her Majesty's Court Service , Sport England, voluntary and community sector, private developers, Fusion.	To recognise HMCS as those organisation which will help deliver infrastructure			29 July 2010	
TOC187	TOC61	123	Table 1, Policy 4	Ch	Insert following wording relating to London Bridge Hospital Under the heading "Delivery and Infrastructure": <u>Expansion to the London Bridge Hospital</u> Under the heading "Phasing": <u>2015</u> Under the heading "Who will be involved": <u>HCA International Ltd (London Bridge Hospital), local landowners and developers</u>	Provide further detail on delivery of objective for improving health facilities. This change is in response to reps 476 and 481.	Rep 476 and 481 – HCA international		26 March 2010	
TOC188	AC35	126	table 2		Under target "4200 homes In the Aylesbury action area (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) 93 (part)	CDAI7 Statement of common ground between the council and Richard Lee CDAI8 Statement of common ground between the Council and Gregory Flynn	2 July 2010	
TOC189	TOC65	135	Table 2, Bankside, Borough and London Bridge	Ch	Insert following wording relating to London Bridge Hospital Under the heading "Delivery and Infrastructure": <u>Expansion to the London Bridge Hospital</u> Under the heading "Phasing": <u>2015</u>	Provide further detail on delivery of objective for improving health facilities. This in response to reps 476 and 481.	Rep 476 and 481 – HCA international		26 March 2010	

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					Under the heading "Who will be involved": <u>HCA International Ltd (London Bridge Hospital), local landowners and developers</u> Under the heading "Funding": <u>HCA International Ltd</u>					
TOC190	AC36	137	Table 1 – implementation, delivery and infrastructure		Development plan documents <u>and supplementary planning documents</u> Development management DPD and Housing DPD will set out more detailed policies for student housing. <u>The section 106 SPD will also provide further information on how we will implement the policy</u>	To reflect the proposed changes to the Local Development Scheme.			2 July 2010	
TOC191	PC81	142	Strategic Policy 14 Table 1	Ch	Under 'who will be involved' column, add: <u>London Geodiversity Partnership.</u>	Factual change			29 July 2010	
TOC192	PC82	144	Strategic Policy 14 Table 1	Ch	Under "Delivery and infrastructure" column add beneath first row: <u>A Geodiversity Action Plan is being developed for London by the London Geodiversity Partnership.</u>	To make reference to work being carried out to implement PPS9			29 July 2010	
TOC193	TOC62	146	Table 1 Policy 12	Ch	Amend target as follows: Increase in the number of listed items <u>designated heritage assets</u> and reduction in number of <u>heritage assets</u> buildings at risk. Under heading "delivery and infrastructure" change reference to "historic areas" to "heritage assets"	To be consistent with national policy. This is in response to rep 228.	Rep 228 – English Heritage		26 March 2010	
TOC194	TOC63	151	Table 1, Policy 13	E	"Under the heading "Delivery and infrastructure" The Thames Tunnel is being developed to help manage sewerage <u>improve water quality in the River Thames.</u>	Reflect the correct role and purpose of the Thames Tunnel. This is in response to reps 22, 135 and 757.	Rep 22 – Thames Water Utilities, Rep 135 – Camberwell New Road Regenerations, Rep 757 – Environment Agency		26 March 2010	
TOC195	PC74	153	Strategic Policy	Ch	Add after the heading 'Borough, Bankside	To ensure there is a cross reference			29 July 2010	

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			14		and London Bridge Opportunity Area' <u>The Borough, Bankside and London Bridge SPD provides further detail.</u>	to lower order DPDs and SPDs for implementation purposes				
TOC196	TOC64	153	Table 2.	Ch	Amend wording: Through the Borough, Bankside and London Bridge Supplementary Planning Document setting out more detailed policies <u>detail to support the policies</u> on homes.	Government Office for London (rep 76) asked for clarification in line with PPS12.	Rep 76 – GOL		26 March 2010	
TOC197	PC75	158	Strategic Policy 14	Ch	Add after the heading 'Elephant and Castle Opportunity Area' <u>The Elephant and Castle SPD provides further detail</u>	To ensure there is a cross reference to lower order DPDs and SPDs for implementation purposes			29 July 2010	
TOC198	AC37	160	second column of the table against the words "Transport Improvements":	CH	<u>Supplementary planning documents Through the Elephant and Castle Supplementary Planning Guidance (2004) and the Enterprise Quarter Supplementary Planning Document (2008) setting out more detailed policies on transport.</u>	To enable a statement of common ground to be prepared with TfL	567	CDAI3	12 July 2010	
TOC199	AC38	160	third column in that line of the table	Ch	<u>Development will be phased to ensure that funding is available to provide the transport capacity needed in time to accommodate the new residents, businesses, retail and leisure activities.</u>	To enable a statement of common ground to be prepared with TfL	567	CDAI3	12 July 2010	
TOC200	PC76	162	Strategic Policy 14	Ch	Add after the heading 'Canada Water action area' <u>The Canada Water AAP provides further detail</u>	To ensure there is a cross reference to lower order DPDs and SPDs for implementation purposes			29 July 2010	
TOC201	PC77	166	Strategic Policy 14	Ch	Add after the heading 'Aylesbury action area' <u>The Aylesbury AAP provides further detail</u>	To ensure there is a cross reference to lower order DPDs and SPDs for implementation purposes			29 July 2010	
TOC202	AC39	166	table 2 Under target		4200 homes (<u>including around 1450 net new homes</u>) (including 2758 replacement 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	
TOC203	PC78	170	Strategic Policy 14	Ch	Amend wording of heading Peckham and Nunhead area action plan <u>action area</u>	To ensure there is a cross reference to lower order DPDs and SPDs for implementation purposes			29 July 2010	

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					Add after the heading 'Peckham and Nunhead action area' <u>The Peckham and Nunhead AAP provides further detail</u>					
TOC204	PC80	173	Table 2	Ch	Amend reference in 'Delivery and Infrastructure' column: Infrastructure Provision Improvements to parks and open spaces, including Peckham Rye and Burgess Park, drawing on the Open Spaces Strategy- 2009 2010	Factual change			29 July 2010	
TOC205	TOC66	197	Appendix A figure 30		Update figure 30 to reflect the new LDS. This is set out in appendix N to this table of changes	The LDS has recently been agreed with GOL. This diagram needs to be updated to reflect these changes.			26 March 2010	TOC1
TOC206	TOC67	202	Appendix B	Ch	Insert table to provide clarity on the different targets. This is set out in appendix O to this table of changes.	This table will provide clarity on the different targets in the adopted and draft London Plans, the Southwark Plan and the core strategy. This is in response to a number of representations asking for clarification on which targets will be using.			26 March 2010	
TOC207	AC40	209	Appendix B Table 4	Ch	Add reference to PPS5 against Objective 2F	To be consistent with national policy.	229	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	TOC68
TOC208	PC79	212	Appendix B Table 4	Ch	Add in column 'London Plan Policies and Objectives': <u>3C.12A New cross-London links within an enhanced London National Rail network</u> <u>Mayor of London Supplementary Planning Guidance</u> <u>'Use of planning obligations in the funding of Crossrail'</u>	Factual change to include reference to the current Cross Rail Policy in the London Plan and the SPG			29 July 2010	
TOC209	AC42	219	Appendix B Table 4	E	<u>Add Borough-wide Tall Building Study under "Southwark Evidence Base Studies" column</u>			CDAI 13 Statement of	12 July 2010	

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					<u>against Policy 12</u>			common ground between council and English Heritage		
TOC210	AC40	219	Appendix B Table 4	Ch	Add reference to PPG15 and PPG16 PPS5 against Policy 12	To be consistent with national policy.	229	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	TOC68
TOC211	PC44	220	Appendix B, Table 4	Ch	Within 'Southwark Plan Policies and Objectives', Delete Policy 3.21 Strategic Views	To make the link between saved policies and the core strategy clearer			28 July 2010	
TOC212	AC41	220	Table 4, appendix B	Er	Amend Southwark Plan policy 3.21 to read as it is not being saved.	Correct error			12 July 2010	TOC76
TOC213	PC44	221	Appendix B, Table 4	Ch	Within 'Southwark Plan Policies and Objectives', Delete Policy 3.5 Renewable Energy	To make the link between saved policies and the core strategy clearer			28 July 2010	
TOC214	PC44	223	Table 4, Appendix B	Ch	Amend text in key The policy or part of the policy will be kept ("saved") as is it is consistent with the core strategy and up-to-date The policy will be replaced or is made redundant by the core S strategy once it is adopted	To make the link between saved policies and the core strategy clearer			28 July 2010	
TOC215	PC21	228		Ch	In the glossary Remove definition of Employment uses Uses falling within Class B1, Class B2 and Class B8 of the Use Classes Order. These include offices, factories and warehouses (see Use Classes Order. Add in <u>Business Space Space occupied by businesses falling within Class B1, Class B2 and Class B8 of the Use Classes Order. These include offices, factories and warehouses (see Use Classes Order.</u>	For consistency.			21 July 2010	

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TOC216	AC43	229	Glossary	Ch	<p>Delete definition of Heritage and replace with:</p> <p>Heritage Assets: <u>A component of the historic environment positively identified as having a degree of significance. They include designated heritage assets (including World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, and Conservation Areas) and non-designated heritage assets such as locally listed buildings.</u></p> <p>Historic Environment: <u>All aspects of the environment resulting from the interaction between people and places through time including areas of local distinctiveness, open spaces of heritage value, known and potential archaeological remains.</u></p>	To be consistent with PPS5.	207, 771, 772	CDAI 13 Statement of common ground between council and English Heritage	12 July 2010	TOC72
TOC217	TOC69	229	Glossary	CH	<p>Update the glossary definition of intermediate housing to read:</p> <p>Housing which costs more than the maximum social housing rents, but is cheaper than housing on the open market. At the moment this is reserved for households on incomes of between £17,600 and £58,600 <u>less than £57,600 (as at August 2008 February 2010 to be reviewed annually to reflect changes in lower quartile house prices). We will update these figures annually.</u></p>	This is updated to reflect the most up to date GLA AMR.			26 March 2010	
TOC218	TOC70	231	Glossary	CH	<p>Update the glossary definition of social rented housing to read:</p> <p>Affordable housing which is affordable by all those in housing need. This is typically provided as rented accommodation through the local authority or a Registered Social Landlord and rents that can be charged are set by the Government. <u>that is owned and managed by local authorities or registered social landlords, or provided by other bodies under equivalent rental arrangements agreed with them as a condition of public sector investment grant, and for which guideline target rents are determined through the national rent regime.</u></p>	This is updated to reflect the most up to date GLA AMR.			26 March 2010	
TOC219	PC31	231	Glossary	Ch	Amend definition Social infrastructure includes healthcare and	To reflect the use classes order			22 July 2010	

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					social care, safety and security, policing facilities, emergency services and courts...					
TOC220	TOC71	232	Glossary	Er	Update the glossary definition of strategic cultural areas to read: Parts of the borough thought most suitable for new art, cultural, and visitor attraction uses to be created. <u>These areas are shown on the proposals map.</u>	To make the glossary more clear.			26 March 2010	
TOC221	TOC73		Change to proposals map. Proposal map update E13.	E	New Camberwell Cemetery Boundary. Change wording to say not a change in designation on the SINC/Mol boundary but to correct a printing error in the Southwark Plan proposal maps. This is shown on appendix P to this table of changes.	To correct a printing error on the Southwark Plan proposals map through the update to the proposals map as part of the core strategy.			26 March 2010	
TOC222	TOC74		Changes to proposals map.	Ch	Insert new maps to the proposed schedule of changes to the proposals map to show the new adopted Kings Bench conservation area and the amendment to Bermondsey conservation area. This is shown on appendix M of this table of changes.	12 January 2010 Planning Committee approved these conservation areas. These will be factual updates to the proposals map.			26 March 2010	
TOC223	PC15		Changes to proposals map.	E	Amend Proposals Map – Canada Water action area core This is shown on appendix Q of this table of changes.				30 July 2010	
TOC224	TOC44		Changes to proposals map.	Ch	Change designation of OS120 Crossbones Graveyard (Map N27) to reflect known boundary of burial ground. This is set out in appendix R to this table of changes.	Response to representation from Transport for London (reps 435, 438, 439, 455, 457, 459, 461).	Reps 435, 438, 439, 455, 457, 459, 461 – Transport for London		26 March 2010	

Appendix B

Inspector's Recommended Changes

IC1:

Change SP5, page 75:

Third bullet point to read as follows:

*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 1100 habitable rooms per hectare;*
- *Urban Zone: 200 to 700 habitable rooms per hectare;*
- *Suburban Zones – North, Middle and South: 200-350 habitable rooms per hectare.*

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.

Amend the supporting text upon page 77 to read as follows:

*"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 so we can make sure 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.**"*

IC2:

Change the final sentence of SP7 and delete the gross internal area table upon page 83 which begins:

~~*"All developments must meet the following minimum overall floor sizes:"*~~

for

"All developments will be expected to meet the Council's minimum overall floor sizes."

Amend the text in the final paragraph on page 84 to read as follows:

*"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 is currently consulting on a London Housing Design Guide requiring 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 SPD.***

IC3:

The final sentence within the SINC's Fact Box upon page 96 to be changed as follows:

~~*"We have identified 77 SINC's on the proposals map covering 513ha, though more may be identified through future planning documents."*~~

for

"SINC's are identified upon the proposals map; more may be identified through future planning documents."

General Clarifications

The Council has indicated a preference for two extracts of the main report, following its 'fact check', to be repeated within this appendix. These should be considered within the context of the overall report. In the interests of clarity and consistency, paragraph 78 relating to the Canada Water Core Area/town centre boundary and paragraph 111 relating to open space and the proposals map are duly included below:

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 Q¹ which indicates specifically the proposed Action Area Core Boundary.

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.

¹ CDAI36