

# Appendix D

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

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

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)
<b>Appendix D</b>	<b>Core strategy publication/submission version consultation report (available in the members offices and on the internet)</b>
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)

# REVITALISE



## Core strategy

CDCS16 Consultation Report

March 2010



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(these are available on our website at:

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## **1. INTRODUCTION**

### **1.1 Purpose of this consultation report**

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

1.1.2 This report is structured as follows

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

### **1.2 The consultation strategy and the objectives of the consultation**

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

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

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

1.2.4 We set out that we will produce a consultation plan and report for each stage of consultation and how we give feedback on the comments we receive.

1.2.5 We prepared the consultation by following the requirements set out in our statement of community involvement, and at each stage of the core strategy preparation we have met or exceeded the minimum requirements.

1.2.6 Our consultation strategy can be viewed at:  
<http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/plannin gpolicy/localdevelopmentframework/corestrategy.html>

### **1.3 What is the core strategy?**

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

1.3.2 The core strategy is one of a set of planning documents, called the local development framework. The core strategy is one of the most important documents in the local development framework. It sets out our approach to development and planning across the whole of Southwark and sets out the strategic policies we will use to make decisions on planning applications.

### **1.4 How we have prepared the core strategy**

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

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

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

## **2. WHO AND HOW WE CONSULTED**

### **2.1 The process and stages of consultation**

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

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

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

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

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

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

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

## **2.2 Who we consulted**

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



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

### 2.3 Methods of consultation at each stage

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

#### *Timescales of consultation on each stage of the core strategy*

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

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

*Scoping report and issues and options consultation*

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

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

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

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

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

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

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

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



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

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

*Publication/submission stage*

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

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

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

### **3. SUMMARY OF COMMENTS MADE ON THE CORE STRATEGY**

#### **3.1 Introduction**

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

#### **3.2 Issues and options consultation**

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

##### 3.2.2 Summary of comments

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

##### 3.2.3 Vision and objectives

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

##### 3.2.5 Living in Southwark

###### Overall approach to housing

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

###### Amount of housing and where it should be located

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

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

#### Affordable housing and tenure mix

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

#### Family housing

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

#### Student housing

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

#### Wheelchair housing

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

### Housing for Gypsies and Travellers

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

### 3.2.5 Working in Southwark

#### Protecting office space

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

#### Protecting industrial land

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

#### Protecting creative and cultural industries

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

#### Tourism

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

#### New shops

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

#### Cafe's, bars & restaurants

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

### 3.2.7 Community facilities

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

### 3.2.7 Sustainable Southwark

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

### 3.2.8 Aylesbury & Walworth

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

### 3.2.9 Bankside & Borough

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

### 3.2.10 Bermondsey & Old Kent Road

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

### 3.2.11 Camberwell

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

### 3.2.11 Canada Water and Rotherhithe

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



### 3.2.13 Central Activities Zone

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

### 3.2.14 Dulwich & Herne Hill

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

### 3.2.15 Elephant & Castle

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

### 3.2.17 Peckham

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

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

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

### 3.2.18 Vision and objectives

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

### 3.2.19 Living in Southwark Council

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

### 3.2.20 Working in Southwark Council

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

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

### 3.2.21 Community facilities

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

### 3.2.22 Sustainable Southwark

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

### 3.2.23 Areas in Southwark

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

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

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

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

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

### **3.3 Preferred options consultation**

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

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

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

#### Challenges

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

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

3.3.4 The other comments that have been addressed are:

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

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

### Vision

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

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

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

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

3.3.7 The other comments that have been addressed are:

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

### Themes and objectives

3.3.8 The GLA comments that have been addressed are:

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

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

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

3.3.10 The other comments that have been addressed are:

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

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

### Areas

3.3.11 The GLA comments that have been addressed are:

- All area approaches welcomed.

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

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

3.3.13 The other comments that have been addressed are:

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

### Central Activity Zone

3.3.14 The GLA comments that have been addressed are:

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

3.3.15 The other comments that have been addressed are:



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

### Bankside, Borough and London Bridge

3.3.16 The GLA comments that have been addressed are:

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

3.3.17 The other comments that have been addressed are:

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

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

### Elephant and Castle

3.3.18 The GLA comments that have been addressed are:

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

3.3.19 The other comments that have been addressed are:

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

### Canada Water

3.3.20 The GOL comments that have been addressed are:

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

3.3.21 The other comments that have been addressed are:

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

### Peckham and Nunhead

3.3.22 The GLA comments that have been addressed are:

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

3.3.23 The GOL comments that have been addressed are:

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

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

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

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

3.3.25 The other comments that have been addressed are:

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

#### Aylesbury

3.3.26 The other comments that have been addressed are:

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

#### Camberwell

3.3.27 The other comments that have been addressed are:

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

#### The Blue

3.3.28 The other comments that have been addressed are:

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

#### Old Kent Road regeneration area

3.3.29 The other comments that have been addressed are:

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

#### Herne Hill

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

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

#### Strategic policies – general

3.3.31 The GLA comments that have been addressed are:

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

#### Policy 1 Sustainable development

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

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

3.3.33 The other comments that have been addressed are:

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

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

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

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

### Policy 2 Sustainable transport

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

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

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

3.3.35 The GOL comments that have been addressed are:

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

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

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

3.3.37 The other comments that have been addressed are:

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

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

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



### Policy 3 Shopping, leisure and entertainment

3.3.38 The GLA comments that have been addressed are:

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

3.3.39 The GOL comments that have been addressed are:

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

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

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

3.3.41 The other comments that have been addressed are:

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

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

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

#### Policy 4 Places to learn and enjoy

3.3.42 The GLA comments that have been addressed are:

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

3.3.43 The GOL comments that have been addressed are:

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

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

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

3.3.45 The other comments that have been addressed are:

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

#### Policy 5 Providing new homes

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

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

3.3.47 The GOL comments that have been addressed are:

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

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

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

3.3.49 The other comments that have been addressed are:

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

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

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

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

### Policy 6 Homes for people on different incomes

3.3.50 The GLA comments that have been addressed are:

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

3.3.51 The GOL comments that have been addressed are:

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

3.3.52 The other comments that have been addressed are:

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

#### Policy 7 Family housing

3.3.53 The GLA comments that have been addressed are:

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

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

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

3.3.55 The other comments that have been addressed are:

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



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

### Policy 8 Student housing

3.3.56 The GLA comments that have been addressed are:

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

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

3.3.58 Other comments that have been addressed are:

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

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

#### Policy 9 Homes for Gypsies and travellers

3.3.59 The GLA comments that have been addressed are:

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

3.3.60 Other comments that have been addressed are:

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

#### Policy 10 Jobs and business

3.3.61 The GLA comments that have been addressed are:

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

3.3.62 The GOL comments that have been addressed are:

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

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

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

3.3.64 The other comments that have been addressed are:

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

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

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

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

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

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

#### Policy 11 Open spaces and wildlife

3.3.65 The GLA comments that have been addressed are:

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

3.3.66 The GOL comments that have been addressed are:

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

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

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

3.3.68 The other comments that have been addressed are:

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

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

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

#### Policy 12 Design and conservation

3.3.69 The GLA comments that have been addressed are:

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

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

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

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

3.3.71 The other comments that have been addressed are:

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



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

### Policy 13 High Environmental Standards

3.3.72 The GLA comments that have been addressed are:

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

3.3.73 The GOL comments that have been addressed are:

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

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

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

3.3.75 The other comments that have been addressed are:

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

#### Policy 14 Delivery and Implementation

3.3.76 The GLA comments that have been addressed are:

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

3.3.77 The other comments that have been addressed are:

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

### Delivery, monitoring and implementation

3.3.78 The GLA comments that have been addressed are:

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

3.3.79 The GOL comments that have been addressed are:

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

### **3.4 Publication/submission consultation**

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

#### *What happens next*

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

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

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

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

### Summary of representations and our responses

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

#### Government Office for London (GOL)

##### 3.4.6 Justified

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

##### 3.4.7 Effective

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

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

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

#### 3.4.8 Flexible

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

#### 3.4.9 Monitoring

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

#### 3.4.10 Consistent with national policy

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

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

#### 3.4.11 Greater London Authority

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

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

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

#### 3.4.12 Transport for London (through the GLA response)

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



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

- The Core Strategy (and any intermediate policy which is applied before the Core Strategy is adopted) will need to take account of the real likelihood that certain key transport infrastructure improvements, on which some of the Core Strategy policies depend, will not be capable of being funded by TfL. Otherwise the Core Strategy will lack coherence, consistency and effectiveness. This change should not be made. We are unclear which improvements and policies that TfL mention we need to address as they are not listed in the response. Therefore we can not provide a detailed response to this objection and which transport improvements that are suggested.
- TfL comment that the Core Strategy is scheduled to be adopted in February 2011 at the earliest. The Core Strategy does not address the implications of the new Community Infrastructure Levy under the Planning Act 2008 and the effect that this is likely to have on the funding of major infrastructure improvements and delivery. We set out that we will address the CIL when we are made aware of our obligations. Until then we will continue to apply our very successful section 106 tariff SPD which provides a very clear and coherent approach.
- TfL remain concerned about delivery issues, particularly in relation to the Elephant and Castle. They also commented that compared to other opportunity areas and action areas, there is very little detail on the public transport improvements required. We suggest that the change is not made as we have included information about working with TfL as they suggested at preferred options consultation on page 44. We also set out that we will work with our partners in strategic policy 14 and also that we will work with infrastructure providers to identify and deliver elements of infrastructure to support growth at the right time. There is also a section on the elephant and castle infrastructure from page 160 where we set out TfL as an important person to be involved.
- TfL welcomes Strategic Policy 2 and Southwark's commitment to promoting walking and cycling throughout the borough, and encouraging mode shift, as detailed in the approach to sustainable transport.
- TfL would welcome a comment in the core strategy on the requirement for travel plans to be submitted with applications. This is covered in our development management policy 5.2 in the Southwark Plan which is being saved along with our sustainability SPDs. This information is too detailed for the core strategy.

- TfL recommend that reference to the Cross River Tram is removed. There is strong support within Southwark for the tram. We set out that we support the tram if it can be delivered. The Mayor's business plan is only up to 2017/18 and this core strategy is for a longer time frame until 2026.

#### 3.4.13 Environment Agency

- Environment Agency commented that the vast majority of their representations at preferred options have been dealt with.
- They advised that the location of sites for homes for travellers and gypsies take into account the groundwater levels. Package Treatment Plants can be used in this housing and there should be a sufficient unsaturated zone for their efficient operation. This is too detailed an issue to be addressed through the core strategy. We will consider a range of environmental issues when we select sites and these will be part of evidence base and detailed policies in the housing development and development management development plan document
- They also commented that groundwater and water quality has not been covered in enough detail in the core strategy policies. We are recommending that the Inspector change Policy 13 to include reference to water pollution which will cover both surface and ground water quality. This is set out in our table of changes.
- They also commented that reference should be made to the Thames River Basin Management Plan 2009. We are recommending the to inspector that he makes this change.
- We should clarify the purpose of the Thames Tidal Tunnel. We are recommending wording to the inspector to clarify the purpose of the Thames Tidal Tunnel.

#### 3.4.14 Primary Care Trust

- At present page 14 does not fully explain the key health and demographic issues to fully justify and support Strategic Policy 4 and the cross cutting approach to health. The PCT suggested text to reflect this. We are proposing this as a recommended change to the Inspector as useful background information.
- Although key health issues are mentioned in the supporting text to Strategic Policy 4 (3<sup>rd</sup> paragraph, page 72) , the PCT suggest further wording. We are proposing this as a recommended change to the Inspector as useful background information.
- Replace the 4<sup>th</sup> paragraph with: "A major risk factor for long term health of local children is the continuing trend of obesity. Over a quarter (26%) of Year 6 children in the borough are obese, one of the highest rates in the country." Although the fact in the core strategy is correct, the target

used by the government to measure performance is based on the suggested change. We have suggested this change to the Inspector.

- Within the challenges and opportunities section, the following text should be inserted: Help tackle the major health issues and inequalities in Southwark, such as obesity and mental health by addressing the environmental, social and economic factors that can influence health.” We have suggested this change to the Inspector.
- The PCT felt that strategic objective does not fully reflect the cross-cutting approach to health and to be effective. The PCT suggested new wording. We feel that the themes already cover all these points and no change is needed.
- The PCT suggest adding wording into supporting text of policy 2 to read “Encouraging active travel and reducing traffic levels and speeds will have positive health impacts for improved air quality, safer roads and encouraging physical activity and successful communities.” We have suggested this change to the Inspector.
- The PCT suggest wording changes to policy 3 regarding fast food outlets. We have suggested this change to the Inspector.
- The PCT suggest change to the title of policy 4 to read: “Places for learning, enjoyment and healthy lifestyles”. We have suggested this change to the Inspector.
- The PCT suggest we insert another bullet point in policy 4 to read “Ensuring that development encourages healthy lifestyles and addresses negative impacts on physical and mental health” The core strategy addresses this partly in bullet 6 of the ‘we will do this by’ and partly in the strategic policy 1 sustainability assessment requirement. This level of further detail would be more appropriate in the sustainability assessment supplementary planning document
- The PCT have suggest wording to policy 4 bullet point 6 to include the wording “in partnership with NHS Southwark”. We have proposed this change to the Inspector.
- The PCT proposed changes to policy 13 to include health. This is already addressed through other policies.
- Under the monitoring table, the PCT suggested that new health facilities must be BREEAM “excellent” and any refurbishment should achieve BREEAM “very good”. We consider very good to be the most appropriate standard, If there is a corporate need for the primary care trust to achieve excellent this could be requested through their tendering and development process.

#### 3.4.15 Metropolitan Police

- The Metropolitan Police stated that police facilities should be included as community facilities. National policy sets out the use classes order with groups of uses of buildings that can be permitted for development. D1 use covers a wide range of community facilities, this does not include facilities for police as set out in the fact box. As this is set by national policy we can not prepare a local policy that would allow new types of D community uses as it would not comply with national requirements.
- Within policy 10 police facilities should be included as a potential use on a site released from employment use. PILs will not normally be suitable for B1(a) and B1(b) uses, although some ancillary B1(a) use is acceptable and some transfer between these classes may be inevitable under the General Permitted Development Order. We have recognised within the supporting text to Policy 10 that new employment sectors are emerging, and that diversifying the range of job opportunities in the PILs would benefit local people. The Development Management Development Plan Document will set out further detailed policy for assessing developments and uses within the Preferred Industrial Locations and also criteria to be applied for proposals to change the use of non-designated industrial land which is being released to other uses.
- Policy 14 should refer to social infrastructure including police facilities. Policy 14 already refers to social infrastructure. It is not appropriate to list all types of social infrastructure. Police facilities are included in the glossary definition of social infrastructure.

#### 3.4.16 Natural England

- Natural England felt that their previous comments had all been dealt with and were supportive of the proposal to designate further Sites of Importance for Nature Conservation.

#### 3.4.17 English Heritage

- English Heritage welcomed Southwark's commitment to develop a policy framework for management of the historic environment and tall buildings.
- They suggested some minor changes to wording to make the core strategy more consistent with PPGs and avoid confusion in interpreting the policies. We are suggesting this change to the Inspector.
- They expressed concern that we need to provide a robust framework for detailed policies on protection and enhancement of the setting of all heritage assets and World Heritage site. The Southwark Plan contains policies for the World Heritage Site and these are to be saved pending the preparation of a development management DPD when they will be reviewed and updated.

- They suggested that we need to recognise opportunities for heritage-led regeneration and the significance of the historic environment in defining the character of areas. We are recommending to the Inspector a reference to the historic environment is added to bullet point three to further clarify that the historic environment is a consideration in determining appropriate heights.
- They felt that our evidence base should be more complete and accessible evidence base. The evidence base is set at the appropriate level of detail to justify the strategic approach of the core strategy, in particular the approach to tall buildings. More detailed evidence has been prepared to support the approach to planning of areas where greater change will take place including the planning of tall buildings. The council will work with English Heritage to make the evidence more easily accessible and referenced to the historic environment.
- They felt that we need to be more consistent in referring to where and when tall buildings may be appropriate, both in policy 12 and in the area visions. We are recommending this change to the Inspector.
- They felt that while we have followed the CABA/EH Guidance on Tall buildings we have applied the methodology in a different order. Our tall buildings study includes the full range of considerations set out in the EH/CABA guidance. The definition of tall buildings used is in accordance with the EH / CABA guidance. We are also recommending to the Inspector that changes are made to the supporting text to Policy 12 to clarify that the approach to tall buildings in the broad location identified will be subject to further more detailed guidance and policies to address any sensitivities in these area. We are also recommending that the supporting text is amended to make clear that in all other areas tall buildings are not considered appropriate.

#### 3.4.18 Thames Water

- Thames Water support the requirements for developments to reduce water use and use local sources of water where possible and the requirement for developments to help reduce flood risk by reducing water run-off, using sustainable urban drainage systems and avoiding the paving over of gardens and creation of hardstanding areas.
- Thames Water object to the omission of a specific policy supporting the Thames Tidal Tunnel and they want explicit support for the Thames Tidal Tunnel to be shown in the core strategy. The core strategy recognises the importance of the Thames Tunnel, in the evidence base, supporting text to policy 13 and the infrastructure table to policy 14.
- Thames Water recommend that we provide clarification on the purpose of the Thames Tidal Tunnel. We are recommending amendment to the supporting text to Policy 13 to clarify the role and function of the

Thames Tunnel to reduce water pollution and refer to Water Framework Directive and Thames River Basin Management Plan.

#### 3.4.19 Port of London Authority

- Port of London Authority commented that Jacob's Pier is a privately owned residential pier and should be removed from all maps showing the piers in the River Thames. We have put forward a recommended change to the planning inspectorate that we remove Jacob's Pier from our maps.
- They also commented that the council should make it more clear whether river transport includes freight transport as well as transporting people. We feel that it is already clear within the "we are doing this because" section of policy 2 that we encourage river transport for freight transport as well as transporting people.

#### 3.4.20 Coal Authority

- The Coal Authority had no specific comments at this stage.

#### 3.4.21 NON-STATUTORY CONSULTEES

The main issues raised by non-statutory consultees are set out below for each policy.

#### 3.4.22 Canada Water

The main representations for Canada Water were:

- Canada Water should not be identified as being sequentially preferential to other suitable town centres within the borough for new retail development. Our retail study has informed this policy and has identified additional scope for retail at Canada Water.
- Make express mention of links to Canary Wharf via the proposed Thames crossing for pedestrians and cyclists. The proposed Thames crossing is already shown on figure 14 and the Canada Water area action plan [provides further detail on the proposal. It is not necessary to add further detail in the core strategy.
- There is no evidence for the assertion that office space for local occupiers is 'much needed' in Canada Water. The targets are based on evidence in our employment land review. The floorspace figures are therefore based on future job generation rates.
- It is wrongly assumed that simply developing new floorspace will generate new jobs. No evidence has been presented to demonstrate this. Our employment land review provides the evidence for this. In arriving at this figure, the ELR synthesises historic and future employment trends.
- The core strategy should also make clear that funding from the HCA may also be required on other sites if the Council is to achieve the

levels of affordable housing to which it aspires. The text on p. 125 refers to the fact that the HCA has a role to play in contributing to the delivery of Southwark's Housing targets generally.

- An additional source of funding for some of the commercial space will need to be identified, as developers are unlikely to provide space for which there is no market demand. It is not anticipated that business space would be reliant on external subsidy to help provide it.
- Strategic Targets Policy 2 in relation to the Canada Water Area vision. There is no robust evidence base to support the Council's aspiration for this form of development. The policy as written is too prescriptive, raises expectations and is therefore considered to be unsound. Our evidence base supports this policy.
- Information supplied by Southwark Council to draw up The London Plan has been substantially incomplete and overly selective. The London Plan therefore wrongly and unjustly seeks to change Rotherhithe area by contributing to 15,000+ more homes along the A200 and associated roads. We have recommended to the planning inspector that we insert a table showing the different Southwark targets to increase the clarity of the plan.

#### 3.4.23 Peckham

- The vision should refer to the need to improving cycling routes and addressing problems caused by 1 way traffic system. The detailed policies for this area will be set out in the Peckham and Nunhead area action plan.
- A clear strategy and robust evidence base is needed to manage tall buildings and protect and enhance the historic environment. We have a robust evidence base as part of the core strategy through our tall buildings background paper.

#### 3.4.24 Borough, Bankside and London Bridge

- Both support and concern for tall buildings, some wanted more clarity over the east boundary of the tall buildings area. We have been working the GLA on the Borough, Bankside and London Bridge SPD and they are happy with the boundary.

#### Elephant and Castle

- Detailed representations to improve specific walking and cycling routes. The appropriate amount of detail is already set out in the Elephant and Castle vision.
- The vision should refer to the adopted London Plan housing target. We are recommending to the inspector that we insert a table showing the different Southwark targets to increase the clarity of the plan.

#### 3.4.25 Aylesbury

The representations on the Aylesbury were:

- Representation that improvements that were made to the Walworth Rd should be continued from where they currently end at Merrow St south to the Albany Rd as part of the regeneration of the Aylesbury Estate. This representation was taken into account by the inspector who examined the Aylesbury AAP. The inspector found the plan to be sound and did not require that any changes be made as a result of this representation.
- Representations that it is not clear from the Vision whether tall buildings would be supported in the Action Area Core of the Aylesbury Action Area, as stated in Strategic Policy 12. At present the Vision does not appear to address how tall building proposals will be managed. The vision for the Aylesbury AAP has been tested during the examination on the AAP. The inspector did not recommend any changes to the vision and considered the plan to be sound.

#### 3.4.26 Camberwell

- There were many detailed representations on problems with transport in Camberwell. Policy 2 and area vision for Camberwell provide the overall strategic policy. More detailed policies will be set out in the development management development plan document and the Camberwell area action plan.
- Concern that there is not enough awareness of border issues and also support that we recognise the border issues.. We will work with Lambeth on the preparation of the Camberwell area action plan.
- Representations asking whether Camberwell is or isn't an action area. Camberwell is an area action plan. We have put forward a recommended change to the planning inspector that we amend the title of Camberwell's vision to read "Camberwell Action Area".
- Representations asking for a raised profile for Camberwell. More detailed policies on how we will achieve the vision will be set out in the area action plan.
- Concern that the core strategy does not protect artistic and creative industries in Camberwell. Policy 10 of the core strategy protects small businesses in Camberwell action area.

#### 3.4.27 Policy 1

- Concern over reasonableness of requirement for sustainability assessment and for development to achieve best outcome and improve places, rather than not make them worse. We already require sustainability assessments and a key aim, of the core strategy is to improve places and so it is essential all development does this.
- The policy did not specify what was meant by "best possible development:" or "very high standard". The core strategy sets out the



strategic policy and further detail will be set out in the development management development plan document.

- Other representations wanted us to be stronger in ensuring new development improves places and responds to the needs of the local community. This is already set out in our sustainable design and construction supplementary planning document. Further detail will be set out in the development management development plan document.
- There was general support for the growth areas approach, though some concern that other areas do not miss out on improvements. The core strategy sets out visions for all areas of the borough, not just the growth areas.

#### 3.4.28 Policy 2

- Objections were raised over the policy not setting out car parking standards. The standards within the Southwark Plan are being saved and will be replaced through the development management development plan document.
- There were many detailed representations made on the need to improve cycle lanes and cycle parking in the borough. This is too detailed an issue for the core strategy. It will be looked at through area action plans, areas supplementary planning documents and the development management development plan document.
- There were objections to the policy not setting out how it will minimise car ownership and use. This is too detailed an issue for the core strategy. It will be looked at through area action plans, areas supplementary planning documents and the development management development plan document.
- There were many representations on the core strategy not setting out detailed policies on improving transport in specific areas. This is too detailed an issue for the core strategy. It will be looked at through area action plans, areas supplementary planning documents and the development management development plan document.

#### 3.4.29 Policy 3

- The draft Core Strategy recognises Camberwell's status as a retail centre, but includes insufficient measures to support and protect this status. We will be preparing an area action plan which will set out more detailed policies for Camberwell.
- The centres of Elephant and Castle, and Canada Water should not be identified as being sequentially preferential to other suitable town centres within the borough for new retail development PPS4 does not preclude out of centre retail development. There may be circumstances where out of centre development is appropriate subject to the tests of: need; impact; sequential approach; and scale, and this should be

reflected within Policy 3. Policy 3 includes the sequential test. Our evidence base identifies further retail capacity at Elephant and Castle and Canada Water.

- Policy 3 deals with shopping, leisure and entertainment with regard to town centres but the text mainly refers to retail matters and does not support any local cultural and entertainment facilities. The Policy promotes a network of successful town centres which have a wide range of shops, services and facilities, to help meet the needs of Southwark's population. The supporting text recognises that encouraging a mix of compatible uses in the centres will also provide a stronger economic environment and will help stimulate a greater diversity of entertainment and evening activities. Policy 10 provides protection to creative, cultural and tourism facilities and encourages new facilities, particularly in strategic cultural areas.
- Whilst the predominance of smaller retail outlets is acknowledged, there is no recognition of the potential role of the retail and leisure sector in stimulating economic and social improvements and there are opportunities to create new, more modern floorspace to assist the retention and enhancement of the retail and leisure offer available to local people and to ease levels of deprivation. We address this in Policy 10 which provides protection to small units and encourages provision of flexible space to help meet the needs of the local office market and independent retailers. Policy 10 also requires: Targeting new jobs and training opportunities which arise from development towards local people and Promoting supply chain opportunities for local businesses during and after construction of development.
- Protecting small units outside town centres – a blanket protection for all retail uses is not appropriate. There will be circumstances where changes may be justified and in the interests of the local community. It is important to provide protection to small retail facilities located outside of the town and local centres as these facilities provide a valuable resource to neighbourhoods in the borough, and reduce the need to travel. We are saving Policy 1.10 in the Southwark Plan until it is replaced by a policy within the forthcoming Development Management DPD which will provide criteria to assess the loss of small scale retail facilities.
- The Core Strategy is to promote the use of town, district and local centres which promote travel. Centres need to be less compact and more spread such as Lordship Lane. The town and local centre hierarchy and 'centre' boundaries do not make any provisions for a more realistic and more sustainable idea of 'neighbourhoods', which would enable the existing local resource (people, skills, retail etc) to really develop and continue growing. We are saving Policy 1.7 of the Southwark Plan until it is replaced by the Core Strategy and the forthcoming Development Management DPD, which will set out appropriate uses to be accommodated within town centres.

- The country's leading economic centre, the CAZ should be recognised as at the top of the hierarchy, above the Major Town Centres. The adopted London Plan does not categorise the CAZ within the town centre hierarchy.
- It states in 'Our approach is' that the Council will maintain a network of town centres which have a wide range of shops, services and facilities, to help meet the needs of Southwark's population. The Policy does not support social infrastructure despite the important contribution it has to the viability of town centres and suitability for locating in town centres. In order to achieve this objective, the policy should be flexible enough to allow a range of suitable facilities within centres. We are saving Policy 1.7 of the Southwark Plan until it is replaced by the Core Strategy and the forthcoming Development Management DPD, which will set out appropriate uses to be accommodated within town centres. Policy 14 also sets out our approach to implementation and delivery including infrastructure.

#### 3.4.30 Policy 4

- There were concerns about the provision for places of worship. Policy 4 provides a strategic approach to guiding community facilities in the borough. We are saving Policies 2.1 and 2.2 of the Southwark Plan which provide support and protection of community facilities, until they are replaced by new policies within the Development Management DPD.
- There are concerns that the Council's Asset Management Strategy is very limited in scope, only covering 73 properties across the borough and looking to reduce this number. The strategy is clear that Southwark's scarce resources need to be channelled to create a strategically managed portfolio of appropriate assets. Therefore the strategy has set a framework for the development of an efficient portfolio rather than growth, nevertheless fully acknowledging the importance of the role played by the VCS
- A number of representations concerned with the definition of community facilities and there should be more of a distinction between those accessible to all members of the community and those for only some members of the community. National policy sets out the use classes order with groups of uses of buildings that can be permitted for development. D1 use covers a wide range of community facilities including places of worship as set out in the fact box. As this is set by national policy we can not prepare a local policy that would allow any of the different types of D community uses and not others as it would not comply with national requirements.
- Concerns of the policy wording asking for a local need to be identified. Local need must be considered when applications are determined and that this is not defined within policy 4. This differs greatly between area

and issue. There is no one definition of this that could be used and therefore a change can not be made to the core strategy.

#### 3.4.31 Policy 5

- There were a number of objections to the policy not referring enough to housing development outside of the identified growth areas. Policy 5 sets out a housing target for the whole of Southwark. Whilst we are concentrating development in the growth areas there will be some housing development outside of the growth areas. This is set out in our evidence base.
- There was some support for the council's objective to build more housing. We are continuing to build more housing and our evidence base sets out where and how we will do this.
- There were objections to having a density policy and that instead density should be determined on a case by case basis. The density policy is in accordance with the London Plan and aims to ensure we can build sufficient number of within attractive environments.
- There were a number of objections that the density policy is not flexible enough. The density policy is in accordance with the London Plan and aims to ensure we can build sufficient number of within attractive environments. Further detailed policies will be set out in the development management development plan document or and housing development plan document.
- There were a number of comments asking why the draft replacement London Plan 2009 housing targets were used when the overall target is from the adopted London Plan 2008. We have recommended to the planning inspectorate that we insert a table into the core strategy setting out the different Southwark targets.
- There were objections to not stating in the policy that the housing targets were minimums to be exceeded. This is set out in the housing background papers.
- There were some objections to the density policies setting out that certain areas may be of higher density if they are of an exemplary design. Some objectors felt this was not flexible enough whilst other objectors felt that this too easily allows high density development. Policy 5 is in conformity with the London Plan density policies. We will set out further detailed policies on what we mean by exemplary design through the housing development management development document. This will review the criteria currently in the adopted residential design standards SPD.

#### 3.4.32 Policy 6

- There were a number of objections to policy 6 not including reference to allowing developers to submit a financial viability appraisal if they

cannot deliver the policy requirements for affordable housing and to not taking into account site viability in the policy. We will continue to allow developers to submit a financial viability assessment if they cannot meet the policy requirements. This is set out in the housing background paper which provides further detail on how we will implement the policies.

- There were objections to the approach taken to affordable housing in the Elephant and Castle. The justification for the approach taken in Elephant and Castle is set out in the background paper. Our affordable housing viability assessment supports this approach.
- There were objections on the methodology of the council's Housing Requirements Study which has informed the policy. Our housing requirements study sets out the detail of the methodology followed.
- There were some objections that the policy should be for a higher level of affordable housing in accordance with the strategic 50% target in the adopted London Plan 2008. We want to create mixed and balanced communities, and meet the need for both affordable and market housing. PPS12 also requires us to have policies that we can implement and deliver. Our affordable housing viability study supports this policy. The background papers set out further detail on why we are taking forward the approach in policy 6.
- Policy 6 should acknowledge the importance of upgrading existing affordable housing stock. The housing background paper sets out the council's to upgrading and improving existing stock. The council's adopted Housing Strategy also provides further detail.

#### 3.4.33 Policy 7

- Comments objecting to the council not using the minimum room sizes set out in the draft replacement London Plan 2009. Our minimum room sizes are based on those in the draft London Plan and both the GLA and GOL are happy with our approach.
- Objections to setting out minimum room sizes in the core strategy rather than in an SPD. We feel that minimum room sizes are a strategic issue to ensure we can reduce overcrowding in dwellings and build high quality new homes. Similarly the Mayor feels this is a strategic issue through the inclusion in the draft replacement London Plan.
- A number of objections to policy 7 not being flexible enough and that the dwelling mix should not be a requirement within the policy. PPS3 and the London Plan require us to provide for a range of different types of homes. Further detailed policies will be set out in the housing development plan document.

- Objections to applying the minimum room sizes to private housing. Our housing studies show that there is a need for family housing across all tenures and there is a need for good quality homes across all tenures.
- Objections to not requiring higher percentages of family housing. PPS12 requires us to have policies that we can implement and deliver. The family housing policy is an increase from the policy in the Southwark Plan and our evidence suggests that we can implement this policy. There is also a need for 1 and 2 bedroom dwellings in Southwark and so we feel that the policy provides the right balance.

#### 3.4.34 Policy 8

- Objections to asking for an element of affordable housing within student schemes. We have identified all sites we expect to come forward for housing through our strategic housing land availability assessment and our development capacity assessment. If we allow these sites to come forward without student housing then we will not meet our affordable housing target and we will not meet the need for family housing. By requiring an element of affordable housing within student housing we will ensure we work towards meeting the needs of students and those needing affordable housing.
- Southwark has already exceeded its target for conventional housing, and is currently well under meeting its target for non-self contained housing. The targets in the London Plan are overall targets including conventional and non-self contained housing. We do not have separate targets. Furthermore our 2008-2009 Annual Monitoring Report shows that we did not meet our overall target of 1630, and in fact have only four times in 13 years met the target of 1630.
- Objections that the policy will have severe impact on delivering student housing. The policy sets out that we will meet the need for student accommodation for local universities and colleges. This need needs to be balanced against the need for conventional housing, specifically affordable and family housing.
- Objections to the policy wanting to meet the need of local universities. We already have the second highest amount of student housing in London and have a huge need for more affordable and family housing. We want to make sure we can work towards meeting that need whilst also meeting the needs of local universities.
- Various representations putting forward that providing student accommodation helps to free up existing private housing for families. As set out in the policy we will work with local universities to deliver student housing where it is required.
- A number of objections stating that policy 4.7 of the Southwark Plan should be retained. We are saving policy 4.7 of the Southwark Plan.

- Some support for setting out want to provide student homes to meet the needs of local universities.

#### 3.4.35 Policy 9

- Objections were raised regarding that the core strategy is not designating Traveller and Gypsy sites. We will manage the need for further Traveller and Gypsy sites through the housing development plan document. This is in accordance with the London Plan.
- An objection were also raised that the site on Ilderton Road should not be protected or new sites be designated. The London Plan requires us to protect our existing sites and also requires us to set criteria for allocating new sites.
- An objection was also raised that the criteria should be more positive and in presumption of planning permission. The core strategy set out the strategic policy and more detail will be set out in the housing development plan document.
- Support was also shown for including criteria for sites and for protecting existing sites.

#### 3.4.36 Policy 10

- Concern that policy 10 does not provide sufficient flexibility. Policy 10 protects existing business floorspace. We are saving policy 1.4 of the Southwark Plan until it is replaced by the Core Strategy and the forthcoming Development Management DPD which will set out more criteria for the loss of business floorspace.
- Representations saying that the council should not be resisting certain types development to certain areas, but instead should be encouraging differing types of development on a flexible site by site basis. The evidence base supports the policy. We recognise that many types of uses, can generate employment. However, our ELR also demonstrates that there is a need to provide B class business space. The policy therefore has elements which concentrate solely on B class space. The policy also states that we will protect and encourage arts, tourism and cultural uses. Other policies in the plan cover other employment generating uses, such as retail and leisure, education, health etc.
- Concerns over the evidence base. The evidence base has been prepared in accordance with government guidance.
- Representations that the Employment Land Review should assess each employment site in the borough or alternatively, assess differing parts of 'Employment Clusters' in the site appraisals and the results of this should be reflected in the Core Strategy. The employment clusters that were surveyed in the ELR are based upon Southwark's 2007 UDP proposals map, URS North East and South East Industrial Land

Baseline mapping (2006), aerial photography and the consultant's and the council's knowledge of employment areas within the borough. The 'cluster' approach for the ELR was adopted given that the ELR is a high-level assessment of the quantity, quality and viability of employment land in the borough. It would not be feasible to assess every individual employment site in the borough.

- A criteria based policy is required to assess sites on a site by site basis to provide suitable flexibility and ensure further surplus and inappropriate employment sites, whether allocated employment land or not, are not retained for longer than required. We are saving policy 1.4 of the Southwark Plan until it is replaced by the Core Strategy and the forthcoming Development Management DPD which will set out more criteria for the loss of business floorspace.
- Employment land designations should allow for the redevelopment of such sites with developments that cater for the needs of existing and future employment growth sectors such as the arts and culture enterprises. We recognise that many types of uses, can generate employment. However, our ELR also demonstrates that there is a need to provide B class business space. The policy therefore has elements which concentrate solely on B class space. The policy also states that we will protect and encourage arts, tourism and cultural uses. Other policies in the plan cover other employment generating uses, such as retail and leisure, education, health etc.
- There was some support for the development of hotels. Policy 10 allows the development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character.
- Objections to targeting new jobs and training opportunities towards local people and promoting supply chain opportunities for local businesses during construction and development. This provides a strategic direction in which more detailed policies will be prepared. The mechanism for delivering this policy is currently provided by Policy 1.1 in the Southwark Plan. This policy will be replaced with a new policy within the Development Management DPD.
- Asking for a greater emphasis to be placed on the development of hotels in the SE1 area. The strategy is consistent with London Plan policy 3D.7 which seeks to ensure that boroughs focus provision for new visitor accommodation within the CAZ and town centres. It should also enable Southwark to meet estimates of hotel growth set out in the GLA hotel demand study. Of all of the hotel bedrooms which exist in Southwark, around 35% are located in the Bankside and Borough areas. Southwark's Tourism Strategy identifies the need to enable tourism dispersal, to increase the economic value of tourism and increase the spread of tourism and its benefits to other areas of the borough.



- Representing seeking the inclusion and recognition of employment-generating sui generis uses within the definition of 'Employment uses' and preferred uses in the 'Preferred Industrial Location (PIL)' definition provided within the glossary. By definition, sui generis uses have impacts which are difficult to predict. For this reason they should be treated on their merits and it would not be appropriate to have a blanket policy which seeks to allow them. This approach is consistent with the advice in paragraph 4.3 (1) of the Mayor's Industrial Capacity SPG.

#### 3.4.37 Policy 11

- There was concern we did not fully recognise and promote the different role open spaces play, including heritage, food growing, estate land. Policy 11 does recognise food growing. We are proposing a change to the inspector to policy 12 to include heritage assets as something development should protect.
- Concern over the soundness of evidence base. We have an up to date audit of open spaces and assessment of deficiency, this is enough for a strategic policy.
- Some objections wanted us to go further and be more prescriptive and set out provision standards and a target for providing more open space to deal with a growing population. We set out the strategic framework, more detail will be in development management DPD and AAPs, we will have a detailed open space strategy to inform these.
- Other objections felt the policy was too prescriptive and wanted more flexibility for developments in terms of contributing to open space provision. The policy is strategic and does not have specific standards, further guidance will be in development management DPD and area action plans
- There were calls for more green links to be identified and for local groups involved in promoting green links to be identified. We will look at this in the development management DPD and area actions plans. We have proposed to the Inspectorate that we identify local green link groups.
- There were some objections concerning specific designations - against Crossbones designation, call for expansion of Nursery Row Park and Brayards Green designations and the call for Carter Place to be designated open space. We are proposed to the Planning Inspectorate that we amend Crossbones designation to reflect the known boundary of the burial ground.

#### 3.4.38 Policy 12

- There was general support for a policy framework for design and conservation.

- There were some concerns that it did not go far enough to protect and enhance the environment and some concerns over allowing tall buildings in some area and the impact this could have. We have a robust evidence base to support our approach to tall buildings and will provide further detail in our area actions plans, supplementary planning documents and development management development plan document.
- Others were concerned that the policy did not provide enough flexibility, some wanted to see a more relaxed approach to tall buildings and assurances that CA would not preclude development. We have a robust evidence base to support our approach to tall buildings and will provide further detail in our area actions plans, supplementary planning documents and development management development plan document.
- Some concern policy wording was too vague or did not provide enough clarity on things like where tall buildings should go. The core strategy policies are strategic and further detail will be set out in the development management development plan document.
- Some concern over the definition for tall building being used. The definition of tall building is in accordance with CABE and English Heritage Guidance. Further detail will be set out in the development management development plan document.

#### 3.4.39 Policy 13

- The targets are onerous and not justified and would make development unviable. We have a strong evidence base demonstrating that the targets are justified given the environmental issues we face, and also that they are viable within the Southwark context. Many of the targets, such as 20% renewable reflect those in the London Plan.
- Some objectors felt that the targets should not be presented as requirements, but as targets that development should aim for. We feel we have the right targets the evidence base the support them.
- Some respondents wanted to see higher targets or more detailed design requirements. We feel we have the right balance and more detail will be in the development management development plan document.

#### 3.4.40 Policy\_14

- There was a suggestion that the voluntary and community sector should be involved in monitoring the core strategy. It is a legal requirement that we produce an Annual Monitoring Report each year. Policy 14 addresses the issues of implementation while section 7 addresses the issues of monitoring the policies to ensure the outcomes of the policies are in line with our ambitions.

- There were representations asking for the core strategy to explicitly state that where the core strategy policies are met, planning permission will be granted. The core strategy is one of the documents within the local development framework that will be used in making decisions on planning applications. Further detail on how this is used in determining planning applications is set out in appendix A of the core strategy.
- There was support of the inclusion of the full implementation and delivery plan and also concern that this was not fully available at preferred options stage.. This has been developed through the core strategy preparation and is being taken forward as part of the publication core strategy. There is also further detail in the infrastructure background paper.
- There were a number of representations asking for specific organisations or types of infrastructure to be set out in the policy. These organisations and/or types of infrastructure are already covered within policy 14 under more generic headings. It is not possible to list everyone that we work with.

#### 3.4.41 Consultation

- There were concerns raised that the community had not been consulted enough on the core strategy and that the commitments set out in the statement of community involvement have not been met.. We consider that we have consulted fully on the core strategy and we have met and exceeded the requirements in our statement of community involvement.
- Some objections raised that the formal consultation period was too short. The consultation period was in accordance with the regulations and as set out in the statement of community involvement.

#### 3.4.42 Other

- Overall support for our objectives. These objectives have been taken forward in the publication core strategy.
- There was a representation that we do not support the objectives of the community strategy. Our objectives are based on the themes and priorities in the community strategy
- Concern that the core strategy is seeking to create mixed communities. This is a priority of PPS1 and PPS3.
- Representations re lack of consistency in referring to the adopted and draft London Plans. We have put forward through out table of changes to the Planning Inspectorate that we insert a table into the core strategy showing all the Southwark targets to provide more clarity.

## 4. MONITORING THE CONSULTATION

### 4.1 Why we monitor consultation

- 4.1.1 Our statement of community involvement indicates that the success of consultation can be measured by the numbers and diversity of consultees and respondees. As a result we have tried to engage with as many different groups as possible.
- 4.1.2 We monitor our consultation at every stage so that we can see where we need to engage more with certain groups at the next stage of consultation.

### 4.2 How we monitored the consultation

- 4.2.1 After each stage of consultation we carried out a review of the consultation to see how we could improve the next stage of consultation. This included reviewing the consultation against the requirements of our statement of community involvement. Section 3 above sets out how we met and exceeded our statement of community involvement requirements.
- 4.2.2 Where possible we tried to monitor event attendance and monitor attendees age, gender and ethnicity. However, in most cases this was very difficult to do as many of the events we attended were run by other people and we did not have control over the monitoring.
- 4.2.3 We also included a monitoring form within our consultation questionnaires so that we could monitor the range of people from our communities that responded to the consultation. In most cases, representations were received without the monitoring form making it difficult for us to get a full picture of the different groups commenting on the document. This was frequently because many of our representations were from businesses who had agents acting on their behalf who may not have felt it was appropriate to submit monitoring forms.
- 4.2.4 The table below sets out the monitoring information we collected at each stage of consultation of those who put in their representations.

#### Ethnicity

	Issues and options	Preferred options	Publications/ submission
Any other mixed	1	0	0
British	35	5	2
Caribbean	1	0	0
Irish	1	0	0
Other white	4	0	0
White and black	1	0	0

Left form blank	19	2	3
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### Gender

	Issues options	and Preferred options	Publication/ Submission
Male	27	3	1
Female	14	1	0
Left form blank	21	3	4

### Age group

	Issues options	and Preferred options	Publication/ Submission
16-24	3	0	0
25-35	12	2	0
36-55	17	1	0
50 and other	10	0	1
Left form blank	20	4	4

4.2.5 We also monitored and reviewed the types of groups putting in representations at each stage of the core strategy. The tables below show how this was broken down at each stage.

### Issues and options

Businesses	15
Community organisation	18
Developer	13
Educational	2
Government organisation	7
Resident	18
Statutory consultee	8

### Preferred options

Businesses	22
Community organisation	7
Developer	26
Educational	2
Government organisation	3
Resident	17
Statutory consultee	15

## Publication/submission

Community group	14
Business	39
Councillors	1
Government agency	7
Statutory consultee	5
Neighbourhood group	2
Resident	10
Other	1
NGO	1

### **4.3 How this changed our consultation**

- 4.3.1 At each stage we then reviewed where we could try to engage more groups where we had the information and we amended the next stage of consultation accordingly where possible.
- 4.3.2 We identified after the issues and options consultation that we had not engaged enough with young people. At the preferred options stage we attended a green fair for school children where we engaged with young people through encouraging them to draw their routes to school and to think about things they would like to change in our borough.
- 4.3.3 We also decided to attend a wider range of events at preferred options to get a wider range of people being involved in the consultation. This included targeting more specific groups including giving presentations to Southwark Travellers and Gypsies Group, Southwark's LGBT group and a religious group called Southwark for Jesus. It also included attending a wider range of meetings/events including festivals in parks, shopping centres, an event at the British Film Institute, in addition to more formal meetings.
- 4.3.4 We also continued to consult in ways which were effective at the first stage of consultation. For example the breakfast meeting for developers and landowners was very successful at issues and options and we subsequently received many responses from these groups. As a result we ran another similar session at preferred options.

### **4.4 Equalities impact assessment**

- 4.4.1 Our equalities impact assessment also provides further information on the impact of the core strategy on the equalities target groups and it also fed into the consultation reviewing process. We carried out an equalities impact assessment on the issues and options, preferred options and publication/submission core strategy. The equalities impact assessment looks at the impact of the core strategy on certain groups and whether there will be negative impacts on these groups and whether the core strategy will improve community cohesion and

promote equality of opportunity. We looked at both the impacts of the core strategy consultation and the impacts of implementing the core strategy. As part of this we have attended the Equalities and Diversity Panel at issues and options, preferred options stage and publication/submission stage. This gives the panel, which consists of representatives from all our equality target groups, an opportunity to comment on both the equalities impact assessment and the core strategy. It also gives them an opportunity to suggest ways in which we could improve our consultation process. The comments we received at each equalities and diversity panel have fed into the next stage of the equalities impact assessment and preparation of the core strategy. Summaries of how this has informed the core strategy are set out in our background papers, with more detail in the equalities impact assessment.