Appendix E

Core Strategy publication/submission version sustainability appraisal (available in the members' offices and on the internet)

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

Planning Committee: 21 March 2011
Cabinet: 22 March 2011

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

REVITALISE

Core strategy

TIMETABLE FOR CONSULTATION AND HOW TO COMMENT

SUSTAINABILITY APPRAISAL PRODUCTION STAGE	TIMETABLE
Consultation on Core Strategy Sustainability Appraisal Scoping Report.	28 July 2008 to 1 September 2008
Consultation on Core Strategy Issues and Options report accompanied by an Interim Sustainability Appraisal report of the Issues and Options report and Equalities Impact Assessment	1 September 2008 to 15 December 2008
Consultation on Core Strategy Preferred Option report and draft Sustainability Appraisal of Preferred Option report and Equalities Impact Assessment	28 April 2009 to 23 July 2009
Consultation on the publication version of the Core Strategy and SA Report	29 September 2009 to 5 March 2010
Publish final version of the Core Strategy accompanied by a final Sustainability Statement	January 2011

HOW TO COMMENT ON THIS REPORT

If you have any queries regarding this sustainability report, please contact the Planning Policy and Research Team: Email: corestrategy@southwark.gov.uk Tel: 020 7525 5471

Comments can be returned by post, fax or email to:

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Consultation on this report begins 29 September 2009.
All comments must be received by 5pm on **5 March 2010**

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Background

Section 19 (5) of the Planning and Compulsory Purchase Act 2004, requires Sustainability Appraisals of plans to be carried out. Under the requirements of the act, Sustainability Appraisal (SA) of all Local Development Documents is now mandatory. A Sustainability Appraisal has, therefore, been carried out as part of preparing the Core Strategy. The appraisal tests how well the planning document considers social, economic and environmental issues in order to achieve sustainable development.

In addition, the SEA Directive (2001/42/EC), implemented in the UK by the SEA Regulations 2004, requires Strategic Environmental Assessment or 'SEA' to be undertaken on all plans and programmes where they are likely to have significant environmental impacts. A Sustainability Appraisal (SA) has been carried out to predict the likely social, economic and environmental impacts of different planning options for Southwark (including the requirements of the SEA Directive). The appraisal has assessed the extent to which different planning options will contribute towards the borough's objectives for achieving a sustainable community.

What planning document is being appraised?

The council is preparing a Core Strategy for the borough as part of the Local Development Framework (LDF). The Local Development Framework is made up of a collection of Development Plan Documents (DPDs), which will be used to guide development in the area, including Area Action Plans and Supplementary Planning Documents. The Core Strategy will set out the strategic vision and overall spatial policies that will guide all the other documents in the LDF.

The aim of the SA, as summarised within this report, is to ensure sustainable development is fully integrated within the Core Strategy and forms a key part of evaluation of the sustainability issues that relate to the planning policies for the borough.

> **A copy of the Submission Version of the Core Strategy DPD can be downloaded from council's website: www.southwark.gov.uk/corestrategy**
> **You can also request a paper copy from the Planning Policy team.**

The Process

The process so far has included:
- Collection of baseline information on the environmental, social and economic characteristics of the borough and its context;
- Identification of sustainability issues, objectives and indicators to be used in the SA to assess the likely impacts of the policies and to enable monitoring of progress in the future
- The preparation of a Scoping report, which set out the proposed method of assessment for the SA, issued for consultation from 28 July 2008 to 1 September 2008.
- An Interim SA of the Issues and Options for growth in the borough, issued for consultation from 1 September 2008 to 15 December 2008
- A draft SA that tested the likely impacts of the Preferred Options policies for development. The report was issued for consultation from May-July 2009.
- The Sustainability Appraisal Report of the Submission Version (this document).

The Sustainability Issues

The SA scoping report and subsequent consultation identified a range of significant sustainability issues for Southwark, based on a review of relevant policies, strategies and programmes and a survey of baseline data. The key social, economic and environmental issues faced in Southwark that need to be taken into consideration by the Core Strategy are:

• Relatively high levels of deprivation
• Employment inequalities and employment opportunities
• Education, skills and training deprivation
• Health inequalities and noise nuisances
• Need to promote equality, diversity and social cohesion
• High levels of crime and fear of crime
• Energy efficiency and use of renewables
• Poor air quality
• Need to minimise waste arisings and increase recycling rates
• Need for sustainable use of water resources
• Protection of landscape features and designated sites and need to address contaminated land issues
• Ensuring a high quality of design in new developments
• Need to preserve and enhance built heritage and the archaeological environment
• Minimising flood risk and improve the quality of controlled waters within the borough
• Protecting and enhancing biodiversity
• Providing everyone with a decent and affordable home to live in
• Need to improve accessibility by public transport and minimise the need to travel by car
• Need to ensure that there is social, physical and green infrastructure capacity for existing and future needs

The Sustainability Objectives

The likely impacts of the Core Strategy were identified using a set of sustainability objectives, which relate to the strategic vision for the Borough. The objectives reflect the current social, economic and environmental issues affecting the borough and are linked with the aims of Southwark 2016 (Community Strategy).

The objectives set out below were presented in the Scoping Report (stage one of the SA process). Comments were received on the objectives during the consultation process, which have been taken into account and as a result an additional objective, number 17, has been added.

Sustainable Development Objectives (SDOs)

SDO 1   To tackle poverty and encourage wealth creation
SDO 2   To improve the education and skill of the population
SDO 3   To improve the health of the population
SDO 4   To reduce the incidence of crime and the fear of crime
SDO 5   To promote social inclusion, equality, diversity and community cohesion
SDO 6   To reduce contributions to climate change
SDO 7   To improve the air quality in Southwark
SDO 8   To reduce waste and maximise use of waste arising as a resource
SDO 9   To encourage sustainable use of water resources
SDO10   To maintain and enhance the quality of land and soils
SDO11   To protect and enhance the quality of landscape and townscape
SDO12   To conserve and enhance that quality of landscape and townscape
SDO13   To protect and improve open spaces, green corridors and biodiversity
SDO14   To reduce vulnerability to flooding
SDO15   To provide everyone with the opportunity to live in a decent home
SDO16   To promote sustainable transport and minimise the need to travel by car
SDO17   To provide the necessary infrastructure to support existing and future development

Section 1.5 of this report sets out the stages in the development of the Core Strategy including details on the different steps of the SA process.

Key Findings of the Sustainability Appraisals

Issues and Options

The Core Strategy Issues and Options paper set out two different options for growth in the borough.

Option 1   proposed the concentration of growth in identified 'Growth Areas'.
Option 2   proposed Housing led growth.

Both options were appraised separately under the five topic headings given below, which were subject to consultation in September-December 2008.

1. Living in Southwark

2. Working in Southwark

3. Community Facilities

4. Sustainable Southwark

5. What will happen to different areas in Southwark

The key findings of the Interim Sustainability Appraisal on the Issues and Options are set out below.

Sustainability Objective	1	2
SDO1 To tackle poverty and encourage wealth creation	✓✓	?
SDO2 To improve the education and skill of the population	✓	✓?
SDO3 To improve the health of the population	✓	✓?
SDO4 To reduce the incidence of crime and the fear of crime	✓	?
SDO5 To promote social inclusion, equality, diversity and community cohesion	✓✓	?
SDO6 To reduce contributions to climate change	?	x
SDO7 To improve the air quality in Southwark	?	x
SDO8 To reduce waste and maximise use of waste arising as a resource	?	x
SDO9 To encourage sustainable use of water resources	?	?
SDO10 To maintain and enhance the quality of land and soils	✓	✓
SDO11 To protect and enhance the quality of landscape and townscape	✓?	?
SDO12 To conserve and enhance the historic environment and cultural assets	✓?	?
SDO13 To protect and enhance open spaces, green corridors and biodiversity	✓?	?
SDO14 To reduce vulnerability to flooding	x	?
SDO15 To provide everyone with the opportunity to live in a decent home	✓✓	✓
SDO16 To promote sustainable transport and minimise the need to travel by car.	✓✓	x

Key	✓	positive
	X	negative
	?	uncertain
	0	no significant impact

Option 1 scored a negative result against 1 objective and an uncertain result against 4 objectives. Option 2 scored a negative result against 4 of the objectives and an uncertain outcome against 8 objectives.

The detailed results can be found in **Appendix 5**. As a result of the findings, it was decided that Option 1 should be taken forward as the Preferred Option for the Core Strategy with some amendments to take into account the findings of the SA.

The detailed results of the Issues and Options appraisal can be found in Appendix 5 of this report and the Interim SA which is available from the Planning Policy team

4

The Preferred Options
The results of the Issues and Options appraisal showed that the overall impact of Option 1 was more positive than for Option 2. Whilst there were uncertain impacts identified, overall, the appraisal indicated that Option 1 – Growth Areas, is likely to make more of a positive contribution to directing new spatial growth within the borough.

The SA of the Preferred Options revealed a predominantly positive impact of the policies in relation to the sustainability objectives. Where negative impacts were identified there were, in general, obvious mitigation measures which could be put in place. Overall, the appraisal indicated that the draft Core Strategy Preferred Options policies would be likely to make a positive contribution to directing new spatial growth within the borough.

The detailed results of the Preferred Options appraisal can be found in Appendix 6 of this report and the Draft SA which is available from the Planning Policy team

Response to consultation

Responses from the following organisations were received on the Interim Sustainability Appraisal of the Issues and Options.
1.   The Environment Agency
2.   English Heritage
3.   Southwark PCT

In summary, the responses suggested additional indicators and baseline data should be included within the SA. Recommendations were also made for the inclusion of additional plans and strategies within the list of documents that have been referenced for information in the preparation of the Core Strategy. Further details can be found in **Appendix 2**

In response to the consultation the sustainability objectives and indicators have been reviewed and amended as shown in the Sustainability Appraisal Framework in section 6.2. In particular, a new SDO 17 was added - '*To provide the necessary infrastructure to support existing and future development'*. New indicators have also been added on the historic environment.

SA of the Submission Version of the Core Strategy

As a result of the consultation process changes have been made to the sustainability objectives and indicators as well as the Core Strategy policies. A further iteration of the SA has therefore been undertaken on the Draft Submission Version to ensure that sustainability has been addressed appropriately and to identify any further mitigation measures that may be necessary.

The SA has been carried out against the Sustainability Framework set out in Section 6 of the Sustainability Report.

Policies Assessed

Strategic Policy 1	Sustainability Assessment
Strategic Policy 2	Sustainable Transport
Strategic Policy 3	Shopping, leisure and entertainment
Strategic Policy 4	Place to learn and enjoy
Strategic Policy 5	Providing new homes
Strategic Policy 6	Homes for people on different incomes
Strategic Policy 7	Family homes
Strategic Policy 8	Student homes
Strategic Policy 9	Homes for Gypsies and Travellers
Strategic Policy 10	Numbers and places for people to work
Strategic Policy 11	Open spaces and wildlife
Strategic Policy 12	Design and Conservation
Strategic Policy 13	High environmental standards
Strategic Policy 14	Implementing the Core Strategy
Strategic Targets Policy 1	Achieving Growth
Strategic Targets Policy 2	Improving Places

The principal findings of the appraisal of each policy are summarised below.

The results of the submission version appraisal showed that the overall impact was positive especially for Policy 1: Sustainable Development and Policy 13: High Environmental standards. Whilst there were uncertain impacts identified, overall, the appraisal indicated that the policies are likely to have a positive contribution to directing new spatial growth within the borough. In particular, the Core Strategy policies will help to achieve sustainable development objectives:

- SDO 1 To tackle poverty and encourage wealth creation
- SDO 5 To promote social inclusion, equality, diversity and community cohesion
- SDO 15 To provide everyone with the opportunity to live in a decent home

Some negative impacts were identified in relation to policies S1, S2, 5 and 10, however these were in relation to the environmental impacts owing to the quantum of new development . Mitigation measures have been identified which will need to be put in place to minimise impacts. Overall, the appraisal indicated that the Submission Version policies would be likely to make a positive contribution to directing new spatial growth within the borough.

A summary table is provided below.

Summary of Results

Sustainability Objectives	Core Strategy Strategic Policies															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	S1	S2
SDO 1 — To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓	✓	✓✓	✓✓
SDO 2 — To improve the education and skill of the population	✓✓	-	✓	✓✓	✓	-	-	✓✓	✓	✓✓	✓	✓	✓	✓	✓	✓
SDO 3 — To improve the health of the population	✓✓	✓✓	✓	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓✓	✓	✓	✓	✓	✓
SDO 4 — To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	✓✓	-	✓	✓	✓	✓	✓✓	-	-	✓	✓✓
SDO 5 — To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓
SDO 6 — To reduce contributions to climate change	✓✓	✓	✓	?	X	-	-	?	-	X	✓	?	✓✓	-	X	X
SDO 7 — To improve the air quality in Southwark	✓✓	✓	✓	?	X	-	-	?	-	X	✓	?	✓✓	-	X	X
SDO 8 — To reduce waste and maximise use of waste arising as a resource	✓✓	-	?	?	X	-	-	?	✓	X	-	?	✓✓	✓✓	X	?
SDO 9 — To encourage sustainable use of water resources	✓✓	-	?	?	?	-	-	?	✓	?	?	✓	✓✓	✓✓	?	?
SDO 10 — To maintain and enhance the quality of land and soils	✓✓	-	✓	✓	✓	-	-	✓	-	✓	✓	✓	✓✓	✓	?	✓
SDO 11 — To protect and enhance the quality of landscape and townscape	✓✓	✓	✓✓	✓	✓✓	?	?	?	✓?	✓	✓	✓✓	?	✓	?	✓✓
SDO 12 — To conserve and enhance the historic environment and cultural assets	✓✓	-	✓	-	?	-	?	?	✓?	✓	✓	✓✓	?	-	?	✓✓
SDO 13 — To protect & improve open spaces, green corridors & biodiversity	✓✓	✓	✓	-	?	-	?	?	✓?	✓	✓✓	✓✓	✓	✓	?	✓✓
SDO 14 — To reduce vulnerability to flooding	✓	-	?	?	X	-	-	X	✓	?	✓	?	✓✓	✓	X	✓
SDO 15 — To provide everyone with the opportunity to live in a decent home	✓✓	-	-	-	✓✓	✓✓	✓✓	✓✓	✓✓	-	-	✓	✓	✓	✓✓	✓✓
SDO 16 — To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	✓	?	✓	✓	✓	✓	?	?	✓	✓	?	✓	✓	✓
SDO 17 — To provide the necessary infrastructure to support existing and future development	✓✓	?	✓	✓	?	?	?	✓	✓	?	✓	-	✓	✓✓	?	✓

Strategic Policies:

1. Sustainable Development
2. Sustainable Transport
3. Shopping, leisure & entertainment
4. Places to learn & enjoy
5. Providing new homes
6. Homes for people on different incomes
7. Family homes
8. Student homes
9. Homes for gypsies & travellers
10. Jobs and businesses
11. Open spaces and wildlife
12. Design and Conservation
13. High environmental standards
14. Implementation & delivery
S1. Achieving growth
S2. Improving Places

Key:
✓✓	major positive
✓	minor positive
XX	major negative
X	minor negative
?	uncertain
-	no significant impact

What difference has the appraisal process made?

The sustainability appraisal process has helped to identify the environmental, social and economic issues that the Core Strategy needs to address and any links between the issues. The core strategy addresses all these issues through its policies, implementation and monitoring. This is very important, as the most effective approach will be one that can address the issues in a coordinated way. The preparation of the sustainability appraisal has been carried out alongside the preparation of the Core Strategy as part of an iterative process. This has helped to inform decisions to ensure that the Core Strategy policies contribute effectively to achieving sustainable development.

The sustainability appraisal has also performed a key role in providing a sound evidence base for the core strategy. As part of the sustainability appraisal we have reviewed the evidence informing the decisions made in the core strategy. This has included looking at both statistics and factual evidence about the borough, and also our many studies that underpin our core strategy. Our background papers provides more information on the studies undertaken.

The sustainability appraisal has informed the decision making process to facilitate the evaluation of alternatives and has helped to demonstrate that the plan is the most appropriate given the reasonable alternatives. At each stage of plan preparation we have appraised the options to ensure that the approach taken forward has the most positive impact; environmentally, socially and economically. The final approach taken forward through the core strategy is considered to be the most effective at achieving sustainable development.

The appraisal process has also provided the opportunity to consider how the Core Strategy should be monitored to keep track of how well it performs after it is adopted. The sustainability indicators indentified through the sustainability appraisal have been incorporated into the monitoring framework set out in section 7 of the core strategy. This will make sure that as part of our monitoring process through the annual monitoring report we also review the impact of the core strategy policies on these sustainability indicators.

Next Steps

The final SA report and submission version of the Core Strategy will be submitted to an Inspector for independent examination. Monitoring of the Core Strategy will take place following its adoption and will be reported on in the Annual Monitoring Report.

The AMR reports on whether Southwark's planning policies are achieving what they set out to do. It is a legal requirement that local planning authorities produce an Annual Monitoring Report (AMR) every year. The AMR sets out in more detail the social, environmental and economic context of the borough within which our planning policies operate. It also includes an overview of what progress the council is making in preparing new planning documents against the timetable set out in the Local Development Scheme.

The AMR acts as an important check to show whether our planning policies are achieving the objectives of the Local Development Framework and what sort of impact they are having on the community and the environment; and how we can improve our planning policies and the way we monitor them in the future.

It is important that the council regularly monitors new development that takes place to help identify;

- If planning policies in the Local Development Framework are having the outcomes intended, and if not the reasons why.
- The changes taking place in Southwark and how planning policies may need to respond to these changes. It may be that we need new policies.
- Whether the council's consultation practices (as set out in the Statement of Community Involvement) are improving the amount and quality of community engagement in planning decisions.

Core Strategy Development Plan Document:
Submission Version

Sustainability Report
March 2010

1   INTRODUCTION

1.1   What is this document?

1.1.1   This report provides the findings of the Sustainability Appraisal of the Core Strategy Submission Version. This report is the final stage of the Sustainability Appraisal (SA) for Southwark's Core Strategy The purpose of an SA is to promote sustainable development through the integration of social, economic and environmental considerations in the preparation of new or revised Development Plan Documents (DPDs).

1.1.2   The council is preparing a Core Strategy for the borough as part of the Local Development Framework (LDF). The Local Development Framework is made up of a collection of DPDs, including Area Action Plans (AAPs), a Development Control DPD and Supplementary Planning Documents (SPDs), which will be used to guide development in the area. Further explanation of the LDF documents is set out below.

- Local Development Scheme – this is a timetable for the preparation of the LDF, setting out what documents will be produced and when the key stages will take place.
- Statement of Community Involvement (SCI) – this sets out how interested people and organisations can be involved in preparation of the LDF and in future planning decisions.
- Core Strategy – this is a key element of the LDF, setting out the spatial vision for the borough and including a set of key strategic policies from which all other documents flow. Together with the other DPDs, it will replace the Southwark Plan 2007. Southwark's Core Strategy will also identify particular locations in the borough and outline what types of development would be appropriate there in the future.
- Area Action Plans (AAPs) – these provide spatial strategies for key areas of the borough. AAPs for Canada Water, Aylesbury and Peckham are being prepared and consulted upon.
- Development Management Policies - this document will build upon the Core Strategy setting out specific policies to manage development across the borough and ensuring it contributes to the overall aims of the council.
- Supplementary Planning Documents (SPDs) – provide additional detail around particular priority policies such as affordable housing and sustainable construction.

More information on Southwark's Local Development Framework and Development Plan Documents can be obtained on the council's website http://www.southwark.gov.uk

1.1.3   This report does the following:
- Sets out the background to the requirement for the SA for the documents and plans within the LDF
- Identifies plans and policies that will be relevant to undertaking the SA
- Identifies relevant baseline data and any data gaps
- Sets out key sustainability issues in Southwark
- Provides the SA framework
- Addresses the range of comments made during the consultation on the Sustainability Appraisal Scoping Report
- Tests the Core Strategy objectives against the SA framework
- Predicts and evaluates the likely significant effects of the options set out within the Core Strategy Preferred Options
- Identifies potential mitigation measures or ways in which positive impacts can be maximised.

1.2   Why do we need to carry out a Sustainability Appraisal?

1.2.1   Section 19 (5) of the Planning and Compulsory Purchase Act 2004, requires Sustainability Appraisals of plans to be carried out. Under the requirements of the act, Sustainability Appraisal (SA) of all Local Development Documents is now mandatory. A Sustainability Appraisal has, therefore, been carried out as part of preparing the Core Strategy. The appraisal tests how well the planning document considers social, economic and environmental issues in order to achieve sustainable development.

"Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular, they should carefully consider the inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development."
 PPS1: Delivering Sustainable Development (paragraph 24)

1.3   Strategic Environmental Assessment

1.3.1   Sustainability Appraisals also need to satisfy the requirements of the European Directive 2001/42/EC. The Directive requires a formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. An SEA is required when preparing new or revised DPDs.

1.3.2   The Government guidance on sustainability appraisal set out in Planning Policy Statement 12: Local Spatial Planning, 2008 and the Plan Making Manual, incorporates the requirements of the SEA Directive within the SA process. For the purposes of simplicity, the term sustainability appraisal (SA) is used throughout this document to include both the SA and SEA processes. Further details on the legislative and policy background to sustainability appraisal are set out in **Appendix 1**.

1.4 Why is the Core Strategy needed?

1.4.1 The Core Strategy sets out the spatial vision and strategic objectives for the borough including the planning policies. The council will use the planning policies to make decisions on individual planning applications. All new development must be in line with the planning policies for the area. The plan will also identify areas of the borough where significant changes are expected and will explain how these changes will take place.

1.5 What are the stages of the Core Strategy production?

1.5.1 The table below sets out the different stages involved in the preparation of the Core Strategy and SA

Stages in Preparing Core Strategy	
Evidence Gathering (Scoping Report)	**July - September 2008** Gathering information and understanding the key social, economic and environmental issues that affect Southwark's future. **Public Consultation** 5 Weeks formal consultation **28 July - 1 September 2008**
Issues & Options (Interim SA)	**September –December 2008** Using the information gathered on issues to identify a vision for Southwark in the future and different ways (options) this vision could be achieved. **Public Consultation** 9 weeks informal consultation **1 Sept – 2 November 2008** Followed by 6 weeks formal consultation: **November– 15 December 2008**
Preferred Option (Draft SA)	**May – July 2009** Identifying the best option for achieving the vision for Southwark in the future, based on an assessment of the positive and negative impacts of each option and incorporating feedback received during previous consultation **Public Consultation** 6 weeks informal consultation followed by 6 weeks formal consultation. **28 April – 21 July 2009**

Draft Core Strategy sent to the Government for approval (Final SA Report)	**February 2010** The Submission Version will be submitted to the Secretary of State and will be examined by an independent inspector who will decide whether or not we can adopt the Core Strategy and if any changes need to be made **Public consultation** 15 weeks informal consultation **29 Sept 2009 – 14 January 2010** Followed by 6 weeks formal consultation: **15 January – 5 March 2010** We will hold 6 weeks formal consultation
Adoption	**January 2011** Once the Secretary of State has approved the core strategy the council will adopt the document and start implementation.

1.6   Structure of the Report

This report is divided into nine sections.

Section 1	Explains why a sustainability appraisal has been prepared and provides an overview of the Core Strategy and preparation process
Section 2	Sets out the methodology used to undertake the SA including the consultation that has been carried out
Section 3	Describes the purpose of the Core Strategy and the plan's objectives and policies
Section 4	Provides information on: the context, other policies, plans and programmes and a summary of the baseline information
Section 5	Presents the sustainability issues and objectives relevant to the Core Strategy
Section 6	Explains the Sustainability Appraisal Framework
Section 7	Examines the issues and options of the Core Strategy that have been considered and compares the plan's objectives against the sustainability objectives
Section 8	The effects of the plan policies are described, including how sustainability has been addressed in the development of the plan, any significant positive or negative effects, cumulative impacts, proposed mitigation, uncertainties and risks
Section 9	The next stages in the plan preparation, implementation and future monitoring are explained.

2 Sustainability Appraisal Methodology

2.1 Purpose of the Sustainability Appraisal

2.1.1 The purpose of Sustainability Appraisal (SA) is to ensure that sustainable development has been integrated in the formulation of development plans and to verify that due consideration has been given to social, economic and environmental factors.   The SA must also show how the requirements of the   Strategic Environmental Assessment (SEA) Directive have been met.

2.2 Planning Policy and Sustainable Development

2.2.1 Planning Policy Statement (PPS) 1: Delivering Sustainable Development; provides the over-arching policy to deliver sustainable development through the planning process. The guidance suggests that planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:
- making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life
- contributing to sustainable economic development
- protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities
- ensuring high quality development through good and inclusive design, and the efficient use of resources
- ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

2.2.2 Planning Policy Statement 12: Local Spatial Planning; sets out the Government's policy on local spatial planning including the need to undertake a sustainability appraisal of the plan. The guidance states:

'SA should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process.' PPS12 para. 4.43

It is also stated in the guidance that provided the sustainability appraisal is carried out following the guidelines in the *A Practical Guide to the Strategic Environmental Assessment Directive, 2005* and the *Plan-Making Manual* there will be no need to carry out a separate SEA.

2.2.3   The Government has also published a Sustainable Development Strategy 'Securing the future - delivering the UK Sustainable Development Strategy, 2005'. A revision of the 1999 strategy, the document sets out the guiding principles for sustainable development and priorities for action. The strategy sets out five guiding principles to achieve sustainable development.

- Living within environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting good governance
- Using sound science responsibly

Illustration of the Government's Definition of Sustainable Development
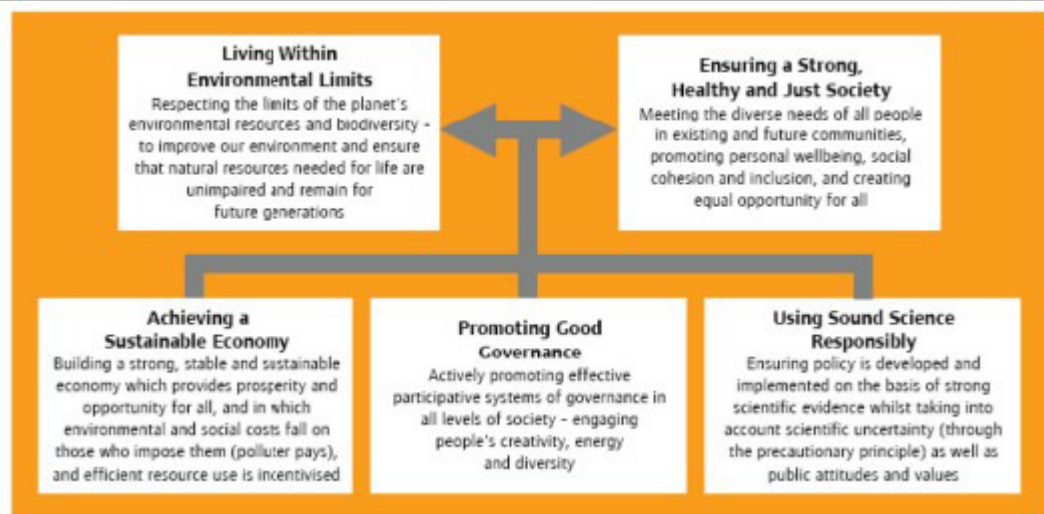
The Strategy also gives the following priorities for action:

- Sustainable consumption and production
- Climate Change and Energy
- Natural Resource Protection and Environmental Enhancement
- Sustainable Communities.

2.3   Sustainability Appraisal Process

2.3.1   The Sustainability Appraisal of the Core Strategy has been carried out by council officers in accordance with Government guidance:

- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM 2005
- Planning Policy Statement 12: Local Spatial Planning, 2008.
- A Practical Guide to the Strategic Environmental Assessment Directive, 2005
- Plan-Making Manual

The stages of the SA process are set out below. Stages A, B and C are the subject of previous reports. This report provides the results from Stage D.

Sustainability Appraisal Stages	Timetable
Stage A	
Setting the context and objectives, establishing the baseline and deciding on the scope	Consultation on the scoping report took place from 28 July 2008 until 1 September 2008
Stage B	
Developing and refining options and assessing effects against the SA framework. A draft sustainability appraisal report is prepared for consultation with the public along with the issues and options paper	Consultation on the issues and options document and draft sustainability appraisal took place between 1 September 2008 and 15 December 2008
Stage C	
Prepare the draft SA report. This stage involves testing in detail the impacts of the preferred option. A draft sustainability appraisal report is prepared for consultation with the public along with the preferred option paper.	28 April 2009 to 23 July 2009
Stage D	
Consult on the publication version of the Core Strategy and the final SA report.	Consultation on the publication version document and sustainability appraisal report will take place from 29 Sept 2009 to 5 March 2010
Stage E	
Once the Core Strategy has been agreed by the council, its social, economic and environmental impacts will then be monitored through the council's annual monitoring report.	Monitoring the Core Strategy will take place once it has been adopted.

Further information regarding the stages of the SA process, and the way in which they correspond with the preparation of the Core Strategy, is given in Appendix 1

2.4   Consultation

2.4.1   As part of the preparation of the Core Strategy, community consultation is being carried out to make sure that local residents and stakeholders are informed of the future plans for the borough. The council has prepared a consultation strategy for the Core Strategy setting out how consultation will take place and showing how this relates to the council's Statement of Community Involvement.

2.4.2   Consultation on the Core Strategy is being carried out in accordance with the SCI (2008). This sets out how individuals, community groups, developers and anyone else who may have an interest in the Local Development Framework should be consulted on planning documents.

2.4.3   Planning Policy Statement 1: Delivering Sustainable Development sets out the principles that the Government believes should underpin community involvement in the planning process. SEA guidance requires that the contents of the scoping report must be consulted on with the following 'authorities with environmental responsibility':

- Natural England
- Environment Agency
- English Heritage.

2.4.4   Government guidance also recommends that additional bodies can be consulted in order to represent the social and economic aspects of sustainability. The following additional bodies were consulted, in addition to an extensive list of local consultees:

- British Telecommunications
- Bromley Council
- Corporation of London
- Government Office for London
- Greater London Authority
- Lambeth Council
- Lewisham Council
- LFEDA
- London Development Agency
- Secretary of State
- Secretary of State for Transport
- Thames Water Property Services
- The Coal Authority
- Southwark Primary Care Trust
- Any of the bodies from the following list who are exercising functions or a function in the borough:
  1. Person to whom a licence has been granted under section 7 (2) of the Gas Act 1986
  2. Sewage undertakers
  3. Water undertakers.
- Any person to whom the electronic communalisations code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003
- Any person who owns or controls electronic communications apparatus situated in any part of the borough.

2.4.5   Consultation has been carried out on the Scoping Report, Interim SA (Issues and Options) and Draft SA (Preferred Options). The responses from the consultation have been used to inform this Sustainability Appraisal Report and ensure that the key local and wider environmental, social and economic issues relevant to the plan have been fully considered.

2.4.6 The consultation responses on the Draft Sustainability Appraisal Report were generally positive, although a range of minor amendments were suggested and incorporated within this report. These included:

- Comments on additional plans, programmes or strategies that should have been considered
- Suggestions of other sustainability issues for Southwark that should have been considered.
- Comments on the proposed objectives and indicators in the Sustainability Appraisal Framework.
- Proposed additional indicators.
- Iteration of the need to consider cross-borough issues and to work with adjoining boroughs. We work closely with our neighbours to ensure that our policies take into account the changes other boroughs are making through their planning documents. We will continue to work closely with them including producing joint evidence documents such as our Strategic Housing Market Assessment, our Strategic Flood Risk Assessment and our Joint Waste Technical Plan. Within section 2 of the core strategy publication/submission we have inserted a section on how we work with our neighbouring boroughs to show our key cross boundary issues.

Further details of the consultation responses can be found in Appendix 2.

2.5 Any difficulties undertaking the SA

2.5.1 The identification of suitable sustainability indicators within the Sustainability Appraisal Framework to ensure issues can be effectively measured and monitored has been an iterative process.

2.5.2 We have borne in mind that the indicators need to satisfy the following characteristics since only these are suitable for monitoring purposes:

a. Important:
Indicators should measure something significant to the achievement of the sustainable development aims of the Plan. These are translated into the main policy areas of the Plan and must fit within the main policy framework. Indicators should assist in the identification of the need to review a strategy, policy or proposal.

b. Supported by readily available information:
The data necessary to support the use of the indicator must be available. This may be of a technical nature.

c. Capable of showing trends over time:
Data over a reasonable time scale is required (e.g. 5 - 10 years) to enable trends to be identified. Data must be available during the Plan period.

d. Easy to understand and communicate:
Any indicator should be readily understood by non-specialists so that the wider community can understand it's relevance to sustainable development and the Local Development Framework.

As a result the indicators in the sustainability appraisal framework have been modified and refined in response to comments received in the consultation process.

2.6 Compliance with the SEA Directive

2.6.1 **Appendix 1** explains the SEA directive and signposts where the relevant information can be found within the SA report.

3.0 Core Strategy Objectives and Policies

3.1 The Purpose of the Core Strategy

3.1.1 Planning Policy Statement 12 (2008) explains the purpose of the Core Strategy:

> *"Every local planning authority should produce a Core Strategy which includes:*
> *(1) An overall vision which sets out how the area and the places within it should develop;*
> *(2) Strategic objectives for the area focussing on the key issues to be addressed;*
> *(3) A delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when, and by what means it will be delivered. Locations for strategic development should be indicated on a key diagram; and*
> *(4) Clear arrangements for managing and monitoring the delivery of the strategy"*

PPS12 paragraph 4.1

3.1.2 The Core Strategy sets out the spatial vision and strategic objectives for the borough, which are derived from the vision in Southwark's Sustainable Community Strategy: Southwark 2016. Issues that the Core Strategy considers are the delivery of new housing, creating new jobs, protecting and enhancing the environment and dealing with climate change. The plan identifies areas of the borough where significant changes are expected, such as at the Elephant and Castle and Canada Water, and explains how these changes will take place.

3.1.3 The Core Strategy includes the strategic planning policies for the borough. The Council will use the planning policies to make decisions on individual planning applications. All new development must be in line with the planning policies for the borough as well as the more specific policies given in the other DPDs and SPDs, which will form part of the Local Development Framework.

3.2 Core Strategy Vision and Objectives

3.2.1 The Core Strategy vision is:

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

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

3.2.2 The Core Strategy seeks to meet the following objectives which are based on those set out in the Southwark 2016: Sustainable Community Strategy:

Theme: Improve individual life chances

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

Southwark will be a prosperous borough providing a wide range of employment opportunities that facilitate regeneration. The Central Activities Zone will contain a mix of tourism, cultural and creative industries, finance and office jobs. Local centres will provide retail, services and local employment whilst preferred industrial locations provide places for small businesses and industry. Southwark will be without concentrations of poverty and with good opportunities because there is good access to jobs and residents will have the training and skills needed by businesses. The policies related to this theme are STP 1, STP 2, SP1, SP 3, SP 10 and SP14.

Strategic Objective 1B. Achieve educational potential

Southwark schools, universities, pre-schools and colleges will be places where children and young people can achieve and gain the knowledge and skills to get a job. Southwark will be a place that creates positive futures by building, redeveloping and improving educational facilities ensuring good access for everyone. Improving Southwark will help to attract good teachers to work in the borough. The policies related to this theme are STP1, STP 2, SP 1, SP4, SP8 , SP 10 and SP 14.

Strategic Objective 1C. Be healthy and active

Southwark's community will be healthy and active. High quality sports and leisure centres will be located across the whole borough and everyone will have access to them. Open spaces will be protected and the local community will be able to enjoy using these spaces, including parks, nature reserves and the River Thames. Good quality and accessible health facilities will be located across the whole borough. Southwark will be without concentrations of people with poor health because everyone has access to good health, sports and leisure facilities, and open spaces. The policies related to this theme are STP 1, STP 2, SP1, SP 4 SP 5 and SP14.

Strategic Objective 1D. Culture, creativity and diversity

Southwark will be a prosperous borough providing a wide range of activities and facilities for the diverse community. Successful creative industries will thrive. There will be a wide range of arts and cultural facilities for Southwark's multicultural and very diverse community. The policies related to this theme are STP 1, STP 2, SP 1, SP 3, SP 4, SP 5 SP 10 and SP 14.

Strategic Objective 1E. Be safe

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

Theme: Make the borough a better place for people

People will choose to live in Southwark because we will have a mixture of different types of housing, jobs, shops, schools, community facilities, health centres, libraries, religious centres and leisure facilities needed by a diverse community. The policies related to this theme are STP 1, STP 2, SP 1, SP2, SP 3, SP , SP 6, SP 7, SP 8, SP 9 and SP 14.

Strategic Objective 2B. Promote sustainable use of resources
Southwark will be a green and environmentally sustainable borough. New developments will be built to high environmental standards to reduce the impact on the environment and adapt to climate change, focussing on flood risk, waste management, biodiversity and water quality. New housing will be located near to community facilities, shops, offices and leisure facilities. This encourages walking, cycling and public transport and restricts parking to reduce pollution and congestion, and the need to travel far. The policies related to this theme are STP 1, STP 2, SP 1, SP 2, SP 11, SP12 SP13 and SP 14.

Strategic Objective 2C. Provide more and better homes
The whole of the borough will offer more housing of a range of different types to meet the needs of the community. All the housing will be built to a high quality of design. There will be a choice of housing types including more family housing, housing for students and more affordable housing. The policies related to this theme are STP 1, STP 2, SP1, SP 5, SP 6, SP 7, SP 8, SP 9, SP 12 and SP13.

Strategic Objective 2D. Create a vibrant economy
Southwark will be a successful and profitable place. The town centres will offer a range of shops and services, along with offices, tourism and cultural facilities. The Central Activities Zone, opportunity areas and action areas will have lots of different activities as well as housing. The policies related to this theme are STP1, STP 2, SP 1, SP 3, SP 4, SP 8, SP 10 and SP 14.

Strategic Objective 2E. A liveable public realm
It will be easy to get to and around places on foot and by bike with excellent public transport links, including water transport. The policies related to this theme are STP 1, STP 2, SP 1, SP 2, SP11 and SP 14.

Strategic Objective 2F. Conserve and protect historic and natural places
Southwark's historic buildings will be protected and improved particularly in conservation areas and listed buildings. Open spaces and biodiversity will be protected, made more accessible and improved. The policies related to this theme are STP 1, STP 2, SP1, SP 11, SP 12 and SP 14.

Theme 3: Deliver quality public services

Strategic Objective 3A. Accessible, customer focused, efficient and modern public services
Public services will be effective and easily accessible by all members of the community. The policies related to this theme are STP 1, STP 2, SP 1, SP 3, SP 4 and SP 14.

Theme 4: Making sure positive change happens

Strategic Objective 4A. Provide enough funding for regeneration to positively transform the image of Southwark
We will work with landowners and developers to achieve regeneration, continuing to make Southwark a place that people aspire to be and that developers and landowners want to invest in. We will have a clear and flexible plan to make sure the right investment decisions are made and that regeneration happens on time. The policy related to this theme is STP 1, STP 2, SP 1, SP 16 and SP14.

Strategic Objective 4B. Make sure that we consult effectively
We will work with local communities, organisations, community groups, developers, businesses and land owners to make sure that we consult effectively on planning policies and development management decisions. We will make sure that we provide people with the opportunity to participate meaningfully in the preparation of local development framework documents as set out in our statement of community involvement. The policy related to this theme is STP 1, STP 2, SP 1, SP 6 and SP 14.

Theme 5: Planning for development in growth areas
Strategic Objective 5A Developing in growth areas
We have a growth areas approach to achieving the vision to improve places prioritising development in the:
• Central activities zone.
• Elephant and Castle opportunity area.
• Borough, Bankside and London Bridge opportunity area.
• Peckham and Nunhead action area.
• Canada Water action area.
• Aylesbury action area.
• West Camberwell regeneration area.
• Old Kent Road regeneration area.

The policies related to this theme are STP 1, STP 2, SP 1, SP 2 and SP5.

3.3 Core Strategy Policies

The Core Strategy strategic policies and strategic targets policies are set out below:

Strategic Policy 1	Sustainability Assessment
Strategic Policy 2	Sustainable Transport
Strategic Policy 3	Shopping, leisure and entertainment
Strategic Policy 4	Place to learn and enjoy
Strategic Policy 5	Providing new homes
Strategic Policy 6	Homes for people on different incomes
Strategic Policy 7	Family homes
Strategic Policy 8	Student homes
Strategic Policy 9	Homes for Gypsies and Travellers
Strategic Policy 10	Numbers and places for people to work
Strategic Policy 11	Open spaces and wildlife
Strategic Policy 12	Design and Conservation
Strategic Policy 13	High environmental standards
Strategic Policy 14	Implementation and Delivery
Strategic Targets Policy 1	Achieving Growth
Strategic Targets Policy 2	Improving Places

4 Context and Baseline Information

4.1 Links to other policies, plans and programmes

4.1.1 A number of plans and programmes of relevance to the Core Strategy have been reviewed to ensure that the messages from the policies are taken into account and to enable a robust appraisal of the impacts of the policies. A full list is set out in **Appendix 3**.

> **Further details on the objectives and requirements of other relevant Policies, Plans and Programmes are contained within the Background Paper to the Core Strategy, which can be found on the Council's website http://www.southwark.gov.uk**

4.2 Summary Baseline Information

4.2.1 Baseline information has been used to measure the current characteristics of the area, to enable an assessment of how it is likely to change in the future and to monitor future implementation. The data that has been collected describes the social, environmental and economic characteristics of the borough. The background paper to the Core Strategy Submission Version sets out the baseline data in further detail. A summary of the data is given below:

4.2.2 Socio-Economic Characteristics

The population of Southwark has risen to 274,400 since the census in 2001, which showed the population to be 256,700, an increase of 6.5%. The government has projected the population to rise to 305,600 by 2016 and 329,300 by 2026. Population density across the borough as a whole averages around 84 persons per hectare. This figure is nearly double the Greater London average of 46.

The age breakdowns from the mid-year estimate are 48,900 people aged between 0-15 years, 195,700 people of working age, and 29,400 older people (65+ for men/60+ for women). There are far more adults aged 25-44 years in the area than in England and Wales as a whole, but the population share for children is around the national average. Southwark also has proportionally fewer older persons compared to England and Wales. Older people comprise 10% of Southwark's population compared to 18% of the population within England and Wales.

Southwark is ranked as the 26th most deprived local authority area (1 being the most deprived) in England out of a total of 354 Local Authorities. Levels of deprivation in the borough vary significantly between areas with Peckham, Walworth and Camberwell being among the most deprived areas. The least deprived areas tend to be in the north and south of the borough such as Bankside and Dulwich.

The working age employment rate for Southwark is 73%, lower than both the London and UK averages with 75% for London and 79% for the UK. The employment rate also varies by area generally being lowest in the more deprived areas of the borough. In terms of Southwark's employed residents, the proportion is broken down into the following sectors:
a) Manufacturing 5.7%
b) Construction 3.7%
c) Distribution, hotel and restaurants 14.6%
d) Transport and communications 5.5%
e) Business, finance, IT 42.4%
f) Public admin, education, health 21.2%
g) Other 6.9%

63% of residents are White, 3.7% Mixed, 4.1% Asia or Asian British, 25.8% Black or Black British and 3.2% Chinese or other ethnic group. In terms of faith groups, 61.6% of residents are Christian, 0.4% are Jewish, 6.9% are Muslim, 1.1% are Hindu, 0.2% are Sikh, 1.1% are Buddhist, 0.4% as Other, 18.5% No religion and 9.9% as religion not stated in the Census

4.2.3 Employment

Southwark has a wide mix of industries and types of employment. The types of employment vary between different areas for example Borough, Bankside and London Bridge (SE1 market) is characterised by large office developments for multi-national corporations. Several large office developments are in the pipeline including the Shard of Glass, whilst offices located elsewhere in the borough serve the local market. The northern area also has the majority of tourist and cultural attractions in the borough due to its location in the Strategic Cultural Zone and the proliferation of tourist attractions in this area. The North West of the borough at Elephant and Castle, Borough and Bankside and London Bridge is in the Central Activities Zone, this is an area where large-scale office development is encouraged and promoted.

There are also clusters of creative industries in certain areas in the borough; Peckham and Camberwell in particular are growth areas for these types of industries. This area of industry has seen a growth from 2,430 in 1998 to 2,978 in 2007.

The majority of residents in Southwark are employed in the business and service sectors although a higher proportion of people in the borough are employed in the manufacturing and construction industries than the London average. Compared to the London figure, there are a higher proportion of people in elementary occupations in Southwark

The Employment Land Review, Employment Strategy and Enterprise strategy show that there is currently 1,255,000sqm of office space in Southwark and around 165,800 people employed. The Employment Land Review shows we have the capacity to increase the amount of office space to 1,674,885sqm and create an additional 32,000 new jobs to 190,800 new jobs between now and 2026. This is in line with the current London Plan targets for the borough.

4.2.4 Education

There are 9 early years' centres in the borough providing childcare and education for children aged from birth to five years old. There are 19,949 pupils on the primary roll at January 2008, of which nearly two-thirds are from black or minority ethnic (BME), a proportion higher than in the adult population. In 2007, a little over one-third, 33.9%, qualified for a free school meal, which was more than double the national average of 15.9%.

As at January 2008, there was capacity for 23,730 primary places, with a surplus of 3,781 places or 15.9%. Thirteen primary schools had surplus capacity above 25%. Of these, two are artificially high after increasing their roll in 2007 and two are due to reduce their roll in September 2008. It is predicted the primary population will rise to 22,067 by 2018 – a figure that is less than 10% below our current capacity.

The borough currently has a range of secondary schools including:
-   1 City Technology College
-   2 Academies
-   5 Community schools (4 to become academies)
-   5 voluntary aided schools (1 to become an academy)
-   1 foundation school
-   4 secondary special schools

Through the Building Schools for the Future and the Academies programme, every secondary school will be refurbished or re-built by 2012. Due to population growth, there is also a need for a new secondary school. As at January 2007, 27% of pupils had a special educational need (SEN). There are two special schools proposed for redevelopment

Southwark has a university and colleges offering a range of higher education courses including Southwark College, London South Bank University, Camberwell College of Arts, London College of Communication, Morley College. Southbank University is expected to grow as is Southwark College.

Over a third (35%) of working age residents in 2001 had higher education qualifications, which is nearly double the national norm. However the proportion of those with no qualifications (24%) was above the London average. In 2001, around 12% of residents were managers or senior professionals. This is 50% above the national figure but less than in inner London. In 2001, Southwark was also home to 18,800 full time students. This is almost double the national average and the third highest in London. 18,500 unpaid carers live in the borough.

4.2.5 Community Facilities
There are currently:
- 210 Council owned community buildings of which approximately 110 are Tenants and Residents association halls (TRA). The remainder are in predominantly VCS occupation;
- 25 non-school buildings currently managed by Children's services (youth buildings, play rooms/one o-clock clubs, adventure playgrounds, sports sites), which are currently used or have the potential to be used by the Voluntary and Community Sector (VCS).

It is estimated that there are around 360 faith groups within Southwark comprising a mixture of religions including Christian, Jewish, Bahai, Coptic, Hindus, Buddhists, Sikhs, Muslims and Rastafarian. A total of 112 faith groups have been identified in the borough. 77 (or 69%) of the 112 places of worship investigated were unauthorised, the majority of which are Pentecostal/evangelical faith groups serving a mostly BME congregation.

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

The 2009 retail study suggests that we can expand retail floor space, particularly for comparison goods, without harming the vitality of centres outside the borough. Our strategy is to improve the choice available in our centres, particularly at Elephant and Castle/Walworth Road, Canada Water and Peckham which have the most capacity for growth. As well as improving choice, this should reduce the number of trips made to places further away outside the borough and also boost the local economy.

Southwark's public leisure centres and the Southwark Park Sports Centre are managed by Fusion Leisure Trust, a non-profit and community based organisation. Other facilities of Borough importance include:
- Surrey Docks Watersports Centre
- Burgess Park Tennis Centre
- Herne Hill Community Velodrome
- South Dock Marina

There are also leisure facilities run by private companies across the borough that provide for the needs of the community.

A range of facilities are available for children and young people in Southwark parks including 40 fixed play sites, 6 enclosed children's play areas catering for 2–14 year olds, informal games areas and a variety of sports facilities. There are also 200 play areas on housing estates comprising fixed metal play equipment, many of which are in need of upgrading and replacing.

In addition, there are:
- 33 school based clubs for 5 – 11 year olds. Users mainly reflect the ethnic population but there is an under-representation of white and Asian children and young people in some areas.
- 10 adventure playgrounds, 7 managed by the council and 3 by voluntary management committees.

The north of the borough and the wider South Bank area provide a world-class cultural quarter with the Tate modern and Shakespeare's Globe. Other cultural facilities in the borough include the Imperial War Museum, Design Museum, Dulwich Picture Gallery, South London Gallery, Café Gallery, Southwark Playhouse, Unicorn Theatre for Children and other galleries, theatres, orchestras, music and dance organisations of national and regional importance.

4.2.6 Health and Safety

Southwark's Primary Care Trust (PCT) is continuously improving and helping to improve health across the whole borough. The 2006/2007 Health Care Commission Annual Health Check gave Southwark PCT a rating of 'good' for both service quality and use of resources. Only four other London PCTs achieved a similar rating.

The prevalence of drug misuse is a significant issue for Southwark, the rate in 2004/05 was one of the highest across London and this was more than double the England average. The rate of teenage pregnancy is a particular concern for Southwark, in 2005/06 Southwark had the second highest rate in London after Lambeth, with figures of 85 per 1000 15-17 year olds conceiving in 2004. This was also significantly higher than the national average. Another concern is the proportion of total birth weights less than 2500grams which was higher than the national average and slightly higher than the average recorded across the London boroughs. This was also reflected in a higher than average infant mortality rate in 2005/06.

Southwark has a high rate of people claiming incapacity benefit with mental or behavioural problems and a high mortality rate from suicide and undetermined injury. The rate of persons admitted to hospital with conditions directly related to the consumption of alcohol in 2005/06 was considerably higher than the average across England and one of the highest rates seen across the London boroughs. Another issue of concern was the rate of deaths attributable to smoking in people aged 35 and over. In 2004 the rate in Southwark was one of the highest across London and higher than the national average.

4.2.7 Climate Change and Sustainability

- **Energy and Carbon**
  Increasingly we need to consider the way we utilise our resources and how we can minimise impact on the environment as a result of new development.   It will be crucial that new development constructed over the next 15 years is built following sustainable design principles in order to reduce the impact on the environment, adapt to climate change and also to enable the creation of sustainable communities.

  Energy use in buildings is responsible for around 85% of the CO_2 emissions across Southwark, mostly from housing, businesses and industry. In 2006, Southwark adopted a climate change strategy that aims to reduce CO_2 emissions across the borough by 80% by 2050 and to pursue a decentralised energy strategy for the borough.

The government has set a target for all new homes to be carbon neutral by the year 2016. Carbon neutrality is defined as emitting no net carbon emissions from all the energy used over the course of the year. To achieve carbon neutral buildings, the design must incorporate elements that conserve energy and water use, include renewable energy technologies and also sustainable construction techniques must be employed. The Code for Sustainable Homes sets out the national standard for developing homes in accordance with sustainability principles. The Government requires all new dwellings to be rated in accordance with the requirements set out in the Code for Sustainable Homes.

The scale of regeneration and estate renewal planned across the borough means that housing and commercial uses in particular can make a very large contribution to achieving our climate change targets. Very high targets have therefore been set for housing and commercial development based on the Code for Sustainable Homes and BREEAM. These targets will also help achieve Government targets to reduce CO_2 emissions from new homes by 44% from 2014 and 100% by 2016 through changes to the Building Regulations.

Elephant and Castle is set to establish new standards of environmental responsibility in urban redevelopment, by undertaking the entire regeneration with a zero increase in carbon emissions. This includes higher targets for energy efficiency, the introduction of renewable energy technology, and a move towards a decentralised low carbon energy supply (in the form of a Multi Utility Services Company - MUSCo), capable of delivering heat and power to 6.5 million square feet of mixed-use development. The sustainable community energy system will connect individual sites to a community heating network, compatible with many forms of renewable energy (including locally derived sources of renewable fuel), and capable of being extended to serve the wider community. There will also be an area-wide, integrated water management system that will cut water consumption and significantly reduce the requirement for a fully treated potable supply. This is achieved through two groundwater abstraction wells at opposite ends of the core development area which can be used for construction, toilet flushing, public area cleansing, landscape establishment and street cleaning. (CDSPD10 E&C Development Framework SPG, CDSPD11 E&C Enterprise Quarter SPD and CDSPD12 Walworth Road SPD)

National Grid's high voltage electricity overhead transmission lines / underground cables within Southwark Council's administrative area that form an essential part of the electricity transmission network in England and Wales including a 275kV underground cable from Newcross substation (on the Old Kent Road) in Southwark to Wimbledon substation in Wandsworth as well as existing gas holders on the same site on the Old Kent Road.

- **Waste and Recycling**
  National Government has set targets for Southwark Council to increase recycling rates and reduce the amount of waste going to landfill. The Mayor has also set waste targets for boroughs through the London Plan including the need to allocate enough land to process at 323,000 tonnes of waste per year by 2015 and 379,000 tonnes per year by 2020. This will help meet the London-wide target of processing at least 85% of the city's waste within London by 2020.

  A Joint Waste Technical Paper with Bromley, Bexley, Greenwich and Lewisham has been prepared to ensure that the waste targets are met. This technical paper provides detail of how working together we will meet our apportionment target. It demonstrates that there is enough combined capacity across these boroughs to meet the Mayor's target for these boroughs. As part of this approach we have safeguarded 11ha of land

at Old Kent Road for waste management, providing enough land to meet the Mayor's waste processing target. A new state of the art facility is being built on part of this land by Veolia Environmental Services, the Council's waste management partners, in order to help meet the targets by processing 111,940 tonnes of waste per annum with the potential to treat further waste by converting it into biomass fuel.

Southwark's Waste Management Strategy, 2003-2021(CDEN7) sets out the council's proposals for moving Southwark towards more sustainable waste management. The key features include:
- a reduction in the amount of municipal solid waste generated in Southwark to below 3% by 2005, and below 2% by 2010. In real terms, due to population growth (estimated at a further 27,000 residents by 2021) the absolute amount of waste will rise but the strategy aims to deliver a decrease in the actual rate of growth
- achievement of 30% recycling and composting standards for household waste by 2010-11 and 40% by 2015-16 and 50% standards by 2020-21
- recovery of value from 45% of municipal solid waste by 2010-11, 67% by 2015-16 and 75% by 2020-21.

Southwark's Waste Minimisation Strategy, 2007 – 2010 (CDEN8) sets out the council's proposals for addressing waste growth by minimising household waste. The Strategy identifies a number of policies, initiatives and projects that can help achieve a reduction in waste growth to 2% or less by 2010, a major element being through engendering behavioural change in Southwark. Veolia Environmental Services will assume responsibility for the implementation and monitoring of the Strategy in the medium and longer term.

- **Flood Risk**
  A Strategic Flood Risk Assessment has been prepared to understand flood risk in Southwark. The northern half of the borough is within the Thames flood plain, which contains over two thirds of Southwark's properties in well established communities. The area also contains major regeneration and growth areas of importance to Southwark and London including: the Central Activities Zone; Elephant and Castle Opportunity Area; Borough, Bankside and London Bridge Opportunity Area; and Canada Water Action Area.

  Two thirds of the sites identified in the Strategic Housing Land Availability Survey are located in this area. These sites are needed to meet our housing targets as they are able to deliver 75% of our housing capacity. In the southern parts of the borough, where flood risk from the Thames is low, there are limited sites available for development. It is, therefore, not realistic to expect new development to occur outside the flood risk area.

  The Thames Catchment Flood Management Plan and Thames Estuary 2100 Project being prepared by the Environment Agency will help manage flood risk from the Thames over then next 50 to 100 years. Whilst the Thames Barrier and flood walls along the riverside provide a degree of protection, consideration needs to be given to their potential failure or inability to contain very high floods as a result of climate change. It is important that new buildings are designed to be safe in the event of a flood and easily repairable afterwards.

  The Environment Agency has identified areas that are particularly vulnerable to localised flooding in heavy rainfall as a result of old water mains; poorly designed and maintained drainage; and too many hard surfaces. The areas include Herne Hill, Camberwell, Peckham and pockets in the north of the borough. Thames Water has a programme to replace old Victorian Water mains and they are planning to build the Thames Tunnel which will help stop sewerage overflowing into the River.

- **Pollution**
  Southwark has particularly high levels of air pollution, mainly caused by traffic. As a result, the entire borough north of the A205 has been declared an Air Quality Management Area. Vehicle emissions are the cause of 50% of air pollution and estimated to cause 24,000 deaths per year in the UK. (CDEN10 Southwark Air Quality Management and Improvement Plan)

- **Water**
  Southwark is also within an area of serious water stress - the amount of water being used is close to the total amount of water available, and demand for water is rising. Climate change will result in hotter, drier summers, which could reduce the amount of water available. In the short-term there could be an increase in water restrictions. Longer-term consequences could include water shortages and rising water prices. Currently, all mains water is treated to drinking standard. This is an expensive and energy intensive process, particularly considering that at least 50% of water consumed in homes and workplaces does not need to be of drinkable quality (for example water used for flushing toilets, washing laundry and watering parks and gardens). It is important that new development reduces our reliance on mains treated water.

  Southwark Council is working with Thames Water and other stakeholders to enable the implementation of the implementation of the Thames Tunnel and deal with, collect and forward sewage to the treatment plant. We will, in line with Thames Water advice require all new dwellings to meet the water usage targets set out in the Code for Sustainable Homes and agree that the new dwellings should comply with the Code 3 rating as a minimum.

  Unfortunately Thames Water are unable to determine the amount of infrastructure require for the development of new housing sites in terms of the sewerage and clean water networks due to the complexity of the network and neighbouring boroughs ambitions. However in line with their advice we are providing, as identified in the SHLAA, a small number of larger sites as it is generally easier to provide for in terms of infrastructure.

- **Historic Buildings and Conservation Areas**
  Throughout the borough there are many attractive and historic buildings, monuments and sites that reflect Southwark's rich history and add to the unique character and identity of places. We currently have 40 conservation areas covering 686ha (23% of the borough) and around 2,500 listed buildings and monuments. Conservation area and character area appraisals have therefore been undertaken. (see appendix 10)

  The Tower of London, a World Heritage Site, is located across the River from London Bridge. There are also archaeological remains that cannot be seen that provide important evidence of our past. We have identified 9 Archaeological Priority Zones (APZs) covering 679ha (23% of the borough).

  Southwark has many places with their own unique character. The central activities zone is a setting for activity and large scale development including tall buildings which give Southwark and London a distinct skyline. There are fewer and smaller open spaces and fewer trees and gardens, but there is a close relationship with the River Thames. Areas such as London Bridge and Elephant and Castle will be transformed by regeneration programmes and major new development.

  Areas in the middle of the borough around Bermondsey, Walworth, Camberwell and Peckham are characterised by lower-scale development, with a mixture of Victorian and Edwardian terraces, broken up by post-war estates, town centres and some newer housing development.

The southern part of Southwark around Nunhead, Peckham Rye and Dulwich has very leafy and green residential neighbourhoods with large open spaces, gardens and tree-lined streets of houses and terraces rather than flats. Areas such as Aylesbury Estate and Peckham are being regenerated and improved.

Rotherhithe also has a suburban character with mostly low scale housing close to large open spaces. There is also a maritime character reflected in and around the docks and River frontage. Canada Water town centre will be transformed by regeneration and new development.

There are a number of views to and across Southwark that are important to both local people and all Londoners. These include views of landmarks and panoramas that make Southwark and London distinctive. It is important that new buildings do not block these views or make them less attractive.

- **Open Space and Biodiversity**
About 20% of Southwark is made up of open spaces that are protected by the planning system. The open spaces are of various sizes and include parks, sports grounds, nature reserves, allotments and woodlands. There is around 660ha of open space in Southwark, covering a fifth of the borough. Most of the open space is parkland, commons and playing fields, but there are a range of other types of spaces including cemeteries, allotments, housing estate grounds and civic squares.

In Southwark formal protection has been given to over 599ha of open space. The design of new development is also controlled to make sure enough open space is provided. The greenness of areas is also protected and improved through conservation areas and tree preservation and by new landscaping and planting schemes.

There are large open spaces which are important to all of London. These are protected by the Mayor and are called Metropolitan Open Land (MOL). These have the highest level of protection and must be kept open in nature with development only in exceptional cases. These include Burgess Park, Southwark Park, Dulwich Park and Peckham Rye Common and Park.

Southwark's Open Spaces Strategy, 2010 (CDEN3) looks at the supply of open spaces in the borough. The strategy has identified that there is not an even supply of open spaces across Southwark. Half of our open space is focussed in the south of the borough in the Dulwich, Nunhead and Peckham Rye community council areas. Whilst the north of the borough has access to major parks including Burgess Park and Southwark Park, smaller spaces are particularly important to local people. The areas in the north also have fewer trees and gardens.

In Southwark, most play spaces are within estates, close to housing. Southwark's Open Space Strategy and Play Strategy have identified a lack of open spaces in the south of the borough. While there is currently a good supply of play spaces in the north of the borough, the housing growth expected here will put pressure on supply and it is important that the quality of spaces is improved as well as making sure they are located close to homes.

Birds, stag beetles, bats and amphibians are particularly at risk in Southwark. Many species of plants and animals are protected under European and national laws, including the Habitats Regulations 1994 and The Wildlife and Countryside Act 1981. The London Biodiversity Action Plan and Southwark Biodiversity Action Plan identify additional species that are important.

- **Housing**

Housing is a key issue in Southwark, as it is across London. The London Borough of Southwark aims to ensure that there is sufficient housing available to meet the required provision so that everyone may have the opportunity for a decent home. Over the period 1997-2006, the Borough achieved an average annual net dwelling completion rate of 1,125 dwellings. Between 2007/08 and 2016/17, Southwark had an annual dwelling requirement of 1,630 in order to meet the target set in the London Plan of 16,300 new homes by 2016/17. Since 2003, completion rates have increased and have averaged 1,337 per annum between 2003 and 2006/07. In the year 2006/2007 a total net gain of 2,602 dwellings was achieved. This comprised 2,137 self-contained dwellings, 318 non-self-contained dwellings and 147 long-term vacant dwellings brought back into occupation. We have only met our current annual housing target of 1630 new units twice in recent years.

In terms of affordable housing, 743 net completions were achieved in the year April 2006 - March 2007, which accounts for 40% of all homes built over this period. This figure is below the London Plan's 50% target for affordable housing provision however dwellings that were built during the last monitoring period may have been approved under the last UDP's affordable housing policy which set a target for 25%. Therefore, improved affordable housing results will not be seen for a few years, in relation to the London Plan's increased affordable housing target for the Borough.

Of the 50% target for the provision of affordable housing, the London Plan sets a target of 35% of affordable housing as social tenure, and 15% as intermediate tenure. The UDP has set target tenures for designated areas around the Borough, in order to achieve the objective of creating mixed and balanced communities.

In the year 2006/2007, 16% of completed affordable housing units were intermediate tenure and 24% were social tenure. However, in relation to the UDP's target split of tenures, some areas of the Borough have experienced a larger proportion of social rented housing being built and this has created a disproportionate tenure mix. For example, Peckham has received a large percentage of social rented housing (85% of 89 net units built). The target within the UDP for this area of the Borough is 30% social rented and 70% intermediate.

In terms of accommodation type, the size of new dwellings has seen an increase in the percentage of one and two bedroom dwellings from 30% in 2005/06 to 40% in 2006/07. This trend conflicts with the Council's target of increasing the number of three or more bedroom dwellings. In the past three years we have delivered between 8 and 12% of all new homes as family housing There is a London-wide shortage of larger family homes, and future housing provision will need to address this issue. Our Strategic Housing Market Assessment and Housing Requirement Study identify that there is a need for more family housing in the borough across all tenures. Of the borough's existing households 34% are 3 bedroom plus, 35% are 2 bedrooms, 26% are 1 bedrooms and 5% are bedsits. As a result of this mix many families are forced to line in overcrowded, unsuitable homes.

Residential density is the number of habitable rooms divided by the site area i.e. habitable rooms per hectare (hr/ha). The UDP set four residential density standards in areas of the borough based upon of the general character of the area and its accessibility to public transport. These are: Central Activities Zone; Urban Zone; Suburban Zone and Public Transport Accessibility Zone (*higher density than Urban Zone where increased development is appropriate in terms of design and scale*). In 2006/07, the majority of development was built within the Urban Density Zone.

We have rolled forward our current London Plan target of 1,630 net new homes up to 2026 to cover the 15 years timeframe of the Core Strategy to give ourselves a target of 24,450 net new homes between 2011 and 2026. Since then the consultation draft replacement

London Plan 2009 has set us a target of 2005 units per year. We will work with officers in the GLA to reach a common view on the most appropriate target.

Through our housing trajectory and our Strategic Housing Land Availability Assessment we have identified sites where we think we can deliver 20,115 net new homes between 2011 and 2026 on sites of over 0.25. The take up of current allocations, commitments and windfalls suggests that completion rates will continue, and the target of 24,450 dwellings will be met by 2026. The average number of dwellings that will be required to be built, taking into account housing completions between 2008 and 2026 is 1,630.

The London Plan also sets minimum targets for homes and jobs to be achieved up to 2026 in identified 'Opportunity Areas and Areas of Intensification'. In Southwark, these areas are Elephant and Castle (including Walworth Road), Canada Water and Borough, Bankside and London Bridge. For the Elephant and Castle, the minimum target for homes is 4,000; Borough, Bankside and London Bridge has a target of 1900 net new homes and Canada Water has a target of 2, 500 net new homes .

We currently have one of the highest amounts of affordable housing in the whole country, with 45% of our 123,948 dwellings being affordable. However, there still is a shortage of affordable homes in Southwark as identified by out Strategic Housing Market Assessment and our Housing Requirement Study. The need is for both social rented and intermediate housing. Based on the amount of housing we expect to deliver between 2011 and 2026, new development will provide 8,558 net new affordable homes which equates to 35% affordable housing on all sites over 10 units. Our Affordable Housing Viability Study shows that this an achievable amount of affordable housing to build across the borough.

We have the second largest number of student homes in London with a further 979 new student bedrooms in the pipeline. However there is still a need for student accommodation across the whole of London and Southwark. This need should be balanced against the need for more family and affordable housing need set out above.

There are four existing gypsy and traveller sites in Southwark which contain 38 pitches altogether. These sites, Bridale Close, Burnhill Close, Ilderton Road and Springtide will be safeguarded. The GLA are currently completing a study on the number of additional sites which may be needed in London.

- **Transport**
  The 2001 census showed that 29% of people's journeys were made by car, 35% were made by public transport and 36% by bicycle and walking. Other surveys show that over three quarters of the population who have a job travel to work by public transport, walking and cycling. The main transport document for the council is the Local Implementation Plan (CDEN6).

  - **Rail**
    There are 11 surface rail stations in the borough including London Bridge, the Elephant and Castle, South Bermondsey, Queens Road Peckham, Peckham Rye, Denmark Hill, Nunhead, East Dulwich, North Dulwich, West Dulwich and Sydenham Hill. Whilst there is a good network of stations, there are two major gaps in Southwark. One is centred on the Burgess Park area (from Camberwell to Bermondsey) and the other is centred on the area between Peckham Rye Park and Dulwich Park.

  - **Underground**
    The underground network is concentrated in the north of the borough where there are nine underground stations including London Bridge, Borough, Elephant and Castle, Kennington, Surrey Quays, Rotherhithe, Southwark, Bermondsey and Canada Water. Four different lines including the Northern, Bakerloo, Jubilee and East London lines service these stations.

- **Bus**
The London Bus Priority Network (LBPN) covers a large part of the borough and provides the main public transport provision in areas away from rail stations. The network is particularly extensive in the northern half of the borough, which is served by approximately 50 high frequency and 12 low frequency bus services as well as 16 night bus services. The Elephant and Castle is a major transport interchange and has more bus routes passing through it than anywhere else in Southwark.

- **Cycle**
The number of cycle trips made by Southwark residents increased by 27% between 1991 and 2001 compared to a London wide average of 2.8%. The Thames cycle route, which is route 4 of the national cycle network, travels through along the Thames River from the Rotherhithe peninsula through Bermondsey and London Bridge to Lambeth.

The London cycle network plus (LCN+) is a London wide 900km formal network, which is being implemented incrementally across London. Implementation of the whole network should be completed by 2009/10. There are 5 proposed LCN+ routes in Southwark:
- Route 0   Southwark Bridge - Imperial War Museum
- Route 2   Lambeth (Imperial War Museum) - Deptford
- Route 22 London Bridge – Brockley
- Route 23 Southwark Bridge – Crystal Palace
- Route 25 Herne Hill - Nunhead

- **Pedestrians**
Walking accounts for the second highest proportion of all trips made in London after driving at 49%. However, the past decade has seen a marked decline in the number of walking trips in greater and inner London, which have decreased by 13% and 20% respectively. Currently, 12% of Southwark residents walk to work, which is similar to other inner London boroughs. The northern part of the borough has a high proportion of commuting walking as well as multi modal trips, which incorporate walking.

- **Roads**
Southwark's road network comprises approximately 23km of principal roads and 336km of non principal or borough roads. Southwark's road network can generally be characterised by the main east west and north south routes that are utilised, not only by local traffic, but a high level of through traffic, seeking access to central London and ways along the south side of the river. Car ownership levels in Southwark have traditionally been low with 48% of households owning a car in 2001. However, the national trend is that growth will be the highest for those areas with a current low base level.

- **River**
There are eight piers on the south bank of the Thames, within Southwark's boundaries. These piers serve varying functions including public passenger transfer, private passenger trips and waste transport.

5 Sustainability Issues and Objectives

5.1 Sustainability Issues

5.1.1 This section sets out the main sustainability issues that need to be taken into consideration. These issues have been identified by considering the baseline information as well as the messages from related plans, policies and programmes.

- Relatively high levels of deprivation
- Employment inequalities and employment opportunities
- Education, skills and training deprivation
- Health inequalities and noise nuisances
- Need to promote equality, diversity and social cohesion
- High levels of crime and fear of crime
- Energy efficiency and use of renewables
- Poor air quality
- Need to minimise waste arisings and increase recycling rates
- Need for sustainable use of water resources
- Protection of landscape features and designated sites and need to address contaminated land issues
- Ensuring a high quality of design in new developments
- Need to preserve and enhance built heritage and the archaeological environment
- Minimising flood risk and improve the quality of controlled waters within the borough
- Protecting and enhancing biodiversity
- Providing everyone with a decent and affordable home to live in
- Need to improve accessibility by public transport and minimise the need to travel by car
- Need to ensure that there is social, physical and green infrastructure capacity for existing and future needs

5.2 Sustainability Objectives

5.2.1 Seventeen Sustainability Objectives have been identified, which are set out below. The objectives reflect the current social, economic and environmental issues affecting the area and were consulted on as part of the scoping report:

SDO 1	To tackle poverty and encourage wealth creation
SDO 2	To improve the education and skill of the population
SDO 3	To improve the health of the population
SDO 4	To reduce the incidence of crime and the fear of crime
SDO 5	To promote social inclusion, equality, diversity and community cohesion
SDO 6	To reduce contributions to climate change
SDO 7	To improve the air quality in Southwark
SDO 8	To reduce waste and maximise use of waste arising as a resource
SDO 9	To encourage sustainable use of water resources
SDO10	To maintain and enhance the quality of land and soils
SDO11	To protect and enhance the quality of landscape and townscape
SDO12	To conserve and enhance that quality of landscape and townscape
SDO13	To protect and improve open spaces, green corridors and biodiversity
SDO14	To reduce vulnerability to flooding
SDO15	To provide everyone with the opportunity to live in a decent home
SDO16	To promote sustainable transport and minimise the need to travel by car
SDO17	To provide the necessary infrastructure to support existing and future development

6   The Sustainability Appraisal Framework

6.1   What is the SA Framework?

6.1.1   The Sustainability Appraisal Framework provides a way in which the sustainability effects of the plan can be described, analysed and compared.   The framework provides a set of sustainability objectives and indicators to be used when undertaking the appraisal.   The indicators should be measurable to provide a way of checking whether the objectives are being met, for example, the number of jobs created.

6.2   The SA Framework

Sustainability Issue	Sustainability Objective and questions	Sustainability Indicators	
Economy, Regeneration and Employment Opportunities	**SDO 1:** **To tackle poverty and encourage wealth creation** Will it improve the range of job opportunities? Will it help to diversify the economy? Will it encourage the retention and /or growth of local employment? Will it close the gaps between equalities target groups compared with the National average? Will it encourage business start-ups and support the growth of businesses?	1.1 1.2 1.3 1.4	Employment land available Change in VAT registered businesses Numbers and % jobs in Southwark by sector Southwark compared to London (broken down by micro, small and medium sized businesses)
Education	**SDO2:** **To improve the education and skill of the population** Will it provide opportunities to improve the skills and qualifications of the population, particularly for young people and adults? Will it help improve employee education/training programmes? Will it help reduce skills shortages? Will it help to reduce the disparity in educational achievement between different ethnic groups?	2.1 2.2 2.3 2.4	Indices of multiple deprivation; Education deprivation % of the population with higher education qualifications % of population with no qualifications Proportion of resident pupils attending Southwark schools achieving 5+ A-Cs including English and Maths split by equality group

Sustainability Issue	Sustainability Objective and questions	Indicators	
Health	**SDO3:** **To improve the health of the population** Will it promote and facilitate healthy living and active lifestyles? Will it reduce health inequalities? Will it promote non-polluting forms of transport? Will it improve access to health and social care/treatment?	3.1	Health life expectancy at age 65 by equality group
		3.2	Indices of multiple deprivation: Health deprivation
		3.3	Rate of obesity in children
		3.4	Mortality from cancer, heart disease and stroke
		3.5	Incapacity benefit for mental illness
		3.6	Distance to GP premises from home
		3.7	Admissions to hospital per 1,000 people
Crime and Community Safety	**SDO4:** **To reduce the incidence of crime and the fear of crime** Will it improve safety and security? Will it incorporate measures to reduce crime and the fear of crime, including anti-social behaviour?	4.1	Indices of multiple deprivation: Crime deprivation
		4.2	Numbers of crime per annum
		4.3	Percentage of residents who feel fairly safe or very safe outside during the day/night
		4.4	Reports of anti-social behaviour
Social Inclusion and Community Cohesion	**SDO5:** **To promote social inclusion, equality, diversity and community cohesion** Will it help support voluntary sector and promote volunteering? Will it support active community engagement? Will it support a diversity of lifestyles? Will it address equality's groups?	5.1	Proportion of people who think they can influence decision-making in their locality
		5.2	Employment/Skills/Health/ Homelessness waiting list by equality group
		5.3	Satisfaction with area

Sustainability Issue	Sustainability Objective and questions	Indicators	
Mitigation of and adaption to climate change	**SDO6:** **To reduce contributions to climate change** Will it reduce consumption of energy? Will it use renewable sources of energy? Will it help local people cope with hotter drier summers and warmer wetter winters? Will it mitigate against the urban heat island effect?	6.1	CO2 emissions and energy consumption (break down by source/type)
		6.2	No. of extreme weather events by type
		6.3	No. of hospital admissions as a result of extreme weather
		6.4	SAP rating of borough's housing stock
Air Quality	**SDO7:** **To improve the air quality in Southwark** Will it help to reduce emissions of PM10, NO2? Will it encourage a reduction in amount and length of journeys made by car?	7.1	Number of days of high pollution
		7.2	Annual average concentrations and number of hourly exceedences of nitrogen dioxide in air
		7.3	Annual average concentrations and number of daily exceedences of PM10 in air
Waste Management	**SDO8:** **To reduce waste and maximise use of waste arising as a resource** Will it promote the reduction of waste during construction / operation? Will it minimise the production of household and commercial waste? Will it promote sustainable processing of waste?	8.1	Municipal waste land-filled (tonnes)
		8.2	Residual household waste per household (tonnes)
		8.3	Percentage of municipal waste sent for reuse, recycling and composting
Water Resources	**SDO9:** **To encourage sustainable use of water resources** Will it encourage reuse of water? Will it maximise use of rainwater or other local water supplies? Will it reduce discharges to surface and groundwater?	9.1	Average domestic and commercial potable water consumption (l/head/day)
		9.2	Water quality measure

Sustainability Issue	Sustainability Objective and questions	Indicators	
Soil and Land Quality	**SDO10:** **To maintain and enhance the quality of land and soils** Will it encourage the remediation of land identified as potentially contaminated? Will it prevent further contamination of soils?	10.1	Number of contaminated sites not remediated
Quality in Design	**SDO11:** **To protect and enhance the quality of landscape and townscape** Will it have a negative impact on important strategic/local views? Will it improve the quality of public spaces and street? Will it improve the relationship between different buildings, streets, squares, parks and waterways and other spaces that make up the public domain?	11.1 11.2 11.3	Satisfaction with local area People who can identify with their local area Building for Life Assessments
Conservation of the Historic Environment	**SDO12:** **To conserve and enhance the historic environment and cultural assets** Will it involve the loss or damage to historic buildings and remains and their setting? Will it improve the historic value of places? Will it promote the historic environment and also contribute to better understanding of the historic environment?	12.1 12.2 12.3 12.4 12.5 12.6	Amount of Southwark covered by Conservation Area or APZ Numbers of heritage assets in the borough on the English Heritage at Risk Register Changes in numbers of listed buildings Number of scheduled ancient monuments at risk Number of conservation areas at risk Number of conservation areas with up-to-date appraisal/ management plans
Open Space and Biodiversity	**SDO13:** **To protect and improve open spaces, green corridors and biodiversity** Will it encourage development on previously developed land? Will it improve the quality and range of open spaces? Will it improve access to open space and nature? Will it improve the quality and range of habitat for wildlife? Will it avoid harm to protected and priority species?	13.1 13.2 13.3 13.4 13.5 13.6	Change in quantity of open space (ha) Resident satisfaction with open space Change in SINCS and LNPS Change in quality of open space (ha) Open space deficiency Deficiency in access to nature

Sustainability Issue	Sustainability Objective and questions	Indicators	
Flood Risk	**SDO14:** **To reduce vulnerability to flooding** Will it minimise the risk of and from flooding? Will it protect and improve flood defences and allow them to be maintained?	14.1	Number of flooding incidents (including sewer flooding)
		14.2	Condition of flood defences
Housing	**SDO15:** **To provide everyone with the opportunity to live in a decent home** Will it contribute towards meeting housing need, in particular affordable housing and family homes? Will it improve the supply and range of housing? Will it contribute towards improving the quality of homes and the living environment? Will it reduce overcrowding?	15.1	Amount of homes in the borough
		15.2	Percentage of households living in temporary accommodation
		15.3	Households in housing need
		15.4	Households on housing register
		15.5	Households unintentionally homeless and in priority need
		15.6	Income to average house price ratio
Sustainable Transport	**SDO16:** **To increase walking, cycling, public transport and reduce car journeys** Will it reduce car use? Will it promote walking and cycling? Will it reduce the number and length of journeys? Will it improve public transport? Will it reduce road traffic accidents?	16.1	Estimated traffic flows per annum (mil.vehicle km)
		16.2	The number of people killed or seriously injured in road traffic collisions
		16.3	Proportion of personal travel made on each mode of transport overall and by equalities groups
Infrastructure	**SDO17:** **To provide the necessary infrastructure to support existing and future development** Will it provide enough social infrastructure ? Will it provide enough physical infrastructure? Will it provide enough green infrastructure?	17.1	Capacity of existing infrastructure (social, physical and green)
		17.2	Capacity of future infrastructure (social, physical and green)

6.3 Comparison of the SA Objectives

6.3.1 As part of the sustainability appraisal, a comparison of the sustainability objectives was undertaken to check if the objectives are compatible with one another.

Compatibility of SA Objectives

Objective	SDO1	SDO 2	SDO 3	SDO 4	SDO 5	SDO 6	SDO 7	SDO 8	SDO 9	SDO 10	SDO11	SDO12	SDO13	SDO14	SDO15	SDO16
SDO 2	✔															
SDO 3	✔	0														
SDO 4	✔	0	✔													
SDO 5	✔	✔	✔	✔												
SDO 6	✔	0	✔	0	0											
SDO 7	✔	0	✔	0	0	✔										
SDO 8	✔	0	0	0	0	✔	0									
SDO 9	✔	0	✔	0	0	✔	0	0								
SDO 10	✔	0	✔	0	0	0	0	✔	0							
SDO 11	✔	0	0	0	0	?	0	?	0	0						
SDO 12	✔	0	0	0	0	?	0	?	0	0	✔					
SDO 13	✔	0	✔	0	0	✔	✔	0	✔	✔	✔	✔				
SDO 14	✔	0	✔	0	0	✔	0	0	✔	0	0	0	✔			
SDO 15	✔	0	✔	0	✔	✔	✔	0	✔	0	✔	✔	✔	✔		
SDO 16	✔	✔	✔	0	✔	✔	✔	✔	0	0	✔	0	✔	✔	✔	
SDO 17	✔	0	✔	0	0	✔	✔	0	✔	0	0	0	✔	✔	✔	✔

✔   Compatible

0   No significant link

?   Depends on implementation

The compatibility of SDO 6: Mitigation of and Adaption to Climate Change and SDO 8: Waste Management with SDO11: Quality in Design and SDO12 Conservation of the Historic Environment will depend upon implementation.

Careful application of renewable technologies and waste provision will be needed to ensure that quality in design or the setting of historic environment is not compromised.

7   Plan Issues and Options

7.1   Compatibility of the SA Objectives against the Core Strategy Objectives

7.1.1   An assessment of the compatibility of the SA objectives against the Core Strategy objectives has been carried out. The results show that the objectives are largely compatible with each other. Some uncertainties do occur in a few of the policies, which will be dependent on the implementation of the policies. The full results can be found at **Appendix 4**.

7.2   Why do we need a plan for development?

7.2.1   Southwark is a rapidly changing, diverse borough with inequalities of wealth. This means that some areas are deprived whilst others gain affluence and continue to thrive. We need to build on each area's strengths and unique identities and address these issues of inequality. By doing this we will ensure that we have accessible, locally distinctive, well designed places which interconnect and link to the rest of London. Improving the quality of places will improve peoples quality of life. Our themes and objectives set the platform for the way we plan, build and design places.

7.2.2   This complex place making process is continuous and needs to involve the diverse range of people to create places that people find successful to live in and use. Collectively we need to work together to improve each place through tackling the challenges and maximising our strengths.

7.2.3   Doing nothing is not an option. We need to make sure we plan for sustainable growth in the borough so that everyone in the community can benefit from new homes, jobs and an improved quality of life. We have targets of 80,000 sqm net new shopping and leisure floorspace, 24,450 net new homes between 2011 and 2026, 8558 net new affordable homes between 2011 and 20206 and 32,000 net new jobs. In order to meet these targets considerable development in the borough will take place. We need to ensure this growth happens along side the necessary infrastructure improvements, in a way that is least harmful to the environment and that meets the needs of our local communities.

7.2.4   Public sector agencies on their own will not have sufficient resources to improve the borough. We have to work with private sector partners to find creative solutions to regeneration. Our biggest challenge is to build a consensus of citizens and agencies about how we influence the future development of our borough and balance competing pressures.

7.2.5   In order to accommodate this future growth, a number of possible options have been considered and these are discussed in more detail in the following section.

7.3   What options have been considered and why?

7.3.1   Two options were considered at the Issues and Options stage of the development of the Core Strategy. These were
Option 1: Growth Areas
Option 2: Housing Led Growth.

In summary, these options were based on:
- Agreed future development in the borough such as regeneration areas
- The London Plan targets to deliver new homes and jobs in areas such as Canada Water and Borough and Bankside

- The amount of affordable housing and types of affordable housing to be delivered in the borough
- The amount of family housing to be built in the borough
- Provision of offices, industrial, tourism, cultural and community facilities
- The quality of public transport links in different parts of the borough.
- Environmental standards

Option 1: Growth Areas

7.3.2 Option 1 prioritised the regeneration of places by creating Growth Areas at the Central Activities Zone, Elephant and Castle, Peckham, Canada Water, Bankside and London Bridge and Camberwell. This option aims to meet the London Plan housing target of 1630 homes per year by focusing housing growth in these areas. A provision of 30% minimum affordable housing would be achieved. The strengths of each area would be built upon, particularly the good public transport links, so that more jobs, shops, community facilities and environmentally friendly buildings are provided. This option would involve setting different housing policies from those set out in the London Plan.

Key Elements

- Create Growth Areas for new housing, shops, offices, community, tourist and cultural facilities.
- The Growth Areas will be the Central Activities Zone, Elephant and Castle, London Bridge and Bankside, Peckham, Canada Water and Camberwell. These are areas with good public transport links.
- Allow larger developments with a lot of housing and some community facilities in Bermondsey Spa and the Aylesbury.
- Restrict large developments outside of these areas
- Protect employment areas and increase offices in the Central Activities Zone.
- Prioritise transport projects, community facilities and employment funding in the Growth Areas.
- Requiring different amounts of affordable, family, social and intermediate housing in different places.
- Increase the protection of employment land in Southwark

Option 2: Housing Led Growth

7.3.3 Option 2 would permit new housing throughout the borough rather than focussing it in specific areas. This option would result in more housing than the 1630 homes per year target in the London Plan and achieve 50% minimum affordable housing. Housing would take priority with less land available for other land uses such as offices, industrial, tourism, culture and community facilities. The housing development would occur outside the main regeneration areas such as Elephant, Bankside, Canada Water, Peckham and Aylesbury, which could result in these areas being less developed or not as quickly as planned.

Key Elements

- Allow housing in all areas of the borough; do not direct it to specific places.
- Require 50% affordable housing;
- There would be less office, industrial, tourism, culture, shops and community facilities.

7.4   What have the options identified?

7.4.1   The two options for growth, identified above, were subject to detailed testing against the sustainability framework. The results of the appraisal showed that the overall impact of Option 1 was more positive than for Option 2.

Summary of Results

Sustainability Objective	1	2
SDO1 To tackle poverty and encourage wealth creation	✓✓	?
SDO2 To improve the education and skill of the population	✓	✓?
SDO3 To improve the health of the population	✓	✓?
SDO4 To reduce the incidence of crime and the fear of crime	✓	?
SDO5 To promote social inclusion, equality, diversity and community cohesion	✓✓	?
SDO6 To reduce contributions to climate change	?	x
SDO7 To improve the air quality in Southwark	?	x
SDO8 To reduce waste and maximise use of waste arising as a resource	?	x
SDO9 To encourage sustainable use of water resources	?	?
SDO10 To maintain and enhance the quality of land and soils	✓	✓
SDO11To protect and enhance the quality of landscape and townscape	✓?	?
SDO12 To conserve and enhance the historic environment and cultural assets	✓?	?
SDO13 To protect and enhance open spaces, green corridors and biodiversity	✓?	?
SDO14 To reduce vulnerability to flooding	x	?
SDO15 To provide everyone with the opportunity to live in a decent home	✓✓	✓
SDO16 To promote sustainable transport and minimise the need to travel by car.	✓✓	x

Key	✓✓	major positive	XX	major negative	?	uncertain
	✓	minor positive	X	minor negative	-	no significant impact

Option 1 scored a negative result against 1 objective and an uncertain result against 4 objectives.

Option 2 scored a negative result against 4 of the objectives and an uncertain outcome against 8 objectives.

The detailed results can be found in **Appendix 5**. As a result of the findings, it was decided that Option 1 should be taken forward as the Preferred Option for the Core Strategy with some amendments to take into account the findings of the SA.

8 Effects of the Core Strategy Policies

8.1 How has sustainability been considered in developing the plan?

8.1.1 The Sustainability Appraisal has helped to identify the preferred options for the Core Strategy and areas of concern to be addressed through the refinement of policies or through the use of mitigation measures, to help avoid potential conflicts. The appraisal has involved making a certain amount of subjective judgements of the likely sustainability impacts of options over the short, medium and long term. The judgement has been made by reference to what the sustainability objective is trying to achieve and the possible impact a proposed action may have on the borough. Impacts of strategic options may be hard to predict at the local level but once site specific information is available it will be easier to establish mitigation measures.

8.1.2 Areas of concern identified at the Issues and Options and Preferred Options stages have led to a refinement of the policies, objectives and indicators to address areas that had not been covered in sufficient detail. A final appraisal of the amended Core Strategy has subsequently been undertaken **(see section 8.3).**

8.2 The Preferred Option

8.2.1 The Growth Areas led option has generally been taken forward, with some ideas from the Housing led approach, following the sustainability appraisal at the Issues and Options stage of the Core Strategy. The results of the Issues and Options SA showed that the overall impact of Option 1 was more positive in terms of social, economic and environmental impacts than for Option 2. Whilst there were a few uncertain impacts identified, overall, the appraisal indicated that Option 1 – Growth Areas would be likely to make more of a positive contribution to directing new spatial growth within the borough and would advance the principles of sustainability in a more comprehensive manner. Consequently, this option was taken forward in the preparation of the Preferred Options report.

8.2.2 The Preferred Option seeks to direct growth towards particular areas and focus on balancing housing growth, with growth in other areas such as employment, leisure provision, arts and culture and social and community infrastructure. The option focuses on the elements that make the different areas of the borough distinctive and through the set of policies, seeks to draw on the strengths of these areas.

8.2.3 The Preferred Option would result in larger developments incorporating housing, shopping, offices, community facilities, tourism and culture being focussed within the Central Activities Zone (including Elephant and Castle, London Bridge and Bankside) and Peckham which are areas of the borough with good public transport. It would also encourage large developments, including housing and community facilities into the areas of Bermondsey Spa, West Camberwell and Aylesbury Estate. The sustainability of locating larger developments outside of the Growth Areas was negatively appraised in the SA process, and therefore the Preferred Option focuses larger development to several of the Growth Areas. Overall, most new development will be prioritised in the following areas:

- Central Activities Zone
- Elephant and Castle opportunity area
- Peckham action area
- Canada Water action area
- Bankside, Borough and London Bridge opportunity area
- Aylesbury action area
- West Camberwell housing regeneration area
- Old Kent Road regeneration area

8.2.4   The appraisal showed a minor negative impact with regard to flooding as the majority of the growth areas identified are within Flood Zones 2 and 3. Where the development is located in an area with a high or medium risk of flooding (flood zones 2 and 3) or in all cases where the development site is larger than 1 hectare, a site specific flood risk assessment must be submitted with the application which demonstrates that:

- suitable sites are not available in an area with a lower risk of flooding (i.e. that the development meets the "sequential test" set out in Planning Policy Statement 25 Development and Flood Risk)
- that the development will be safe for future users
- that the development will reduce the risk of flooding elsewhere.

8.2.5   In the southern parts of the borough, where flood risk from the Thames is low, there are limited sites available for development. It is, therefore, not realistic to expect all new development to occur outside the flood risk area. Further guidance on the location of different types of development is set out in PPS25: Development and Flood Risk. The issues to be addressed in a site specific flood risk assessment are set out in the Sustainable Design and Construction SPD.

8.3   The Submission Version

8.3.1   A final appraisal of the Submission Version of the Core Strategy has been carried out to check that the revised policies have addressed sustainable development appropriately. Fourteen planning policies and two Strategic Target Policies have been produced to seek to achieve sustainable development and direct spatial growth within the borough. These are set out below:

Strategic Policy 1	Sustainability Assessment
Strategic Policy 2	Sustainable Transport
Strategic Policy 3	Shopping, leisure and entertainment
Strategic Policy 4	Place to learn and enjoy
Strategic Policy 5	Providing new homes
Strategic Policy 6	Homes for people on different incomes
Strategic Policy 7	Family homes
Strategic Policy 8	Student homes
Strategic Policy 9	Homes for Gypsies and Travellers
Strategic Policy 10	Numbers and places for people to work
Strategic Policy 11	Open spaces and wildlife
Strategic Policy 12	Design and Conservation
Strategic Policy 13	High environmental standards
Strategic Policy 14	Implementation and delivery
Strategic Targets Policy 1	Achieving growth
Strategic Targets Policy 2	Improving places

8.4 What are the significant positive effects of the plan?

8.4.1 The appraisal found that overwhelmingly the policies in the Submission Version of the Core Strategy document will have a positive impact upon sustainability. For each policy the number of positive impacts identified outweighed the negative impacts, when taken across the whole range of sustainable objectives.

8.4.2 The results of the appraisal showed a major positive impact for the following policies:

Strategic Policy 1: Sustainable Development
Strategic Policy 13: High Environmental Standards

- **Strategic Policy 1** has the highest number of positive impacts which are largely attributable to the need for proposals to produce a Sustainability Assessment as part of the planning application. The need for a Sustainability Assessment will ensure that developers consider the social, economic and environmental impacts of their schemes and identify the measures that are proposed to provide a positive impact as well any necessary mitigation. The Sustainable Design and Construction SPD and Sustainability Assessment SPDs provide further details to applicants on the type of measures that should be introduced and the targets that need to be achieved.

- **Strategic Policy 13** scores a very positive impact against seven of the Sustainability Objectives and a minor positive impact against a further eight. The policy on high environmental standards sets the targets that the Council wish developers to achieve for new development, however, the level of achievement will in part be dependent upon implementation.

8.4.3 The majority of the other policies scored a minor positive impact. Whilst there were some uncertain impacts identified, overall, the appraisal indicated the policies are likely to have a positive contribution to directing new spatial growth within the borough. In particular, the Core Strategy policies will help to meet the following sustainable development objectives:

- SDO 1   To tackle poverty and encourage wealth creation
- SDO 5   To promote social inclusion, equality, diversity and community cohesion
- SDO 15   To provide everyone with the opportunity to live in a decent home.

8.5 What are the significant negative effects of the plan?

8.5.1 Minor negative impacts were identified in relation to the following policies:

Strategic Policy 2:	Sustainable Transport
Strategic Policy 5:	Providing New Homes
Strategic Policy 8:	Student Homes
Strategic Policy 10:	Jobs and Businesses
Strategic Targets Policy 1:	Achieving Growth
Strategic Targets Policy 2:	Improving Places

8.5.2 **Strategic Policy 2: Sustainable Transport** scored one minor negative impact in relation to SDO17 - to provide the necessary infrastructure to support existing and future development. The policy encourages development which, minimises the use of the private car and improves accessibility to public transport, placing increased demands upon the existing transport infrastructure. Improvements to the infrastructure will, therefore, need to be identified to ensure that that the existing transport network can cope with the additional demands of new development. The infrastructure plan, which supports the Core Strategy, identifies the necessary transport requirements, phasing and costs.

8.5.3   **Strategic Policy 5: Providing New Homes** scored five minor negative impacts. The reason for the negative impacts is that the quantum of new development is likely to have negative impacts upon climate change, air quality, waste, areas vulnerable to flooding and infrastructure capacity. However, it is felt that the negative impacts can be resolved through appropriate mitigation measures, in particular the application of Policies 1, 13 and 14.

8.5.4   **Strategic Policy 8: Student Homes** scored one minor negative impact in relation to development in areas that are vulnerable to flooding. The amount of development that is needed to cope with the growth in population and their future needs necessitates the need to develop land that it is in the flood zone. Policies 1 and 13 will ensure that development is designed appropriately to include flood resistant design and adequate set backs from the river edges.

8.5.5   **Strategic Policy 10: Jobs and Businesses** scored a minor negative impact against three objectives in relation to climate change, air quality and waste. As in policy 5 the reason for the negative impacts is because of the quantum of development proposed in the Borough. Policies 1,13 and 14 will be used to mitigate any negative impacts.

8.5.6   **Strategic Targets Policy 1: Achieving Growth** scored a minor negative impact against three objectives in relation to climate change, air quality and waste. As in policies 5 and 8 the reason for the negative impacts is because of the quantum of development proposed in the Borough. Policies 1,13 and 14 will be used to mitigate any negative impacts.

8.5.7   **Strategic Targets Policy 2: Improving places** scored a minor negative in relation to climate change and air quality as CO_2 emissions and energy consumption and demand will increase as a result of construction and operation. Policies 1,13 and 14 will be used to mitigate any negative impacts.

8.6   **Cumulative Impacts**

The SEA Directive requires an assessment of secondary, cumulative, and synergistic effects, which should be incorporated in the SA. Collectively these effects are called cumulative impacts. Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects (e.g. noise, dust and visual) have a combined effect.

Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.

In assessing the cumulative impacts of the Core Strategy the policies had a minor negative impact upon only one of the sustainability objectives – SDO6: To reduce contributions to climate change. The cumulative impact of the policies is considered to be negative owing to the quantum of development that is required to support the level of growth in the borough. The development will cause an increase in the amount of CO_2 emissions as a result of activities in both construction and operation. Whilst mitigation measures have been put in place to reduce CO_2 emissions through the policies that specifically address sustainability (SP1, SP2, SP13, AAPs and Sustainability SPDs) the amount of CO_2 emissions are unlikely to reduce. However, the development of new technologies could have a beneficial effect in the future but the impact of such technologies is unknown at this stage. Future monitoring of the impacts of the policies will provide further data on the success of the policies in addressing climate change.

An uncertain impact is also shown for the following sustainability objectives:

SDO 7:   To improve air quality in Southwark

SDO 8:   To reduce waste and maximise use of waste arising as a resource

SDO 14: To reduce vulnerability to flooding

Again mitigation measures should succeed in addressing potential negative impacts but the quantum of development could result in a synergistic effect from individual sites. The impacts on these issues will need to be carefully considered when monitoring the effectiveness of the policies. **(Please see Appendix 7 for the detailed results)**

8.7   Proposed mitigation

8.7.1   Where the SA identified potential shortcomings of particular policies, mitigation measures are proposed to help off-set the negative impacts. For example, the adoption of technologies and construction practices to minimise energy consumption and waste production. Also the facilitation of measures to encourage and increase recycling rates will help mitigate any negative impacts associated with new development in the borough. In addition, the requirement for new developments to adhere to minimum standards in design and construction will ensure greater energy, water and waste efficiency over time.

8.7.2   Some of the negative impacts will be mitigated through other planning policies which deal with such matters, in particular Strategic Policies 1: Sustainability Assessment, 13: High Environmental Standards and 14: Implementation. These policies reflect the guidance set out in national and regional guidance to ensure development meets the required sustainability and environmental standards.

8.7.3   Strategic Policy 1 deals with the assessment of development in terms of its social, economic and environmental impacts. This policy sets out the requirement for a sustainability assessment to be submitted with applications. The impact of development plan documents will also be tested through sustainability appraisals and equalities impact assessments. This policy meets the requirements set out in London Plan policies 2A.1 Sustainability criteria and 3A.17 Addressing the needs of London's diverse population. The Sustainability Assessment and Sustainable Construction and Design SPD's offer further guidance to applicants on how to comply with the policies and meet the council's targets.

8.7.4   Strategic Policies 13 sets out how we will make sure development helps us live and work in a way that respects the limits of the planets natural resources, reduces pollution and damage to the environment and helps us adapt to climate change. This policy sets out a number of targets for development including:

- requiring development to meet Code for Sustainable homes level 4 and BREEAM standard "excellent"
- Achieving a 44% saving in carbon dioxide emissions above the building regulations
- Achieving a reduction in carbon dioxide of 20% from using on-site or local low and zero carbon sources of energy.
- Achieving a potable water use target of 105 litres per person per day.

These targets are in general conformity with London Plan targets and we set out more evidence to demonstrate how we can meet these targets in the background paper and evidence based studies. The Sustainability Assessment and Sustainable Construction and Design SPD's offer further guidance to applicants on how to comply with the policies and meet the council's targets.

8.7.5   Strategic policy 14 identifies how we will implement and deliver our vision and objectives for the borough. This policy sets out how we will use S106 planning obligations to overcome negative impacts of development and to make sure that infrastructure needed to support development is provided. The S106 Planning obligations SPD explains our policies in more detail and sets out a series of standard charges to be applied to development. An infrastructure plan has also been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

8.7.6 We have also carried out a number of studies to help inform the approaches set out through these policies. These include
- a Joint Waste Technical Paper 2009
- a Strategic Flood Risk Assessment 2008
- an infrastructure plan 2009
- a Retail Study 2009
- a Strategic Housing Market Assessment 2009
- a Strategic Housing Land Availability Study 2009
- a Housing Requirement Study 2009
- an Affordable Housing Viability Study 2009
- an Employment Land Review 2009
- Southwark Open Spaces Strategy 2009

8.7.7 We will consider more locally specific issues including the mitigation of negative impacts through our Area Action Plans (AAPs) and Supplementary Planning Documents. We are preparing plans for:
- Aylesbury AAP
- Peckham and Nunhead AAP
- Canada Water AAP
- Old Kent Road AAP
- Bankside, Borough and London Bridge SPD
- Dulwich SPD
- Aylesbury AAP Public Realm SPD
- Camberwell SPD
- Tower Bridge Workshops SPD

8.7.8 The AAPs and SPDs can also set out guidance on more topic based issues. The following guidance has already been adopted:

- Sustainable Design and Construction SPD (February 2009)
- Sustainability Assessment SPD (February 2009)
- Affordable Housing SPD (September 2008)
- Sustainable Transport SPD (September 2008)
- Residential Design Standards SPD (January 2008)
- Design and Access Statements SPD (September 2007)
- Section 106 SPD (July 2007)

We are also proposing to set out additional policies to guide development across the borough in a Development Management DPD and a Housing DPD.

8.8 Uncertainties and risks

8.8.1 The conclusions that were reached in undertaking the SA of the Core Strategy policies were a result of qualitative (i.e. subjective) judgement, albeit by planning professionals within the Council. In addition, predicting the outcome of a potentially complex mix of social, economic and environmental factors is an inherently difficult task to undertake, and can only be undertaken on the basis of the background data that is available.

8.8.2 Consequently, there may be some questions about the way some policies were ranked against particular sustainability objectives. However, whilst some individual rankings may possibly be challenged at this level, it is the overall performance of a policy against the Sustainability Framework taken as a whole, which is the most important element to consider.

Please see Appendix 7 for the detailed results

9 IMPLEMENTATION

## 9.1 What are the next stages in the plan preparation?

SA PRODUCTION STAGE	TIMETABLE
Submission of the Final Sustainability Appraisal Report to accompany the publication version of the Core Strategy	March 2010
Adoption of the Core Strategy and publication of the final sustainability appraisal report.	January 2011

9.2 How will the plan be implemented?

9.2.1 The Core Strategy sets out the vision for the type of place Southwark should be in the future. The Core Strategy will shape the development of the borough up to the year 2026 by providing a list of clear objectives and a delivery plan to make development happen in the right place at the right time. The plan sets out what should be achieved in different places in the borough and directs development to shape these areas.

9.2.2 Implementation of the core policies will be achieved through our development management function when we make decisions on planning applications and also through the development of more focused policies for areas and sites of significant growth, regeneration or change. We are preparing development management policies, area action plans and supplementary planning documents that will explain Core Strategy policies and provide more detail.

9.2.3 Our Statement of Community Involvement (SCI) sets out how and when we will involve the community in preparing planning policy documents and in making decisions on planning applications. We developed our SCI by working with many local people, businesses, voluntary and community organisations, councillors and statutory organisations. The SCI includes: information on different consultation methods; how to overcome barriers to involve different groups and; the consultation process for both planning policy documents and planning applications. Involving the community at the earliest stage possible in the planning process helps us to implement development that is wanted and needed by the community.

9.2.4 New development in the borough also needs to be supported by adequate social, physical and green infrastructure. This includes: social infrastructure such as schools, health and other community facilities; physical infrastructure such as transport and utilities; green infrastructure such as parks and open spaces. Where infrastructure is needed to support development, it should be provided along side it. Development should not be permitted unless essential infrastructure can be completed prior to occupation of the new development.

9.2.5 We have worked in partnership with infrastructure providers, including both internal council departments and external agencies, throughout the development of the Core Strategy to identify infrastructure required to facilitate the development set out in the Core Strategy.

9.2.6 We will use s106 planning obligations to overcome negative impacts of development and to make sure that infrastructure needed to support development is provided. We will use planning obligations in accordance with government guidance, set out Circular 2005/05. We have an approved Planning Obligations supplementary planning document which explains our policies in more detail and sets out a series of standard charges to be applied to development. Through implementing this SPD we will secure financial contributions to mitigate the impacts of development.

9.3 Links to other tiers of plans, programmes and other guidance

9.3.1 The LDF for Southwark will guide development in the future and is made up of a series of documents, prepared in stages. More information on the LDF can be viewed on the Council's website. This includes the Local Development scheme which sets out the programme for the production of documents.

9.3.2 It should be noted that local planning policy is produced within a framework set by national and regional government planning guidance. This guidance indicates the broad principles that local policy should adopt. For example, the need to provide further housing as established in guidance means that it would not be possible to have an option of no further housing provision.
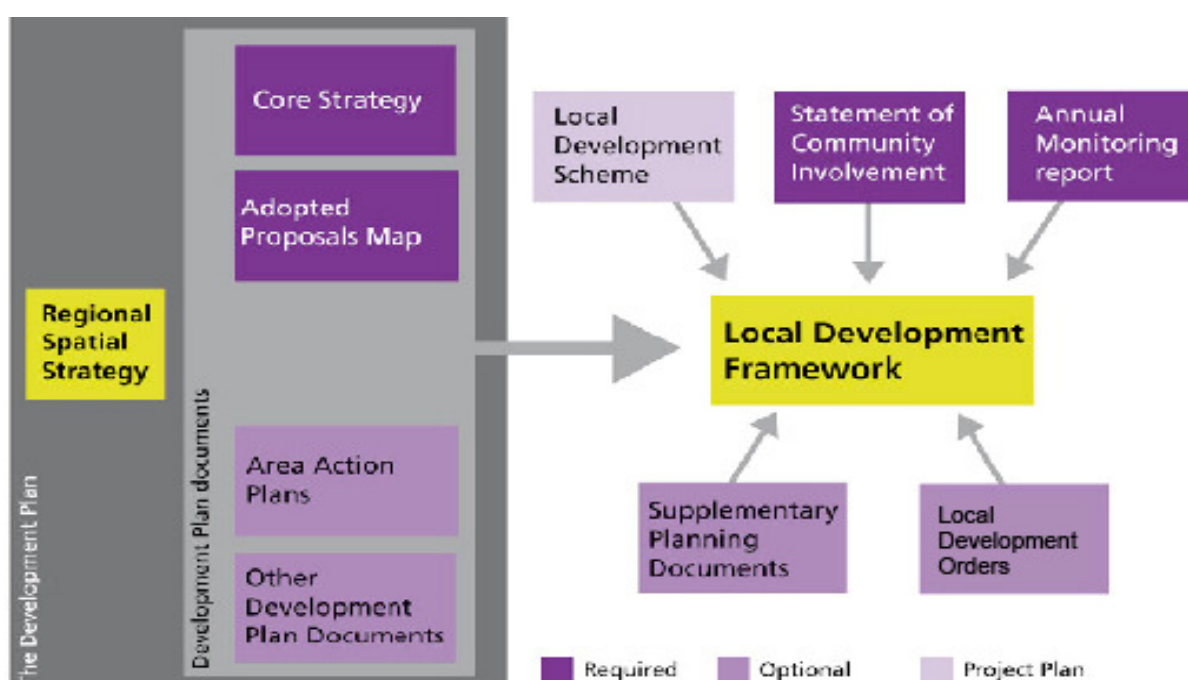
The Development Plan process

9.4 Area Action Plans and Supplementary Planning Guidance

9.4.1 Further guidance is also being produced for specific areas of growth within the Borough in the form of Area Action Plans (AAPs) and Supplementary Planning Documents (SPDs), which are also subject to the SA process. These documents will enable further assessment and refinement of issues to be made at the local level. The areas include:

- Elephant & Castle Opportunity Area
- Aylesbury Action Area
- Canada Water (and Rotherhithe) Action Area
- Peckham and Nunhead Action Area
- Bankside, Borough and London Bridge Opportunity Area
- Dulwich Village and West Dulwich

9.5 Proposals for monitoring

9.5.1 It is important that the plan is monitored to keep track of whether it is working in the way it should. This report has identified indicators that should be used to monitor the Core Strategy. The most appropriate way to monitor the Core Strategy is through the Local Development Framework Annual Monitoring Report (AMR). The AMR monitors the type of development that is occurring as a result of all of the council's planning policies and guidance and what effects this development is having in terms of sustainability. Where new indicators have been identified, through the SA process, these will be added to the AMR.

APPENDICES

APPENDIX 1
Legal and Policy Background for Sustainability Appraisal and Development Plan Documents

Strategic Environmental Assessment and Sustainability Appraisal

The Core Strategy falls within the definition of a 'plan or programme' under European Directive 2001/42 (the SEA Directive). As it is likely to have significant environmental effects, it must also undergo a Strategic Environmental Assessment (SEA), as part of the sustainability appraisal.

The SEA directive is transposed (made) into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004. Guidance on the implementation of the 2004 Regulations and the Planning and Compulsory Purchase Act is set out in the ODPM's Practical Guide to the Strategic Environmental Assessment Directive (September 2005) and Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (November 2005) respectively. Further guidance is also provided in PPS12: Local Saptial Planning, 2008 and the Plan Making Manual.

These guidance documents set out a similar methodology to be used in the preparation of both SAs and SEAs. The government guidance on SA incorporates the requirements of the SEA Directive within the SA process. In the case of the Core Strategy, all reference to SA should be understood as referring to both the SA and SEA process. The components of the SA and its relationship to the information required within the SEA report is set out below.

Components of the SA Report which make up the Environmental Report for the purposes of the Strategic Environmental Assessment

Information Required in Environment Report		Section in SA Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I)		**The SA report**
a	An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plan and programmes	Sections 1, 3 and 4 Appendix 3
b	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Sections 4 and 5
c	The environmental characteristics of areas likely to be significantly affected	Sections 4 and 5
d	Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Section 4
e	The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 4 Appendix 3
f	The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Sections 7 and 8 Appendices 4,5, 6 and 7
g	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Sections 8 and 9
h	An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Section 6, 7 and 8 Appendix 5 and 6
i	A description of measures envisaged concerning monitoring in accordance with Article 10	Sections 2 and 9
j	A non-technical summary of the information provided under the above headings.	Non-technical summary

	The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).	Sections 2, 3 and 9
	Consultation: • authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4). • authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2). • other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).	Section 2 Appendix 2
	Taking the environmental report and the results of the consultations into account in decision-making (Art. 8) **Provision of information on the decision:** When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed: • the plan or programme as adopted; • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9 and 10)	Section 9
	Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	Section 9
	Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA checklist Directive (Art. 12).	The Quality Assurance Checklist has been followed

APPENDIX 2
RESPONSES TO CONSULTATION

Scoping Opinion Responses

Name	Section of Reports	Comment	Officer response
The Environment Agency	Preferred Options Report section 8 Background paper to the Preferred Options report SA Section 6 SA: Relevant Plans, strategies and programmes (Appendix 3)	We would wish to comment on the following: • Development and flood risk • Surface Water Flooding • Climate Change • Open Space and Biodiversity • Energy Efficiency and Renewables • Waste Management • Policy Context **Development and flood risk** We are pleased to note that flood risk has been identified as one of the key sustainability objective in Southwark. However, there is little mention of SFRA which should provide a framework at local/strategic level to help apply the sequential test and inform site allocations. It is also used to identify sustainability objectives and test policy options in SA/SEA. The SFRA should analyse the likely locations, depths and speed of flood water in the event of overtopping or breach of the existing river defences. It should also provide information to show how any environmental objectives relating to flooding that have been mentioned in the Sustainability Appraisal are affected by additional development. Once levels of risk have been determined, they can be balanced against the other key issues covering the environmental and social economic issues. All reference to PPG25 should change to PPS25. We appreciate the impact of flooding in the borough has been understood and hope the risks will be appropriately managed. The borough wide SFRA should identify the actual and residual flood risks, as required by PPS25. This information will need to inform the borough's spatial plan and policies. Development proposals within the defended tidal flood plain must consider the residual risks that are present, i.e., increasing risks from rising flood water and sea levels due to climate change and the risks resulting from a	Comments noted. **Development and Flood Risk** PPS 25 has been referred to within the Draft Sustainability Assessment. It is acknowledged that planning policy needs to take into account the risk posed by flooding. The Preferred Options Report sets out our approach to reducing flooding. A Strategic Flood Risk Assessment (February 2008) has been prepared for the borough and it is used by the council to inform the application of the Exceptions and Sequential Tests. The SFRA forms part of the evidence base to inform the preparation of the Core Strategy and the policy relating to development and flood risk. We have included additional indicators within the Sustainability Framework of the Draft Sustainability Appraisal

Name	Section of Reports	Comment	Officer response
		failure or overtopping of a section of defence protecting the area under consideration. This may lead to reallocating some of the more vulnerable uses to areas with lower residual risks as well as designing new development in a more flood resilient manner. The emerging policies should focus on reducing flood risk through appropriate location, layout and design of development as set out in PPS25 and Thames CFMP. In particular, opportunities should be sought to: • Set back development from the river edge to enable sustainable and cost effective flood risk management options • Ensure that the buildings with residual flood risk are designed to be flood compatible or flood resilient • Use open spaces within developments which have a residual flood risk to act as flood storage areas. Flood risk management planning needs to be linked closely with regeneration and redevelopment so that the location of development can help to reduce flood risk. There is need to incorporate long-term policies in the Core Strategy that outline protecting and recreating river corridors and areas where flooding can happen naturally. These policies will support the objectives of Thames Estuary 2100 (TE2100) and the London Plan Blue Ribbon Network *(Policy eC.3 The natural value of the Blue Ribbon Network , Policy 4C.6 Sustainable growth priorities for the Blue Ribbon Network and Policy 5D.1 The strategic priorities for South East London).* Flood resilience must be built into buildings and other infrastructure, such as transport in areas currently at residual risk. Emergency Planning and evacuation procedures are required that fully understand current and future risk. Defra's Policy to achieve *Making Space for Water* must be delivered in the short and long term to enable us to maintain existing defences and plan for future land use. If developments are set back from existing defences we retain the option of future upgrades, as well as making space for flood storage. This will require land allocation many years in advance, which needs to occur through current spatial planning. The protection of floodplains from the physical threats posed by development is dependent on the powers exercised by local planning authorities. The Environment Agency would therefore support any Council's proposal to safeguard areas of currently undeveloped land such as marshes as Strategic Flood Storage areas to use as emergency flood storage.	The Preferred Options report sets out our approach to flood resilience. The Sustainable Design and Construction SPD sets out our minimum standards for maximising the flood resilience of new development. Southwark is an inner city London borough currently under going or planning significant levels of regeneration development, some of which located will be located within floodplains. The majority of the borough is developed, and therefore the suggestion to consider safeguarding areas of currently undeveloped land for Strategic Flood Storage areas is not feasible. We need to ensure the land is developed as efficiently as possible, whilst also having appropriate policies to manage flood risk. In accordance with PPS25, we require the application of the sequential and exceptions tests as pre-requisites when development is proposed within the floodplains. We have reviewed the criteria questions and indicators of the Sustainability Framework of the Draft Sustainability Appraisal, in relation to achieving the objective for addressing flood risk.

Name	Section of Reports	Comment	Officer response
		More criteria questions for table 5-SD014 • Are the sites riparian? • Will any proposed development impact on the structural integrity of the defences? • Are the defences appropriate for the lifetime of any proposed development? • Will any work be required to bring them up to this standard? • Will sites be drained in a sustainable manner (i.e. no pumping will be required?	
	Preferred Options Report Section 8 Background Paper to Preferred Options Report SA: Section 6	**Appendix 4: Baseline data for Southwark** Baseline data needs to be compiled for flood risk issues. This is needed to allow the assessment of change and policy performance against key indicators. Examples include: -the number of dwellings in Flood Zone 3, the number of new or replacement dwellings permitted in Flood Zone 3 and the number of highly vulnerable premises within flood Zone 3 (as per PPS25 Annex D). The SFRA should be the key source of data.	A Strategic Flood Risk Assessment (February 2008) has been prepared for the borough. The report will form part of the evidence base to inform the preparation of the Core Strategy. We have reviewed the key indicators to address Flood Risk
	SA: Section 6	**Surface Water Flooding** The Water Strategy, published in February 2008, sets out the Government's preferred approach to managing surface water drainage. It also advocates local authorities having a lead role. The SFRA recognises that within the urban centres of the Borough, it is inevitable that localised flooding problems arising from under capacity drainage and/or sewer systems will occur. With increasingly intense downpours the risks would increase due to climate change and it is imperative that provisions are made to manage and address this risk. At present there is little information on surface water flood risk. To understand the level and nature of risk it would be necessary to prepare a Surface Water Management Plan (SWMP) or Integrated Urban Drainage Plan (IUDP) that would help to define the future approach. These can guide your local area policy direction in terms of risk or consequence reduction and management. This would be an action plan, agreed by all local stakeholders with drainage responsibilities, to clarify responsibilities and manage these risks. For flood risk reduction it would be necessary to reduce surface water run-off and have provision of open spaces that can function as flood conveyance and storage for surface water flooding. For reducing the consequences it would be necessary to adapt existing (through retrofitting) and new houses to be more flood resilient.	Comment noted. Surface Water Flooding The preparation of further studies and plans will be considered. We will continue to consult with stakeholders with drainage responsibilities We address surface water flood risk within the Sustainability Framework of the Draft Sustainability Appraisal.

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		Surface water drainage networks are normally designed to cope with storms of a 1 in 20 year intensity. It is therefore to be expected that events above this intensity will occur from time to time. Many areas with large roof areas, at low points in the drainage network or have suffered blockages in the surface water system may experience surface water flooding. Surface water should generally be managed at source. Large developments locations offer particular opportunities to make significant changes to surface water management so that it becomes more sustainable.	
	Preferred Options Report Section 8	**Sustainable Drainage Systems (SUDS)** We appreciate the inclusion of SUDs in the draft Sustainability Appraisal Report. PPS1 and PPS25 directly mention SUDS and the opportunity to promote SUDS. It is hoped that there will be a readiness to secure SUDS for many developments of all scales in the achievement of sustainable development. New development will be expected to include a provision for the adequate environmentally acceptable measures to deal with surface water run-off or discharge. Planning permission for development that includes non –sustainable methods of surface water drainage should not be granted unless it can be demonstrated that sustainable techniques are not feasible on the grounds of practicability. As well as controlling surface water run-off at source to reduce the risk of flooding, SUDS can protect and improve water quality in receiving water courses, provide habitat creation opportunities, enhance the design of the development by providing amenity areas and landscape settings, and encourage natural groundwater recharge. For technical guidance you are referred to The SUDS manual, CIRIA C697. Box 2.1, on page 2-15, Chapter 2 of the CIRIA C697 document provides a comprehensive list entitled "Basic requirements of drainage assessments". The CIRIA document can also be downloaded freely at http://www.ciria.org/suds/publications.htm. The C697 document provides advice on: • SUDS techniques: their principles and benefits and compares them to conventional drainage systems • Design requirements for SUDS systems and their appropriateness for site conditions • Maintenance and adoption of SUDS • Regulation and responsibilities for SUDS Construction of SUDS and the requirements to protect the SUDS features and watercourses during the construction process	SUDS Comments noted. The adopted Sustainable Design and Construction SPD require minimum standards for drainage requirements and sets out our Preferred Standards in order to achieve an excellent standard of design and construction. Applicants therefore need to robustly justify why they cannot meet the minimum standards as set out in the SPD. The Preferred Options report sets out our preferred approach to address flood risk and sustainability measures within development.

Name	Section of Reports	Comment	Officer response
	Preferred Options Report Section 8 Background paper to Preferred Options report SA: Section 6	**Climate change** Climate change considerations should be integrated into all spatial planning concerns, including transport, housing, economic growth and regeneration, water supply and waste management. It should be viewed from the wider sustainability objectives and not only reducing the impacts of carbon emissions. Mitigation and adaptation should not be considered in isolation of each other, and opportunities for their integration in the development of spatial strategies, and their delivery, should be maximised. Consideration should be accorded to the area's vulnerability to climate change, using the most recent scenarios available from UKCIP and TE2100, and specifically the implications for built development, infrastructure, services and biodiversity. There is need to identify how sustainable flood risk management can be best aligned to redevelopment plans and how it can apply policies associated with Blue Ribbon Network. This will define the combination of river and river corridor restoration, attenuation and conveyance that can best offset the impacts of climate change and complements the redevelopment plans within this catchment. The rising sea level will steadily reduce the level of protection that defences offer. The predictions for how quickly sea level will rise vary considerably depending on the assumptions used about emissions and climate modelling. The TE2100 project has considered a range of climate change derived sea level rises from 0.9m (Defra 2006 Climate Change Scenario) to 4m (High++ Level where all conceivable sea level rise contributions up to 2100 occur). The Environment Agency Thames Catchment Flood Management Plan (Thames CFMP) (September 2006) confirms the above and sets out some main messages:- a) Flood defences cannot be built to protect everything. b) The ongoing cycle of development and urban regeneration is a crucial opportunity to manage flood risk. c) Land for future flood risk management will be identified and protected by authorities. Work undertaken so far by Thames Estuary 2100 (TE2100) indicates that the present system of flood risk management for the tidal flooding can continue to provide an acceptable level of risk management up to 2030. Beyond 2030 more actions will be needed. These actions would be easier and more affordable and sustainably delivered if they are planned now. The London Plan, *Spatial Development Strategy for Greater London* - consolidated with Alterations since 2004 was published in February 2008. It states inter alia that *"The Mayor will, and boroughs and other agencies should, take*	Comments noted. <u>Climate Change</u> The Preferred Options report sets out the approach to integrating climate change considerations into the development process. The Draft Sustainability Report also sets out objectives and indicators to help monitor the achievement of the objectives. The adopted Sustainable Design and Construction SPD sets out detailed planning and design guidance for development in flood risk areas.

Name	Section of Reports	Comment	Officer response
		fully into account the emerging findings of the Thames Estuary 2100 Study, the Regional Flood Risk Appraisal and the Thames Catchment Flood Management Plan" page 211	
		New development should be avoided in those areas with likely increased vulnerability to climate change, particularly where it is not viable to manage likely risks through suitable measures to provide resilience; and bring forward adaptation options for existing development in likely vulnerable areas.	The Preferred Options Report sets out our approach on the expectations and requirements for environmental standards.
		The council should require development proposals to take account of the expected changes in local climate conditions, throughout the proposed lifetime of the development, by adaptation or flexibility to allow future adaptation. Information on these measures must be submitted with an application. Specifically, the council should require major developments to:	
		• identify the type of and extent of the main changes expected in the local climate throughout the lifetime of the proposed development, • identify the potential impacts of these changes on the proposed development and its neighbours, • indicate the ways in which the proposed development design overcomes the hazards and exploits the opportunities associated with these impacts whilst meeting other sustainable development criteria, particularly the need to achieve overall reductions in greenhouse.	The Sustainable Design and Construction SPD sets out guidance on how new developments should be designed to adapt to climate change.
		Climate Change Baseline and indicators Suggested baseline data sources and indicators to address climate change are included in the response for inclusion within the SA.	We have considered the suggested baseline data and indicators and included, where appropriate, additional information into the Draft Sustainability Appraisal
	SA: Section 6 Background Paper to Preferred Options Report	Appendix 4:SD09 Water Resources Under the ' Water Resources' Objective: we suggest that this be strengthened to read' to improve the quality of controlled waters within the borough'. Controlled waters include surface and groundwater, as defined by S.104 of the Water Resources Act 1991. Other objectives would include meeting requirements of the Water Framework Directive, maintaining and enhancing riverside and water based recreational activities (including navigation, angling, canoeing)	Comments noted. We consider the accompanying criteria questions to the Sustainability objectives appropriately cover the suggestions. We have reviewed the indicators within the Draft Sustainability Appraisal
		Additional Indicators for baseline data should include number of water efficient developments, use of water saving technology and number of new or improved sites. Targets should include the following: reduce water use, reduce demand for water, increase/create riverside and water based opportunities for activities.	

Name	Section of Reports	Comment	Officer response
	SA: Section 6 Preferred Options Report Section 8	**Open Space and Biodiversity** Appendix 4: SDO13 Open Space and Biodiversity The key issues we have identified for this objective relate to: • Improving and linking open spaces to local residents and wider population and visitors. • Providing new and attractive green grid style development • Improving entrance ways and knowledge of open spaces • Increased environmental recreation in and around parks e.g. increased access to fishing and environmental education. A more informal / softer landscape that connects to the water edge would add a quality of life value for visitor enjoyment and could be an environmental and economic benefit to new development in the area. • Improved environmental links (e.g. cycle ways, walkways, extensions and links to existing green space areas). Objectives, indicators and targets to be included on Appendix 4 are recommended.	Comments noted Open Space and Biodiversity We have reviewed the indicators within the Draft Sustainability Appraisal We have included reference to the importance and benefits of biodiversity within the Preferred Options Report
		Green Roofs: Benefits Living roofs and walls can enhance biodiversity, reduce the risk of flooding (by absorbing rainfall), improve a building's thermal performance, thus reducing associated energy costs, help counter the Urban Heat Island Effect, support higher density more sustainable development and improve the appearance of the urban areas.	Comments noted
	Preferred Options report Section 8 SA: Section 6 Background Paper of the Preferred Options Report	**Energy efficiency and Renewable Energy** Appendix 4: SDO6 The Core Strategy should ensure that a significant proportion of the energy supply of substantial new development is gained on-site and renewably, and/or from decentralised, renewable or low carbon energy supply and support the use of renewables, CHP and biofuels. It should promote the use of recycled building materials and materials that have low embodied energy and also promote retrofitting existing buildings to make them more energy efficient We recommend inclusion of the following additional indicators- total electricity and gas use, electricity generated from renewable energy sources and CHP located in the area, embodied energy in new buildings and percentage of new homes conforming to recognised codes for sustainable buildings. This information would be obtained from the following sources: -	Comments noted The Preferred Options report sets out our preferred approach to energy efficiency and renewable energy. The adopted Sustainable Design and Construction SPD also sets out our minimum requirements for development and our Preferred Standards We have reviewed the indicators and updated the baseline data

Name	Section of Reports	Comment	Officer response
		• Audit Commission Area Profiles-household and individual energy use, by local authority • Department of trade and Industry(Currently Department for Business and Enterprise)- energy trends • Environment Change Institute-emissions from buildings, appliances • Renewable Energy Statistics Database- renewable energy	
	Preferred Options Report Section 8 Background paper to Preferred Options report	**Waste Management** We support the target Southwark council has set for recycling of 50% of household waste. This is 5% higher than the target set by both the Mayor of London in the London Plan and DEFRA, but is not as high as the 60% aspirational target the Mayor set in his Municipal Waste Management Strategy. (s2.3.1) As a London borough which performs highly on waste management we would wish for the 50% target the borough has set itself to be seen as a minimum, with the ambition to achieve a recycling rate closer to the 60% advocated by the Mayor.	Comments noted The London Plan policy 4A.21 requires all London Boroughs have sufficient capacity to manage 75% of waste arising within London by 2010, rising to 80% by 2015 and 85% by 2020. To this end the GLA have apportioned 133,000 Municipal waste and 246,000 Commercial and Industrial waste to be managed by Southwark by 2020. This is a target which we are required to meet and are doing so jointly by the planning team and the Council's waste department by allocating a site. It should be noted that this is not a forecast of waste arising in the Borough rather it is an apportionment figure of the amount of waste we should deal with in the Borough. Clearly this site, half of the designated site, is not expected to meet the entire apportionment target and is considered by Southwark Council to simply contribute towards meeting our Council's target.. In addition to this Southwark is also required to minimise the levels of waste generated, and exceed levels of recycling and composting in
		Residential Recycling We would support the council's strategy of providing a range of services to enable residents to recycle their waste in a way which is convenient to them. One of the aims of the core strategy is to increase the amount of waste that is recycled by residents. Households will recycle more if the services that they are provided with are easy to understand and easy to use. Recycling containers which are not sufficiently large to store all of the materials which residents wish to recycle can undermine efforts to increase recycling and result in materials entering the residual waste stream. As part of the on going dialogue with residents, the council should canvass residents opinion about what may be limiting the amount of material that residents recycle, and whether the recycling containers themselves play any part in this. The move from fortnightly to weekly collection of recyclables should improve recycling rates if container size is a problem.	
		Business Waste Recycling One area of sustainability that is receiving increasing regulatory scrutiny is material waste. The Government is currently consulting on making Site Waste Management Plans compulsory this year (2008). With landfills closing at a rapid rate and the landfill tax set to triple within the next decade, the construction industry is under extreme pressure to minimise its waste sent to landfill. The proposed mandatory waste management plans are designed to encourage the better use of resources and to minimise waste taken from construction sites for	

Name	Section of Reports	Comment	Officer response
		disposal. Construction projects with a value greater than £250,000 will have to produce a management plan that details the volume of waste produced and outlines how it will be handled. Projects with a value of greater than £500,000 will be subject to more stringent and detailed accounting requirements.	municipal waste of 35% by 2010 and 45% by 2015; and 70% for commercial and industrial waste by 2020.
		Management of Street Litter Recycling of materials should be extended to include street litter and waste and introduce a scheme to try and recycle the growing quantities of waste arising from the distribution of free newspapers. We could appreciate if the sustainability Appraisal Report of the Core Strategy considers the following issues: - How to retro fit existing developments to improve recycling rates even further in Southwark. - Ensuring the Waste Management addresses climate change issues within Southwark. - Maximising the use of the River Thames as a transport route for waste. - Consider ways new development can make space for management of domestic waste e.g. using Supplementary planning documents, validation checklists, promoting good practice. - Consider how waste trends will change within Southwark as the regeneration of Thames Gateway continues. - Consider how a changing population in Southwark may require different service levels, e.g. opening hours of waste management facilities, ensuring waste management facilities are accessible to all e.g. people without access to cars. - Ways to change attitudes that waste can be a valuable resource not just "rubbish" - Ways to minimise illegal waste activities and unlicensed waste activities.	The proposed waste facility, which is only half of the allocated site, will deal with municipal solid wastes comprising household waste along with non-household waste including commercial waste, street cleaning waste, bulky waste and waste from community groups and schools. It proposes to recycle 30% of municipal waste arising in Southwark by 2010, 40% by 2015, and 50% from 2020 onwards The Council's Waste Management Strategy sets out our approach to the management of waste in the borough. The Preferred Options report sets out the overall strategy for addressing waste and recycling and further detail is contained within adopted supplementary documents. The Sustainable Design and Construction SPD sets out our standards for avoiding waste and minimising landfill. It also includes our standards for waste capacity requirements for residential development. The annual monitoring process of the LDF will assess how well the recycling targets are being met and whether we need to review our minimum standards.

Name	Section of Reports	Comment	Officer response
			<u>Business Waste Recycling</u> The Sustainable Design and Construction SPD requires Site Waste Management Plans to be submitted for building construction.
		<u>Waste Water Treatment</u> Although the draft Sustainability Appraisal mentions waste management and water resources as part of the key sustainability issues, it would be preferable to have a separate waste water treatment objective. More new development will create higher volumes of sewage to be transported from houses to sewage treatment works, and additional treated effluent to discharge to surface and ground waters. The combined drainage system of London has limited capacity. Moderate rainfall (as low as 2 mm per hour) frequently overloads the system resulting in 50-60 days per year when sewer overflows operate. Therefore the infrastructure should be sufficient to guarantee both surface and ground water quality would not be detrimentally affected, and avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property and pollution of land and watercourses The Water Framework Directive sets ecological standards in addition to chemical standards for rivers. This is likely to place greater demands on Sewage Treatment Works to achieve cleaner effluents. In preparing the Core Strategy, the council must: i) ensure that the rate of development broadly accords with the capacity of existing water supply, sewage treatment and discharge systems, particularly in connection with major new development ii) require development to incorporate measures to enhance water efficiency, and sustainable drainage solutions iii) work with the Environment Agency and water companies to identify infrastructure needs and allocate areas for and permit necessary infrastructure	We consider the number of key sustainability issues identified is sufficient. We continue to liaise with local stakeholders in relation to the capacity of the system and infrastructure requirements. We will be preparing an Implementation Plan which will set out how we will deliver The Preferred Option report sets out our broad approach to sustainability and environmental standards. Detail is currently set out in our adopted Sustainable Design and Construction SPD
	SA: Relevant Plans, strategies and programmes (Appendix 3)	**Additional Plans and Programmes** Table 3 and Appendix 3 **Adapting to Climate Change: A checklist for development** This guidance on designing developments in a changing climate was published by the Greater London Authority in November 2005. The main actions are summarised in a simple to use checklist, however, it is not intended to be a design manual, although it does contain signposts to more detailed guidance.	Comments noted We have incorporated these documents into the list of relevant Plans and Strategies which inform the Core Strategy

Name	Section of Reports	Comment	Officer response
		Thames Region Catchment Flood Management Plan This plan presents what the Environment Agency considers the most sustainable direction for the management of fluvial flood risk within the region for the next 50 to 100 years. It is based on extensive research into the catchment characteristics of the region and the options available for managing the risk to people, properties and the environment. It takes into account the likely impacts of climate change and the plans for future development.	
		Thames River Basin Management Plan - due to be completed 2009. The EU Water Framework Directive requires the Environment Agency to prepare and publish 10 River Basin Management Plans (RBMP) by 2009 to promote the concept of sustainable water management. Their aims are: - To safeguard the sustainable use of water - To protect and restore the status of aquatic ecosystems - To improve aquatic environments by the reduction of hazardous substances - To reduce groundwater pollution; and - To help mitigate the effects of flood and droughts	
		Thames Corridor Catchment Abstraction Management Strategy (CAMS) Produced by the Environment Agency June 2004 - looks at water resources management and the implications for the River Thames. CAMS are strategies for management of water resources at a local level. They make available information on water resources and licensing practice publicly available and allow the balance between the needs of the water abstractors, other water users and the aquatic environment to be considered in consultation with the local community and interested parties.	We will look at the possibility of the implementation of CAMS in consultation with Thames Water and local commercial ratepayers.
	SA: Relevant Plans, strategies and programmes (Appendix 3)	**Planning Policy Statement 12 (PPS12) - Local Spatial Planning** Para 1.2 All reference to PPS12-Local Development Framework (2004) should be replaced by the new PPS12- Local Spatial Planning (2008). This new policy statement sets out what the key ingredients of local spatial planning are and how they should be prepared. It should therefore be included on Table 3 and Appendix 3 as the key reference to the preparation of the Core Strategy. PPS 12 (2008) paragraph 4.1 states inter alia that *'every local planning authority should produce a core strategy which includes:* *(1) an overall vision which sets out how the area and the places within it should develop;* *(2) strategic objectives for the area focussing on the key issues to be addressed;*	Comments noted PPS 12 – Local Spatial Planning is referenced within the list of relevant Plans and Strategies in the Draft Sustainability Assessment We are preparing an Implementation Plan to set out how we intend to deliver the policies in the Core Strategy. We have an evidence base, which is

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	Background paper to Preferred Options report	*(3) a delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when, and by what means it will be delivered. Locations for strategic development should be indicated on a key diagram; and* *(4) clear arrangements for managing and monitoring the delivery of the strategy'* The delivery strategy is central. The core strategy needs to set out in practical terms when, where and by whom the objectives will be delivered. To be 'sound' a core strategy should be justified, effective and consistent with national policy	continuing to evolve, which will provide the justification for the policies in the Core Strategy.
English Heritage	SA: Relevant Plans, strategies and programmes (Appendix 3) SA: Section 6 **Background Paper to Preferred Options report**	As the Government's statutory adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. English Heritage therefore welcomes the opportunity to comment on the Sustainability Appraisal (SA) Scoping Report for London Borough of Southwark's Local Development Framework (LDF) Core Strategy. Overall English Heritage supports the approach taken in this consultation; however we would like to highlight areas where greater consideration of the historic environment is needed to inform the LB Southwark LDF. Our recommendations are set out below and we hope our advice will help to ensure your LDF is technically sound in accordance with government planning policy, such as PPG15 and 16, and the assessment is based on robust evidence. The policies set out in the LDF Core Strategy should aim to protect and enhance the historic environment, helping achieve genuinely sustainable development, as set out in Planning Policy Statement 1 paragraph 5. **Relationship to Other Plans and Programmes (Chapter 3)** English Heritage notes that PPG16: *Archaeology and Planning* and PPG15: *Planning and the Historic Environment* are identified in Table 3 and Appendix 3 as key documents to be taken into account in the preparation of the LDF Core Strategy. In addition, English Heritage recommends the European Landscape Convention, which was ratified by the United Kingdom government in 2006, also be included. It is the first international convention for the management and protection of landscapes and the text is available at: http://conventions.coe.int/Treaty/en/Treaties/Html/176.htm. We welcome reference to Local plans relating to the historic environment in Table 3, for example adopted Conservation Area Appraisals, and would like to see these plans referenced in Appendix 3. Archaeology Priority Areas are also set out in the existing	Comments noted Noted. The document 'European Landscape Convention' has been considered and included in the Draft Sustainability Appraisal section on Relevant Plans and Strategies. The Archaeology Priority Areas are listed within the Southwark Plan which is included within the section on Relevant Plans and Strategies

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		Southwark Plan (UDP) and we would like to see these referenced in Appendix 3. In particular we welcome inclusion of the CABE and English Heritage Tall Building Guidance to create high quality and safe urban environments. The reference to English Heritage's 2007 Buildings at Risk report in Appendix 3 needs to be updated to include the latest 2008 version, now called '*Heritage At Risk*' and available at www.english-heritage.org.uk/BAR. Please note in the commentary on 'relevant objectives and targets' that this currently refers to an AAP area and this should be amended for Southwark as a whole (there are currently 36 assets on the *Heritage At Risk* register). **Social, Economic and Environmental Context (Chapter 4)** The baseline data for the historic environment presented in Appendix 4 requires further expansion. Currently the only data included is the number of listed buildings at risk and extent of conservation areas, which does not reflect the full wealth of historic assets in Southwark and associated sustainability issues. The appropriate information sources that should be consulted, in respect of the historic environment, are as follows: • Greater London Sites and Monuments Record (archaeology, including Scheduled Ancient Monuments and Archaeology Priority Areas) http://www.english-heritage.org.uk/server/show/nav.8900; • The Schedule of Buildings of Architectural and Historic Interest (listed buildings); • The borough's conservation area records and adopted guidance (including conservation area designation reports, statements, appraisals and design guidance); • The borough's list of Locally Listed Buildings (or equivalent); • The Register of Historic Parks and Gardens • The London Buildings at Risk Register www.english-heritage.org.uk/BAR; • The HELM website www.helm.org.uk; and • The Heritage Counts website www.heritagecounts.org.uk	Noted. We have updated the section to include the latest version. Comments noted The list of baseline information has been reviewed
	SA: Section 6	We welcome inclusion of the number of Listed Buildings at risk in the Borough as an indicator and we would also suggest this includes the number of Scheduled Ancient Monuments at risk as well. Similarly, maintaining the extent of Archaeology Priority Areas would be a useful indicator for archaeology. The extent of Conservation Areas as an indicator is also welcomed, however LB Southwark could consider including the number of conservation areas, the number with an up-to-date management plan and appraisal as well. If data exists, the number of museums, heritage/ local history centres or other relevant heritage attractions open to the public could be an indicator.	Comments noted We have considered the suggestions and reviewed the relevant sections of the Draft Sustainability Appraisal

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		It is also worth noting that English Heritage's 'Heritage At Risk' register and will include broader data on heritage assets at risk in the future. For example, conservation areas; historic parks and gardens; and heritage landscapes and LB of Southwark may wish to consider these as indicators in the future.	
		Finally, English Heritage would also encourage LB of Southwark to undertake historic 'characterisation' of regeneration areas in the Borough as part of the character assessment, and to inform how future change can be managed in the historic environment. Your in-house conservation staff would be able to advise you on this, as well as the Greater London Sites and Monuments Record (http://www.english-heritage.org.uk/server/show/nav.8900).	Noted. We will keep the Council's Conservation officer's appraised of the preparation of this document and also request feedback of how we can incorporate the suggested historic 'characterisation' of the Growth Areas.
	SA Section 6	**The Sustainability Appraisal Framework (Chapter 5)** English Heritage notes and welcomes that a specific sustainability objective on the historic environment has been included in Table 5. The criteria set out in Table 5 could include a question as to whether it will enhance access to the historic environment and also contribute to better understanding of the historic environment. There should also be a reference to sustaining the setting of heritage assets (in addition to the assets themselves).	Comments noted We have considered the suggestions and reviewed the relevant sections of the Draft Sustainability Appraisal
	SA: Section 6	**Main Sustainability Issues Relevant to the Core Strategy (Chapter 6)** English Heritage welcomes that management of the historic environment has been identified as a sustainability issue that needs to be taken into consideration when preparing the LDF Core Strategy in Table 6. The historic environment is a component of the existing urban environment and enhancement of this resource should be identified as a means to improve quality and local distinctiveness of the area. However, the description of the issue only mentions a select number of assets, and does not capture archaeological and landscape issues. It is important LB of Southwark manages change through the LDF Core Strategy in a way that sustains, reveals or reinforces the historic environment in its broadest sense (see English Heritage *Conservation Principles, Policies and Guidance: for the sustainable management of the historic environment* at http://www.english-heritage.org.uk/server/show/nav.9181). This includes historic buildings, areas and their setting; archaeology; historic parks and gardens; heritage landscapes and the wider historic environment, such as those elements that may not be statutorily protected, yet help define the areas local distinctiveness.	Comments noted The reference to the historic environment within the Sustainability Objective 13 is intended to also encompass landscape and archaeological assets. The criteria questions appropriately address landscape and archaeological assets

Name	Section of Reports	Comment	Officer response
	SA: Relevant Plans, strategies and programmes (Appendix 3)	Finally, English Heritage would strongly advise that the local authority's conservation staff are involved throughout the preparation and implementation of the LDF, as they are often best placed to advise on local historic environment issues and priorities; sources of data; and, consideration of options relating to the historic environment. English Heritage has also recently published *Conservation Principles*, containing policies and guidance for the sustainable management of the historic environment (see http://www.english-heritage.org.uk/server/show/nav.9181). We recommend use of this document when considering heritage values, how to assess their significance and manage successful change in the historic environment. This advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the Southwark LDF and its Sustainability Appraisal, and which may have adverse effects on the historic environment.	The council's Design and Conservation officers are consulted in the preparation of the LDF documents. We have considered the document and have included reference to it within the section Relevant Plans and Strategies of the Draft Sustainability Appraisal.
Natural England		Paragraph 1.2 (page 60 covers the issues to be considered by the document and includes "….protecting and enhancing the environment and dealing with Climate Change," which is both welcomed and supported. Chapter 3 – Relationship to other Plans and Programmes The Plans and Programmes identified are appropriate and acceptable and will cover the issues and areas of interest for natural England; we therefore have no other Plans or Programmes to add to this section. Chapter 4 – Social, Economic and Environmental Context Baseline Topics identified and listed in Table 4 are again considered to be appropriate and cover the areas that Natural England would wish to see considered/covered by such a document, especially issues relating to Open Space, Biodiversity and Sustainable Transport. Chapter 5 – Sustainability Appraisal Framework Table 5 provides a list of 16 objectives which can be broadly supported, especially the following; SDO 6: To reduce contributions to Climate Change. SDO 13: To protect and enhance open spaces, green corridors and biodiversity.	Comments noted

Name	Section of Reports	Comment	Officer response
		The inclusion of green corridors is especially welcomed and supported, the Council should also give consideration on how the provision of new or enhanced green spaces can be used to alleviate and compensate for areas of deprivation.	
Southwark Public Health	Preferred Options Report Section 5 SA: Relevant Plans, strategies and programmes (Appendix 3) **Background Paper to Preferred Options report**	**Consultation Question 1** Would suggest that Health is given its own line in the table as it is an important area. Obviously merges into the larger social determinants that are dealt with elsewhere. (transport, education, housing, leisure and recreation, employment, access to services, community safety, built environment and parks/open space) Some major recent relevant plans and programmes are: **National:** Dept of Health: *Next Step Review: High Quality Care For All*: final report at http://www.ournhs.nhs.uk/2008/06/30/high-quality-care-for-all-nsr-final-report-launched/ In the light of local circumstances also include: *Health inequalities: progress and next steps* at http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_085307 and *Healthy Weight Healthy Lives* which is a cross government strategy with considerable relevance for planning and regeneration and can be found at http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_082378 **Regional**: You may wish to take note of the Mayor's Inequalities Strategy once it is published. Further information can be found at: http://www.london.gov.uk/mayor/health/index.jsp NHS London also has a strategy: http://www.london.nhs.uk/webfiles/Corporate/NHSL_Strategic_Plan.pdf There has also been a review of Healthcare in London by Lord Darzi – further information at: http://www.healthcareforlondon.nhs.uk/background.asp **Local:** *Southwark PCT Commissioning Strategy Plan 2007-2012* available at http://www.southwarkpct.nhs.uk/index.php?assetId=2638&assetGroupId=1402 http://www.southwarkpct.nhs.uk/a/1400 has other strategy documents and explains the planning framework.(This strategy is currently being refreshed – for further information contact Kathryn McDermott The Joint Strategic Needs Assessment (JSNA) will be an important resource in terms of data about population health and social care needs. Will soon be available electronically from the Public Health Dept. The core data set for it can be found at http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_086676	Health is considered in the Preferred Options Report We have considered the suggested plans and programmes and have included them into the Relevant Plans and Strategies section of the Draft Sustainability Appraisal We have noted the JSNA and will have reviewed the core data set to inform the Preferred Options Report

Name	Section of Reports	Comment	Officer response
	SA: Section 6	**Consultation Question 2** Good to see health has its own section. The issue of measurement is a complicated one and if quantifiable data is required, it is important to choose indicators that are significantly affected by planning and land use (as opposed, say, to how services are run and delivered.) One source of indicators to consider is the local area action plan which will run until 31 March 2011. This is expected to contain 35 indicators chosen from a new national indicator set plus 16 Mandatory Education and Early Years indicators. The LAA can also include local indicators, agreed by partners, which address Southwark 2016 / LAA priorities that are not covered by national indicators. (Jonathan Horne - Principal corporate planning and performance officer Tel: 020 7525 7251 **)** With respect to health, using the IMD Health Deprivation and Disability Domain looks fine and it's good that we can have the data at neighbourhood level. The Census data is fine except we only get it every 10 years – it will have the benefit of being comparable with past data and other parts of the country. Other indicators are possible which act on the determinants of health – e.g increasing physical activity, such as walking and cycling; increasing public use of open spaces; improving air quality; reducing traffic accidents resulting in serious injury/death amongst adults and children; homelessness and number of people in temporary housing; proportion of homes judged unfit to live in; access to services, work and shops by walking; well-insulated homes that are cool in summer and warm in winter with minimal fuel costs; avoidance of 'food deserts' and concentrations of fast food outlets and improved access to fresh food; reduced food miles; provision of allotments, community gardens and 'living roofs'; adequate provision of children's play space; preservation and enhancement of local shopping facilities; promotion of the flexibilities contained within planning regulations, so that local authorities are able to manage the proliferation of fast food outlets in particular areas, e.g. near parks or schools; reduction in unemployment etc are also relevant to health but I guess may well be measured in categories other than health. If it is possible to tweak the other categories so as to highlight the health improving aspects are highlighted that would be great in Southwark, as well as mental disorders, depression and anxiety, obesity, cardiovascular disease (CVD) is also a major issue and linked to deprivation. As are other long term conditions such as diabetes and respiratory disease. Obesity, diabetes and CVD are all linked to, and exacerbated by lack of physical activity.(And there is also good evidence to show that depression/anxiety can be helped by physical activity)	Comments noted We have considered the suggestions and reviewed the list of indicators. We have kept these to a manageable number

Name	Section of Reports	Comment	Officer response
		The big challenges for behaviour change are: smoking cessation; better diet; increased physical activity of all kinds; reduction in substance misuse (drugs and alcohol), reducing obesity and improving mental and sexual health.	
	SA: Section 6	**Consultation Question 3** You might be interested in having a look at *Indicators for Sustainable Communities*. This is produced at national level and mainly covers poverty, health, crime, access, mobility, and local and domestic environments. This seems a useful resource generally and can be found at : http://www.sustainable-development.gov.uk/progress/data-resources/sdiyp.htm and you might want to consult it to see how they think about sustainable communities and see if any of it can be applied at local level. One problem though to note with some of the health indicators is that at local there can be problems in using mortality data in that the time scale from an intervention to a benefit may be very long. Also rate of death not a relevant indicator of the incidence and prevalence of many of the common chronic conditions in a community. There are some **big** questions to ask around population health impacts of the strategy and perhaps to bear in mind when writing it. I don't know if this is the place but wanted you to be aware of them. What is its impact on the most vulnerable groups? Will it meet the objectives of care closer to home and the shift from acute to community care? Will it promote and facilitate healthy lifestyle choices? Will it reduce the burden on the NHS by reducing the prevalence of ill health and preventing illness? Will it encourage partnership working to reduce inequalities in health? Have housing plans considered local need for social care or supported/extra care housing for older/disabled people? These seem to me the big sustainability issues. Finally, I would suggest that **Leisure and Recreation** is added as a Baseline topic/SDO.	Comments noted We have considered the suggested questions and reviewed the Sustainability Framework of the Draft Sustainability Appraisal To keep the Sustainability objectives to a manageable number leisure and recreation facilities are covered within the following Sustainability Objectives with accompanying criteria questions: Health: To improve the health of the population Social inclusion and Community Cohesion: To promote social inclusion, equality, diversity and community cohesion Open Space and Biodiversity: To protect and enhance open spaces, green corridors and biodiversity
	SA: Section 6	**Consultation Question 4** You might find it useful to refresh some aspects of this with the JSNA which is good on demographics as well as health. E.g. where population is concerned, note Southwark's young population (e.g. 0-4s) and the substantial rate of growth forecast which is likely to put stress on the social, economic infrastructure and environment unless well-handled. Where health is concerned, I think you need to note that in Southwark, as well as mental illness and obesity, cardiovascular disease (CVD) is also a major issue and linked to deprivation. Also other long term conditions such as diabetes and COPD, and	Comments noted We have considered the suggestions reviewed the Sustainability Framework of the Draft Sustainability Appraisal

Name	Section of Reports	Comment	Officer response
		improvements in mortality mean there will be more people living longer with age associated problems.	
		General comments: 1. I have not yet got to grips with the issue of Strategic Environment Assessment! I see that this sustainability appraisal is intended to encompass it which is fine as a proliferation of documents is unhelpful. One thing I think we need to do though is have a look at the DH guidance that was produced on SEA as it was clearly seen as a vehicle for incorporating health issues into planning and is also a statutory obligation under a EU directive. Perhaps I can work with Kate to do this during September to ensure that anything important from there is captured in the sustainability appraisal and that we use anything that is helpful in it to continue to build the links between health and planning. 2. I felt that Children were a bit invisible – do you have anyone from Children's Services listed as a consultee? Spatial considerations very relevant to obesity issues	Comments noted We consult with the Council's Children's services department

Name	Section of Reports	Comment	Officer response
Thames Water		A key sustainability objective for the preparation of the new Local Development Framework should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 4.8 of the new PPS12, 2008 states: *"The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations."* Paragraphs 4.10 of PPS12 place goes on provide advice on the need for infrastructure to support housing growth and states: *"The outcome of the infrastructure planning process should inform the core strategy and should be part of a robust evidence base. It will greatly assist the overall planning process for all participants if the agencies responsible for infrastructure delivery and the local authority producing the core strategy were to align their planning processes. Local authorities should undertake timely, effective and conclusive discussion with key infrastructure providers when preparing a core strategy."*	Comments noted We will be preparing an Implementation Plan to set out the delivery mechanisms for the preferred approach to development. We will continue to liaise with local stakeholders to understand the requisite infrastructure requirements that will be required to enable development to occur.

Name	Section of Reports	Comment	Officer response
		The water companies' investment programmes are based on a 5-year cycle known as the Asset Management Plan (AMP) process. We are currently in the AMP4 period, which runs from 1st April 2005 to 31st March 2010 and does not therefore cover the whole LDF period. AMP5 will cover the period from 1st April 2010 to 31st March 2015 and we are currently preparing our business plan submission to OFWAT. **As part of our five year business plan Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result we base our investment programmes on development plan allocations, which form the clearest picture of the shape of the community. Where the infrastructure is not available we may require an 18-month to three-year lead in time for provision of extra capacity to drain new development sites. If any large engineering works are needed to upgrade infrastructure the lead in time could be up to five years. Implementing new technologies and the construction of new treatment works could take up to ten years.** In view of the advice contained in PPS12 Thames Water has the following comments in response to the consultation questions set out in the draft document.	Comments noted and will be taken into consideration in the preparation of the Sustainability Appraisal for the Core Strategy

Name	Section of Reports	Comment	Officer response
	SA section 6	**Consultation Question 2 – Baseline Topics** The inclusion of Water Resources as a baseline topic is supported however, it is considered that the topic should be widened or a separate topic should be included to relate to the provision of new water and sewerage infrastructure. **Consultation Question 3 – Sustainability Objectives** The list of sustainability objectives should make reference to the provision of water and sewerage infrastructure to service development. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low-pressure water supply problems. Whilst the water resources objective is supported it is considered that the objective should either go further, or that a separate objective should be inserted in relation to the satisfactory provision of water and sewerage infrastructure. **Consultation Question 4 – Sustainability Issues** The capacity of the existing water and sewerage infrastructure should be included as a sustainability issue. Where possible new development should be located where there is sufficient capacity within the existing infrastructure. However, where this is not the case infrastructure upgrades will be required which could affect the overall sustainability of a development and impact on its	Comments noted Baseline Topics Sustainability objective 9: Water resources - includes reference to the provision of water and sewer infrastructure Sustainability Issues We are preparing an Implementation Plan to accompany the next stage of the Core Strategy. This will address capacity and infrastructure

Name	Section of Reports	Comment	Officer response
	Preferred Options report Section 8	delivery as any upgrades should be provided ahead of development in order to avoid unacceptable impacts such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low-pressure water supply problems. The sustainable use of water is listed as a sustainability objective within Table 5 on page 14, however Table 6 on page 21 which relates to sustainability issues makes no reference to water efficiency within the water resources section. **Further Comments** **Renewable Energy – Page 46** Climate Change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water firmly supports the objective to make London an exemplar world city in mitigating and adapting to climate change. PPS22 provides guidance on renewable energy and encourages opportunities for incorporating renewable energy projects in all new developments. However, PPS22 also states that policies supporting such developments should be framed in such a way not to provide an undue burden on developers. Therefore any renewable energy provision policy should have an element of flexibility to allow for consideration of other factors. Thames Water is statutorily required by OFWAT and the EA to maintain an efficient and economical system of water supply and wastewater treatment within strict regulatory timescales. Due to the predicted increases in demand for potable water (taking into account water efficient new development) and the increased levels of wastewater requiring treatment, Thames Water will be required to continually develop and invest in our infrastructure over the life time of the LDF. However, on many of our sites it will not be feasible to provide 20% renewable energy for technical, planning and land ownership reasons. This is why it is essential that any renewable energy provision policy should have an element of flexibility to allow for consideration of other factors.	<u>Comments noted</u> The Preferred Options report sets out our approach to renewable energy. Developers would need to justify reasons why the minimum requirements cannot be met.
	SA: Relevant Plans, strategies and programmes (Appendix 3)	**Appendix 3: Relevant Plans, Programmes and Environmental Objectives** The table within Appendix 3 makes no reference to any documents produced by Thames Water. It is considered that the contents of the following documents would be relevant to the Core Strategy: Taking Care of Water - Our Plan for the Next 25 Years – Thames Water 2007 Draft Water Resource Management Plan – Thames Water 2008 Draft Strategic Proposals for Sludge Management – Thames Water 2008 Our Plans for Water – Thames Water 2008	We have considered the suggested documents and included them into the section on Relevant Plans and Strategies within the Draft Sustainability Appraisal

Name	Section of Reports	Comment	Officer response
	SA Section 6	Copies of all of these documents can be obtained from Thames Waters' website at www.thameswater.co.uk **Appendix 4: Baseline Data for Southwark** It is considered that the number of developments granted planning permission against the recommendation of Thames Water on sewer/surface water flooding grounds should be an indicator in relation to the Flood Risk Sustainable Development Objective.	Comments noted We have reviewed the Sustainability Framework indicators and amended it where appropriate.
The Coal Authority		Thank you for consulting The Coal Authority on your SA Scoping Report. Just to confirm that The Coal Authority has no specific comments to make.	Noted.
Indigo Planning Limited		**CORE STRATEGY – SUSTAINABILITY APPRAISAL SCOPING REPORT,** **JULY 2008** We write on behalf of our client, Threadneedle Property Investments Ltd, who own Beckett House, St Thomas Street, Southwark to make representations to the Southwark Core Strategy Sustainability Appraisal Scoping Report. As such, we set out our comments below: **Chapter 5 – Sustainability Appraisal Framework** We recognise the importance of the *Regeneration and Employment Opportunities* objective and fully support the aims outlined in Chapter 5. We especially welcome the desire to reduce the disparity between areas in the borough, through economic investment, and the increase in opportunities available. We support the stated objectives and the importance of economic investment in employment to allow regeneration of more deprived areas and increase access to employment availability for residents of different skill levels. We welcome the *Quality in Design* objectives criteria for safeguarding views and the high standards of design desired. We also encourage the pursuance of a quality built environment and investment into creating a desirable public realm. In addition, the *Housing* objectives outlined are important in providing quality homes for all residents, and we support the general rejuvenation of the borough and provision of much needed housing.	Comments noted. No change required.

Name	Section of Reports	Comment	Officer response
	Preferred Options Report section 6	**Chapter 6 – Main Sustainability Issues Relevant to the Core Strategy** We would like to reiterate the importance of locating businesses and services with a high level of trip generation and areas of high employment activity near to a range of public transport opportunities. This should also be the case with high density residential development which should be located in areas of high public transport accessibility. Accordingly, we welcome the planned improvements to transport infrastructure in the borough and the addition of the Cross River Tram and Thameslink extension, which will further improve the accessibility of the borough. The location of improved transport links is important in serving employment and high density residential development, and we therefore consider there should be continued development of transport infrastructure to support the planned development and regeneration of the borough. We hope you give consideration to these comments and we look forward to seeing how the Core Strategy and Sustainability Appraisal progresses.	Comments noted. The Preferred Option is a 'Growth Areas' approach, which will encourage major development to be located in these areas with good public transport accessibility. Some areas within the borough are more suitable for major housing developments than others. By directing larger housing developments to Growth Areas we ensure sustainable development as these areas have good public transport accessibility and lots of opportunities for new housing. We agree that it is important to improve transport infrastructure where they will serve new employment and housing development. We continue to work with transport infrastructure providers to plan for future growth.
Richard Lee	SA: Relevant Plans, strategies and programmes (Appendix 3) SELHP-referenced within the Consultation Strategy report	**Consultation Question 1 – Relationship to other plans and strategies** Table 3 and appendix 3 are rather dated. This is particularly so regarding regional policy, with no documents cited that are more recent than 2004. I would suggest that for London's SPG's you consult Annex 6 of the Consolidated London Plan (2008) and for the Mayor's strategies and other reasonably up to date national, regional and local policies see Chapter 6A.4 of the London Plan (2008), pages 385-388. Another significant gap is the work of the South-East London sub-regional partnership, which should also be a good source of data.	Comments noted. We have updated Appendix 3 of the Draft Sustainability Appraisal of the Core Strategy Preferred Options report. We will also be referencing the revised list of relevant plans and documents in the Background Paper which will accompany the Preferred Options Report. We are a member of the South East London Housing Partnership (SELHP) and provide input into the work that is being undertaken i.e. Strategic Housing Market Assessments

Name	Section of Reports	Comment	Officer response
	Preferred Option Report sections 5 & 7 Background Paper to Preferred Options Report	**Consultation Question 2 – Data sources and data** In table 4, there are no baseline topics on the economy (industrial locations, SME's, growth sectors) and on social infrastructure. The latter should include lifetime neighbourhoods, in which local shops, community premises and facilities and green open spaces are within easy walking distance and accessible to everyone. In Appendix 4, much of the data is a recycling of existing policy in the UDP, instead of fresh thinking about new needs and emerging policies. The Core Strategy can set new policy, but this does not seem to be the mindset. Where it says that data is not currently collected, it would be useful to have an indication of what new data will be collected to inform the Core Strategy.	Comments noted. The Preferred Options report addresses the topics of the economy and social infrastructure. An appraisal of the impact of the Preferred Options policies for the economy and social infrastructure is included in the Draft Sustainability Appraisal The Baseline Data of the Draft Sustainability Appraisal has been reviewed and updated
	Core Strategy Equalities Impact Assessment Background Paper to Preferred Options Report Annual Monitoring Report	There are the following gaps where data should be collected:- Social inclusion – only refers to 4 of the equality target groups. Under faith, there is a major issue about the needs of Black Christian Churches, especially in the new migrant communities and particularly needing places of worship.	Comment noted. It is acknowledged that the needs of all of the different equality groups must be taken into account when preparing the Core Strategy and assessing its long term impacts on these target groups The Annual Monitoring Report also sets out information collected on equalities groups. The AMR forms part of the evidence base for the Core Strategy.
	Background Paper to Preferred Options Report	Open space – should make reference to the deficiency maps (appendix 13) and to the data on other open spaces as covered in Southwark's Open Space Strategy.	Comment noted. Baseline data on open space is included in the Draft Sustainability Appraisal of the Preferred Options report. Information on open spaces data will also be included in Background Paper.

Name	Section of Reports	Comment	Officer response
	Background Paper to Preferred Options Report	Housing – the needs based information has to be up to date, not from 2003. There is much useful data in the London Housing Strategy and the draft Mayor's Housing Strategy 2007,	Comments noted. A Housing Requirements Study for Southwark has been prepared. The study will form part of the evidence base for the Core Strategy policies. We have referenced the Mayor's Housing Strategy within the Draft Sustainability Appraisal and the strategy has informed the preparation of the Preferred Options policies.
	Preferred Option Report – Section 5 SA: Appraisal of the Preferred Option (Appendix 6)	An assessment of the need for social infrastructure and community facilities in the borough, and to ensure that they are capable of being met wherever possible, as required by the London Plan (Policy 3A.18).	Comment noted. We have included a policy within the Preferred Options report on community facilities. We have assessed the impact of the Preferred Option on community facilities within the Draft Sustainability Appraisal. We are continuing to consult with infrastructure providers and will set out delivery mechanisms in an Implementation Plan
	Background Paper to Preferred Options Report	A comprehensive assessment of the need for extra care housing sheltered housing and other appropriate specialist housing for older and disabled persons in accordance with the London Plan (paragraph 3.68).	Comment noted We have undertaken a Housing Requirements Study which forms part of our evidence base.
	Preferred Options Report sections 6, 7,8 Background Paper to	**Consultation Question 4 – sustainability issues** The following issues should all be turned into options as part of the Options and Issues. Regeneration and employment – add the need to increase the number of jobs, increase the available workspace, more support for SME's, including social enterprises, green and creative industries and to provide affordable small shop units in all major developments.	Comments noted. The Preferred Option Report sets out the approach to employment, energy efficiency, open spaces and housing. We have taken into account background data, evidence, plans and strategies to inform our preferred approach.

Name	Section of Reports	Comment	Officer response
	Preferred Options Report	Social inclusion and community cohesion – add that diversity is a major asset to be supported and sustained, that Southwark is experiencing an increase in poverty and social exclusion, that the BME communities will become the majority community during the lifetime of the Core Strategy and that there is a particular issue about the growth in the Black elderly population. Energy efficiency – add the option for new developments to be zero carbon and to make use of decentralised energy systems. Open space – An option that any new development in the north west of the borough must not result in the loss of existing green open space and should provide increased green amenity space and play areas. Housing – The issues refer to the need for more social rented housing and how too many are living in overcrowded or unsuitable housing conditions. The options to include the following alternatives:- • 50% of new housing to be social rented housing in those parts of the borough where there is support from local residents and cllrs. • To remove the 35% affordable housing target for parts of the borough. • The target of 50% affordable housing to apply to schemes of 10 or more units. • To change the balance of housing tenure in Dulwich where the majority of housing is private. • To support applications for public subsidy from the HCA • Lifts to be installed in all flatted developments	The objective of achieving social inclusion and community cohesion are embedded in the objectives of Southwark's Sustainable Community Strategy (Southwark 2016). The Core Strategy has the same objectives as Southwark 2016, and the Preferred Option sets out the preferred approach to contribute to the achievement of these objectives. In relation to the comment on public subsidy and lifts: We set out our approach to support for applications for public subsidy in our adopted Affordable Housing SPD. This is not for the Core Strategy to address. We set out guidance in our adopted Residential Design Standards SPD on incorporation of lifts for Wheelchair accessible units. Building Regulations also deal with the inclusion of lifts within developments. This is not for the Core Strategy to address.

Name	Section of Reports	Comment	Officer response
Home Builder's Federation Ltd	Background Paper to Preferred Options report	**Question 1** An important source of information and evidence to inform policy formulation relating to housing supply and affordability will be the Strategic Housing Market Assessment (SHMA) – both the GLA sponsored study (the GLA SHMA 2009) and any sub-regional or local study that the council participates in. The information from these studies should inform in the sustainability appraisal since it will provide information on market and social housing need and demand, and the size of dwellings that may be required. We would also strongly urge the council to open a dialogue with house builders operating in the borough who will have information on market drivers that can be used to inform the SA. Also of great importance will be Southwark's Strategic Housing Land Availability Assessment (SHLAA) as well as the data from the GLA Housing Capacity Study and SHLAA 2009. This will indicate where adequate supplies of suitable, developable and deliverable land for housing will be available in the borough, and this will have an important bearing on the development of the SA, the council's community engagement strategy (the SCI), and the development of core strategy policies. For example, if the costs of remediation or regeneration are very high within the identified opportunity areas, or if development is heavily reliant upon the delivery of new key infrastructure, then it may be a while before the development sites concerned begin to generate any net housing additions. It is vital, therefore, for the council to identify as many suitable sites for residential development as possible (so that housing can come forward on less-constrained sites), and not overly rely on one of two opportunity areas in order to meet its annual monitoring targets. In terms of other baseline data the council should also be drawing upon information it has on the total number of residents on the council waiting list; in temporary accommodation; and those who are homeless. It might also consider the need for additional student housing if college numbers are expected to rise over the plan period. Non-self contained dwellings, however, should not be included in net housing additions target. Although we recognise that the GLA does count these towards the London Plan target we continue to dispute this with the GLA as no other region of the country does and neither does the CLG. To enable the council to respond to the social dimension of the sustainability agenda the council as part of its SHMA should also try to assess how many people would remain in the borough if they could secure a larger or a different type of home. It might consider how many households aspire to move out of the social rented sector into owner occupation and information on net in-migration into the borough into market	Comments noted. The GLA are in the process of preparing the London-wide Housing Capacity and SHLAA, with input from London Boroughs. Sites over 0.25 ha within Southwark have been assessed for their capacity and availability for housing. Sites will be identified within on a series of maps. The GLA have recently published the London-wide SHMA. These two assessments will be part of the evidence base. A Housing Requirements Study has been prepared and is part of the evidence base to inform the preferred approach. A sub-regional SHMA is being prepared to set further context to the housing market in South East London. We are also in the process of preparing other studies to further inform the preparation of the Core Strategy policies. In relation to the proposed exclusion of non-self contained dwellings within the net housing additions target, this is an issue for the GLA in its preparation of the London-wide Housing Capacity and SHLAA and the revisions to the London Plan.

Name	Section of Reports	Comment	Officer response
		housing. This would help provide the council with a picture and possible indicators of likely levels of market demand as much as absolute housing need.	
	Preferred Option Report - all sections Equalities Impact Assessment	**Question 3** The council should aim to promote social inclusion, equality and diversity in all areas of the borough, not only in those areas of relative social deprivation. It can achieve this by identifying small as well as large sites suitable for residential development in all areas of the borough including those in the south. The south benefits from good public transport connections, in over-ground rail and bus services, so the council should take advantage of these. The higher land values in these areas should also make it easier to secure higher percentages of affordable housing.	Comments noted. The objective of achieving social inclusion and community cohesion are embedded in the objectives of Southwark's Sustainable Community Strategy (Southwark 2016). The Core Strategy has the same objectives as Southwark 2016, and the Preferred Option sets out the preferred approach to contribute to the achievement of these objectives. The London-wide Housing Capacity SHLAA will assess sites over 0.25 ha for housing capacity and availability and this data will inform the preparation of the Core Strategy and allocation of sites for development. We are undertaking an affordable housing viability study to further inform the preferred approach for the Core Strategy and provide further evidence for the policies.
The Theatres Trust	**Preferred Options Report Section 4 & 5**	The Theatres Trust is the national advisory public body for theatres and a statutory consultee on planning applications affecting land on which there is a theatre. This applies to all theatre buildings, old and new, in current use, in other uses, or disused. Established by The Theatres Trust Act 1976 *'to promote the better protection of theatres'*, our main objective is to safeguard theatre use, or the potential for such use but we also provide expert advice on design, conservation, property and planning matters to theatre operators, local authorities and official bodies. **Consultation Question 3 - Objectives** We have examined the objectives, each chapter and the appendices and can find no reference to tourism or leisure and cultural facilities. The use of sustainability appraisal encourages the creation of policies linked to clear objectives which means that	Comments noted To keep the Sustainability objectives to a manageable number Tourism, leisure and cultural facilities are covered within the following Sustainability Objectives with accompanying criteria questions: Health: To improve the health of the population Social inclusion and Community

Name	Section of Reports	Comment	Officer response
		progress towards those objectives can be monitored. The Theatres Trust wishes to be assured that the Local Development Documents are robust enough to include specific guidance on protecting and encouraging arts and cultural provision, especially for Southwark. The Foreword of your Community Strategy states that *We want Southwark to become a world class quarter of a world class city.* We have noted the objectives and priorities of your Community Strategy where one of the goals on page 15 of this document is to *Enjoy cultural and leisure opportunities,* and one of the key actions on page 23 is to *Encourage active participation in local arts, heritage and cultural events …….* The SA Scoping Report has not included these aspirations as an objective to maintain and improve cultural, social and leisure provision which would make a significant contribution towards Southwark becoming 'a world class quarter of a world class city'. Policy 3D.4 of The London Plan states that LDF policies should *identify, protect and enhance Strategic Cultural Areas and their settings; designate and develop Cultural Quarters; where appropriate, support evening and night-time entertainment activities in central London, City fringe areas and town centres.* Item 3.235 of the same policy states that *Cultural facilities such as local theatres, tourist attractions and libraries are vitally important to all London's town centres and central London. They are particularly valuable as a means of engaging younger people in wider community activity.* The promotion of cultural facilities are also included within the Mayor's cultural strategy - *London: Cultural Capital - Realising the potential of a world-class city,* published in June 2004. Policy 1 states: *"London needs to ensure its cultural institutions and events are of a high quality, world class status."* In the following paragraph it continues: *"By any standards, London's cultural facilities and institutions offer unparalleled range, quality and diversity. These cultural assets are central to London's identity, heritage and standing in the world and have provided the foundations for the growth of a vast range of contemporary activity. This value needs to be protected and enhanced."* Southwark has a rich and varied cultural offer including Tate Modern, The Globe, The Old Vic, Southwark Playhouse, Blue Elephant Theatre, The Coronet Theatre, Unicorn Children's Theatre, The Oval House, The Young Vic, Menier Chocolate Factory and many more, and we therefore expect to see specific guidance on protecting and encouraging arts and cultural provision in the Core Strategy.	<u>Cohesion:</u> To promote social inclusion, equality, diversity and community cohesion <u>Conservation of Historic Environment:</u> To protect and improve the historic nature of places The Preferred Options Report sets out our preferred approach to addressing the protection and provision of tourism, leisure and cultural facilities.

Name	Section of Reports	Comment	Officer response
South Bank Employers' Group	SA: Relevant Plans, strategies and programmes (Appendix 3)	**Consultation Question 1** We feel it is important that the Core Strategy should take account of visions and plans for particular neighbourhoods within Southwark. We would therefore recommend reference to the South Bank Partnership Manifesto, "Under pressure and on the edge: London's South Bank – a Manifesto for Action". There may well be equivalent material relating to other neighbourhoods in the Borough. It is also important to take into account important cross-borough issues, so in the case of Lambeth, there should be reference to Lambeth's Sustainable Community Strategy and other key documents, and similarly for other neighbouring boroughs.	Comments noted We have considered the suggested documents, and updated the section on Relevant Plans and Strategies of the Draft Sustainability Appraisal
	Preferred Options report Section 5 and 8	**Consultation Question 2** There is no data/data sources relating to tourism, culture or the relationship to neighbouring boroughs, which we believe should be included.	Comments noted The Preferred Options Report sets out our preferred approach to addressing the protection and provision of tourism, leisure and cultural facilities.
		Consultation Question 3 It is important to recognise and pre-empt radicalism in the area and therefore we recommend that this should be included in some form of criteria question in 'Social inclusion and Community Cohesion'. A critical route to improving energy efficiency ('Energy Efficiency and Renewable Energy') is undoubtedly decentralised energy and therefore we would advise that this is specifically referenced. There is much work going on in this field with South Bank Employers' Group and London South Bank University and further information can be provided.	Comments noted
	SA: Section 6 Preferred Options Report Section 8	**Consultation Question 4** In 'Energy Efficiency and renewable energy', the Core Strategy should encourage decentralised energy systems in the borough.	Comments noted We encourage renewable sources of energy (i.e. combined heat and power systems) within the Sustainability Framework in the Draft Sustainability Appraisal The Preferred Options report sets out our approach to sustainability

Name	Section of Reports	Comment	Officer response
Highways Agency		The HA, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) (i.e. the Trunk Road and Motorway network) in England as laid down in Department for Transport (DfT0 Circular 02/2007 (Planning and the Strategic Road Network). The HA do not wish to comment on the Sustainability Scoping Report	Comments noted
Southwark Chamber of Commerce	SA: Relevant Plans, strategies and programmes (Appendix 3**)**	**Question 1** Other policies to be taken into account: 1. Policy papers on places of worship – national and regional government. 2. Policy papers on the sustainability of SME's from Bolton (c1970) onwards 3. Business crime 4. Business community	Comments noted. We have reviewed the section on Relevant Plans and Strategies and included additional references where appropriate, to inform the preparation of the Core Strategy
	SA Section 6	**Question 2** Other data to be taken into account. 1. Regeneration and Employment- Employment by Industry: number and % of jobs in London by sector. SME employment rate (new indicator) Southwark compared to London (broken down by micro, small and medium sized businesses). Total business growth rate (new indicator). Unfilled vacancy rate. Childcare sufficiency throughout the borough 2. Crime and the community- business crime all indicators and comparators 3. Health- life expectancy data (age at death by ethnic group and geographic location) 4. Social cohesion – number of new places of worship built and/or brought back into use 5. Housing- number people working in Southwark living in Southwark 6. Waste- amount of waste created in the borough 7. Transport- number of car parking spaces; number of free car parking spaces; Does it support local shopping within walking distance of all homes?	Comments noted We have reviewed the Sustainability Framework and amended it where appropriate
	SA Section 6	**Question 3** 1. Regeneration- will it provide sustainable business growth? Will it provide for sustainable knowledge industry growth? Will it provide more opportunities for the long term unemployed? Will it help local people set up sustainable businesses in their own borough? Will it provide sufficient opportunities to help local people set up sustainable businesses in the borough? Will it enable existing local businesses to sustain themselves in the borough?	Comments noted We have considered the additional criteria questions for the Sustainability Framework and added additional questions where appropriate into the Draft Sustainability Appraisal

Name	Section of Reports	Comment	Officer response
		2. Education: Will it provide local employers with people who have the necessary level of education and skills to fill vacancies in the borough and elsewhere in London? 3. Crime: Will it help to reduce business crime and encourage more business crime to be officially reported? 4. Health: Will it improve life expectancy? 5. Social Inclusion and Community: Will it improve quality of life (UNDP standard indicators). Will it provide sufficient places of worship for new faiths and churches reflecting the needs of Southwark's diverse population? 6. Energy: Will energy efficiency measures damage the sustainability SMEs in the borough? 7. Sustainable Transport: Will it enable SME growth to take place, particularly in the retail sector?	
		Question 4 There are insufficient open spaces for leisure and recreation in many areas of Southwark- more space less building (except high rise) should be encouraged.	Comments noted

Issues and Options Responses

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The Environment Agency	Background Paper to Preferred Options Report Preferred Options report Section 8 SA Section 6	Evidence Base There is little connection between the evidence in the Sustainability Appraisal Report and the content of the Core Strategy Issues and Options Report. For instance the report does not mention the findings of the SFRA. This is notwithstanding the fact that some of the growth areas identified for development lie in areas at risk of flooding. The use of the SFRA findings would identify what needs to be done, and form the basis for understanding what happens, testing the effectiveness of the plan and enabling it to be reviewed. Some action plan areas lie within an area that would flood if it were not for the River Thames Tidal Defences, including the Thames Barrier and the river walls. There remains a residual risk of the river walls failing, breaching or being over topped in severe weather. The SFRA assesses this risk in more detail. Objective 2B The sustainability Appraisal Report recognises the magnitude of flood risk in the borough. This therefore would warrant a stand alone objective on flood risk management which should be informed by the SFRA recommendations. Southwark SFRA has delineated areas of "flood hazard" through more detailed flood mapping and modelling. Areas are categorised according to "flood hazard" and depicted on a drawing. The Core Strategy must refer to the Southwark SFRA as part of the evidence base to ensure that development is located and designed appropriately taking into account flood risk issues. All development adjacent to flood defences must submit appropriate detail with the development proposals to demonstrate the potential impact of the development on the integrity of the defences. The flood defences must be appropriate for the lifetime of the development. Design drawings and calculations may be required to support a development proposal. **Environmental Infrastructure Delivery** The key areas to address are: - Getting Location Right: Of particular concern is the location of housing in areas of flood risk and where water quality and water resources are already at or approaching environmental limits. - Long Term Planning Framework: To ensure a long term planning framework exists for all types of environmental infrastructure. - Demand Management: To promote more ways of managing and reducing the demand for new environmental infrastructure. - Funding Delivery Systems and incentives: Clear funding streams, with costs allocated to polluters, developers, consumers and the taxpayer on clear and defensible principles.	Comments noted Reference to the significance of the SFRA and its findings is included within the background paper. The SFRA is part of the evidence base to inform the preparation of the Core Strategy and provide guidance to developers when preparing their proposals. We opted to keep the Sustainability objectives to a manageable and appropriate number. For each objective, we recognise that within that objective there are sub-objectives. We have taken these into account in the appraisal process of the Preferred Option policies The Preferred Options Report sets out our preferred approach to addressing flood risk and flood risk management. We have noted the comments in relation to Environmental Infrastructure Delivery and the recommendations for further consideration of the scope of environmental infrastructure.

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		Properties and infrastructure within the London Borough of Southwark are also at risk of flooding from other sources. These include surcharging of the underground sewer system, the blockage of culverts and gullies (which results in overland flow), and surface water flooding. We consider that where new developments place extra pressure on capacity of strategic environmental infrastructure for the wider area, then a deliverable infrastructure plan should be in place. The scope of environmental infrastructure should include surface water management / drainage, flood risk management, waste infrastructure, water resources. Funds should be targeted towards improving capacity of existing infrastructure, new infrastructure, or other mitigation measures. All environmental infrastructure programmes will need to be climate proofed to ensure infrastructure will have capacity to deal with any additional pressures from climate change, for example, modifications to existing flood management measures to adapt to climate change within the lifetime of the development. Early investment and careful planning may be required to ensure expanded or improved infrastructure will have the capacity to cope with additional demands, particularly with climate change.	We are preparing an Implementation Plan to accompany the Core Strategy in order to set out the mechanisms for delivery of the policies. We continue to liaise with local stakeholders in relation to infrastructure capacity and requirements.
		See our report 'Hidden Infrastructure: The Pressures on Environmental infrastructure. The report can be downloaded at http://publications.environment-agency.gov.uk/pdf/GEHO0307BMCD-E-E.pdf . The borough's infrastructure for flood protection (tidal defences, river flood defences) must be considered. Climate change could exacerbate the impacts of growth on environmental infrastructure. In accordance with PPS12. Paragraph 4.9 of the Core Strategy should be enhanced to ensure 'the infrastructure planning process should identify, as far as possible: infrastructure needs and costs; phasing of development; funding sources; and responsibilities for delivery.	We note the recommended report and consideration of it will contribute to our Implementation Plan preparation.
		Developers should be encouraged to demonstrate that their proposal will deliver a positive reduction in flood risk to the borough, whether that be by reducing the frequency or severity of flooding (for example, through the introduction of SuDS), or by reducing the impact that flooding may have on the community (for example, through a reduction in the number of people within the site that may be at risk). This should be reflected through the inclusion of a positive statement within the detailed FRA that clearly and concisely summarised how this reduction in flood risk will be delivered. The services and infrastructure necessary to support development, substations, telephone exchanges, emergency services, etc. should also be located away from areas of flood risk to ensure they are available in an emergency. Any infrastructure in place to reduce the risk of flooding must provide an acceptable level of risk for the lifetime of the development, taking on board the residual risks.	Our adopted Sustainable Design and Construction SPD sets out our requirements for new development in relation to reducing flood risk. The SPD sets out that new development should be located, designed, built and operated in ways that reduce the risks from flooding as much as possible.

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		Sustainable drainage systems (SUDS) SUDS are of particular importance within national planning policy (including Planning Policy Statement 25: Development & Flood Risk). Annex F, (Paragraph F6) states "Surface water arising from a developed site should, as far as is practicable, be managed in a sustainable manner to mimic surface water flows arising from the site prior to the proposed development..". SUDS are promoted as the preferred drainage option by other National planning policy statements. These include: PPS1, PPS3, PPS9, PPS23 and the London Plan (February 2008) - Policy 4A.3 Sustainable design and construction Policy 4A.9 Adaptation to Climate Change Policy 4A.11 Living Roofs and Walls Policy 4A.14 Sustainable drainage Policy 4A.17 Water quality Throughout the London Plan SUDS is cited as one of the most effective means of reducing flood risk. A drainage impact assessment / surface water management plan is to be submitted as part of development proposals, demonstrating how the rates and volumes of surface water runoff from sites will be reduced in accordance with the London Plan, using the most sustainable methods and techniques. Developers should aim to achieve greenfield run off from their site through incorporating rainwater harvesting and sustainable drainage. Surface water drainage The management of the drainage systems and associated flooding is the responsibility of several bodies, making the risks of flooding even more complex. With increasingly intense downpours the risks would increase due to climate change and it is imperative that provisions are made to manage and address this risk. To understand the level and nature of risk it would be necessary to prepare a Surface Water Management Plan (SWMP) or Integrated Urban Drainage Plan (IUDP) that would help to define the future approach. These can guide your local area policy direction in terms of risk or consequence reduction and management. This plan should consider increased risk to the drainage system from future development and climate change. Southwark has a significant amount of green space. This may provide an opportunity to design in some storage/retention of surface water into green spaces, in the form of small detention basins or wetlands. Surface water from development could drain to these storage and/or wetland areas and they would also be valuable amenity for local residents as well as improving habitat.	The SFRA is referenced within the SPD, and we advise developers to review the SFRA in preparing their proposals. The Preferred Options Report sets out our approach to flood risk and flood risk management, including reference to SUDS. The SPD is part of the LDF and will be reviewed again once the Core Strategy is adopted, to reflect any changes required. We note the recommendation to prepare additional plans and will give this further consideration.

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		Waste Water Treatment Core Strategy Issue 18 and Sustainability Appraisal Report Issue 8: Environment Agency supports environmental standards set out in issue 18 but notes with concern that waste water treatment is not included. It would be preferable to have a separate waste water treatment objective taking into account the Water Framework Directive and the need for any further operational development at the existing Sewage Treatment Works. More new development will create higher volumes of sewage to be transported from houses to sewage treatment works, and additional treated effluent to discharge to surface and ground waters. Therefore the infrastructure should be sufficient to guarantee both surface and ground water quality would not be detrimentally affected, and avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property and pollution of land and watercourses. The Water Framework Directive sets ecological standards in addition to chemical standards for rivers. This is likely to place greater demands on Sewage Treatment Works to achieve cleaner effluents. In preparing the Core Strategy, the council must: - ensure that the rate of development broadly accords with the capacity of existing water supply, sewage treatment and discharge systems, particularly in connection with major new development - require development to incorporate measures to enhance water efficiency, and sustainable drainage solutions - work with the Environment Agency and water companies to identify infrastructure needs and allocate areas for and permit necessary infrastructure Water Resources Water resource is a key strategic issue for Southwark. The projected increase in housing numbers in the borough requires management for the increase in demand. As a result we would ask for strong environmental standards to be in place to promote the efficient use of water resources. The London Catchment Management Strategy has recently determined the Thames Catchment as having a status of 'no water available'. This means that no further water is available for consumptive abstraction during low flows. We would recommend a specific core policy to address this issue. **Land Contamination Soil and Land Quality SAR issue 10** Core Strategy issues 18: Sustainability Issue 10 appears to contain misleading information on the key baseline data column on page 22. It would be preferable to shift this information to issue 13 on open space and biodiversity. We note that land contamination has been included as one of the key environmental objective for the core strategy to respond to. We however note that Core strategy objective 2B does not address land contamination. We strongly recommend that if potentially	We are preparing an Implementation Plan for the Core Strategy policies, to set out how we plan to deliver the strategy. We will continue to liaise with local stakeholders to assess the capacity of the existing systems and consider the measures that will be required. The Preferred Option report sets out the preferred approach to addressing water efficiency. The Preferred Options report sets out our approach to addressing water resources. We consider that the issue is sufficiently addressed through this policy approach. We note the comment on Sustainability Issue 10: Soil and Land Quality and the correlation with the Core Strategy Objective 2B: Encourage environmentally sustainable buildings by setting high environmental and transport standards to reduce the impact of development. Helping to tackle climate change, congestion, pollution, waste, flood risk and other

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		contaminating activities have previously been conducted at a site, such as chemical or fuel storage, manufacturing or other industrial processes, an assessment of risk of potential contamination to controlled waters should be carried out. This work should follow 'Environment Agency guidance on requirements for land contamination reports' and the 'Model Procedures for the Management of Contaminated Land' (CLR11). These documents can be down loaded from our website at http://www.environment-gency.gov.uk/subjects/landquality/113813/ 887579/1101611 Most of the redevelopment in the regeneration areas will occur on previously developed land. PPS23: Planning and Pollution Control, (Nov 2004) has changed the basis for dealing with land affected by contamination. It rests firmly on the precautionary principle. Where development is proposed on or near a site known or reasonably believed to be contaminated a site assessment will be required to establish the nature and extent of the contamination prior to determining the application. If potential for significant contamination is identified, the Environment Agency and the Local Authority Contaminated Land Officer should be consulted for advice prior to work commencing on site. Responsibility for the safe development and secure occupancy of the sites rest with the developer/landowner. Should contamination on the sites be found to be affecting controlled waters subsequent to the redevelopment, the sites may be determined as contaminated land under Part IIA of the Environmental Protection Act 1990 and cost for remedial action sought from the developers. Green Roofs Living roofs and walls can enhance biodiversity, reduce the risk of flooding (by absorbing rainfall), improve a building's thermal performance, thus reducing associated energy costs, help counter the Urban Heat Island Effect, support higher density more sustainable development and improve the appearance of the urban areas. For more information please use the link below: http://www.london.gov.uk/mayor/strategies/sds/docs/living-roofs.pdf **Regeneration Areas** SFRA states that Southwark is the largest housing landlord in London and the sixth largest in the country with 40,000 homes. These homes are concentrated in the north of the borough, primarily on very large estates where regeneration is earmarked. They include the Heygate Estate at the Elephant and Castle, the Aylesbury estate, the north Peckham estates, the Neckinger Estate in Bermondsey, The Tustin Estate on the Old Kent Road and the Canada Estate in Rotherhithe. Most of these estates are within areas of deprivation, measured against a range of indicators including quality of the environment, pollution and health.	important issues'. Land contamination is considered to be included within this objective as it is a form of pollution. We have noted the references to the contaminated land guidance documents, and will take these into account. The Preferred Option report sets out our approach to environmental standards, including pollution. We have adopted a Sustainable Design and Construction SPD which is part of the LDF. This SPD sets out our minimum requirements in terms of avoiding pollution and environmental nuisance (including land contamination). We have noted the reference to Green Roofs/Living Roofs and walls. The Preferred Option report sets out our approach to environmental standards and further information is set out in our adopted Sustainable Design and Construction SPD which recommends the incorporation of Green Roofs/Living Roofs etc in the design of buildings to enhance biodiversity

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		Although most of these areas are susceptible to flooding, it's disappointing to note that flood risk is not included as a constraint. Depending on where it is located and the standards to which it is built, planned new housing has implications for water resources, water quality, and flood risk, as well as waste management and air quality. It should not be assumed that it is always possible to manage the environmental impacts of housing growth through investment in new or expanded environmental infrastructure. Where growth threatens to exceed absolute environmental limits there may be barriers, in terms of cost effectiveness or the limits of current technology, which mean that growth is impossible to accommodate. Rigorous assessment of the environmental impacts and the viability of infrastructure dependent solutions is essential before plans for growth are adopted. Where development is necessary in areas of higher flood risk, the new exception test aims to ensure that development and its occupants will be safe for the lifetime of development taking account of climate change. The exception test enables some development in flood zone 3 but only when no suitable alternative site is available in a lower flood risk zone. The test makes it clear that these wider arguments justifying development have to be very powerful - underlining that building in high risk flood zones is very rarely going to be the best option. Of particular concern is the location of housing (and the infrastructure and services supporting housing) in areas of flood risk and where water quality and water resources are already fully committed. We however recognise the necessity of redevelopment to sustain and regenerate communities. This approach is also supported by the London Plan Opportunity Areas and Areas for Intensification. The north of the borough contains development areas of London-wide importance, as identified in the London Plan. These include the Elephant and Castle and London Bridge Opportunity Areas, part of the Central Activities Zone. The London Plan also extends the London Bridge Opportunity Area westwards to cover Borough and Bankside and designates Canada Water and Surrey Quays as an Area for Intensification. Where there are exceptional circumstances for building in the floodplain, the ongoing cycle of redevelopment and urban regeneration is the crucial opportunity to reduce the risk. Development should be located and designed so it is safe, with adequate escape and evacuation routes, allows its occupants to recover quickly, does not increase risk elsewhere, and where possible contributes to reducing flood risk overall.	The Sustainability Framework set of criteria questions and indicators address the incorporation of environmental design measures. The SA provides an assessment of the environmental, social and physical impacts of the preferred option. We acknowledge that a rigorous assessment is required and the viability of the provision of infrastructure to facilitate and help deliver new development.

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		The borough should consider how to apply Annexe G of PPS25 (managing residual flood risk within redevelopment plans) and link to SFRA recommendations and policies within the plan. **Waterfront development** Key issues to consider: Will the proposed development impact on the structural integrity of the defences? Are the defences appropriate for the lifetime of the development? Will any work be required to bring them up to this standard? Will there be appropriate set-back between the defences and the proposed development? Can the site be drained in a sustainable manner (i.e. no pumping will be required?) **All River** Thames walls have a statutory flood defence level, and the crest of these river walls must remain at this height, during and after any works to the river walls. Consent is required for any work on the river walls. Access to the river is not only required for social reasons but for flood risk management reasons, in general all development should be set back at least 16 metres from the River Thames and/or any flood defences associated with the River. Setting back development will allow for access and maintenance to the defences and provide adequate space should the defences need to be improved in the future. Any projects within 16m of flood defences require consent from Environment Agency.	We have considered PPS25 and the borough's SFRA in preparing the Preferred Options report and the Draft Sustainability Appraisal **Waterfront development** We have considered the suggestions and updated the Sustainability Framework accordingly We have included appropriate reference to flood risk for Southwark within the Preferred Options report
		Statutory Flood Defence level is 5.41m AOD in this area. Flood risk management planning needs to be linked closely with regeneration and redevelopment so that the location of development can help to reduce flood risk. There is need to incorporate long-term policies in the Core Strategy that outline protecting and recreating river corridors and areas where flooding can happen naturally. These policies will support the objectives of Thames Estuary 2100 (TE2100) and the London Plan Blue Ribbon Network (Policy eC.3 The natural value of the Blue Ribbon Network , Policy 4C.6 Sustainable growth priorities for the Blue Ribbon Network and Policy 5D.1	Comments noted
		The strategic priorities for South East London Development proposals within the defended tidal flood plain must consider the residual risks that are present, i.e., increasing risks from rising flood water and sea levels due to climate change and the risks resulting from a failure or overtopping of a section of defence protecting the area under consideration. This may lead to reallocating some of the more vulnerable uses to areas with lower residual risks as well as designing new development in a more flood resilient manner.	

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		Flood resilience must be built into buildings and other infrastructure, such as transport in areas currently at residual risk. Emergency Planning and evacuation procedures are required that fully understand current and future risk. Defra's Policy to achieve Making Space for Water must be delivered in the short and long term to enable us to maintain existing defences and plan for future land use. If developments are set back from existing defences we retain the option of future upgrades, as well as making space for flood storage. This will require land allocation many years in advance, which needs to occur through current spatial planning. The Council should seek to maintain and look for opportunities to enhance the setting of and increase space for the River Thames and its tributaries. In considering development proposals it will: a) Ensure the protection of landscape features that contribute to the setting of the rivers b) Seek to protect and enhance existing views of the rivers c) Pay special attention to the design of development located in riverside settings to ensure that it respects and makes a positive contribution to the setting of the rivers d) Ensure that the quality of the water environment is maintained e) Seek opportunities to improve public access to and alongside the rivers and ensure that existing public access is maintained Sequential Test & Exception Test Paragraphs 8 and D.5 of PPS25 require decision-makers to steer new development to areas at the lowest probability of flooding by applying a 'Sequential Test'. Only if the council can demonstrate through the sequential process that a site with a lower probability of flood risk is not reasonably available can a case be put forward as to why a site could be considered as an exception. If this can be achieved, then, in accordance with PPS25, for the exception test to be passed it must be demonstrated that the development provides wider benefits to the community that outweigh flood risk, the site is previously-developed land, and a Flood Risk Assessment must demonstrate that the development will be safe without increasing flood risk elsewhere. PPS25 states in paragraph 14 that: 'A sequential risk-based approach to determining the suitability of land for development in flood risk areas is central to the policy statement and should be applied at all levels of the planning process'. It goes on to state in paragraph 16 that: LPAs allocating land in LDDs for development should apply the Sequential Test (see Annex D and Table D.1) to demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed. A sequential approach should be used in areas known to be at risk from other forms of flooding.	Comments noted. The SFRA has informed the site selection process for the Core Strategy. The Sequential Test of PPS25 has been applied.

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		The Southwark SFRA has been developed to inform the Sequential Test. It will be the responsibility of the Council to carry out the Sequential Test on the basis of this information, allocating potential sites for future development accordingly. Furthermore, the developer will be required to demonstrate within the detailed Flood Risk Assessment that the Sequential Test has been applied, and (where appropriate) that the risk of flooding has been adequately addressed in accordance with PPS25. Climate change The Planning Act 2008 introduces an amendment to Section 19 of the Planning and Compulsory Purchase Act 2004 on the requirement of climate change policies. It states '(1A) Development Plan Documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contributes to the mitigation of, and adaptation to, climate change' The rising sea level will steadily reduce the level of protection that defences offer. The predictions for how quickly sea level will rise vary considerably depending on the assumptions used about emissions and climate modelling. The TE2100 project has considered a range of climate change derived sea level rises from 0.9m (Defra 2006 Climate Change Scenario) to 4m (High++ Level where all conceivable sea level rise contributions up to 2100 occur).	
		The Environment Agency Thames Catchment Flood Management Plan (Thames CFMP) (September 2006) confirms the above and sets out some main messages:- a) Flood defences cannot be built to protect everything. b) The ongoing cycle of development and urban regeneration is a crucial opportunity to manage flood risk. c) Land for future flood risk management will be identified and protected by authorities.	
		Work undertaken so far by Thames Estuary 2100 (TE2100) indicates that the present system of flood risk management for the tidal flooding can continue to provide an acceptable level of risk management up to 2030. Beyond 2030 more actions will be needed. These actions would be easier and more affordable and sustainably delivered if they are planned now. The London Plan states inter alia that "The Mayor will, and boroughs and other agencies should, take fully into account the emerging findings of the Thames Estuary 2100 Study, the Regional Flood Risk Appraisal and the Thames Catchment Flood Management Plan" page 211	
		New development should be avoided in those areas with likely increased vulnerability to climate change, particularly where it is not viable to manage likely risks through suitable measures to provide resilience; and bring forward adaptation options for existing development in likely vulnerable areas. The council should require	The Preferred Option report includes a policy relating to environmental standards

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		development proposals to take account of the expected changes in local climate conditions, throughout the proposed lifetime of the development, by adaptation or flexibility to allow future adaptation. Information on these measures must be submitted with an application. Specifically, the council should require major developments to: - identify the type of and extent of the main changes expected in the local climate throughout the lifetime of the proposed development, - identify the potential impacts of these changes on the proposed development and its neighbours indicate the ways in which the proposed development design overcomes the hazards and exploits the opportunities associated with these impacts whilst meeting other sustainable development criteria, particularly the need to achieve overall reductions in greenhouse gases	Comments noted. Flood Risk Assessments must be submitted with all major planning applications, within Flood Zones.
English Heritage	SA section 6	Interim Sustainability Report Initial comments were provided by English Heritage at scoping stage on the 1st September 2008, however although these have been noted in Appendix 2 of the Interim SA Report, it is disappointing that some of these points have not been acted upon. Relationship to Other Plans and Programmes (Chapter 3) English Heritage notes that PPG16: Archaeology and Planning, PPG15: Planning and the Historic Environment and the draft Heritage Protection Bill are identified in Table 3 as key documents to be taken into account in the preparation of the LDF Core Strategy. In addition, English Heritage recommends the European Landscape Convention, which was ratified by the United Kingdom government in 2006, also be included. We welcome reference to Adopted Conservation Area Appraisals in Table 3, however Archaeology Priority Areas are also set out in the existing Southwark Plan (UDP) and we would like to see these referenced also. In particular we welcome inclusion of the CABE and English Heritage Tall Building Guidance to create high quality and safe urban environments. Social, Economic and Environmental Context and Key Sustainability Issues (Chapter 4 and 5) The baseline data for the historic environment presented in Table 5 requires further expansion. Currently the only data included is the number of listed buildings, listed buildings at risk and the number of conservation areas, which does not reflect the full wealth of historic assets in Southwark and associated sustainability issues. The appropriate information sources that should be consulted, in respect of the historic environment, are as follows:	Please see our comments to English Heritage's earlier response, as their earlier response has been repeated here.

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		- Greater London Sites and Monuments Record (archaeology, including Scheduled Ancient Monuments and Archaeology Priority Areas) http://www.english-heritage.org.uk/server/show/nav.8900;	
		- The Schedule of Buildings of Architectural and Historic Interest (listed buildings); The borough's conservation area records and adopted guidance (including conservation area designation reports, statements, appraisals and design guidance);	
		- The borough's list of Locally Listed Buildings (or equivalent);	
		- The Register of Historic Parks and Gardens	
		- The London Buildings at Risk Register www.english-heritage.org.uk/BAR	
		- The HELM website www.helm.org.uk and The Heritage Counts website www.heritagecounts.org.uk	
		We welcome inclusion of the number of Listed Buildings at risk in the Borough as an indicator and we would also suggest this includes the number of Scheduled Ancient Monuments at risk as well. Similarly, maintaining the extent of Archaeology Priority Areas would be a useful indicator for archaeology. The number of Conservation Areas as an indicator is also welcomed, however LB Southwark could consider including the number of conservation areas with an up-to-date management plan and appraisal as well. If data exists, the number of museums, heritage/ local history centres or other relevant heritage attractions open to the public could be an indicator.	
		It is also worth noting that English Heritage's 'Heritage At Risk' register and will include broader data on heritage assets at risk in the future. For example, conservation areas; historic parks and gardens; and heritage landscapes and LB of Southwark may wish to consider these as indicators in the future. Finally, English Heritage would also encourage LB of Southwark to undertake historic 'characterisation' of regeneration areas in the Borough as part of the character assessment, and to inform how future change can be managed in the historic environment. Your in-house conservation staff would be able to advise you on this, as well as the Greater London Sites and Monuments Record (http://www.english-heritage.org.uk/server/show/nav.8900).	

Name	Section of Reports	Comment	Officer response
		Outcomes of the Sustainability Appraisal (Chapter 6) English Heritage notes and welcomes that a specific sustainability objective on the historic environment has been included in Table 6. The criteria set out in Table 6 could include a question as to whether it will enhance access to the historic environment and also contribute to better understanding of the historic environment. Appendix 5 claims that most objectives have no significant link or depend on implementation with SDO12.. We agree SD1, 11, 13 and 15 should be compatible. However, the relationships between SD12 and SDO5, 6, 8, 14 and 16, need to be explored further. For example, how improving the quality of public spaces and streetscapes can encourage alternative modes of transport (objective 16). The role of cultural facilities, including access to museums, heritage/ local history centres or other relevant heritage attractions are currently not considered as part of social infrastructure provision or education/ training/ community facilities (objective 5). The role of the historic environment in achieving greater energy efficiency (objective 6) and the implications of managing flood risk should also be considered (objective 14). Para. 6.6 states that the Core Strategy is not likely to have any major negative sustainability impacts, and in Appendix 5 (appraisal matrixes) there are no negative impacts identified for the historic environment to be mitigated or minimised with each option.	We have further considered the inter-relationships between objectives and reviewed the Sustainability Framework of the Draft Sustainability Appraisal accordingly
		Most of the comments refer to the impact being dependant on the quality of the design of new buildings and improvements to their setting. We agree this is a key consideration; however the appraisal appears to be heavily biased towards aesthetic considerations. Overall, we would urge LB of Southwark to give further thought to the complexity of the sustainability issues associated with the historic environment to assist in the drafting of the preferred options.	Comments noted

Name	Section of Reports	Comment	Officer response
Southwark PCT	Background paper to Preferred Options Report Preferred Options Report Section 5	In making our response to this we have used the appraisal framework offered by the Healthy Urban Development unit as a starting point. We do appreciate that this checklist is designed for evaluating draft versions of the Core Strategy rather than the Issues and Options consultation. We hope, however, that introducing these considerations at an early stage will enable stronger coverage of health issues within the Core Strategy and ensure its soundness when it comes to examination.	Comments noted
		We recognise that there are a number of frameworks that the Core Strategy will need to conform to. The London Plan in particular sets a clear and helpful framework for considering health. The key policies for health it sets out are: London Plan Policy 3A.17 Health objectives London Plan Policy 3A.18 Locations for healthcare London Plan Policy 3A.19 Medical Excellence London Plan Policy 3A.20 Health impacts. Other key London Plan Policies with health impacts are: London Plan Policy 3A.5 Large residential developments London Plan Policy 3A.7 Affordable housing targets London Plan Policy 3A.8 Negotiating affordable housing in individual private residential and mixed-use schemes London Plan Policy 3A.14 Addressing the needs of London's diverse population London Plan Policy 3A.15 Protection and enhancement of social infrastructure and community London Plan Policy 3B.1 Developing London's Economy London Plan Policy 3B.12. Improving the skills and employment opportunities for Londoners, London Plan Policy 4A.15 Climate Change London Plan Policy 6A.4 Priorities in planning obligations. It was difficult to see if these policies had been expressed and met within the Core Issues and Options paper.	We note the references to the London Plan Policies on Health. We have provided an overview of our evidence and policies which have informed the preparation of the Preferred Option, in a background paper
		We would argue that the planning objectives around health in the London Plan are not negotiable at local level and should be more clearly stated. Further detail is available in Health Issues in Planning: Best Practice Guidance.	Health and social care are addressed in the Sustainability Framework
		In general within this paper, health and social care seems to be sparsely treated and this is something of a surprise as the evidence base paper refers to many relevant sources which do not seem to have been tapped in the writing of this paper. One surprising gap was the PCT Asset Management Strategy 2006) There was no mapping of existing/proposed health facilities which really need to be read in tandem with plans for the two options. As well as the lack of evidence, there was little explanation/discussion of key issues arising from policy drivers and challenges. A more detailed spatial portrait incorporating information about health/health inequalities would have been useful. Some information around the demographics of the growth of the population would also have been useful. Although mention is made of new homes, there is no indication of what this may mean in population numbers and this clearly has	We will be undertaking a Health Impact Assessment which will include this information. Our background paper to the Issues and Options sets out population projections for the borough. The background paper has been reviewed to accompany the

Name	Section of Reports	Comment	Officer response
		implications for health and other public services. As noted on the checklist, the bundling together of 'Be healthy, safe and active' rather precluded specific treatment of these aspirations.	Preferred Options Report and will address population changes
		Is it not the function to the plan to indicate in spatial terms how these aspirations can be achieved? Good planning will promote health, however that does not mean that health can be left implicit within the strategy, particularly given the health inequalities within the borough. Two options are presented - the first seems to repeat the existing UDP strategy and the second seems to be a more market led one of housing growth across the borough. It is concerning that this one seems to preclude any kind of planning for community facilities - surely this would not be an acceptable approach as it would be in breach of a number of national policies?	The Preferred Options report has a policy for community facilities.
		Documents attached: - Completed Health Check for PCTs and Boroughs; is the core strategy ready for examination? - Integrating health into the Core Strategy: a guide for Primary Care Trusts in London. This provides helpful guidance for PCTs unfamiliar with planning issues - in particular we recommend pp 27-27 and 36-37 as this links significant health issues to policy actions on the part of planning and regeneration. - Southwark PCT Asset Management Strategy There was no reference to existing or proposed PCT estate. (See checklist section Healthcare facilities) so this should be helpful in improving coverage showing how services will be configured in order to meet health needs especially where areas become more densely occupied. - Summary of Health Inequalities: progress and next steps (Department of Health 2008) providing some indication of the future direction of travel in terms of seeking to reduce health inequalities - Maps from the Southwark Atlas of Health (http://www.spatial-literacy.org/health/) indicating the spatial distribution of some significant illnesses and other health conditions. Also showing the current locations of GPs and Dentists. - Matrix showing how the major health related policies in the London Plan relate to the cross cutting theme of health and equalities.	We will be undertaking a Health Impact Assessment as part of the evidence base for the Core Strategy. We have noted the documents that have been recommended and have considered the policy response for the issues identified, within community facilities policy within the Preferred Options report.

Name	Section of Reports	Comment	Officer response
Thames Water		**Vision and Objectives – Objection to Omission of Reference to Water & Sewerage Infrastructure** While the vision and objectives refer to the provision of community facilities and transport infrastructure there is no reference to the provision of water and sewerage infrastructure. The provision of water and sewerage infrastructure is essential to support growth within the Borough and ensure sustainable development and needs to be provided ahead of development in order to avoid sewer flooding and problems of low/no water pressure. As such the provision of the water and sewerage infrastructure required to support growth within the Borough should be included as an objective. A key sustainability objective for the preparation of the new Local Development Framework should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 4.8 of the new PPS12, 2008 states: *"The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations."* Paragraphs 4.10 of PPS12 place goes on provide advice on the need for infrastructure to support housing growth and states: *"The outcome of the infrastructure planning process should inform the core strategy and should be part of a robust evidence base. It will greatly assist the overall planning process for all participants if the agencies responsible for infrastructure delivery and the local authority producing the core strategy were to align their planning processes. Local authorities should undertake timely, effective and conclusive discussion with key infrastructure providers when preparing a core strategy."* Paragraph 5.1 of PPS12 states: "*LPAs should consider the following criteria when determining which DPDs other than the core strategy they produce:…..In considering these questions, the following issues should be considered:* *- the requirements of utilities/infrastructure providers……"*	The Core Strategy will be accompanied by an Infrastructure Plan which will set out the infrastructure required to support the planned growth in the Core Strategy, including water and sewerage requirements. This will take into account planned projects, such as the Thames Tunnel, and any additional infrastructure needed including who will deliver this.

Name	Section of Reports	Comment	Officer response
		There are also relevant key sources of evidence identified in answering Coherence Test number (vii). The sources of evidence include: **"If the DPD is a Core Strategy, the following documents, amongst other evidence, may be relevant: ....infrastructure providers' investment programmes and strategies; environmental programmes etc."** The water companies' investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. We are currently in the AMP4 period which runs from 1st April 2005 to 31st March 2010 and does not therefore cover the whole LDF period. AMP5 will cover the period from 1st April 2010 to 31st March 2015 and we have recently submitted our business plan to OFWAT for approval.	
		As part of our five year business plan Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result we base our investment programmes on development plan allocations which form the clearest picture of the shape of the community. Where the infrastructure is not available we may require an 18-month to three-year lead in time for provision of extra capacity to drain new development sites. If any large engineering works are needed to upgrade infrastructure the lead in time could be up to five years. Implementing new technologies and the construction of new treatment works could take up to ten years.	
		It is essential that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development. It will therefore be essential that the Core Strategy makes reference to the provision of adequate water and sewerage infrastructure to service development to avoid unacceptable impacts on the environment (such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems).	

Name	Section of Reports	Comment	Officer response
		Specific Sewerage Infrastructure Project - Thames Tunnel Thames Water consider that there should be a specific policy on the proposed Thames Tunnel which will provide significant water quality improvements to the Tidal River Thames. As set out below, this should be addressed in the submission version of the Core Strategy. Development will be required within the London Borough of Southwark to enable the construction of the Thames Tunnel. Thames Water therefore considers that there should be Policy support in the Core Strategy for the Thames Tunnel development to help facilitate its approval and construction.	
		Growth Options In general terms it is easier to provide infrastructure for a small number of large clearly defined sites than a large number of smaller less well defined sites. Consequently, in terms of water and sewerage infrastructure provision, the concentration of growth within specific growth areas would be preferable.	
		Sustainable Southwark Thames Water supports the promotion and use of systems to reduce water consumption within new development including those in the Code for Sustainable Homes and the BREEAM ratings. Any policy should require Developers to achieve Code for Sustainable Homes Level 3 as a minimum for water efficient measures in new homes. However, the application of such codes and ratings needs to be carefully applied. For example, the Code for Sustainable Homes could allow for a less water efficient property to be found acceptable as it scores highly on other criteria. In addition, developments that are shown to have high water efficiency ratings can subsequently be retrofitted with appliances and fittings with higher water consumption rates upon their occupation. It is also considered any policy should require the use of SUDs in new development. We would also recommend that the Core Strategy include a future drainage hierarchy as set out in the London Plan (Consolidated with Alterations, 2008).	

Preferred Options Responses

Name	Comment	Officer response
English Heritage	Comments on this SA were provided by English Heritage at scoping stage on the 10/09/08 and issues and options stage on the 15/12/08.	Noted
	Links to other policies, plans and programmes (Para 4.1) We welcome that our previous comments on relevant plans and programmes have been considered and incorporated into the SA.	Support noted
	Summary Baseline Information (Para 4.2) We note this is just a summary of baseline data gathered and Appendix 2 indicates that our previous comments in relation to heritage have been considered. The reference to the Buildings at Risk Register in para 4.2.1, should however be updated to include the <u>Heritage</u> at Risk Register. The latest report was published in 2009 and also includes scheduled monuments; conservation areas; and, historic parks and gardens at risk (see www.english-heritage.org.uk/BAR).	Noted and amended
	Sustainability Issues (Para 5.1) We note and welcome that conservation of the historic environment has been considered as a sustainability issue.	Support noted
	The SA Framework (Para 6.2) English Heritage notes that a specific sustainability objective on the historic environment has been included (SDO 12). We welcome that our previous comments on questions have been incorporated. In terms of indicators, the number of conservation areas at risk and the number of conservation areas with up-to-date appraisals/ management plans would be recommended.	Support noted We have included these indicators into the SA Framework
	Internal Comparison of the SA Objectives (Para 6.3) We welcome that the SA has identified the need for careful application of renewable technologies and waste provision to ensure the setting of the historic environment is not compromised.	Support noted
	Compatibility of the SA Objectives against the Core Strategy Objectives (Para 7.1) As set out in Appendix 4, the majority of the Core Strategy Objectives are considered to be compatible with the historic environment (SDO 12) and none are considered to be incompatible. The SA identifies that the impact of objective 1A (creating employment) and objective 2C (providing more homes) on the historic environment will depend on implementation. This highlights the need for careful consideration of this issue in the Core Strategy objectives. Objective 1C (be healthy and active) is assessed as having no significant link to the historic environment. LB of Southwark should be bear in mind that many open spaces in the Borough are of historic value, including Registered Historic Parks and Gardens. These heritage assets provide the local community with attractive places for enjoyment, leisure and exercise.	Noted and addressed in the final SA of the Core Strategy

Name	Comment	Officer response
	What Options are Considered and Why? (Para 7.2) We note that Option 1 (growth areas) and 2 (housing led growth) have been assessed as compatible with the historic environment (SD0 12), however no detail is provided on why this is deemed to be so. Considering both options promote a high amount of development in the Borough we would expect some adverse environmental effects to be identified in the SA and that impact would be heavily dependant on implementation of the Options.	Noted and addressed in the final SA of the Core Strategy
	Effects of the Core Strategy Policies (Section 8) As set out in Appendix 5, the majority of the Core Strategy Policies are considered to have a minor positive impact on the historic environment (SD0 12) and none are considered to be negative. As one would expect, the policy on design and conservation (12) is assessed as having a major positive impact. Upon reviewing the assessment results, there are some useful commentary notes, for example in relation to policy 5. We do however question some of the assessments, which are based upon the presumption that focusing on growth areas somehow protects the historic environment. Areas such as Bankside, Borough, London Bridge, Camberwell and Peckham have a wealth of heritage that contributes to the distinctive identity of these places today. Although focusing development to the north/ central area of the Borough does alleviate pressure in the south, it is important to recognise that these areas have heritage value also and high levels of growth will have an impact on their character. We hope proposals for mitigation and monitoring in the SA will consider the effects of this Plan on the historic environment.	Noted and addressed in the final SA of the Core Strategy
	Evidence Base Background Paper The evidence base background paper is disappointing with respects to the historic environment (under the 'sustainability issues' section pg 80). The publications section refers to just one document – PPS 9 on biodiversity and geological conservation, which must be an error. Although there is reference to the Boroughs conservation area appraisals and archaeology priority zone, there does not appear to be anything with respects to locally listed buildings, views, heritage at risk etc. It is important the Core Strategy draws on the broader historic environment to ensure the local distinctiveness and character of places is sustained and enhanced through placemaking. Again, we would reiterate the importance of a characterisation study (incorporating the historic environment) to inform how future change can be managed. In addition, we cannot find evidence for an urban design/tall building study, which provides the justification for the Core Strategy tall building locations. We would encourage LB of Southwark to refer to the English Heritage and CABE joint *Guidance on Tall Buildings* (July, 2007), which has been endorsed by Government as capable of being a material consideration in the determination of planning applications. Paragraph 2.7 advises local planning authorities to carry out a detailed urban design study to identify where tall buildings would and would not be appropriate in their development plan documents.	We have updated our background papers to the core strategy and these will incorporate a characterisation study and a tall buildings study. The guidance documents are noted and will be referred to in the studies.

Name	Comment	Officer response
	Finally, English Heritage would strongly advise that the local authority's conservation staff are involved throughout the preparation and implementation of the LDF, as they are often best placed to advise on local historic environment issues and priorities; sources of data; and, consideration of options relating to the historic environment. English Heritages has also recently published Conservation Principles, containing policies and guidance for the sustainable management of the historic environment (see http://www.english-heritage.org.uk/server/show/nav.9181). We recommend use of this document when considering heritage values, how to assess their significance and manage successful change in the historic environment. You will also be aware that the Government has launched a consultation on PPS 15: Planning for the Historic Environment. It reflects a more modern, integrated approach which defines the historic environment in terms of heritage assets to be conserved in accordance with a set of principles and in proportion to their significance. http://www.communities.gov.uk/publications/planningandbuilding/consultationhistoricpps. This advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the Southwark LDF and its Sustainability Appraisal, and which may have adverse effects on the historic environment.	These documents have informed the preparation of the core strategy and SA

Name	Comment	Officer response
Environment Agency	It is good to see that the draft Sustainability Appraisal contains a Sustainability Objective (SDO14) "to reduce vulnerability to flooding" but it is concerning to see that both of the Growth Options put forward in the Issues and Options report scored negatively in relation to this objective. Also, given that the vast majority of housing sites that were proposed by Option 1 lie within Flood Zone 3, as indicated by the Southwark Strategic Flood Risk Assessment (SFRA), it is hard to envisage that Option 2 would have resulted in more housing being developed within this Flood Zone. However, we are aware of the wider sustainability issues affecting the central and northern parts of the Borough and the fact that the decision has already been made to regenerate certain parts of the Borough, which lie in Flood Zone 3.	The appraisal of the options has been revisited in the light of the comments on flooding and amended results are now included in the final SA. Further guidance on building in flood risk areas is included within the Sustainable Design and Construction and Sustainability Assessment SPDs.
	Water Quality – Sustainability Appraisal We advise that SD09 should be re-worded to include protection "and enhancement" of water quality. This is important in order to maintain groundwater as a useful resource for drinking water. In addition, given the emphasis upon use of renewable energies within the core strategy objectives, it is important to protect water quality from the effects of thermal pollution associated with ground source heat pumps. Similarly, we recommend the inclusion of groundwater to SDO10 to recognise the impact that contamination can have on this resource, as follows; "To maintain and enhance soil and groundwater quality"	Whilst the wording of the objectives has not changed the issues raised are dealt with in the sustainability questions and indicators that are used in the sustainability appraisal process.
	Plans and strategies, reports & datasets that should be included: Environment Agency Adapting to Climate Change strategy http://publications.environment-agency.gov.uk/pdf/GEHO0709BQBW-e-e.pdf State of the Environment Report for London www.environment-agency.gov.uk/londonsoe Southwark State of the Environment Fact Sheet http://www.environment-agency.gov.uk/static/documents/Research/SOUTHWARK_factsheet.pdf Link to Environment Agency Strategies, Plans and Reports http://www.environment-agency.gov.uk/research/policy/32981.aspx Environment Agency baseline information/datasets available for Strategic Environmental Assessment & Sustainability Appraisal The Environment Agency holds information on the following environmental issues: (see email for table attached)	Noted

Name	Comment	Officer response
	Please be aware that the information provided in these datasets is likely to be in a raw state and may not have been interpreted. The list has been complied from a nationally agreed list of EA datasets available for the production of SEAs and SAs. This information is available (subject to the appropriate legal checks, e.g. information that we are unable to provide due to the Data Protection Act, National Security, etc) to external parties as required under the SEA Directive. Please refer to Government guidance, A Practical Guide to the SEA Directive for other lead organisations who are able to provide alternative and additional datasets. The following links take you to the English and Welsh Standards of Service. Obtaining the information To obtain a licence for any of the above datasets please contact the National Customer Contact Centre (NCCC) on 08708 500250. The licensing fee will be waived if requested by, and licensed to, a Local Authority for the production of a plan. This allows Local Authorities to pass the information to contractors working on their behalf. All other parties will be licensed as per the Environment Agency's charging policy and procedures. Follow the link to find out more information about the Environment Agency's charging for information policy.	Noted
Southwark PCT	As I understand it, health is meant to be comprehensively considered in a SEA, I understand that the SEA has been subsumed into a broader sustainability assessment in developing the Core Strategy The DH has issued guidance on the use of SEA for looking at health in Draft Guidance on Health in Strategic Environmental Assessment Consultation Document which I attach. Annex D: SEA topics and health evidence gives a useful checklist of what needs to be included. I'd like to be sure that you are aware of this guidance and that it has been taken note of in the writing of the core strategy and accompanying documents	This document has been taken into account when writing the core strategy

Name	Comment	Officer response
Richard Lee	At the moment, Southwark's sustainability assessments are based on presumption and not evidence. This is unsound. There should be a requirement that local residents are involved in the sustainability assessment process. This will check that the adverse impacts and remedies are real. Without this reality check the process is meaningless and in breach of the European Directive for SEAs. There should be health impact assessments for all major applications and Habitats Regulation Assessments where there are impacts on sites of importance for nature conservation.	The Sustainability Assessment process is set out in the adopted SA SPD. We also consult on Sustainability Appraisal Scoping and Appraisal reports as part of the preparation of planning policy documents, which incorporates the requirements of the SEA Directive (as set out in Government guidance on undertaking Sustainability Appraisals 2005). The SEA requirements apply to certain plans and programmes that have likely significant impacts upon the environment. The Sustainability Assessment SPD sets out measures relating to health in line with London Plan Policy. The Development Management DPD will provide further detail to the Core Strategy policies and considered of the requirement of submitting Health Impact Assessments will be undertaken during the preparation of this DPD. The Habitat Assessment Regulations relate to Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites – collectively known as Natura 2000 sites or 'European' designations. Southwark has no sites with a European habitat designation. We have also carried out an Appropriate Assesssment which demonstrated that development in our borough would not have a detrimental impact on these sites. The SDC SPD sets out the requirements for developers to comply with protected species legislation that is applicable at the local level.

Name	Comment	Officer response
Thames Water	The Core Strategy. Within the supporting documentation for the Preferred Options there are Officers Comments responding to Thames Waters consultation response. The Officers Comments state that "The Core Strategy will be accompanied by an Infrastructure Plan which will set out infrastructure required to support the planned growth in the Core Strategy, including water and sewerage requirements. This will take into account planned projects, such as the Thames Tunnel, and any additional infrastructure needed including who will deliver this." The Thames Tunnel is required in order to comply with the European Union Waste Water Treatment Directive. The purpose of the Thames Tunnel is to substantially reduce the level of overflows of untreated sewage from Combined Sewer Overflows (CSO's) into the River Thames and not to support growth set out within the Core Strategy. As such the Thames Tunnel should be considered separately from other sewerage infrastructure that may be required in order to support growth within Southwark.	The justification text for Policy 13 discusses the Thames water projects and specifically the Thames Tunnel. We will work with the Environment Agency, Thames Water, Transport for London, developers and emergency services to manage and reduce flood risk. We have identified this project in our implementation table in Policy 14 - Implementation and delivery.
	As stated in our previous comments, a key sustainability objective for the preparation of the new Local Development Framework should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 4.8 of the new PPS12, 2008 states: "The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations." Paragraph 4.10 of PPS12 goes on to provide advice on the need for infrastructure to support housing growth and states: "The outcome of the infrastructure planning process should inform the core strategy and should be part of a robust evidence base. It will greatly assist the overall planning process for all participants if the agencies responsible for infrastructure delivery and the local authority producing the core strategy were to align their planning processes. Local authorities should undertake timely, effective and conclusive discussion with key infrastructure providers when preparing a core strategy." To meet the test of "soundness" as set out in PPS 12 it is essential that the Core Strategy does consider such water and sewerage infrastructure. In July 2008 The Planning Inspectorate published "Examination of Development Plan Documents: Soundness Guidance". The Guide sets out a series of 'key questions' that should be convincingly answered which aim to provide a framework for the assessment of soundness of DPDs.	We have addressed this comment through the introduction of Policy 14- Implementation and Delivery This policy sets out tables showing the physical, social and green infrastructure, required, including costs, sources of funding, agency responsible, timing and any contingency plans. Detailed infrastructure studies have also been undertaken for the strategic sites in the borough to inform the Development Plan Documents. The relevant infrastructure providers have been consulted as part of the plan making process. Water and sewerage infrastructure has been considered as part of this process. The representations from authorities on the draft policies have also been reviewed and, as a result, the policy wording has now been amended to include specific reference to infrastructure within Policy 14. Reference has been made to the investment programmes and business plan in the production of the infrastructure plan. In addition to the inclusion of Policy 14 - Implementation and delivery - further guidance on the provision of infrastructure will be included in the Development Management DPD.

Name	Comment	Officer response
	Section 5 of the Preferred Options document relates to delivery and implementation. It is stated that at the next stage of consultation in November a delivery and implementation plan will be included. In relation to infrastructure it is stated that "This will include information on how we will make sure the supporting infrastructure is in place for the scale of development proposed in the Core Strategy, such as waste, water and energy infrastructure." It is considered that any delivery and implementation plan will need to include policies on the provision of wastewater infrastructure in addition to waste, water and energy infrastructure. Furthermore, in order to be in line with national policy and the London Plan, and therefore considered sound, the Core Strategy will need to contain policies on water and sewerage infrastructure.	We have addressed this comment in the new Policy 14- Implementation and Delivery, which includes information on all infrastructure including wastewater.
	Key questions set out in the Inspectorates guide to the Examination of DPDs include "Have the infrastructure implications of the strategy/policies clearly been identified?" and "Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?" Regarding the funding of water and sewerage infrastructure, it is our understanding that Section 106 Agreements can not be used to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. Water and sewerage undertakers also have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.	We have addressed this comment in the new Policy 14, Implementation and Delivery, which includes information on all infrastructure including wastewater.
	As detailed above the purpose of the Thames Tunnel is not to support growth promoted through the Core Strategy and as such the project relates to a different type of infrastructure to the water and wastewater infrastructure requirements set out above. Thames Water consider that there should be a specific policy on the proposed Thames Tunnel which will provide significant water quality improvements to the Tidal River Thames. As set out below, this should be addressed in the submission version of the Core Strategy.	We have included reference to the Thames Tunnel in the supporting text to Policy 13 and also Policy 14 – Implementation and Delivery
	Thames Water support the requirement for all new dwellings to meet the water usage targets set out in the Code for Sustainable Homes and agree that the new dwellings should comply with the Code 3 rating as a minimum.	Thames Water support the requirement for all new dwellings to meet the water usage targets set out in the Code for Sustainable Homes and agree that the new dwellings should comply with the Code 3 rating as a minimum.

Name	Comment	Officer response
	With respect to potential housing sites, due to the limited information on the size of proposed developments and the complexities of sewerage and clean water networks, Thames Water are unable to determine the infrastructure needs at this stage. Drainage areas do not fit neatly over local authority boundaries and therefore we also need to consider neighbouring boroughs ambitions as well.	Noted. This approach to infrastructure provision is in line with our policies concentrating development in growth areas.
	In very general terms it is easier to provide infrastructure for a small number of large clearly defined sites than a large number of smaller less well defined sites.	

Submission Version Responses to Consultation ending 5th March 2010

Name	Comment	Officer response
English Heritage	In general English Heritage welcomes the Borough's commitment to develop a policy framework for the management of the historic environment and tall buildings. We also welcome the Borough's undertaking of a Borough-wide study as supporting evidence to these policy areas. However on considering the details of the submitted documents we have following concerns which we believe should be addressed. These issues relate to the management of the historic environment, tall buildings issues and the robustness of the evidence base.	Noted. Detailed comments addressed in Core Strategy responses to representations
	We would advise that the target to increase the number of listed items and reduce number of buildings at risk should be amended to increase the number of designated heritage assets and reduce the number of heritage assets at risk. This change in emphasis reflects the emerging PPS on the historic environment and English Heritage's expansion of the Buildings at Risk Register to include all heritage assets.	Noted. Indicator 12.2 has been amended and 'buildings' has been replaced with 'heritage assets'
	Sustainability Appraisal Report Appendix 3 - Relevant Plans, Strategies and Programmes National The 2003 version of EH/CABE Guidance on Tall Buildings has been replaced by a July 2007 revision. This should be used for the SA.	Noted and amended
	Appendix 7 - appraisal of Submission Version Sustainability Objective 12 – Core Strategy Policy 12 – Page 50 It is noted that the scoring across all three timescale a 'major positive'. However the Core Strategy Policy 12 contains two key potentially conflicting issues of protecting and enhancing the historic environment, and promoting tall buildings. The relationship between these two issues should be recognised in the commentary and possibly reflected in the scoring.	The commentary recognises that there is potential conflict that can be managed through the need to meet the high standards in design for buildings and public spaces, as stated below: *'The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.'* The score given is therefore considered to be appropriate

Name	Comment	Officer response
Environment Agency	Since our response to the Preferred Options consultation, in July 2009, Southwark have incorporated the vast majority of our recommendations. The submission version of the Core Strategy contains objectives and policies that comprehensively reflect the environmental challenges and opportunities present in the Borough. These are 1. Adapting to climate change, 2. Managing and minimising waste, and 3. Managing flood risk.	
	However, we do advise amendments to ensure all aspects of the environment are protected sufficiently and to reflect recent events in terms of plans and projects. We recommend that water quality is included in this policy. It is listed as a factor in achieving "Sustainability Objective 2B. Promote sustainable use of resources" but is not mentioned within Strategic Policy 13, which is where this issue should be included. Without a policy to deliver the protection and enhancement of water quality it is not obvious how Sustainability Objective 2B will be fully achieved.	We are recommending that the Inspector change Policy 13 to include reference to water pollution which will cover both surface and ground water quality. This is set out in our table of changes. Policy 13 provides the strategic hook for more detailed policies in the development management DPD.
	The Borough also contains locations where the groundwater is sensitive to pollution. A minor aquifer is present in the north eastern part of the Borough and the area south of Peckham is within a Source Protection Zone, which is an area close to a point where drinking water is abstracted (the Honor Oak Pumping Station). These locations are particularly vulnerable to pollution and should be protected.	

Name	Comment	Officer response
	There have also been developments since the Preferred Options stage in relation to various plans and projects, namely the adoption of the Thames River Basin Management Plan (December 2009) and the progression of Thames Tideway Tunnel Project.	The document has been reviewed and added to the list of reference documents
	Thames Tideway Tunnel	
	We are pleased to see the Thames Tunnel, also called the Thames Tideway Tunnel, mentioned in this Section because it is essential infrastructure that will help deliver Sustainability Objective 2B. The Thames Tideway Tunnel is being designed to stop untreated sewage flowing in to the Thames in times of high surface water flows. It is, therefore, designed to improve water quality in the River Thames, rather than specifically reduce flooding, which its positioning this Section implies.	
	Thames River Basin Management Plan	
	Adopted in December 2009, the Thames River Basin Management Plan, is a result of the implementation of the "EU Water Framework Directive". As a result, the UK has to meet certain standards for the water quality for both surface and ground waters. A number of bodies will be responsible for the implementation of the recommendations of this plan, including Local Authorities.	

Name	Comment	Officer response
Thames Water	Policy 13	The Core Strategy recognises the importance of the Thames Tunnel, in the evidence base, supporting text to policy 13 and the infrastructure table to policy 14. This provides a sufficient strategic hook for delivery of the project without duplicating national and regional policy and guidance. Policy 13 states that we will set high standards for reducing pollution. We are recommending including a reference to supporting measures to reduce water pollution as a proposed change, which provides flexibility to cover a range of projects including the Thames Tidal Tunnel. This is set out in our table of changes.
	Thames Water supports the requirements for developments to reduce water use and use local sources of water where possible and the requirement for developments to help reduce flood risk by reducing water run-off, using sustainable urban drainage systems and avoiding the paving over of gardens and creation of hard-standing areas.	
	However, Thames Water objects to the omission of a specific policy supporting the Thames Tunnel which will make the Core Strategy not properly justified, ineffective and inconsistent with national policy.	
	Policy 14 states that the approach will be achieved by "Working with infrastructure providers to identify and deliver elements of infrastructure to support growth at the right time."	We are working with Thames Water to identify potential locations for delivery of the tunnel within Southwark. We can include more detailed policies on the Thames Tidal Tunnel in the development management DPD, including site allocations where necessary.
	Thames Water support s this statement in that water and sewerage infrastructure needs to be provided ahead of development where upgrades to existing infrastructure or new infrastructure are necessary. However, the provision of new water and sewerage infrastructure is not solely related to supporting growth, in the absence of support for non-growth related infrastructure the Core Strategy is unsound.	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.

Name	Comment	Officer response
Natural England	After careful consideration of the information provided it is our opinion that the document has altered to include the changes and recommendations proposed by Natural England, strengthening and ensuring that the document is compliant with relevant legislation and has a credible evidence base. Natural England has previously commented on the ability of the document to be monitored and measured and this was and is deemed acceptable. Overall Natural England has no further comments to add to the Core Strategy Consultation, but we would offer our support to the intention of the Council to designate eleven additional sites within the Borough as Sites of Interest for Nature Conservation (SINC's) – the SINC's Evidence Base document page 2 refers. The document is acceptable to Natural England, compliant with relevant legislation and is in line with the approach adopted by other London Boroughs, however, if you are aware of any reason why Natural England should comment further on this application please let us know as soon as possible.	Support Noted

Name	Comment	Officer response
Transport for London	The Core Strategy provides strategic guidance for other documents in the LDF. The Elephant and Castle Opportunity Area is an important strategic proposal and the Elephant and Castle Development Framework SPG (2004) contains important detailed guidance that forms the basis of the Elephant and Castle regeneration project. The Core Strategy should clearly state that the Core Strategy proposals in respect of this key strategic regeneration project are based on the Elephant and Castle Development Framework SPG (2004) and will be guided by the principles contained therein. This would be consistent with paragraph 5.110 of the London Plan, which sets out strategic guidance for the Elephant & Castle Opportunity Area. This should also be made clear in the Core Strategy Sustainability Appraisal Report (SAR) in order to clearly state the basis on which the SAR has been conducted. This is important to satisfy the requirement of soundness as outlined in paragraph 4.52 of PPS12.	This change should not be made as the core strategy is not based on the E+C SPG as the quantum of development and legal processes have changed. The SPG provides useful additional information however the principles do not set out the basis for the core strategy for a number of reasons. •The core strategy has set out 2 approaches for informal consultation at issues and options, has taken forward a preferred option and now has a strategy for development at the Elephant and Castle which has been subject to formal consultation. These will now be examined at an Examination in Public. An SPG is not subject to public examination. E+C SPG was adopted in 2004 and is therefore not up to date. More recent evidence is now available TfL have been consulted at each stage of this process and have not raised these issues for inclusion at these earlier stages in the core strategy. Therefore these issues have not been included in our reporting to date. The consideration of issues raised through evidence and consultation are set out in our sustainability appraisal and consultation report. These processes are in line with the current planning and London acts, regulations and guidance. Basing a core strategy on an SPG prepared for adoption in 2004 would not be in line with this guidance. The SPG will be reviewed after the core strategy to establish whether it needs to be redrafted to provide further guidance to the core strategy as set out in the Local Development Scheme. Furthermore the information in the SPG does not accord with the core strategy. The SPG is based on strategy, targets and policies in the Draft London Plan 2002, 1995 Southwark Plan and emerging Southwark Plan 2002/2004. These are different due to changing evidence, national and regional guidance. This change should not be made. The SPG provides useful additional information however the principles do not set out the basis for the core strategy for a number of reasons.

Name	Comment	Officer response
	There is no mention (either in the Core Strategy or the SAR) of the fact that some of the Underground stations (in particular the Elephant and Castle Bakerloo and Northern Line station) are beginning to experience congestion and/or that there is currently a lack of transport capacity at these stations to accommodate the high levels of growth envisaged in the Core Strategy. These issues are addressed in the Elephant and Castle Development Framework SPG (2004) and this should also be identified in the Core Strategy and the SAR, which will provide the strategic framework for LDF policies and development control decisions. This omission substantially undermines the credibility of the Core Strategy in relation to both Core Strategy Strategic Policy 2 and the deliverability of comprehensive regeneration in this Opportunity Area, and thus undermines the deliverability of the Core Strategy vision as a whole.	This change should not be made. Our research does not demonstrate that some of the underground stations are experiencing congestion or that they have capacity issues that would impact on the regeneration and development set out in the core strategy. All developments are required to provide a transport assessment in line with policies 3.3 and 5.2 of the Southwark Plan which are being saved. We require a strategic transport contribution and we make provision for additional Transport for London contributions in our section 106 SPD. Therefore there is no evidence to suggest that this detail should be added. We will be updating this SPD as set out in our Local Development Scheme, we will change the contributions if there is evidence and if the 4 tests of circular 5/05 are met.

Name	Comment	Officer response
	Elephant and Castle Opportunity Area – Vision Pages 44-45 Paragraph 1 of page 44 states that: "*Elephant and Castle will continue to be highly accessible from other places in Southwark and London*" and in paragraph 3 that "*Public transport will become more accessible*". In earlier Core Strategy representations, TfL has raised concerns about delivery issues and it remains concerned that the Core Strategy needs effectively to address the challenges to sustainable delivery of this regeneration scheme, particularly by reference to the transport constraints and challenges as detailed in the Elephant and Castle Development Framework SPG (2004). These are not adequately addressed in the Core Strategy or in the Core Strategy Sustainability Appraisal Report (SAR). Though this section says that public transport will become more accessible and that the existing subways will be replaced by surface crossings, there is no mention of the capacity issues related to access to the Northern line via the associated ticket hall or the method of their being addressed. This issue is also overlooked in the SAR. The need for securing the delivery of medium-term transport infrastructure improvements to deliver the vision set out on this page for the Elephant and Castle Opportunity Area is seriously understated in the Core Strategy and it is not addressed in the SAR, the Local Implementation Plan or any other documents that form part of the evidence base for the Core Strategy. There are indications in the SAR that the Council recognises that there are risks of delay in the delivery of the necessary transport interchange improvements (for example, see Tables on pages 29, 56 and 58 of the SAR). There is no statement or assessment of how any delay in the delivery of such improvements will be addressed by the Core Strategy, either in terms of intermediate mitigation measures or the restraint on further development until the necessary mitigation has been provided.	We suggest that the change is not made as we have included information about working with TfL as they suggested at preferred options consultation on page 44. We also set out that we will work with our partners on strategic policy 14 and also that we will work with infrastructure providers to identify and deliver elements of infrastructure to support growth at the right time. There is also a section on the elephant and castle infrastructure from page 160 where we set out TfL as an important person to be involved.

Name	Comment	Officer response
	Strategic Policy 2 Paragraphs 7 and 8 of page 60 set out that "*It is important that we increase the capacity, quality and integration of public transport as a co-ordinated network...Our support of public transport improvements is important for current residents and businesses and also to ensure that provision is made for new development. There are a number of transport schemes that could improve Southwark.*" TfL fully supports this statement but there appears to be a failure of the Core Strategy and the Core Strategy Sustainability Appraisal Report (SAR) to explain what the key improvements are in relation to the Elephant and Castle Opportunity Area (see point 6 above). This may be achieved by a simple cross-reference to the Elephant and Castle Development Framework.	This change should not be made. Core strategy policy 2 sets out the strategy for maintaining and improving the road network. This strategic policy sets out the framework to overcome vehicle congestion within Southwark including the Elephant and Castle. The purpose of the core strategy is to set out strategic policies. Additional detail can be provided in other documents within the Local Development Framework.
	Paragraph 2 of page 62 sets out that "*It is important that the existing road network is properly maintained and improved to ensure that these roads allow vehicles to pass through Southwark with minimum delay and keep congestion and pollution as low as possible.*" The Elephant and Castle regeneration will also need to resolve the pedestrian capacity, safety and amenity issues that could arise from the closure of the subways and from other impacts of the regeneration proposals where pedestrian space may be constrained. TfL's feasibility study demonstrates that the proposed subway replacement with surface pedestrian crossings and associated traffic signal introduction at the northern roundabout will inevitably result in some, possibly significant, delay to traffic through the local area. In light of this TfL considers that progressive phasing and monitoring of changes to the surface layout offers the most pragmatic means of delivery at this critical part of the TfL Road Network. These possible significant impacts (and the mitigation measures to address them) are not addressed in the Core Strategy Sustainability Appraisal Report (SAR).	This change should not be made. Core strategy policy 2 sets out the strategy for maintaining and improving the road network. This strategic policy sets out the framework to overcome vehicle congestion within Southwark including the Elephant and Castle. The purpose of the core strategy is to set out strategic policies. Additional detail can be provided in other documents within the Local Development Framework.

The full set of representations on the Core Strategy are available to view on our website at www.southwark.gov.uk/corestrategy

APPENDIX 3
RELEVANT PLANS, STRATEGIES AND PROGRAMMES

POLICY OR PLAN
International
Kyoto Protocol to the United Nations framework convention on climate change (1997)
Johannesburg Declaration on Sustainable Development (2002)
European
EU Sixth Action Plan (SD Strategy) (2002)
Council Directive 79/409/EEC on conservation of wild birds
Council Directive 92/43/EEC on conservation of natural habitats and of wild fauna and flora
EU Water Framework Directive (2000/60/EC)
EU Directive 2002/91/EC on the energy performance of buildings
Air Quality Framework Directive 96/62/EC and daughter directives (99/30/EC), (2000/69/EC), (2002/3/EC)
European Spatial Development Strategy (1999)
European Landscape Convention (ratified by the UK government in 2006)
European transport policy for 2010: time to decide (EC, 2001)
European Directive 2003/30/EC on the promotion of the use of biofuels or other renewable fuels for transport
Waste Framework Directive 75/442/EEC Landfill Directive (99/31/WC)
The Water Framework Directive (2000) Put into UK law (transposed) in 2003.

POLICY OR PLAN
National
PPS 1: Delivering Sustainable Development (2005)
Planning and Climate Change: Supplement to PPS1(2007)
PPS 3: Housing (2006)
Draft PPS4: Planning for Sustainable Economic Development (2008)
PPS 6: Planning for Town Centres (2005)
PPS 9: Biodiversity and Geological Conservation (2005)
PPS 10: Planning for Waste Management (2005)
PPS 12: Local Spatial Planning (2008
PPG 13: Transport (2001)
PPG 15: Planning and the Historic Environment (1994)
Draft PPS15: Planning for the Historic Environment (2009)
PPG 16: Archaeology and Planning (1990)
PPG 17: Planning for Open Space, Sport and Recreation (2002)
PPS 22: Renewable Energy (2004)
PPS 23: Planning and Pollution Control (2004)
PPG 24: Planning and Noise (1994)
PPS 25: Development and Flood Risk (2006)
Biodiversity – The UK Action Plan (1994)
Biodiversity by Design
Biodiversity and the Built Environment. A report by the UK-GBC Task Group
Department for Transport 10 Year Transport Plan (2000)
By Design – Urban design in the planning system: towards better practice. DETR / CABE (2000)
Urban White Paper 2001

POLICY OR PLAN
England Biodiversity (2002)
Communities Plan - Sustainable Communities: Building for the Future (2003)
Guidance on Tall Buildings CABE and English Heritage (2007)
Securing the Future – UK Sustainable Development Strategy (2005)
The UK Climate Change Programme (2006)
Air Quality Strategy (2007)
Waste Strategy (2007)
Planning for a Sustainable Future - White Paper (2007)
Future Water: The Government's Water Strategy for England (2008)
Sustainable Construction Strategy (2007)
Energy White Paper (2007)
UK Sustainable Procurement Action Plan (2007)
English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)
Department of Health: Next Step Review: High Quality Care for All (2008)
Department of Health: Draft Guidance on Strategic Environmental Assessment (2007)
Health inequalities: progress and next steps (2008)
Healthy Weight Healthy Lives: A Cross Government Strategy for England (2008)
Model Procedures for the Management of Contaminated Land- Environment Agency (2004)
Environment Agency: Adapting to Climate Change Strategy
Environment Agency Strategies, Plans and Reports

POLICY OR PLAN
London
The London Plan: Spatial Development Strategy for Greater London consolidated with alterations since 2004 (2008)
Draft Replacement London Plan 2009
A Sustainable Development Framework for London. London Sustainable Development Commission (June 2003)
Sustainable Communities Plan for London: Building for the Future (2003)
Sustaining Success: The Mayor's Economic Development Strategy (2004)
London: Cultural Capital – Realising the potential of a world-class city. The Mayor's Culture Strategy (2004)
Connecting with London's Nature. The Mayor's Biodiversity Strategy (2002)
Sounder City: The Mayors Ambient Noise Strategy (2004)
Cleaning London's Air, The Mayor's Air Quality Strategy (2002)
Green Light to Clean Power. The Mayor's Energy Strategy (2004)
Rethinking Rubbish in London. The Mayor's Waste Management Strategy (2003)
Accessible London: Achieving an Inclusive Environment. Mayor's Supplementary Planning Guidance (2004)
Industrial Capacity Mayor's Supplementary Planning Guidance (2003)
Providing for Children and Young People's Play and Informal Recreation. Mayor's Supplementary Planning Guidance (2008)
Planning for Equality and Diversity in London. Mayor's Supplementary Planning Guidance (2007)
London View Management Framework. Mayor's Supplementary Planning Guidance (2007)
Land for Transport Functions. Mayor's Supplementary Planning Guidance (2007)
London Plan Sustainable Design and Construction. Mayor's Supplementary Planning Guidance (2006)
Housing Mayor's Supplementary Planning Guidance (2005)
London Remade Demolition Protocol Report (2005)
English Heritage's Heritage at Risk- London 2008
Thames Region Catchment Flood Management Plan

POLICY OR PLAN
Thames River Basin Management Plan, 2009
Regional Flood Risk Appraisal
Taking Care of Water- Our Plan for the next 25 years (Thames Water Utilities 2007)
Draft Water Resource Management Plan (Thames Water Utilities) 2008
Our Plans for Water (Thames Water Utilities) 2008
Draft Strategic Proposals for Sludge Management (Thames Water Utilities) 2008
Thames Corridor Catchment Abstraction Management Strategy (CAMS)
Adapting to Climate Change: A checklist for development (2005)
Living Well in London: The Mayor's draft Health Inequalities Strategy (2008)
NHS London: Strategic Plan (2008)
Healthcare for London: A Framework for Action (2007)
State of the Environment Report for London
Thames Path National Trail – Management Strategy 2006-11
Improving Londoner's Access to Nature
The London Rivers Action Plan

POLICY OR PLAN
Local
London Borough of Southwark: Community Strategy 2006-16
Southwark's Unitary Development Plan (2007)
Southwark Local Implementation Plan (LIP)
Southwark Waste Management Strategy: 2003 – 2021
London Borough of Southwark: Enterprise Strategy: 2005 – 2016
London Borough of Southwark: Employment Strategy: 2005 – 2016
London Borough of Southwark Contaminated Land Strategy (2001)
London Borough of Southwark Biodiversity Action Plan
London Borough of Southwark Air Quality Management and Improvement Plan
Southwark Housing Strategy 2005- 2010
London Borough of Southwark Crime and Drugs Strategy 2005 - 2008
Southwark Climate Change and Sustainability Strategy (Emerging)
Southwark Open Spaces Strategy, 2003
Southwark Tourism Strategy 2005-2010
London Borough of Southwark, Children and Young People's Plan 2006/7- 2008/9
London Borough of Southwark School Organisation Plan and Education Development Plan
Southwark Alliance, Neighbourhood Renewal Strategy 2002 – 2004
Southwark Conservation Area Appraisals
Southwark Archaeology Priority Zones
Southwark State of the Environment Fact Sheet
Metropolitan Police Estate – Asset Management Plan, Southwark, 2007
Southwark Walking Plan, 2006

POLICY OR PLAN
Southwark PCT Commissioning Strategy Plan 2009-2012 (2007)
Southwark PCT Asset Management Strategy (2007)
South Bank Partnership Manifesto, "Under pressure and on the edge: London's South Bank – a Manifesto for Action" (2006)
Lambeth Council Sustainable Community Strategy (2008-2020)
Lewisham Council Sustainable Community Strategy (2008-2020)

Further details can be found in the Background Paper that supports the Core Strategy

APPENDIX 4
Comparison of Sustainability Objectives

Sustainability Objectives

SDO 1   To tackle poverty and encourage wealth creation

SDO 2   To improve the education and skill of the population

SDO 3   To improve the health of the population

SDO 4   To reduce the incidence of crime and the fear of crime

SDO 5   To promote social inclusion, equality, diversity and community cohesion

SDO 6   To reduce contributions to climate change

SDO 7   To improve the air quality in Southwark

SDO 8   To reduce waste and maximise use of waste arising as a resource

SDO 9   To encourage sustainable use of water resources

SDO10   To maintain and enhance the quality of land and soils

SDO11   To protect and enhance the quality of landscape and townscape

SDO12   To conserve and enhance that quality of landscape and townscape

SDO13   To protect and improve open spaces, green corridors and biodiversity

SDO14   To reduce vulnerability to flooding

SDO15   To provide everyone with the opportunity to live in a decent home

SDO16   To promote sustainable transport and minimise the need to travel by car

SDO17   To provide the necessary infrastructure to support existing and future development

Core Strategy Objectives

Theme: Improve individual life chances

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

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

Objective 1B. Achieve educational potential

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

Objective 1C. Be healthy and active

Southwark's community will be healthy and active. High quality sports and leisure centres will be located across the whole borough and everyone will have access to them. Open spaces will be protected and the local community will be able to enjoy using these spaces, including parks, nature reserves and the River Thames. Good quality and accessible health facilities will be located across the whole borough. Southwark will be without concentrations of people with poor health because everyone has access to good health, sports and leisure facilities, and open spaces. The policies related to this theme are Policy 1and Policy 4.

Objective 1D. Culture, creativity and diversity

Southwark will be a prosperous borough providing a wide range of activities and facilities for the diverse community. Successful creative industries will thrive. There will be a wide range of arts and cultural facilities for Southwark's multicultural and very diverse community. The policies related to this theme are Policy 1, Policy 3, Policy 4 and Policy 10.

Objective 1E. Be safe
Southwark will be a safe place for people to live, visit and work. The policies related to this theme are Policy 1, Policy 4 and Policy 12.

Theme: Make the borough a better place for people
Objective 2A. Create mixed communities
People will choose to live in Southwark because we will have a the mixture of different types of housing, jobs, shops, schools, community facilities, health centres, libraries, religious centres and leisure facilities needed by a diverse community. The policies related to this theme are Policy 1, Policy 2 and Policy 3.
Objective 2B. Promote sustainable use of resources
Southwark will be a green and environmentally sustainable borough. New developments will be built to high environmental standards to reduce the impact on the environment and adapt to climate change, focussing on flood risk, waste management, biodiversity and water quality. New housing will be located near to community facilities, shops, offices and leisure facilities. This encourages walking, cycling and public transport and restricts parking to reduce pollution and congestion, and the need to travel far. The policies related to this theme are Policy 1, Policy 2, Policy 11, Policy 12 and Policy 13.
Objective 2C. Provide more and better homes
The whole of the borough will offer more housing of a range of different types to meet the needs of the community. All the housing will be built to a high quality of design. There will be a choice of housing types including more family housing, housing for students and more affordable housing. The policies related to this theme are Policy 1, Policy 12 and Policy 13.
Objective 2D. Create a vibrant economy
Southwark will be a successful and profitable place. The town centres will offer a range of shops and services, along with offices, tourism and cultural facilities. The Central Activities Zone, opportunity areas and action areas will have lots of different activities as well as housing. The policies related to this theme are Policy 1, Policy 3, Policy 4 and Policy 10.
Objective 2E. A liveable public realm
It will be easy to get to and around places on foot and by bike with excellent public transport links, including water transport. The policies related to this theme are Policy 1, Policy 2 and Policy 11.
Objective 2F. Conserve and protect historic and natural places
Southwark's historic buildings will be protected and improved particularly in conservation areas and listed buildings. Open spaces and biodiversity will be protected, made more accessible and improved. The policies related to this theme are Policy 1, Policy 11 and Policy 12.

Theme 3: Deliver quality public services
Objective 3A. Accessible, customer focused, efficient and modern public services
Public services will be effective and easily accessible by all members of the community. The policies related to this theme are Policy 1, Policy 3 and Policy 4.

Theme 4: Making sure positive change happens
Objective 4A. Provide enough funding for regeneration to positively transform the image of Southwark
We will work with landowners and developers to achieve regeneration, continuing to make Southwark a place that people aspire to be and that developers and landowners want to invest in. We will have a clear and flexible plan to make sure the right investment decisions are made and that regeneration happens on time. The policy related to this theme is Policy 1 and Policy 14.

Objective 4B. Make sure that we consult effectively
We will work with local communities, organisations, community groups, developers, businesses and land owners to make sure that we consult effectively on planning policies and development management decisions. We will make sure that we provide people with the opportunity to participate meaningfully in the preparation of local development framework documents as set out in our statement of community involvement. The policy related to this theme is Policy 1 and Policy 14.

Theme 5: Planning for development in growth areas
Strategic Objective 5A Developing in growth areas
We have a growth areas approach to achieving the vision to improve places prioritising development in the:
- Central activities zone.
- Elephant and Castle opportunity area.
- Borough, Bankside and London Bridge opportunity area.
- Peckham and Nunhead action area.
- Canada Water action area.
- Aylesbury action area.
- West Camberwell regeneration area.
- Old Kent Road regeneration area.

Compatibility Matrix

Core Strategy Strategic Objectives

Sustainability Objectives	1a	1b	1c	1d	1e	2a	2b	2c	2d	2e	2f	3a	4a	4b	5a
SDO 1 — To tackle poverty and encourage wealth creation	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	0	✓	✓	✓	✓
SDO 2 — To improve the education and skill of the population	✓	✓	0	✓	0	✓	0	0	✓	0	0	✓	✓	✓	0
SDO 3 — To improve the health of the population	0	0	✓	0	✓	0	✓	0	0	✓	0	✓	✓	0	0
SDO 4 — To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	0	✓	✓	0	✓
SDO 5 — To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	✓	✓	0	✓	✓	0	0	✓	✓	✓	✓
SDO 6 — To reduce contributions to climate change	?	?	✓	0	0	✓	✓	?	✓	✓	0	0	✓	0	?
SDO 7 — To improve the air quality in Southwark	?	?	✓	0	0	✓	✓	?	✓	✓	0	0	✓	0	?
SDO 8 — To reduce waste and maximise use of waste arising as a resource	?	✓	0	0	0	0	✓	?	✓	0	0	0	✓	0	?
SDO 9 — To encourage sustainable use of water resources	✓	✓	0	0	0	0	✓	✓	✓	✓	0	0	✓	0	✓
SDO 10 — To maintain and enhance the quality of land and soils	?	0	✓	0	0	✓	✓	0	0	✓	0	0	✓	0	✓
SDO 11 — To protect and enhance the quality of landscape and townscape	✓	0	✓	✓	✓	✓	✓	?	✓	✓	✓	0	✓	✓	?
SD0 12 — To conserve and enhance the historic environment and cultural assets	?	✓	0	✓	✓	✓	✓	?	✓	✓	✓	✓	✓	✓	?
SDO 13 — To protect and improve open spaces, green corridors and biodiversity	✓	✓	✓	✓	✓	✓	✓	?	✓	✓	✓	0	✓	✓	?
SDO 14 — To reduce vulnerability to flooding	?	?	0	0	0	0	0	?	✓	✓	✓	✓	✓	0	?
SDO 15 — To provide everyone with the opportunity to live in a decent home	?	0	✓	0	✓	✓	✓	✓	✓	0	✓	✓	✓	0	✓
SDO 16 — To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	0	✓
SDO 17 — To provide the necessary infrastructure to support existing and future development	✓	0	0	0	0	✓	✓	✓	✓	✓	0	✓	✓	0	✓

Key: ✓ compatible | ? dependent on implementation | 0 no significant link | X incompatible

1a	Creating employment and link local people to jobs
1b	Achieve educational potential
1c	Be healthy and active
1d	Culture, creativity and diversity
1e	Be Safe
2a	Create mixed communities
2b	Promote sustainable use of resources
2c	Provide more and better homes
2d	Create a vibrant economy
2e	A liveable public realm
2f	Conserve and protect historic and natural places
3a	Accessible, customer focused, efficient and modern public services
4a	Provide enough funding for regeneration to positively transform the image of Southwark
4b	Make sure that we consult effectively
5a	Develop in growth areas

Commentary of results

1A		CREATING EMPLOYMENT AND LINKING LOCAL PEOPLE TO JOBS
	SDO6	**To reduce contributions to climate change**
	?	Some employment uses could increase contributions to climate change. However, new technologies could help reduce impacts and provide new opportunities for employment
	SDO7	**To improve the air quality in Southwark**
	?	Some employment uses could have an adverse impact upon air quality as a result of construction and operation
	SDO8	**To avoid waste and maximise use of waste arising as a resource**
	?	Creating employment will result in an increase in waste produced in both construction and operation
	SDO10	**To maintain and enhance quality of soils**
	?	Some employment uses could have a negative impact on the quality of land and soils
	SDO12	**To conserve and enhance the historic environment and cultural assets**
	?	The need to provide land for employment use could conflict with the need to conserve and enhance the historic environment
	SDO15	**To provide everyone with the opportunity to live in a decent home**
	?	The need to provide homes could conflict with the need to provide employment land
1B		**ACHIEVE EDUCATIONAL POTENTIAL**
	SDO6	**To reduce contributions to climate change**
	?	The process of building and redeveloping schools could increase contributions to climate change in the short term but, providing best practice methods are followed, could reduce contributions in the long term
	SDO7	**To improve the air quality in Southwark**
	?	Building and redeveloping schools could have a negative impact on air quality
	SDO 14	**To reduce vulnerability to flooding**
	?	Building and redeveloping schools located in the flood zone could increase those vulnerable to flooding
2C		**PROVIDE MORE AND BETTER HOMES**
	SDO6	**To reduce contributions to climate change and adapt to climate change that is already happening**
	?	The provision of more and better homes could increase contributions to climate change
	SDO7	**To improve the air quality in Southwark**
	?	The provision of new homes could have an adverse impact upon air quality both in construction and operation
	SDO8	**To avoid waste and maximise use of waste arising as a resource**
		Creating new homes will result in an increase in waste produced in both construction and operation
	SDO11	**To protect and enhance the quality of landscape and townscape**
	?	The provision of more and better homes will not necessarily protect and enhance the look and character of places
	SDO12	**To conserve and enhance the historic environment and cultural assets**
	?	The provision of more and better homes will not necessarily protect and enhance the historic environment and cultural assets
	SDO13	**To protect and improve open spaces, green corridors and biodiversity**
	?	The need to provide more homes could put pressure on open space land to be developed
	SDO14	**To reduce vulnerability to flooding**
	?	Pressure for new homes could increase vulnerability to flooding

5A		DEVELOP IN GROWTH AREAS
	SDO6	**To reduce contributions to climate change and adapt to climate change that is already happening**
	?	Development in growth areas could increase contributions to climate change in construction and operation
	SDO7	**To improve the air quality in Southwark**
	?	Development in growth areas could have an adverse impact on air quality in construction and operation
	SDO8	**To avoid waste and maximise use of waste arising as a resource**
	?	Development in growth areas will result in an increase in waste produced in both construction and operation
	SDO11	**To protect and enhance the quality of landscape and townscape**
	?	Development in the growth areas will not necessarily protect and enhance the look and character of places
	SDO12	**To conserve and enhance the historic environment and cultural assets**
	?	Development in growth areas will not necessarily protect and enhance the historic environment and cultural assets
	SDO13	**To protect and improve open spaces, green corridors and biodiversity**
	?	Development in the growth areas could put pressure on open space land to be developed
	SDO14	**To reduce vulnerability to flooding**
	?	Development in the growth areas could increase vulnerability to flooding

Coverage of SA Objectives

Objective	Environmental	Social	Economic
SDO 1		✓	✓
SDO 2		✓	✓
SDO 3	✓	✓	✓
SDO 4	✓	✓	✓
SDO 5		✓	
SDO 6	✓	✓	✓
SDO 7	✓	✓	✓
SDO 8	✓		✓
SDO 9	✓	✓	✓
SDO 10	✓	✓	✓
SDO 11	✓	✓	✓
SDO 12	✓	✓	✓
SDO 13	✓	✓	✓
SDO 14	✓	✓	✓
SDO 15		✓	✓
SDO 16	✓	✓	✓
SDO17	✓	✓	✓

Most of the objectives cover environmental, social and economic issues, either directly or indirectly. For example, Sustainability Objective 6 (**To reduce contributions to climate change**) is directly aimed at reducing the impact of carbon dioxide emissions on the environment. However, there will also be social and economic benefits as more sustainable transport choices are being promoted to encourage energy efficiency which in turn can have a positive impact on the health and quality of life of residents.

APPENDIX 5
Sustainability Appraisal of Core Strategy Issues and Options

Summary of Results – OPTION 1: GROWTH AREAS

Sustainability Objectives	OPTION 1 - GROWTH AREAS																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓✓	?	✓✓	✓✓	✓✓	✓	✓	✓✓	✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓	✓
SDO 2 To improve the education and skill of the population	✓	✓	-	-	-	-	-	✓	✓	✓	✓✓	✓	✓	✓	✓	✓	✓	✓	-
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SDO 4 To reduce the incidence of crime and the fear of crime	-	✓	✓	✓	✓	-	-	-	✓	✓	✓	✓	-	✓	✓	✓	✓	-	✓
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	-	✓
SDO 6 To reduce contributions to climate change	X	?	-	-	-	-	-	✓	-	?	?	-	?	✓	?	?	-	✓✓	✓✓
SDO 7 To improve the air quality in Southwark	X	?	-	-	-	-	-	✓	-	?	?	-	?	✓	?	?	-	✓✓	✓✓
SDO 8 To reduce waste and maximise use of waste arising as a resource	X	?	-	-	-	-	-	-	?	?	?	-	?	-	?	?	-	✓✓	-
SDO 9 To encourage sustainable use of water resources	?	?	-	?	-	-	-	-	?	?	?	-	?	-	?	?	-	✓✓	-
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	-	✓	-	-	-	-	?	✓	✓	-	-	-	✓	✓	-	✓✓	✓

1 Quantity of housing
2 Location of housing
3 Quantity of Affordable housing
4 Reprovision of affordable housing
5 Split between affordable/ intermediate
6 Family housing
7 Disabled provision
8 Student housing
9 Gypsies & travellers
10 Quantity of office space
11 Industrial land
12 Cultural/Creative industries
13 Tourist facilities
14 Small businesses
15 Shops
16 Bars/Cafes/Restaurants
17 Community Facilities
18 Environmental Standards
19 Car Parking

Sustainability Objectives	OPTION 1 - GROWTH AREAS																				Key		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19			✓✓	major positive
SDO 11 To protect and enhance the quality of landscape and townscape	?	✓	?	?	-	?	-	?	✓?	✓?	✓	✓	✓?	✓	✓	✓✓	✓?	?	✓			✓	minor positive
SD0 12 To conserve and enhance the historic environment and cultural assets	?	?	-	?	-	?	-	?	✓?	✓?	✓	✓	✓?	✓?	✓?	✓	✓?	?	✓			XX	major negative
SDO 13 To protect and improve open spaces, green corridors and biodiversity	?	✓	-	?	-	?	-	-	✓?	✓?	✓	-	✓?	✓?	✓?	✓	✓?	✓?	✓			X	minor negative
SDO 14 To reduce vulnerability to flooding	X	X	-	-	-	-	-	X	-	?	?	?	?	?	✓?	✓	-	✓	-			?	uncertain
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓	-	?	-	-	-	-	-	-	✓	-			-	no significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	✓	✓	✓	-	✓	-	✓✓	-	✓	?	✓	✓	✓	✓✓	✓✓	✓✓	✓?	✓✓				

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Summary of Results – OPTION 2: HOUSING LED GROWTH

Sustainability Objectives	OPTION 2 - HOUSING LED GROWTH																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	?	?	✓	?	✓	?	✓✓	?	X ?	?	?	✓ ?	✓	✓✓	?	✓	-
SDO 2 To improve the education and skill of the population	?	?	-	-	-	-	-	✓	✓	?	?	?	?	✓ ?	✓	✓	✓	✓	-
SDO 3 To improve the health of the population	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	✓ ?	✓	✓	?	✓	✓
SDO 4 To reduce the incidence of crime and the fear of crime	-	?	?	✓	✓	-	-	?	✓	?	-	?	?	-	✓	✓	?	-	?
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	X ?	✓	?	✓✓	✓	✓✓	?	?	?	?	?	✓	✓✓	?	-	-
SDO 6 To reduce contributions to climate change	X	X	-	X	-	-	-	?	-	?	?	-	?	-	X ?	?	-	✓	✓
SDO 7 To improve the air quality in Southwark	X	X	-	X	-	-	-	?	-	?	?	-	?	-	X ?	?	-	✓	✓
SDO 8 To reduce waste and maximise use of waste arising as a resource	X	X	-	X	-	-	-	-	-	?	?	-	?	-	X ?	?	-	✓	-
SDO 9 To encourage sustainable use of water resources	?	?	-	-	-	-	-	-	-	?	?	-	?	-	X ?	?	-	✓	-
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	-	✓	-	-	-	-	-	✓	X	-	?	-	✓	✓	-	✓	✓

1 Quantity of housing
2 Location of housing
3 Quantity of Affordable housing
4 Reprovision of affordable housing
5 Split between affordable/intermediate
6 Family housing
7 Disabled provision
8 Student housing
9 Gypsies & travellers
10 Quantity of office space
11 Industrial land
12 Cultural/Creative industries
13 Tourist facilities
14 Small businesses
15 Shops
16 Bars/Cafes/Restaurants
17 Community Facilities
18 Environmental Standards
19 Car Parking

Sustainability Objectives	OPTION 2 - HOUSING LED GROWTH																				Key		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		✓✓	major positive
SDO 11 To protect and enhance the quality of landscape and townscape	?	?	?	?	-	?	-	?	?	?	?	?	?	?	✓?	✓✓	?	?	✓		✓	minor positive
SD0 12 To conserve and enhance the historic environment and cultural assets	?	?	-	?	-	?	-	?	?	?	?	?	?	?	✓?	✓	?	?	✓		XX	major negative
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	?	?	-	?	-	?	-	-	?	?	?	-	?	-	✓?	-	?	✓?	✓		X	minor negative
SDO 14 To reduce vulnerability to flooding	X	?	-	-	-	-	-	?	-	?	?	?	?	?	?	-	-	✓	-		?	uncertain
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	?	✓	✓	✓✓	✓	✓	-	?	-	-	-	-	-	-	✓	-		-	no significant impact
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	?	✓	✓	-	?	-	?	-	X	X	?	?	?	✓	✓	?	✓?	✓			

The detailed results can found in the Issues and Options SA report

APPENDIX 6
Appraisal of Preferred Options

The following summary appraises the sustainability of each spatial policy included in the Core Strategy Preferred Options paper, April 2009. This appraisal has assisted in drafting the publication/ submission version of the plan. The assessment involves the appraisal of the Core Strategy preferred options against the Sustainability Appraisal objectives developed in the scoping document.

Positive, negative, uncertain and insignificant effects are considered. Where potential sustainability issues arise these are discussed in more detail in the supporting table. This approach is designed to be iterative with the options refined following public consultation and through the Sustainability Appraisal of the Submission Version of the Core strategy.

Sustainability Appraisal of Preferred Option Core Strategy

Summary of Results – Preferred Option Policies

Sustainability Objectives	\- Core Strategy Policies												
	1	2	3	4	5	6	7	8	9	10	11	12	13
SDO 1 To tackle poverty and encourage wealth creation	?	✓	✓✓	✓	?	?	?	✓	-	✓✓	✓	✓	✓
SDO 2 To improve the education and skill of the population	✓	-	✓	✓✓	-	-	-	✓	-	✓✓	-	-	-
SDO 3 To improve the health of the population	✓	✓✓	✓	✓✓	?	?	✓✓	-	✓✓	✓	✓✓	✓	✓
SDO 4 To reduce the incidence of crime and the fear of crime	?	✓	✓✓	✓	✓	✓	✓	-	-	✓	?	✓✓	?
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓	✓✓	✓✓	✓
SDO 6 To reduce contributions to climate change	✓✓	✓✓	✓	✓	✓	✓	✓	✓	-	✓	✓	?	✓✓
SDO 7 To improve the air quality in Southwark	✓	✓✓	✓	✓	✓	✓	✓	-	-	✓	✓	✓	✓✓
SDO 8 To reduce waste and maximise use of waste arising as a resource	✓	-	-	?	X	X	X	X	-	X	-	?	✓✓
SDO 9 To encourage sustainable use of water resources	✓	-	-	?	X	X	X	X	-	X	?	?	✓✓
SDO 10 To maintain and enhance the quality of land and soils	✓	-	✓	✓	✓	✓	✓	✓	-	✓	✓✓	?	✓✓
SDO 11 To protect and enhance the quality of landscape and townscape	✓	-	✓✓	✓	✓	✓	✓	✓	-	✓	✓✓	✓✓	✓
SD0 12 To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	✓	✓	✓	✓	-	✓	✓	✓✓	?
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓	✓✓	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	✓✓
SDO 14 To reduce vulnerability to flooding	✓	-	?	?	?	?	?	?	-	?	✓	✓	✓✓
SDO 15 To provide everyone with the opportunity to live in a decent home	✓	-	-	-	✓✓	✓✓	✓✓	✓	✓	✓	-	✓	✓
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	-	✓	✓✓	✓	✓

1 Sustainability Assessment
2 Sustainable Transport
3 Shopping Leisure and Entertainment
4 Places to Learn and Enjoy
5 Providing New Homes
6 Homes for People on Different Incomes
7 Family Homes
8 Student Homes
9 Homes for Gypsies and Travellers
10 Numbers and Places for People to Work
11 Open Spaces and Wildlife
12 Design and Conservation
13 High Environmental Standards

Key

Symbol	Meaning
✓✓	major positive
✓	minor positive
XX	major negative
X	minor negative
?	uncertain
-	no significant impact

Summary of Findings

In total, there are two SDOs that show potential minor negative impacts in relation to the Preferred Options Policies. These are:
- SDO 8 To reduce waste and maximise use of waste arising as a resource
- SDO 9 To encourage sustainable use of water resources

In relation to Policies:
- Policy 5 Providing New Homes
- Policy 6 Homes for People on Different Incomes
- Policy 7 Family Homes
- Policy 8 Student Homes
- Policy 10 Numbers and Places for People to Work

SDO 8 To reduce waste and maximise use of waste arising as a resource

The provision of new homes in a range of tenures, the provision of more family homes and student homes and the provision of more employment will require the generation of more waste, however potential impacts can be mitigated over time through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse.

SDO 9 To encourage sustainable use of water resources

The provision of new homes, in a range of tenures, the provision of more family homes and student homes and the provision of more employment will result in additional water consumption; however potential impacts can be mitigated over time through the adoption of technologies and infrastructure that will encourage water efficiency.

The majority of other policies scored positively against the objectives however there were a few uncertainties identified. These were in relation to;

- SDO 1 To tackle poverty and encourage wealth creation
  Policy 1 requires the assessment of social, environmental and economic impacts, however it is uncertain whether by undertaking a sustainability assessment, overall it would tackle poverty and encourage wealth creation as this will be dependent upon the nature of specific proposals. Policies 5, 6 and 7 include the provision of new homes, the different amounts of affordable and private homes and the amount of family housing which may have a positive impact on poverty and wealth creation, however this will need to be in tandem with other initiatives such as increased opportunities for employment training and education.

- SDO 3 To improve health
  Policies 5 and 6 include the provision of new homes, the different amounts of affordable and private homes which may result in an improvement of health in the population as a result of improved quality of accommodation however this is likely to be affected by a number of other factors as well.

- SDO 4 To reduce the incidence of crime and fear of crime
  Policy 1 (Assessing social, environmental and economic impacts) could lead to a reduction in crime and fear of crime but it will be dependent on implementation and whether this can be measured effectively. Policy 11 aims to protect and improve open spaces, green corridors and biodiversity in the borough, this could lead to a reduction in crime and fear of crime with improved local environments but this will be dependent on implementation. Policy 13 will require high design standards, which will encompass the incorporation of Secured by Design principles in new developments. However the impact on reducing the incidence and fear of crime will still be dependent upon implementation and long term monitoring.

- SDO 6 To reduce contributions to climate change
  Policy 12 aims to achieve high standards of design that will reduce the need to travel and encourage people to live, work, study and relax in their local environment. The extent to which this reduces contributions to climate change will be dependent upon implementation.

- SDO 8 To reduce waste and maximise use of waste arising as a resource
  The impact of Policy 4 (Places to learn and enjoy) on levels of waste in the borough is uncertain because this will depend on the type of community facilities that come forward as these can vary greatly and on the developments design and construction. As with Policy 12 which aims to achieve high standards of design whilst protecting and improving the historic environment, this will be dependent upon implementation.

- SDO 9 To encourage sustainable use of water resources
  The impact of Policy 4 (Places to learn and enjoy) on water resources in the borough and water quality will depend on the type of community facilities that come forward as these can vary greatly and on the developments design and construction. As with Policy 12 which aims to achieve high standards of design whilst protecting and improving the historic environment, this will be dependant upon implementation. Policy 11 aims to protect and improve open spaces and wildlife in the borough, the impact upon water resources will be dependent on types of planting and management techniques such as irrigation.

- SDO 10 To maintain and enhance the quality of land and soils
  Policy 12 aims to achieve high standards of design in the borough, the achievement of this against the need to maintain and enhance soil and land quality will be dependent upon implementation.

- SDO 12 To conserve and enhance the historic environment and cultural assets
  Policy 13 aims to achieve high standards of design that will improve the environment and reduce the impacts on climate change. The impact of this on the historic environment will depend on the type and scale of development and the environmental measures that are put in place.

- SDO 14 To reduce vulnerability to flooding
  Policies 3, 5, 6, 7, 8 and 10 set out how many new shops, homes and jobs should be provided in the borough and where they should go. It is not always possible to locate all new developments in areas of low flood risk. Any impacts could be mitigated through good design that incorporates flood resilient measures. Over time this would be a positive impact.

APPENDIX 7
Appraisal of Submission Version

The following matrices appraise the sustainability of each spatial policy included in the Core Strategy Submission Version October 2009. The assessment involves the appraisal of the Core Strategy policies against the Sustainability Appraisal objectives which were developed in the scoping document. Since the Preferred Options iteration further policies ST1, ST2 and 14 have been added as well as SDO 17 on Infrastructure in response to comments received in the consultation exercises. Positive, negative, uncertain and insignificant effects are considered, which are discussed in more detail in the supporting tables.

Sustainability Appraisal of Submission Version Core Strategy

Sustainability Objectives	1	2	3	4	5	6	7	8	9	10	11	12	13	14	S1	S2
SDO 1 — To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓	✓	✓✓	✓✓
SDO 2 — To improve the education and skill of the population	✓✓	-	✓	✓✓	✓	-	-	✓✓	✓	✓✓	✓	✓	✓	✓	✓	✓
SDO 3 — To improve the health of the population	✓✓	✓✓	✓	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓✓	✓	✓	✓	✓	✓
SDO 4 — To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	✓✓	-	✓	✓	✓	✓	✓✓	-	-	✓	✓✓
SDO 5 — To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓
SDO 6 — To reduce contributions to climate change	✓✓	✓	✓	?	X	-	-	?	-	X	✓	?	✓✓	-	X	X
SDO 7 — To improve the air quality in Southwark	✓✓	✓	✓	?	X	-	-	?	-	X	✓	?	✓✓	-	X	X
SDO 8 — To reduce waste and maximise use of waste arising as a resource	✓✓	-	?	?	X	-	-	?	✓	X	-	?	✓✓	✓✓	X	?
SDO 9 — To encourage sustainable use of water resources	✓✓	-	?	?	?	-	-	?	✓	?	?	✓	✓✓	✓✓	?	?
SDO 10 — To maintain and enhance the quality of land and soils	✓✓	-	✓	✓	✓	-	-	✓	-	✓	✓	✓	✓✓	✓	?	✓
SDO 11 — To protect and enhance the quality of landscape and townscape	✓✓	✓	✓✓	✓	✓✓	?	?	?	✓?	✓	✓	✓✓	?	✓	?	✓✓
SD0 12 — To conserve and enhance the historic environment and cultural assets	✓✓	-	✓	-	?	-	?	?	✓?	✓	✓	✓✓	?	-	?	✓✓
SDO 13 — To protect & improve open spaces, green corridors & biodiversity	✓✓	✓	✓	-	?	-	?	?	✓?	✓	✓✓	✓✓	✓	✓	?	✓✓
SDO 14 — To reduce vulnerability to flooding	✓	-	?	?	X	-	-	X	✓	?	✓	?	✓✓	✓	X	✓
SDO 15 — To provide everyone with the opportunity to live in a decent home	✓✓	-	-	-	✓✓	✓✓	✓✓	✓✓	✓✓	-	-	✓	✓	✓	✓✓	✓✓
SDO 16 — To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	✓	?	✓	✓	✓	✓	?	?	✓	✓	?	✓	✓	✓
SDO17 — To provide the necessary infrastructure to support existing and future development	✓✓	?	✓	✓	?	?	?	✓	✓	?	✓	-	✓	✓✓	?	✓

Core Strategy Strategic Policies

No.	Policy
1	Sustainable Development
2	Sustainable Transport
3	Shopping, leisure & entertainment
4	Places to learn & enjoy
5	Providing new homes
6	Homes for people on different incomes
7	Family homes
8	Student homes
9	Homes for gypsies & travellers
10	Jobs and businesses
11	Open spaces and wildlife
12	Design and Conservation
13	High environmental standards
14	Implementation & delivery
S1	Achieving growth
S2	Improving Places

Key

Symbol	Meaning
✓✓	major positive
✓	minor positive
XX	major negative
X	minor negative
?	uncertain
-	no significant impact

Detailed Core Strategy Policy Results

Sustainability Objectives	Timescale				Core Strategy Policy 1: Sustainable Development
	1	S	M	L	Commentary on Results
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will ensure that change in the borough takes into account the social, economic and environmental impacts of new development. This will result in better places to live and work helping to reduce poverty and encourage wealth in the borough.
SDO 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will ensure that change in the borough takes into account the impacts on education in the borough. We will require major developments to make S106 contributions to help improve schools and employment training opportunities which will improve the education and skill of the population.
SDO 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will ensure that change in the borough takes into account the impacts on health in the borough. We will require major developments to make S106 contributions to help improve health facilities which will improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Encouraging more sustainable development will mean that everyone has better access to homes, employment and community facilities. This will help to address existing inequalities in the borough and help to reduce levels of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	✓✓	✓✓	Encouraging more sustainable development will mean that everyone has better access to homes, employment and community facilities. This will help to address existing inequalities in the borough which will promote social inclusion, equality, diversity and community cohesion.
SDO 6 To reduce contributions to climate change	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will help to ensure new development reduces contributions to climate change through good design. The Sustainable Design and Construction SPD and Sustainability Assessment SPD provide further guidance on energy efficient design and set out the targets for development.
SDO 7 To improve the air quality in Southwark	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will help to ensure new development contributes to improving air quality in the borough and includes appropriate mitigation measures where necessary. The Sustainable Design and Construction SPD and Sustainability Assessment SPD provide further guidance and set out the targets for development.
SDO 8 To reduce waste and maximise use of waste arising as a resource	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will help to ensure new development contributes to reducing the amount of waste in the borough and require appropriate mitigation measures where necessary. The Sustainable Design and Construction SPD and Sustainability Assessment SPD provide further guidance and set out the targets for development.
SDO 9 To encourage sustainable use of water resources	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will help to ensure new development includes design measures that allow for more sustainable water use. The Sustainable Design and Construction SPD and Sustainability Assessment SPD provide further guidance and set out the targets for development.
SDO 10 To maintain and enhance the quality of land and soils	✓✓	✓	✓✓	✓✓	New development will be provided on brownfield sites. Where land may have contamination as a result of previous uses, suitable remediation would be needed before development can proceed

Sustainability Objectives	Timescale				Core Strategy Policy 1: Sustainable Development
	1	S	M	L	Commentary on Results
SDO 11 To protect and enhance the quality of landscape and townscape	✓✓	✓	✓✓	✓✓	Regenerating areas that are most in need of physical improvements will help to improve the townscapes and protect other sensitive areas of the borough.
SD0 12 To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	✓✓	✓✓	Focusing development in areas that are most in need of physical improvements will help to protect the historic environment and cultural assets in the borough.
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓✓	✓✓	✓✓	✓✓	Focusing development in areas that are most in need of physical improvements will help to protect open spaces, green corridors and levels of biodiversity in the borough.
SDO 14 To reduce vulnerability to flooding	✓	✓	✓	✓	A Flood Risk Assessment will need to accompany applications and suitable mitigation measures such as flood resilient design incorporated. Further guidance is set out in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	Encouraging more sustainable development will mean that more housing is built to a higher design enabling people to have the opportunity to live in a decent home. New homes will need to be constructed to the Government's decent home standards, providing access to decent homes for increased numbers of the population
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓✓	✓✓	Encouraging development in accessible locations should increase access to public transport and encourage alternative modes of transport to the car. Provision will need to be made for new development in terms of public transport capacity and other mitigation measures can be put in place such as travel plans and car parking restrictions. Improvements to public transport provision may not be realised in the short term.
SDO17 To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	Requiring a sustainability assessment to be submitted with proposals will ensure that change in the borough takes into account the social, economic and environmental impacts of new development. This will include how new development will impact on infrastructure capacity. Funding for infrastructure will be secured through s106 agreements where appropriate. Details of the infrastructure needs are set out in the infrastructure plan.

Sustainability Objectives	Timescale				Core Strategy Policy 2: Sustainable Transport
	2	S	M	L	Commentary on Results
SDO 1￼To tackle poverty and encourage wealth creation	✓	-	✓	✓	Improving access to public transport and making it safer and easier to walk and cycle will enable greater access to jobs and services, thereby helping to reduce poverty and encourage wealth creation.
SDO 2￼To improve the education and skill of the population	-	-	-	-	No significant impact.
SDO 3￼To improve the health of the population	✓✓	✓	✓✓	✓✓	Improving opportunities for cycling and walking will help improve people's quality of life and improve the health of the population by making it easier, safe and more enjoyable to walk and cycle.
SDO 4￼To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Planning places with priority for walking, cycling and public transport will result in safer and more attractive places, which will encourage more people to use them and reduce crime and the fear of crime.
SDO 5￼To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Improving access to public transport and making places safer and more attractive will enable greater access to jobs and community facilities helping to promote social inclusion, equality, diversity and community cohesion.
SDO 6￼To reduce contributions to climate change	✓	✓	✓	✓	Encouraging developments that minimise car use and improving accessibility to public transport will help to reduce contributions to climate change. A transport assessment will be required with applications to show how schemes minimise their impacts
SDO 7￼To improve the air quality in Southwark	✓	✓	✓	✓	Encouraging developments that minimise car use and improving accessibility to public transport will reduce emissions and improve air quality in the borough. A transport assessment will be required with applications to show how schemes minimise their impacts
SDO 8￼To reduce waste and maximise use of waste arising as a resource	-	-	-	-	No significant impact.
SDO 9￼To encourage sustainable use of water resources	-	-	-	-	No significant impact.
SDO 10￼To maintain and enhance the quality of land and soils	-	-	-	-	No significant impact.
SDO 11￼To protect and enhance the quality of landscape and townscape	✓	-	✓	✓	Improving accessibility to public transport and encouraging development that minimises car use will reduce the overall amount of parking in the borough which may improve the quality of landscape and townscapes. A transport assessment will be required with applications to show how schemes minimise their impacts
SD0 12￼To conserve and enhance the historic environment and cultural assets	-	-	-	-	No significant impact.
SDO 13￼To protect and improve open spaces, green corridors and biodiversity	✓	✓	✓	✓	Improving accessibility to public transport and encouraging development that minimises car use will reduce the overall amount of parking in the borough which will help to protect the existing open spaces, green corridors and biodiversity.
SDO 14￼To reduce vulnerability to flooding	-	-	-	-	No significant impact.
SDO 15￼To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact.

Sustainability Objectives	Timescale				Core Strategy Policy 2: Sustainable Transport
	2	S	M	L	Commentary on Results
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	✓✓	✓✓	Improving accessibility to public transport and encouraging development that minimises car use, such as walking and cycling, will help to promote public transport and reduce car usage. The use of the River Thames will also be encouraged for transport and improving links between Southwark and north of the river
SDO17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	Improving accessibility to public transport and encouraging development that minimises car use will increase the demands on the existing transport infrastructure. Improvements will be required to ensure that the existing transport network can cope with the impact of new development especially in areas where large regeneration schemes are proposed. Land will be safeguarded for planned public transport improvements and where the need arises in the future. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives	3	S	M	L	Core Strategy Policy 3: Shopping Leisure and Entertainment
		Timescale			
	3	**S**	**M**	**L**	**Commentary on Results**
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Maintaining a network of successful town centres will increase employment opportunities in the borough which will help to reduce poverty and encourage wealth creation.
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	Maintaining a network of successful town centres will increase employment opportunities which will help to improve the education and skills of the population.
SDO 3 To improve the health of the population	✓	-	✓	✓	Maintaining a network of successful town centres will increase employment opportunities which will improve the quality of life for residents in the borough and help to improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Using the town centre hierarchy to direct new shops to appropriate locations will ensure town centres are viable and well used. This will help to reduce fear of crime and incidence of crime in the borough.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Maintaining a network of successful town centres will increase employment opportunities and improve the quality of life for residents. This will help to overcome issues of inequality in the borough and promote social inclusion, equality, diversity and social cohesion.
SDO 6 To reduce contributions to climate change	✓	-	✓	✓	Using the town centre hierarchy to direct new shops to appropriate locations will mean that people do not have to travel across the borough for a range of services. This will reduce the need to travel and therefore reduce contributions to climate change.
SDO 7 To improve the air quality in Southwark	✓	-	✓	✓	Using the town centre hierarchy to direct new shops to appropriate locations will mean that people do not have to travel across the borough for a range of services. This will reduce the need to travel and therefore reduce emissions helping to improve air quality.
SDO 8 To reduce waste and maximise use of waste arising as a resource	?	?	?	?	The provision of new shops in the borough is likely to increase the levels of waste, however, impacts can be mitigated through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 9 To encourage sustainable use of water resources	?	?	?	?	The provision of new shops is likely to increase water use in the borough, however, new development will be required to incorporate mitigation measures to help overcome this such as rainwater harvesting and efficient fixtures and fittings. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will be provided on brownfield sites. Where land may have contamination as a result of previous uses, suitable remediation would be needed before development can proceed
SDO 11 To protect and enhance the quality of landscape and townscape	✓✓	✓	✓✓	✓✓	Using the town centre hierarchy to direct new shops to appropriate locations will ensure town centres are viable and well used. This will protect and enhance existing townscapes and protect more sensitive areas of the borough.
SD0 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	Using the town centre hierarchy to direct new shops to appropriate locations will focus development in existing centres and protect the historic environment and cultural assets.
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓	✓	✓	✓	Using the town centre hierarchy to direct new shops to appropriate locations will focus development in existing centres and protect existing open spaces, green corridors and biodiversity.

Sustainability Objectives	Timescale				Core Strategy Policy 3: Shopping Leisure and Entertainment
	3	**S**	**M**	**L**	**Commentary on Results**
SDO 14 To reduce vulnerability to flooding	?	?	?	?	The provision of new shops in the borough could have a negative impact on vulnerability to flooding, especially as many of the town centres are located in flood risk areas. However, as set out in the Strategic Flood Risk Assessment, shops are considered to be less vulnerable uses than housing and therefore the overall impact on flood risk cannot be determined. Further guidance on mitigation measures such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	Maintaining a network of successful town centres will focus new development in the existing centres which are well served by public transport. This means that people can access local services by public transport reducing the need to travel by car.
SDO17 To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	Maintaining a network of successful town centres that are easily accessible will help to ensure that more people have access to essential goods and services.

Sustainability Objectives	4	S	M	L	Core Strategy Policy 4: Places to Learn and Enjoy
		Timescale			
	4	**S**	**M**	**L**	**Commentary on Results**
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Increasing the number of community facilities in the borough will increase employment opportunities helping to reduce poverty and encourage wealth creation.
SDO 2 To improve the education and skill of the population	✓✓	✓✓	✓✓	✓✓	New community facilities will increase employment opportunities and provide more educational facilities that will help to improve the education and skills of the population.
SDO 3 To improve the health of the population	✓✓	✓✓	✓✓	✓✓	Making community facilities more accessible to everyone will help improve quality of life for residents in the borough and provide more health facilities improving the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Providing a network of well used community facilities will result in well located services that can be easily accessed improving the quality of life for residents and helping to reduce levels of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Facilitating a network of well used community facilities will protect existing facilities and allow for new community facilities in areas where there is the greatest need. This will help to overcome issues of inequality in the borough and promote social inclusion, equality, diversity and social cohesion.
SDO 6 To reduce contributions to climate change	?	?	?	?	The impact of new community facilities on contributions to climate change is uncertain as this will be determined by the type and location of new facilities and the design measures incorporated within the new developments. Further guidance on energy efficient design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 7 To improve the air quality in Southwark	?	?	?	?	The impact of new community facilities on air quality in the borough is uncertain as this will be determined by the type and location of new facilities and the design measures incorporated within the new developments. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 8 To reduce waste and maximise use of waste arising as a resource	?	?	?	?	The impact of new community facilities on levels of waste in the borough is uncertain as this will be determined by the type and location of new facilities and the mitigation measures put in place to address increases in waste. Impacts can be mitigated through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	The application of sustainable design and construction standards will encourage new development to adopt sustainable methods of water use through the use of systems such as Sustainable Urban Drainage, rainwater harvesting and recycling and greywater recycling. As new technologies become more readily available this is likely to improve
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will be provided on brownfield sites. Where land may have contamination as a result of previous uses, suitable remediation would be needed before development can proceed
SDO 11 To protect and enhance the quality of landscape and townscape	✓	✓	✓	✓	New community facilities will be located in easily accessible locations, which will help to maintain and enhance existing townscapes and protect more sensitive areas of the borough.

Sustainability Objectives	Timescale				Core Strategy Policy 4: Places to Learn and Enjoy
	4	S	M	L	Commentary on Results
SD0 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-	No significant impact.
SDO 13 To protect and improve open spaces, green corridors and biodiversity	-	-	-	-	No significant impact.
SDO 14 To reduce vulnerability to flooding	?	?	?	?	The impact of new community facilities on vulnerability to flooding will depend on the type and location of new facilities and the mitigation measures incorporated in new developments to protect against flood risk. Further guidance on mitigation measures such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	By locating new community facilities in accessible locations sustainable will be promoted and the need to travel by car minimised
SDO17 To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	Providing a network of well used community facilities that are easily accessible will help to ensure that more people have access to necessary social infrastructure such as schools and health facilities. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives	Timescale				Core Strategy Policy 5: Providing New homes
	5	S	M	L	**Commentary on Results**
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	The Strategic Housing Market Assessment and Housing Requirement Study identified the number of new homes that are needed in the borough. Providing more housing in the borough and focusing this in the areas where there is the greatest need will allow for more regeneration which will help to tackle poverty and encourage wealth creation.
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	Providing more housing in the borough and focusing this in the areas where there is the greatest need will mean that more funding for education will be secured through S106 agreements especially through regeneration schemes.
SDO 3 To improve the health of the population	✓	✓	✓	✓	Providing more housing in the borough and focusing this in the areas where there is the greatest need will improve the health of the population as a result of improved quality of accommodation. More funding for health will be secured through S106 agreements especially through regeneration schemes brought forward in the borough.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	Providing more housing in the borough and focusing this in the areas where there is the greatest need will help to improve the quality of life for residents and make areas safer and more attractive. This will help to reduce levels of crime and reduce fear of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Providing more housing in the borough and focusing this in the areas where there is the greatest need will help to reduce inequalities and promote social inclusion, equality, diversity and community cohesion by improving the quality of accommodation for people in the borough and addressing existing inequalities.
SDO 6 To reduce contributions to climate change	X	X	X	X	Building more new homes will have a negative impact on climate change as CO_2 emissions and energy consumption and demand will increase in construction and operation. Mitigation measures including energy efficient design will need to be taken to address this. Further guidance on energy efficient design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 7 To improve the air quality in Southwark	X	X	X	X	Building more new homes will have a negative impact on air quality. Construction and operation of new homes and increased vehicular traffic will cause an increase in emissions affecting air quality. Mitigation measures will need to be taken to address this. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 8 To reduce waste and maximise use of waste arising as a resource	X	X	X	X	Increasing the amount of housing will result in an increased amount of waste however impacts can be mitigated through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	New development will encourage the sustainable use of water resources through the use of technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. As new technologies become more readily available this will improve.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will be provided on brownfield sites. Where land may have contamination as a result of previous uses, suitable remediation would be needed before development can proceed

Sustainability Objectives	Timescale				Core Strategy Policy 5: Providing New homes
	5	S	M	L	Commentary on Results
SDO 11 To protect and enhance the quality of landscape and townscape	✓✓	✓	✓✓	✓✓	Focusing new housing in areas where there is the greatest need will result in more regeneration schemes. This will protect the landscape in other sensitive areas and promote varied townscapes through mixed use developments. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.
SD0 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	The impact of building new homes on the historic environment and cultural assets will be determined by the location of developments and the type and quality of housing. New development will need to show the impacts upon the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs
SDO 13 To protect and improve open spaces, green corridors and biodiversity	?	?	?	?	Building more housing in the borough may have a negative impact on open spaces and further mitigation measures to enhance biodiversity will need to be considered such as the greening of buildings in the design process including the use of green roofs and living walls. Further guidance on mitigation is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 14 To reduce vulnerability to flooding	X	X	X	X	Building more new homes will have a negative impact on levels of flood risk in the borough and mitigation measures will need to be taken to address this in the design process. This will need to be set out in a Flood risk assessment that considers flood resistant design of buildings. The Strategic Flood Risk Assessment should be used when considering the location of vulnerable uses in the borough.
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	New housing will be built to a high design standard increasing the numbers of homes in the borough that meet the decent homes standards.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	?	✓	✓	Providing more new homes may increase the amount of car ownership in the borough however concentrating development in accessible locations should increase access to public transport. Provision will need to be made for new development in terms of public transport capacity and other mitigation measures can be put in place such as travel plans and car parking restrictions.
SDO17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	The quantum of new housing proposed in the borough will increase the demands on the existing infrastructure capacity. Improvements will be required to ensure that provision of infrastructure can meet the additional demands associated with new development especially in areas where large regeneration schemes are proposed. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives	Timescale				Core Strategy Policy 6: Homes for People on Different Incomes
	6	S	M	L	Commentary on Results
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Setting different requirements for social and intermediate housing in certain areas will help to address existing inequalities. Increasing the amount of affordable housing will mean that more people can afford to live in good accommodation helping to reduce poverty. Southwark currently has one of the highest amounts of affordable housing in the whole country with 45% of the 123,948 dwellings being affordable. However, there is still a shortage of affordable homes in Southwark as identified in the Strategic Housing Market Assessment and Housing requirement Study.
SDO 2 To improve the education and skill of the population	-	-	-	-	No significant impact.
SDO 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	Providing more affordable homes in areas where there is the greatest need will result in an improvement in the health of the population as a result of improved quality of accommodation.
SDO 4 To reduce the incidence of crime and the fear of crime	✓✓	✓	✓✓	✓✓	Providing more affordable homes in areas where there is the greatest need will help to reduce inequalities and reduce levels of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Providing more affordable housing, especially as part of regeneration schemes will result in more development in the areas of the borough that require regeneration and provide a focus for promoting social inclusion, equality, diversity and community cohesion by reducing existing inequalities. Based on the amount of housing that is expected to be delivered between 2011 and 2026, new development will provide 8,558 net new affordable homes which equates to 35% affordable housing on all sites over 10units. The Affordable Housing Viability Study shows that this amount of affordable housing is achievable.
SDO 6 To reduce contributions to climate change	-	-	-	-	No significant impact.
SDO 7 To improve the air quality in Southwark	-	-	-	-	No significant impact.
SDO 8 To reduce waste and maximise use of waste arising as a resource	-	-	-	-	No significant impact.
SDO 9 To encourage sustainable use of water resources	-	-	-	-	No significant impact.
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	No significant impact.
SDO 11 To protect and enhance the quality of landscape and townscape	?	?	?	?	The type and quality of affordable housing will determine how development will impact on the landscape and townscape. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.
SD0 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-	No significant impact.
SDO 13 To protect and improve open spaces, green corridors and biodiversity	-	-	-	-	No significant impact.

Sustainability Objectives	Timescale				Core Strategy Policy 6: Homes for People on Different Incomes
	6	S	M	L	Commentary on Results
SDO 14 To reduce vulnerability to flooding	-	-	-	-	No significant impact.
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	New affordable housing will be built to a high design standard increasing the numbers of homes in the borough that meet the decent homes standards.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	-	✓	✓	Providing more affordable housing may help to reduce the amount of cars and promote sustainable travel patterns as car ownership is generally lower amongst affordable housing occupants.
SDO17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	The impact of providing a range of homes for people on different incomes on infrastructure will depend on the quantity and location of new housing. This will be determined by the individual schemes that are delivered and these will be subject to a sustainability assessment and other supporting studies which will need to demonstrate how the infrastructure demands of new development will be met. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives	Timescale				Core Strategy Policy 7: Family Homes
	7	S	M	L	Commentary on Results
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	The Strategic Housing Market Assessment and Housing Requirement Study identify that there is a need for more family housing in the borough across all tenures. Providing more family housing will help to meet the housing requirements of the local residents which will help to reduce poverty in the borough.
SDO 2 To improve the education and skill of the population	-	-	-	-	No significant impact.
SDO 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	Providing more family housing will help reduce overcrowding in the borough and ensure more people have access to high quality accommodation which will help to improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	No significant impact.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Providing more family housing will promote social inclusion, equality, diversity and community cohesion, by developing more mixed and balanced communities.
SDO 6 To reduce contributions to climate change	-	-	-	-	No significant impact.
SDO 7 To improve the air quality in Southwark	-	-	-	-	No significant impact.
SDO 8 To reduce waste and maximise use of waste arising as a resource	-	-	-	-	No significant impact.
SDO 9 To encourage sustainable use of water resources	-	-	-	-	No significant impact.
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	No significant impact.
SDO 11 To protect and enhance the quality of landscape and townscape	?	?	?	?	The impact on the surrounding landscapes and townscapes will be determined by the location of new family housing and the type and quality of development. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.
SD0 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	The impact on the historic environment and cultural assets will be determined by the location of new family housing and the type and quality of development. New development will need to show the impacts upon the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs
SDO 13 To protect and improve open spaces, green corridors and biodiversity	?	?	?	?	The impact on open spaces, green corridors and biodiversity will be determined by the location of new family housing and the type and quality of development. Development will be expected to preserve or enhance registered parks and gardens. The priorities for the borough are set out in the Open Space and Biodiversity strategies. Further guidance is provided in the Sustainability SPDs

Sustainability Objectives	Timescale				Core Strategy Policy 7: Family Homes
	7	S	M	L	Commentary on Results
SDO 14 To reduce vulnerability to flooding	-	-	-	-	No significant impact.
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	The provision of more family sized homes will provide a wider range of housing types in the borough helping to ensure everyone has the opportunity to live in a decent home.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	The provision of more family housing in accessible locations will help to reduce the need to travel by car.
SDO17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	The impact of providing more family housing on existing infrastructure will depend on the quantity and location of development. This will be determined by the individual schemes that are delivered and these will be subject to a sustainability assessment and other supporting studies which will need to demonstrate how the infrastructure demands of new development will be met. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives	Timescale			Core Strategy Policy 8: Student Homes
	8	S	M	L	Commentary on Results

Sustainability Objectives	8	S	M	L	Commentary on Results
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Providing more student housing and requiring student homes to have an affordable element will help ensure more people in the borough have access to suitable accommodation that is affordable.
SDO 2 To improve the education and skill of the population	✓✓	✓✓	✓✓	✓✓	Providing more student housing in the borough will encourage more students to attend local universities and colleges which will raise levels of education and improve the skills of the population.
SDO 3 To improve the health of the population	✓	-	✓	✓	Providing more student housing will mean more students have access to good quality accommodation improving health as a result of improved living conditions.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Building student housing in appropriate locations will help to make places safer and more attractive helping to reduce levels of crime and fear of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	Building student housing in appropriate locations will result in more mixed and balanced communities that will promote social inclusion, equality, diversity and community cohesion. Southwark has the second largest number of student homes in London with a further 979 new student bedrooms in the pipeline. However, there is still a need for student accommodation across the whole of London and Southwark, which should be balanced against the need for more family and affordable housing.
SDO 6 To reduce contributions to climate change	?	?	?	?	Encouraging student housing in areas with good access to public transport will reduce the need to travel however the impact of construction and energy use associated with new developments will need to be mitigated against. Further guidance on energy efficient design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 7 To improve the air quality in Southwark	?	?	?	?	The location of student housing within growth areas may reduce the need to travel and improve air quality however the impact of construction and energy use associated with new developments will need to be mitigated against. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 8 To reduce waste and maximise use of waste arising as a resource	?	?	?	?	Increasing the amount of student housing will result in an increased amount of waste however impacts can be mitigated through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	New development will encourage the sustainable use of water resources through the use of technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. As new technologies become more readily available this will improve.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will be provided on brownfield sites. Where land may have contamination as a result of previous uses, suitable remediation would be needed before development can proceed

Sustainability Objectives	Timescale			Core Strategy Policy 8: Student Homes
	8	**S**	**M**	**L**	**Commentary on Results**
SDO 11 To protect and enhance the quality of landscape and townscape	?	?	?	?	The impact on the surrounding landscapes and townscapes will be determined by the location of new student housing and the type and quality of development. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.
SD0 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	The impact on the historic environment and cultural assets will be determined by the location of new student housing and the type and quality of development. New development will need to show the impacts upon the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs
SDO 13 To protect and improve open spaces, green corridors and biodiversity	?	?	?	?	The impact on open spaces, green corridors and biodiversity will be determined by the location of new student housing and the type and quality of development. Development will be expected to preserve or enhance registered parks and gardens. The priorities for the borough are set out in the Open Space and Biodiversity strategies. Further guidance is provided in the Sustainability SPDs
SDO 14 To reduce vulnerability to flooding	X	X	X	X	Focusing new student housing in accessible locations is likely to increase the amount of vulnerable people living in flood risk areas as the majority of developable land is within the flood zone. Flood Risk Assessments and suitable mitigation measures will need to be carried out as part of the planning application. Further guidance on mitigation measures, such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	Providing more student housing and requiring student homes to have an affordable element will help to provide everyone with the opportunity to live in a decent home. The Strategic Housing Land Availability Assessment has identified sites that need to be developed so that housing targets can be met
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	✓✓	✓✓	Student housing will only be allowed in town centres and areas with good public transport accessibility as these areas can accommodate growth. The provision of good public transport accessibility and pedestrian and cycling facilities will minimise the need to travel by car.
SDO17 To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	The impact of providing more student housing on existing infrastructure will need to be assessed by the individual schemes. Proposals will be subject to a sustainability assessment and other supporting studies, which will need to demonstrate how the infrastructure demands of new development will be met. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives		Timescale			Core Strategy Policy 9: Homes for Gypsies and Travellers
	9	S	M	L	Commentary on Results
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Providing more pitches in suitable locations in the borough for gypsies and travellers will help to reduce poverty for people in this group.
SDO 2 To improve the education and skill of the population	✓	-	✓	✓	Safeguarding existing sites and identifying new sites for gypsies and travellers will help to ensure that people in this group have access to education.
SDO 3 To improve the health of the population	✓	-	✓	✓	Safeguarding existing pitches and identifying new sites will help to meet the accommodation needs of gypsies and travellers. Evidence has shown that this leads to an improved quality of life for people in this group and improved health.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Safeguarding existing sites and identifying suitable new sites for the additional pitches will ensure that sites that have appropriate facilities and safe access, which will help to reduce crime and fear of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Safeguarding existing sites and identifying new sites for gypsies and travellers will promote equality for all and increase social inclusion, diversity and community cohesion.
SDO 6 To reduce contributions to climate change	-	-	-	-	No significant impact.
SDO 7 To improve the air quality in Southwark	-	-	-	-	No significant impact.
SDO 8 To reduce waste and maximise use of waste arising as a resource	✓	-	✓	✓	Identifying new sites for gypsies and travellers with regard to the availability of essential services such as waste will help to reduce levels of waste in the borough.
SDO 9 To encourage sustainable use of water resources	✓	-	✓	✓	Identifying new sites for gypsies and travellers with regard to the availability of essential services such as water will help to promote more sustainable use of water in the borough.
SDO 10 To maintain and enhance the quality of land and soils	-	-	-	-	No significant impact.
SDO 11 To protect and enhance the quality of landscape and townscape	✓?	✓?	✓?	✓?	Safeguarding existing sites and identifying suitable sites for additional pitches may help to protect the quality of existing townscapes and landscapes. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD.
SD0 12 To conserve and enhance the historic environment and cultural assets	✓?	✓?	✓?	✓?	Designating suitable sites for additional pitches may help to protect the historic environment and cultural assets in the borough.
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓?	✓?	✓?	✓?	Designating a suitable site for additional pitches in the borough may help to protect the open spaces, green corridors and biodiversity in the borough.
SDO 14 To reduce vulnerability to flooding	✓	✓	✓	✓	Recognising the need to avoid areas at high risk of flooding for sites for gypsies and travellers will help to reduce vulnerability to flooding.
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	Safeguarding existing sites and identifying suitable sites for additional pitches will help to ensure that people in this group have the opportunity to live in a decent home.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	New sites for gypsies and travellers will be selected with regard to access to proximity to services, which should help promote sustainable transport use and minimise the need to travel by car
SDO17 To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	New sites will be selected on their availability of essential services such as water, sewerage, drainage and waste disposal as well the proximity to local facilities and services.

Sustainability Objectives	Timescale				Core Strategy Policy 10: Jobs and Businesses
	10	S	M	L	Commentary on Results
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Increasing employment opportunities and protecting existing business space in the borough will help to reduce poverty and encourage wealth creation. Southwark's Employment Land review suggests a need to provide up to 500,000 sqm of new business space to meet the demands of businesses which need to locate in central London.
SDO 2 To improve the education and skill of the population	✓✓	✓✓	✓✓	✓✓	Increasing employment opportunities will raise education levels and improve the skills of the population. There will be more funding negotiated from development for skills and training. New jobs and training opportunities which arise from development will be targeted towards local people.
SDO 3 To improve the health of the population	✓	-	✓	✓	Increasing employment opportunities will help to improve people's quality of life which will have a positive effect on the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	Increasing employment opportunities will help to reduce inequalities and regenerate deprived areas in the borough which will help to reduce levels of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Increasing employment opportunities in accessible locations especially through mixed use developments will help to reduce social inequalities and promote social inclusion, equality, diversity and community cohesion.
SDO 6 To reduce contributions to climate change	X	X	X	X	The quantum of development is likely to have a negative impact on climate change however this can be mitigated through sustainable design and construction. Further guidance on energy efficient design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 7 To improve the air quality in Southwark	X	X	X	X	The quantum of development is likely to have a negative impact on air quality however focusing new employment opportunities in accessible locations will reduce reliance on the car and promote more sustainable travel patterns. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 8 To reduce waste and maximise use of waste arising as a resource	X	X	X	X	The quantum of development is likely to have a negative impact on levels of waste however this can be mitigated through sustainable design and construction. Further guidance on the design and targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	New development will encourage the sustainable use of water resources through the use of technologies such as sustainable urban drainage systems (SUDS) and grey water recycling. As new technologies become more readily available this will improve.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	New development will be provided on brownfield sites. Where land may have contamination as a result of previous uses, suitable remediation would be needed before development can proceed

Sustainability Objectives	Timescale				Core Strategy Policy 10: Jobs and Businesses
	10	S	M	L	Commentary on Results
SDO 11 To protect and enhance the quality of landscape and townscape	✓	✓	✓	✓	Providing suitable space for a range of businesses and other uses as part of mixed use developments is likely to ensure varied townscapes and protect more sensitive landscapes in other areas. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.
SD0 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	Directing new development to areas where there is a greater need of regeneration will help to protect the historic environment and cultural assets. New development will need to show the impacts upon the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓	✓	✓	✓	Directing new development to areas where there is a greater need of regeneration will help to protect existing open spaces, green corridors and levels of biodiversity. Development will be expected to preserve or enhance registered parks and gardens. The priorities for the borough are set out in the Open Space and Biodiversity strategies. Further guidance is provided in the Sustainability SPDs
SDO 14 To reduce vulnerability to flooding	?	?	?	?	Areas at high risk of flooding will be avoided; however, the majority of developable land in the borough is in the flood zone. Focusing new development in accessible locations could therefore have a negative impact on vulnerability to flooding, although business use is a less vulnerable use than housing. Flood Risk Assessments and suitable mitigation measures will need to be carried out as part of the planning application. Further guidance on mitigation measures, such as flood resilient design is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact.
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	?	?	?	The quantum of development is likely to have a negative impact on transport however focusing new employment opportunities in accessible locations accessibility should reduce reliance on the car and promote more sustainable travel patterns.
SDO17 To provide the necessary infrastructure to support existing and future development	X	X	X	X	The quantum of new development proposed in the borough will increase the demands on the existing infrastructure capacity. Improvements will be required to ensure that provision of infrastructure can meet the additional demands associated with new development especially in areas where large regeneration schemes are proposed.

Sustainability Objectives	Timescale				Core Strategy Policy 11: Open Spaces and Wildlife
	11	S	M	L	Commentary on Results
SDO 1 To tackle poverty and encourage wealth creation	✓	-	✓	✓	Protecting and improving open spaces in the borough will improve the quality of life and provide a range of employment opportunities which will help to reduce poverty and encourage wealth creation.
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	Protecting and improving open spaces in the borough will also provide a range of employment and education opportunities which will help to improve education and skills of the population.
SDO 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	Protecting and improving open spaces will ensure more people have access to parks, gardens for recreation which help will improve well being and quality of life as well as encourage more physical activity which will improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Protecting and improving open spaces will ensure that they are safer and well used helping to reduce fear of crime and providing more facilities for young people which may help to reduce incidences of crime.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Protecting and improving open spaces in the borough especially in areas that are currently deficient will ensure more people have access to parks, gardens for recreation improving the quality of life for local residents as well as providing a range of employment opportunities which will promote social inclusion, equality, diversity and community cohesion. The open space and biodiversity strategies identify the areas of priority for the borough. New development will be required to meet the needs of a growing population and avoid harming protected and priority plants
SDO 6 To reduce contributions to climate change	✓	✓	✓	✓	Protecting existing open spaces and encouraging more open space in the borough will help to reduce contributions to climate change. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 7 To improve the air quality in Southwark	✓	✓	✓	✓	Protecting existing open spaces and encouraging more open space in the borough will help to improve air quality. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 8 To reduce waste and maximise use of waste arising as a resource	-	-	-	-	No significant impact.
SDO 9 To encourage sustainable use of water resources	?	?	?	?	Water may be required for irrigation of new and existing open spaces therefore the sustainable use of water is dependent on the implementation measures used to address this. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	Protecting existing open spaces and encouraging more open space in the borough will help to enhance the quality of land and soils through the possible remediation of brownfield sites.
SDO 11 To protect and enhance the quality of landscape and townscape	✓	✓	✓	✓	Protecting existing open spaces and encouraging more open space will have a positive impact on the quality of landscape and townscape in the borough. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction, Sustainability Assessment and Design & Access SPDs.

Sustainability Objectives	11	S	M	L	Core Strategy Policy 11: Open Spaces and Wildlife
			Timescale		
					Commentary on Results
SD0 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	Protecting existing open spaces and encouraging more open space will have a positive impact on the historic environment and cultural assets in the borough, particularly the listed parks in the borough, which are of specific importance
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓✓	✓✓	✓✓	✓✓	Protecting existing open spaces and encouraging more open space will result in more high quality open spaces and green corridors and increased levels of biodiversity in the borough. Important open spaces will be protected form inappropriate development. New development will be required to meet the needs of a growing population whilst avoiding harm to protected and priority species.
SDO 14 To reduce vulnerability to flooding	✓	-	✓	✓	Protecting existing open spaces and encouraging more open space and greening of buildings in the borough will help to reduce vulnerability to flooding as it will help to decrease surface water run-off by reducing the amount of hard surfaces, reducing risk associated with new development.
SDO 15 To provide everyone with the opportunity to live in a decent home	-	-	-	-	No significant impact.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	Improving existing open spaces and encouraging more green corridors in the borough will encourage more people to walk and cycle reducing the need to travel by car.
SDO17 To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	Protecting and improving open spaces will increase green infrastructure provision in the borough and help to meet the demands associated with a growing population. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives	Timescale				Core Strategy Policy 12: Design and Conservation
	12	S	M	L	Commentary on Results
SDO 1 To tackle poverty and encourage wealth creation	✓	-	✓	✓	Requiring high standards of design for buildings and public spaces will help to improve quality of life and reduce poverty.
SDO 2 To improve the education and skill of the population	✓	-	✓	✓	Requiring high standards of design for buildings and public spaces may lead to a wider range of education and training opportunities that will help to improve education and skills of the population.
SDO 3 To improve the health of the population	✓	-	✓	✓	Requiring high standards of design for buildings and public spaces will make places safer and more attractive. This will encourage more people to walk and cycle which will improving the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	✓✓	✓	✓	✓✓	Requiring high standards of design for buildings and public spaces will make places safer and more attractive which will help to reduce fear of crime. New development will meet 'Secured by Design' standards, which will help to reduce incidences of crime especially in regeneration areas.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Requiring high standards of design for buildings and public spaces will make places safer and more attractive helping to promote social inclusion and community cohesion. As new development will be focused in areas where there is the greatest need of regeneration this will help to address existing inequalities in the borough. Further guidance is provided in the Design and Access SPD
SDO 6 To reduce contributions to climate change	?	?	?	?	Requiring high standards of design for buildings and public spaces may help to reduce contributions to climate change however this will depend on the type of new development and the design measures used to mitigate against negative impacts. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 7 To improve the air quality in Southwark	?	?	?	?	Requiring high standards of design for buildings and public spaces may help to improve air quality however this will depend on the type of new development and the design measures used to mitigate against negative impacts. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 8 To reduce waste and maximise use of waste arising as a resource	?	?	?	?	Requiring high standards of design for buildings and public spaces may help to reduce levels of waste however this will depend on the type of new development and the design measures used to mitigate against negative impacts. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	Requiring high standards of design for buildings and public spaces will help to encourage sustainable use of water resources through the use of sustainable urban drainage systems, grey water recycling and other design measures. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.

Sustainability Objectives	Timescale				Core Strategy Policy 12: Design and Conservation
	12	S	M	L	Commentary on Results
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	Requiring high standards of design for buildings and public spaces will help to enhance the quality of land and soils through the possible remediation of brownfield sites.
SDO 11 To protect and enhance the quality of landscape and townscape	✓✓	✓✓	✓✓	✓✓	Requiring high standards of design for buildings and public spaces will ensure new development has a positive impact on the quality of landscape and townscape in the borough. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.
SD0 12 To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	✓✓	✓✓	Requiring high standards of design for buildings and public spaces will ensure new development has a positive impact on the historic environment and cultural assets in the borough including the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓✓	✓✓	✓✓	✓✓	Requiring high standards of design for buildings and public spaces will ensure new development has a positive impact on open spaces, green corridors and biodiversity. Development will be expected to preserve or enhance registered parks and gardens. The priorities for the borough are set out in the Open Space and Biodiversity strategies. Further guidance is provided in the Sustainability SPDs
SDO 14 To reduce vulnerability to flooding	?	?	?	?	Requiring high standards of design for buildings and public spaces may help to reduce vulnerability to flooding however this will depend on the type and location of new development and the design measures used to mitigate against flood risk. Further guidance on mitigation is provided in the Sustainability SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	✓	✓	✓	✓	Requiring high standards of design for buildings will mean more people have the opportunity to live in a decent home.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	Requiring high standards of public spaces will help to encourage more people to walk and cycle reducing reliance on the car.
SDO17 To provide the necessary infrastructure to support existing and future development	-	-	-	-	No significant impact.

Sustainability Objectives	Timescale				Core Strategy Policy 13: High Environmental Standards
	13	S	M	L	Commentary on Results
SDO 1 To tackle poverty and encourage wealth creation	✓	-	✓	✓	Encouraging development that is of a very high environmental standard will help to improve quality of life and provide a range of employment opportunities that will reduce poverty and encourage wealth creation.
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	Encouraging development that is of a very high environmental standard will provide a range of training opportunities that will help to improve education and skills of the population.
SDO 3 To improve the health of the population	✓	✓	✓	✓	Encouraging development that is of a very high environmental standard will improve quality of life and may help to improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	No significant impact.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	-	✓	✓	Encouraging development that is of a very high environmental standard will help to improve quality of life and provide a range of employment opportunities which will help to promote social inclusion, equality, diversity and community cohesion
SDO 6 To reduce contributions to climate change	✓✓	✓	✓✓	✓✓	Encouraging development that is of a very high environmental standard will help to reduce contributions to climate change through good design. Development will be required to meet the highest possible environmental standards and minimise greenhouse gas emissions across its lifetime. Existing buildings will also be enabled to become more energy efficient and make use of low and zero carbon sources of energy. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 7 To improve the air quality in Southwark	✓✓	✓	✓✓	✓✓	Encouraging development that is of a very high environmental standard will help to improve air quality in the borough through good design. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 8 To reduce waste and maximise use of waste arising as a resource	✓✓	✓	✓✓	✓✓	Encouraging development that is of a very high environmental standard will help to reduce waste and maximise use of waste arising as a resource through good design measures. Applicants will need to demonstrate how they will avoid waste and minimise landfill from construction and use of the development. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 9 To encourage sustainable use of water resources	✓✓	✓	✓✓	✓✓	Encouraging development that is of a very high environmental standard will help to encourage sustainable use of water resources through the use of sustainable urban drainage systems, grey water recycling and other design measures. Developments will be required to minimise water use and local sources of water where possible. Further guidance on design and the targets for development are provided in the Sustainable Design and Construction and Sustainability Assessment SPDs.
SDO 10 To maintain and enhance the quality of land and soils	✓✓	✓	✓✓	✓✓	Encouraging development that is of a very high environmental standard will help to enhance the quality of land and soils through the possible remediation of brownfield sites.
SDO 11 To protect and enhance the quality of landscape and townscape	?	?	?	?	The impact of new environmental technologies may have a negative impact on the quality of landscape and townscapes in the borough. Mitigation measures will need to be taken. Further guidance is set out in the Design and Access SPD and Sustainability SPDs

Sustainability Objectives	Timescale				Core Strategy Policy 13: High Environmental Standards
	13	S	M	L	Commentary on Results
SD0 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	The impact of new environmental technologies may have a negative impact on the historic environment and cultural assets of the borough. Mitigation measures will need to be taken. Further guidance is set out in the Design and Access SPD and Sustainability SPDs.
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓	✓	✓	✓	Encouraging development that is of a very high environmental standard will help to protect open spaces, green corridors and biodiversity by requiring access to amenity space and encouraging development to promote levels of biodiversity. The priorities for the borough are set out in the Open Space and Biodiversity strategies. Further guidance is provided in the Sustainability SPDs
SDO 14 To reduce vulnerability to flooding	✓✓	✓	✓✓	✓✓	Requiring a flood risk assessment to be submitted with proposals for development within flood risk areas will reduce vulnerability to flooding. Development will be allowed in the protected Thames flood zone as long as it is designed to be safe and resilient to flooding and meets the exceptions test as set out in PPS25. New development will be required to reduce water run-off using through the use of sustainable urban drainage systems and other design measures. Further guidance is provided in the Sustainability SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	✓	-	✓	✓	Encouraging development that is of a very high environmental standard will improve the quality of housing in the borough meaning more people have the opportunity to live in a decent home.
SDO 16 To promote sustainable transport and minimise the need to travel by car	?	?	?	?	Encouraging development that is of a very high environmental standard may have a positive impact on sustainable transport however this will depend on the type and location of new development.
SDO17 To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓	✓✓	Encouraging development that is of a very high environmental standard will help to promote more sustainable use of resources and mitigate against the demands of new development on the existing infrastructure capacity. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives	Timescale				Core Strategy Policy 14: Implementation and Delivery
	14	S	M	L	Commentary on Results
SDO 1 To tackle poverty and encourage wealth creation	✓	-	✓	✓	Using new development to regenerate areas in Southwark so that it continues to be a successful and vibrant borough will create employment opportunities helping to reduce poverty and encourage investment into the borough.
SDO 2 To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	We will use planning obligations to require major developments to make S106 contributions towards education facilities which will improve the education and skill of the population.
SDO 3 To improve the health of the population	✓✓	✓	✓✓	✓✓	We will use planning obligations to require major developments to make S106 contributions towards health facilities which will improve the health of the population.
SDO 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	No significant impact.
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	✓✓	✓✓	Using new development to regenerate areas in Southwark will mean that everyone has better access to homes, employment and community facilities. This will help to address existing inequalities in the borough which will promote social inclusion, equality, diversity and community cohesion.
SDO 6 To reduce contributions to climate change	✓	-	✓	✓	We will use planning obligations to reduce or mitigate the impact of developments which will help to reduce contributions to climate change. All new development will be designed to minimise greenhouse gas emissions across its lifetime. All major development will be expected to set up or connect to local energy generation networks where possible.
SDO 7 To improve the air quality in Southwark	✓	-	✓	✓	We will use planning obligations to reduce or mitigate the impact of developments which will help to improve air quality in the borough.
SDO 8 To reduce waste and maximise use of waste arising as a resource	✓✓	✓	✓✓	✓✓	We will work with infrastructure providers to identify requirements and make sure that important elements of infrastructure that are needed to support growth are delivered at the right time. We will also use planning obligations to reduce or mitigate the impact of developments which will help to reduce waste in the borough and maximise the use of waste arising as a resource.
SDO 9 To encourage sustainable use of water resources	✓✓	✓	✓✓	✓✓	We will work with infrastructure providers to identify requirements and make sure that important elements of infrastructure that are needed to support growth are delivered at the right time. We will also use planning obligations to reduce or mitigate the impact of developments which will help to encourage more sustainable use of water resources.
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	Using new development to regenerate areas in Southwark will involve development on brownfield sites. Where land may have contamination as a result of previous uses new development would require remediation of the land.
SDO 11 To protect and enhance the quality of landscape and townscape	✓	✓	✓	✓	Using new development to regenerate areas in Southwark that are most in need of physical improvements will help to improve the townscapes and protect other sensitive areas of the borough.
SD0 12 To conserve and enhance the historic environment and cultural assets	-	-	-	-	No significant impact.
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓	✓	✓	✓	Using new development to regenerate areas in Southwark will help to protect open spaces, green corridors and levels of biodiversity in the borough. We will use planning obligations to reduce or mitigate the impact of developments which will help to improve open spaces and contribute to the green infrastructure provision in the borough.

Sustainability Objectives	Timescale				Core Strategy Policy 14: Implementing the Core Strategy
	14	**S**	**M**	**L**	**Commentary on Results**
SDO 14 To reduce vulnerability to flooding	✓	-	✓	✓	We will work with infrastructure providers to identify requirements and make sure that important elements of infrastructure that are needed to support growth are delivered at the right time. We will also use planning obligations to reduce or mitigate the impact of developments which will help to reduce vulnerability to flood risk.
SDO 15 To provide everyone with the opportunity to live in a decent home	✓	✓	✓	✓	Using new development to regenerate areas in Southwark will mean that everyone has better access to homes meaning more people have the opportunity to live in a decent home.
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	We will work with infrastructure providers to identify requirements and make sure that important elements of infrastructure that are needed to support growth are delivered at the right time. We will also use planning obligations to reduce or mitigate the impact of developments which will help to ensure transport infrastructure capacity can cope with additional demands associated with new development.
SDO17 To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	✓✓	✓✓	We will work with infrastructure providers to identify requirements and make sure that important elements of infrastructure that are needed to support growth are delivered at the right time. We will also use planning obligations to reduce or mitigate the impact of developments. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives	Timescale				Core Strategic Target Policy 1: Achieving Growth
	S1	S	M	L	**Commentary on Results**
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Achieving growth will tackle poverty and encourage wealth creation through the delivery of jobs, homes and regeneration in the growth areas. The impact is likely to increase over time as developments are completed
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	The proposed growth is likely to have a minor positive impact upon education and the skills of the population as a result of new educational facilities that may be provided and new jobs/employment attracted to the area
SDO 3 To improve the health of the population	✓	✓	✓	✓	Achieving growth should have a positive impact upon the health of the population through the provision of decent homes, employment and access to new health facilities
SDO 4 To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	The regeneration of the growth areas will improve the environment and is therefore likely to reduce crime and the fear of crime
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	✓✓	✓✓	Regeneration of the growth areas will enable better access to homes, employment, transport and services, which will help to promote social inclusion, equality, diversity and community cohesion. Achieving growth is necessary to meet the London Plan targets and the needs for the population growth that is forecast
SDO 6 To reduce contributions to climate change	X	X	X	X	Achieving growth will have a negative impact on climate change as CO_2 emissions and energy consumption and demand will increase as a result of construction and operation. Mitigation measures including energy efficient design and conservation measures will need to be taken to address this. The Sustainable Design and Construction SPD and Sustainability Assessment SPDs provide further guidance on energy efficient design and set out the targets for development to minimise impacts.
SDO 7 To improve the air quality in Southwark	X	X	X	X	Achieving growth will have a negative impact on air quality through the construction and operation of development and increased vehicular traffic. However, locating the growth in areas of high density will help to encourage access to public transport and reliance upon the car. Further guidance is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs on suitable mitigation measures
SDO 8 To reduce waste and maximise use of waste arising as a resource	X	X	X	X	Achieving growth will result in an increased amount of waste, however, impacts can be mitigated through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Further guidance is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs on suitable mitigation measures
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	The application of sustainable design and construction standards will encourage new development to adopt sustainable methods of water use through the use of systems such as Sustainable Urban Drainage, rainwater harvesting and recycling and greywater recycling. As new technologies become more readily available this is likely to improve
SDO 10 To maintain and enhance the quality of land and soils	?	?	?	?	The growth areas are all brownfield sites. Should contamination of the land be identified as a result of previous uses, suitable remediation will need to be undertaken before development can proceed.

Sustainability Objectives	Timescale				Core Strategic Target Policy 1: Achieving Growth
	S1	S	M	L	Commentary on Results
SDO 11 To protect and enhance the quality of landscape and townscape	✓	✓	✓	✓	Achieving growth in areas that are in need of regeneration will improve the quality of landscape and townscape. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals. Design guidance will seek to ensure that any existing assets are protected and enhanced and that new development is sensitive to its surroundings.
SD0 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	The impact of achieving growth on the historic environment and cultural assets will be determined by the location, type and quality of development. New development will need to show the impacts upon the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs
SDO 13 To protect and improve open spaces, green corridors and biodiversity	?	?	?	?	Achieving growth could have an adverse impact upon open spaces, green corridors and biodiversity, however, the status of the open spaces and green corridors is identified in the Open Space Strategy. Further guidance on mitigation measures to protect and enhance open space and biodiversity is set out in the Sustainable Design and Construction and Sustainability Assessment SPDs, which includes specific measures for the built up area including the use of green roofs and living walls.
SDO 14 To reduce vulnerability to flooding	X	X	X	X	Achieving growth will necessitate building new development in flood risk areas owing to the lack of suitable development areas elsewhere in the Borough to accommodate the growth that is needed. The majority of the growth areas fall within flood zones 2 and 3 as identified in the SFRA. A Flood Risk Assessment will need to accompany applications and suitable mitigation measures identified such as flood resilient design. Further guidance is set out in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	Achieving growth will enable the delivery of new homes in the borough, which will need to be constructed to the Government's decent home standards, providing access to decent homes for increased numbers of the population
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	?	✓	✓	Achieving growth could increase the amount of car ownership and car use in the borough, however, concentrating development in accessible locations should increase access to public transport and encourage alternative modes of transport to the car. Provision will need to be made for new development in terms of public transport capacity and other mitigation measures can be put in place such as travel plans and car parking restrictions. Improvements to public transport provision may not be realised in the short term.
SDO17 To provide the necessary infrastructure to support existing and future development	?	?	?	?	Achieving growth in the borough will increase the demands on the existing infrastructure capacity. Improvements will be required to ensure that provision of infrastructure can meet the additional demands associated with new development especially in areas where large regeneration schemes are proposed. An infrastructure Plan has been prepared in support of the Core Strategy to identify the existing capacity, future needs, costs, funding and timescales to ensure that development proposals will be viable and deliverable.

Sustainability Objectives	Timescale				Core Strategic Target Policy 2: Improving Places
	S2	S	M	L	Commentary on Results
SDO 1 To tackle poverty and encourage wealth creation	✓✓	✓✓	✓✓	✓✓	Improving places within the Borough will help to tackle poverty and encourage wealth creation through the provision of new homes in a mix of types and tenures and employment opportunities
SDO 2 To improve the education and skill of the population	✓	✓	✓	✓	Improving places within the Borough will result in the provision of new or improved education facilities and provide new opportunities for a wide skill set both in the construction and operation of development and the attraction of new businesses to the area
SDO 3 To improve the health of the population	✓	✓	✓	✓	Improving places within the Borough will have a positive impact upon the health of the population as a result of new or improved health facilities, decent homes and employment opportunities, which will lead to an improved quality of life
SDO 4 To reduce the incidence of crime and the fear of crime	✓✓	✓✓	✓✓	✓✓	Improving places within the Borough will result in the regeneration of areas thereby reducing the incidence of crime and the fear of crime. Further guidance is provided in the SPDs on the principles of Secured by Design and Designing out Crime
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	✓✓	✓✓	Improving places within the Borough will result in the regeneration of areas thereby promoting social inclusion, equality, diversity and community cohesion through the provision of new homes with a mixture of types and tenures, employment opportunities and community facilities and services
SDO 6 To reduce contributions to climate change	x	x	x	x	Improving places will have a negative impact on climate change as CO_2 emissions and energy consumption and demand will increase as a result of construction and operation. Mitigation measures including energy efficient design and conservation measures will need to be taken to address this. The Sustainable Design and Construction SPD and Sustainability Assessment SPDs provide further guidance on energy efficient design and set out the targets for development to minimise impacts.
SDO 7 To improve the air quality in Southwark	x	x	x	x	Improving places will have a negative impact on air quality through the construction and operation of development and increased vehicular traffic. However, locating the growth in areas of high density will help to encourage access to public transport and reliance upon the car. Further guidance is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs on suitable mitigation measures
SDO 8 To reduce waste and maximise use of waste arising as a resource	?	?	?	?	Improving places will result in an increased amount of waste in construction and operation of facilities, however, impacts can be mitigated through the adoption of technologies and infrastructure that will minimise waste production and encourage recycling and reuse. Further guidance is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs on suitable mitigation measures
SDO 9 To encourage sustainable use of water resources	✓	?	✓	✓	The application of sustainable design and construction standards will encourage new development to adopt sustainable methods of water use through the use of systems such as Sustainable Urban Drainage, rainwater harvesting and recycling and greywater recycling. As new technologies become more readily available this is likely to improve
SDO 10 To maintain and enhance the quality of land and soils	✓	✓	✓	✓	The growth areas are all brownfield sites. Should contamination of the land be identified as a result of previous uses, suitable remediation will need to be undertaken before development can proceed.

Sustainability Objectives	Timescale				Core Strategic Target Policy 2: Improving Places
	S2	S	M	L	**Commentary on Results**
SDO 11 To protect and enhance the quality of landscape and townscape	✓✓	✓✓	✓✓	✓✓	Improving places that are in need of regeneration will improve the quality of landscape and townscape. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals. Design guidance will seek to ensure that any existing assets are protected and enhanced and that new development is sensitive to its surroundings.
SD0 12 To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	✓✓	✓✓	Improving places will have a positive impact on the historic environment and cultural assets. New development will need to show the impacts upon the preservation or enhancement of conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments. Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs.
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓✓	✓✓	✓✓	✓✓	Improving places will have a positive impact upon open spaces, green corridors and biodiversity, The areas of priority are identified within the Open Space Strategy. Further guidance on measures to protect and enhance open space and biodiversity is set out in the Sustainable Design and Construction and Sustainability Assessment SPDs, which includes specific measures for the built up area including the use of green roofs and living walls.
SDO 14 To reduce vulnerability to flooding	✓	✓	✓	✓	The majority of the growth areas fall within flood zones 2 and 3 as identified in the SFRA. A Flood Risk Assessment will need to accompany applications and suitable mitigation measures identified such as flood resilient design in order to improve places. Further guidance is set out in the Sustainable Design and Construction and Sustainability Assessment SPDs
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	Improving places will enable the delivery of new homes in the borough, which will need to be constructed to the Government's decent home standards, providing access to dents homes for increased numbers of the population
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	Improving areas could increase the amount of car ownership and car use in the borough, however, concentrating development in accessible locations should increase access to public transport and encourage alternative modes of transport to the car. Provision will need to be made for new development in terms of public transport capacity and other mitigation measures can be put in place such as travel plans and car parking restrictions. Improvements to public transport provision may not be realised in the short term.
SDO17 To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	Improving places in the borough will include improvements to the infrastructure to ensure that there is sufficient capacity to cope with the anticipated growth. An infrastructure Plan has been prepared in support of the Core Strategy to identify the existing capacity, future needs, costs, funding and timescales to ensure that development proposals will be viable and deliverable.

Cumulative Impact Results

Sustainability Objectives	Cumulative Impacts of Core Strategy Policies																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	S1	S2	C
SDO 1 — To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓	✓	✓✓	✓✓	✓✓
SDO 2 — To improve the education and skill of the population	✓✓	-	✓	✓✓	✓	-	-	✓✓	✓	✓✓	✓	✓	✓	✓	✓	✓	✓
SDO 3 — To improve the health of the population	✓✓	✓✓	✓	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓✓	✓	✓	✓	✓	✓	✓
SDO 4 — To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	✓	✓✓	-	✓	✓	✓	✓	✓✓	-	-	✓	✓✓	✓
SDO 5 — To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓
SDO 6 — To reduce contributions to climate change	✓✓	✓	✓	?	X	-	-	?	-	X	✓	?	✓✓	-	X	X	x
SDO 7 — To improve the air quality in Southwark	✓✓	✓	✓	?	X	-	-	?	-	X	✓	?	✓✓	-	X	X	?
SDO 8 — To reduce waste and maximise use of waste arising as a resource	✓✓	-	?	?	X	-	-	?	✓	X	-	?	✓✓	✓✓	X	?	?
SDO 9 — To encourage sustainable use of water resources	✓✓	-	?	?	?	-	-	?	✓	?	?	✓	✓✓	✓✓	?	?	✓
SDO 10 — To maintain and enhance the quality of land and soils	✓✓	-	✓	✓	✓	-	-	✓	-	✓	✓	✓	✓✓	✓	?	✓	✓
SDO 11 — To protect and enhance the quality of landscape and townscape	✓✓	✓	✓✓	✓	✓✓	?	?	?	✓?	✓	✓	✓✓	?	✓	✓	✓✓	✓
SD0 12 — To conserve and enhance the historic environment and cultural assets	✓✓	-	✓	-	?	-	?	?	✓?	✓	✓	✓✓	?	-	?	✓✓	✓
SDO 13 — To protect & improve open spaces, green corridors & biodiversity	✓✓	✓	✓	-	?	-	?	?	✓?	✓	✓✓	✓✓	✓	✓	?	✓✓	✓
SDO 14 — To reduce vulnerability to flooding	✓	-	?	?	X	-	-	X	✓	?	✓	?	✓✓	✓	X	✓	?
SDO 15 — To provide everyone with the opportunity to live in a decent home	✓✓	-	-	-	✓✓	✓✓	✓✓	✓✓	✓✓	-	-	✓	✓	✓	✓✓	✓✓	✓✓
SDO 16 — To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	✓	?	✓	✓	✓	✓	?	?	✓	✓	?	✓	✓	✓	✓
SDO17 — To provide the necessary infrastructure to support existing and future development	✓✓	?	✓	✓	?	?	?	✓	✓	✓	✓	-	✓	✓✓	?	✓	✓

Policy reference:

No.	Policy
1	Sustainable Development
2	Sustainable Transport
3	Shopping, leisure & entertainment
4	Places to learn & enjoy
5	Providing new homes
6	Homes for people on different incomes
7	Family homes
8	Student homes
9	Homes for gypsies & travellers
10	Jobs and businesses
11	Open spaces and wildlife
12	Design and Conservation
13	High environmental standards
14	Implementation & delivery
S1	Achieving growth
S2	Improving places

Key:

Symbol	Meaning
✓✓	major positive
✓	minor positive
XX	major negative
X	minor negative
?	uncertain
-	no significant impact

Cumulative Impact Commentary

Sustainability Objectives	C	Cumulative Impacts
		Commentary on Results
SDO 1 To tackle poverty and encourage wealth creation	✓✓	Delivering growth through the provision of homes and new business space will have a major positive impact upon tackling poverty and encouraging wealth creation throughout the borough
SDO 2 To improve the education and skill of the population	✓	The encouragement of new development and the safeguarding of existing business should have a positive impact upon the provision of facilities and services providing opportunities for education and skills for the local population
SDO 3 To improve the health of the population	✓	The quality of life of the population will be improved as a result of better access to health facilities, job opportunities and services through the regeneration of the borough
SDO 4 To reduce the incidence of crime and the fear of crime	✓	The regeneration of the borough should improve the quality of housing and public realm which should result in a reduction in crime and the fear of crime
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	The promotion of mixed use development will have a major positive impact with regard to social inclusion, equality, diversity and community cohesion
SDO 6 To reduce contributions to climate change	x	The quantum of development is likely to result in an increase in CO_2 emissions both in the construction and operation of development overall. Mitigation measures will help to reduce but the collective impact is likely to be negative. As technology evolves to address the need for a low carbon future the impact could improve. The impact of the policies on climate change will need to be carefully monitored
SDO 7 To improve the air quality in Southwark	?	The quantum of development is likely to have a negative impact upon air quality, however, this should be suitably managed through mitigation measures in both construction and operation
SDO 8 To reduce waste and maximise use of waste arising as a resource	?	The quantum of development is likely to result in an increase in waste, however, this should be suitably managed through mitigation measures in both construction and operation
SDO 9 To encourage sustainable use of water resources	✓	The quantum of development will put pressure on water resources, however suitable mitigation and targets have been identified to encourage the sustainable use of water.
SDO 10 To maintain and enhance the quality of land and soils	✓	Suitable remediation will need to be carried out prior to the start of development
SDO 11 To protect and enhance the quality of landscape and townscape	✓	Development will need to be carried out with full consideration of the design guidance to demonstrate that the impact upon the quality of the landscape and townscape is positive, in particular the impact on scale, massing and views. Further guidance is provided in the AAPs and SPDs
SD0 12 To conserve and enhance the historic environment and cultural assets	✓	Development will need to be carried out with full consideration of the design guidance to demonstrate that the impact upon historic environment and cultural assets is positive. Attention must be given to the Conservation Area appraisals and any listed buildings. Further guidance is found in the AAPs and SPDs
SDO 13 To protect and improve open spaces, green corridors and biodiversity	✓	Development will need to be carried out with full consideration of the design guidance to demonstrate that the impact upon open spaces, green corridors and biodiveristy is positive. Attention must be given to the Conservation Area appraisals and any listed buildings. Further guidance is found in the Open Space and Biodiversity Strategies, AAPs and SPDs
SDO 14 To reduce vulnerability to flooding	?	The majority of developable land lies within flood zones 2 and 3 as identified in the SFRA. FRAs will need to be undertaken in support of applications. Mitigation measures including flood resilient design measures should be able to address increased vulnerability to flooding, however, the impact of climate change makes the impact uncertain

Sustainability Objectives		Cumulative Impacts
	C	Commentary on Results
SDO 15 To provide everyone with the opportunity to live in a decent home	✓✓	The policies will enable the housing targets for the borough to be met, providing everyone with the opportunity to live in a decent home. New housing will need to be built in accordance with the council's design standards
SDO 16 To promote sustainable transport and minimise the need to travel by car	✓	The provision of mixed use development in accessible locations, that encourages walking and cycling, will promote sustainable transport use and minimise the use of the private car
SDO17 To provide the necessary infrastructure to support existing and future development	✓	The quantum of development will put pressure on the existing infrastructure. Development will need to demonstrate that infrastructure needs can be met. An infrastructure plan has been prepared in support of the Core strategy that identifies the capacity, costs, funding and timescales of infrastructure provision.

APPENDIX 8

Glossary

Air Quality Management Area (AQMA)
An area designated for action where it is predicted that the Air Quality Objectives in the Council's AQMA Plan will be exceeded.

Archaeological Priority Zones
The boundaries of Archaeological Priority Zones are designated on the Proposals Map. These are areas where there is potential for significant archaeological remains, and planning applications within these areas must be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

Biodiversity
Biodiversity is the diversity or variety of plants and animals and other living things in a particular area or region. The term encompasses the diversity of landscapes, eco-systems, species, habitats and genetics.

Conservation Areas
An area of special architectural or historic interest designated by the local planning authority under the provisions of the Planning (Listed Buildings and Conservation areas) Act 1990, the character or appearance of which it is desirable to preserve or enhance.

Greenhouse gases
Greenhouse gases are those gases that contribute to climate change. In the UK, the most common greenhouse gas is carbon dioxide, which contributed around 77% of the UK's total emissions of greenhouses gases in 1990. Other greenhouse gases are methane (12% of total UK emissions), nitrous oxide (9%) and fluorinated gases (2.4%).

Local development framework (LDF)
A portfolio of local development documents, which will provide the framework for delivering the spatial planning strategy for the area.

Local Development Scheme (LDS)
A chart that sets out the council's timetable for preparing planning documents over a three year period. It also explains what each document is.

London Plan
The London Plan is the strategic plan for the whole of London produced by the Mayor of London. The main purpose of the London Plan is to ensure that all the individual plans produced by the London boroughs work together to meet the priorities that are agreed for the whole London region. The Local Development Framework cannot contain strategies or policies that are not in general conformity with the London Plan.

Proposals maps
Illustrate the geographical extent of planning policies and designations.

Regional Spatial Strategy (RSS)
The RSS is a spatial framework for a region over a 15 to 20 year period including policies for housing, environmental protection, transport and waste management. The London Plan is the Regional Spatial Strategy that with which Southwark Plan Policies should be consistent.

Renewable Energy
Energy derived from a source which is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material. Although not strictly renewable, geothermal energy is generally included.

Supplementary Planning Documents (SPD) or Guidance (SPG)
Guidance notes, additional and supplementary to the Unitary Development Plan, on how to implement the policies. They also contain background information applicants may find useful when preparing their planning applications.

Sustainability Appraisal/ Strategic Environmental Assessment
SA/SEA is a systematic and interactive process undertaken during the preparation of a plan or strategy, which identifies and reports on the extent to which the implementation of the plan or strategy would achieve environmental, economic and social objectives by which sustainable development can be defined, in order that the performance of the strategy and policies is improved.

Sustainable Development
Development that contributes towards the principles of sustainability, that is, development that does not cause environmental damage, contributes to the local economy and meets the needs of the local community.

Unitary Development Plans (UDPs)
Statutory plans produced by each borough, which integrate strategic and local planning responsibilities through policies and proposals for the development and use of land in their area.

Southwark Plan See "Unitary Development Plans"

APPENDIX 9

Abbreviations

AQMA	Air Quality Management Area
CABE	Commission for Architecture and the Built Environment
DCLG	Department for Communities and Local Government
DETR	Department for Environment, Transport, and the Regions
DfT	Department for Transport
DPD	Development Plan Document
GLA	Greater London Authority
IMD	Index of Multiple Deprivation
LDD	Local Development Documents
LDF	Local Development Framework
LDS	Local Development Scheme
ODPM	Office of the Deputy Prime Minister
PPG	Planning Policy Guidance
PPS	Planning Policy Statement

SA	Sustainability Appraisal
SINC	Sites of Importance for Nature Conservation
SCI	Statement of Community Involvement
SDO	Sustainable Development Objective
SEA	Strategic Environmental Assessment
SOA	Super Output Areas
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
UDP	Unitary Development Plan

Appendix 10 – Core Documents

International
CDIN1.   Kyoto Protocol (1997)
CDIN2.   Johannesburg Declaration on Sustainable Development (2002)

EU
CDEU1.   EU Biodiversity Strategy (1998)
CDEU2.   EU Biodiversity Action Plan (2006)
CDEU3.   EC Habitat Directive 92/43/EEC (1992)
CDEU4.   EU Biodiversity Action Plan (2006)
CDEU5.   EU Water Framework Directive 2000/60/EC
CDEU6.   EC Waste Framework directive 2006/12/EC
CDEU7.   EC Air Quality Framework directive 92/62/EC and daughter directives(99/30/EC), (2000/69/EC, (2002/3/EC)
CDEU8.   EC Landfill Directive 1999/31/EC and other waste management directives
CDEU9.   EC Birds Directive 79/409/EEC
CDEU10. Environmental Impact Assessment directive 85/337/EC
CDEU11. Strategic Environmental Assessment directive 2001/42/EC
CDEU12. Energy Performance of Buildings Directive 2002/91/EC
CDEU13. EU Sixth Action Plan (Sustainable Development Strategy) 2002
CDEU14. European Spatial Development Strategy, 1999
CDEU15. European Landscape Convention (ratified by UK Government 2006)
CDEU16. European Transport Policy for 2010:time to decide (EC2001)
CDEU17. EU Directive on the promotion of biofuels or other renewable fuels for transport (2003/30/EC)
CDEU18. EU Renewable Energy Directive (2009/28/EC)
CDEU19. EU Sustainable Development Strategy, 2002 (revised 2006)
CDEU20. Floods Directive (2007/60/EC)

National
CDN1.   Planning Policy Statement 1 Planning for Sustainable Development (2005)
CDN2.   Planning Policy Statement: Planning and Climate Change Supplement to Planning Policy Statement 1 (2007)
CDN3.   Planning Policy Guidance 2 (Green Belts) (1995)
CDN4.   Planning Policy Statement 3 Housing (2006)
CDN5.   Planning Policy Statement 4: Planning for Sustainable Economic Growth (2009)
CDN6.   Planning Policy Statement 9: Biodiversity and Geological Conservation (2005)
CDN7.   Planning Policy Statement 10: Planning for Sustainable Waste Management (July 2005)
CDN8.   Planning Policy Statement 12 Local Spatial Planning (2008)
CDN9.   Planning Policy Guidance 13: Transport (Communities and Local Government, April 2001)
CDN10. Planning Policy Guidance15: Planning and the Historic Environment
CDN11. Planning Policy Guidance 16: Archaeology and Planning
CDN12. Planning Policy Guidance 17 (PPG17) Planning for Open Space, Sport and Recreation (2002)
CDN13. Assessing Needs and Opportunities: Planning Policy Guidance 17 Companion Guide (2003)
CDN14. Planning Policy Statement 22: Renewable Energy
CDN15. Planning For Renewable Energy: Implementing PPS22 - Guidance for Preparing Renewable Energy Planning Policies in Development Plan Documents
CDN16. Planning Policy Statement 23: Planning and Pollution Control (2004)

CDN17. Planning Policy Statement 25: Development and Flood Risk (PPS25) (2006)

CDN18. Circular 05/05 Planning Obligations

CDN19. Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites

CDN20. Circular 04/2007 Planning for Travelling Showpeople

CDN21. Circular on the Protection of World Heritage Sites (July 2009)

CDN22. Planning and Compulsory Purchase Act (2004)

CDN23. UK Renewable Energy Strategy (2009)

CDN24. UK Strategy for Sustainable Development (2005)

CDN25. Guidance on Tall Buildings, (CABE & English Heritage, July 2007)

CDN26. Understanding Place: Historic Characterisation For Planning And Development Draft Document (English Heritage, July 2009)

CDN27. By Design – Urban Design in the planning system: towards better practice (DETR/CABE, 2000)

CDN28. Recommendation for living at Superdensity, Design for Homes (July 2007)

CDN29. Waste Strategy (2000)

CDN30. Waste Management Licensing Regulations (1994)

CDN31. Code for Sustainable Homes: Technical Guide Version 2 (May 2009)

CDN32. DCLG Guidance Notes on Employment Land Reviews (2004)

CDN33. ONS Annual Population Survey 2007

CDN34. ONS Annual Population Survey 2008

CDN35. ONS Annual Population Survey 2009

CDN36. ONS Annual Business Inquiry 2007

CDN37. Census 2001, Neighbourhood Statistics

CDN38. BREEAM Offices 2008 Assessor Manual (BES 5055: ISSUE 3.0), 2009)

CDN39. BREEAM Education 2008 Assessor Manual (BES 5051 ISSUE 3.0), 2009

CDN40. UK Climate Change Act (2008)

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CDN42. DCLG 'Proposals for amending Part L and Part F of the Building Regulations', (June 2009)

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CDN47. Climate Change: The UK Programme, 2006

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CDN49. Future Water Strategy, 2008

CDN50. Energy Act, 2008

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CDN53. Towards Zero Carbon Homes, Consultation, 2009

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CDN55. Local Government Act 2000

CDN56. England Biodiversity 2002

CDN57. Communities Plan – Sustainable Communities: Building for the Future (2003)

CDN58. UK Climate Change Regulations (2009)

CDN59. UK Sustainable Procurement Action Plan (2007)

CDN60. English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)

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CDN74. Putting a price on sustainability, BRE Centre for Sustainable Construction and BRE Trust, and Cyril Sweett, 2005
CDN75. Research to Assess the Costs and Benefits of the Government's Proposals to Reduce the Carbon Footprint of New Housing Development, DCLG, September 2008
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CDN80. Local Development Framework Core Output Indicators, Department for Communities and Local Government, October 2005
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CDN82. UK Climate Change Programme 2006
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CDR5. London Economic Development Strategy (January 2005)

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CDR7. Mayor's Draft revised interim Housing Supplementary Planning Guidance (October 2009)

CDR8. GLA Industrial Capacity Supplementary Planning Guidance (SPG) (March 2008)

CDR9. London Tourism Action Plan 2009-2013

CDR10. London Development Agency's Corporate Plan 2007-2010

CDR11. Providing for Children and Young People's Play and Informal Recreation SPG (March 2008)

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CDR53. A Sustainable Development Framework for London. London Sustainable Development Commission (June 2003)
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CDR60. Land for Transport Functions. Mayor's Supplementary Planning Guidance (2007)
CDR61. London Remade Demolition Protocol Report (2005)
CDR62. English Heritage's Heritage at Risk- London 2008
CDR63. Thames Region Catchment Flood Management Plan
CDR64. Thames River Basin Management Plan
CDR65. Regional Flood Risk Appraisal
CDR66. Taking Care of Water- Our Plan for the next 25 years (Thames Water Utilities 2007)

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CDR70. Thames Corridor Catchment Abstraction Management Strategy (CAMS)
CDR71. Living Well in London: The Mayor's draft Health Inequalities Strategy (2008)
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CDL3.   Southwark Corporate Plan 2009-2011
CDL4.   Southwark Statement of Community Involvement (2008)
CDL5.   Southwark Local Development Scheme (January 2010)
CDL6.   Annual Monitoring Report (2008-2009)
CDL7.   Annual Monitoring Report (2007-2008)
CDL8.   Annual Monitoring Report (2006-2007)
CDL9.   Annual Monitoring Report (2005-2006)
CDL10.   Annual Monitoring Report (2004-2005)
CDL11.   Southwark Plan Proposals Map (2007)
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CDL13.   Southwark Land Use Survey 2004, Southwark Council
CDL14.   Southwark unitary development plan Inspector report (2006)
CDL15.   Secretary of State direction (2007)

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CDCS1.   Core Strategy Submission/Publication 2009
CDCS2.   Core Strategy Submission/Publication Consultation plan 2009
CDCS3.   Core Strategy Submission/Publication EQIA 2009
CDCS4.   Core Strategy Submission/Publication Sustainability Appraisal and appendices 2009
CDCS5.   Core Strategy Submission/Publication Appropriate assessment 2009
CDCS6.   Core Strategy Submission/Publication Consultation statement and appendices 2009
CDCS7.   Core Strategy Submission/Publication Changes to proposals map document and maps 2009
CDCS8.   Core strategy issues and options report 2008
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CDCS11. Core Strategy Sustainability Appraisal - Scoping Report and Appendices 2008
CDCS12. Core Strategy Issues and Options - Interim Sustainability Appraisal and Appendices 2008
CDCS13. Core Strategy Preferred Options - Draft Sustainability Appraisal and Appendices 2009
CDCS14. Core Strategy Submission Version - Sustainability Appraisal Report and Appendices 2009

Background papers
CDB1.   Environmental Performance Feasibility Study
CDB2.   Housing background paper one
CDB3.   Housing background paper two
CDB4.   Housing background paper three -density
CDB5.   Retail
CDB6.   Employment
CDB7.   Energy Performance and Flooding
CDB8.   Strategic Flood Risk Sequential Test
CDB9.   SINCS
CDB10.   Infrastructure
CDB11.   Borough-wide tall buildings
CDB12.   Joint Waste Apportionment Technical paper

Canada Water area action plan and supporting documents
CDAAP2   Canada Water AAP submission/publication 2010
CDCW1.   Canada Water AAP submission/publication Sustainability Appraisal 2010
CDCW2.   Canada Water AAP submission/publication Consultation Plan 2010
CDCW3.   Canada Water AAP submission/publication Consultation Statement 2010
CDCW4.   Canada Water AAP submission/publication Equalities Impact Assessment 2010
CDCW5.   Canada Water AAP submission/publication Appropriate Assessment 2010
CDCW6.   Canada Water AAP Preferred Options 2009

CDCW7.   Canada Water AAP Consultation Statement Preferred Options 2009
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CDCW9.   Canada Water AAP Sustainability Appraisal Scoping Report 2008
CDCW10. Canada Water AAP Issues and Options Interim Sustainability Appraisal 2008
CDCW11. Canada Water AAP Preferred Options Draft Sustainability Appraisal 2009
CDCW12. Canada Water AAP Submission Version Final Sustainability Appraisal Report 2009

Canada Water AAP background papers
CDCW13. Employment
CDCW14. Retail
CDCW15. Housing
CDCW16. Infrastructure
CDCW17. Delivery of Proposal Sites
CDCW18. Urban Design
CDCW19. Proposed changes to proposals map
CDCW20. S106

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CDEN1.   Southwark Climate Change Strategy (2006)
CDEN2.   Strategic Flood Risk Assessment (2008)
CDEN3.   Southwark Open Space Study (2010)
CDEN4.   Southwark Play Strategy (2008-2011)
CDEN5.   Southwark's Biodiversity Action Plan 2006-2010 (Work for Wildlife) (2007)
CDEN6.   Southwark Local Implementation Plan (LIP)
CDEN7.   Southwark Waste Management Strategy 2003 – 2021
CDEN8.   Southwark Waste Minimisation Strategy 2007 - 2010
CDEN9.   Southwark Contaminated Land Strategy (2001)
CDEN10. Southwark Air Quality Management and Improvement Plan
CDEN11. The Canada Water Area Action Plan Energy Study (2009)
CDEN12. Southwark State of the Environment Fact Sheet

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CDEN16. Background paper: Sustainable design and construction strategy Aylesbury Area Action Plan, Ramboll, 2009
CDEN17. Southwark Climate Change and Sustainability Strategy (Emerging)
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CDH3.   Draft Strategic Housing Market Assessment sub report – students (2009)
CDH4.   Southwark Housing Requirements Study (2009)
CDH5.   Southwark Housing Requirements Study sub report – Camberwell (2009)
CDH6.   Southwark Housing Requirements Study sub report – Bermondsey (2009)
CDH7.   Southwark Housing Requirements Study sub report – Rotherhithe (2009)
CDH8.   Southwark Housing Requirements Study sub report – Dulwich (2009)
CDH9.   Southwark Housing Requirements Study sub report – Borough and Bankside (2009)

CDH10. Southwark Housing Requirements Study sub report – Aylesbury Estate (2009)

CDH11. Southwark Housing Requirements Study sub report – Walworth (2009)

CDH12. Southwark Housing Requirements Study sub report – Peckham (2009)

CDH13. Southwark Housing Requirements Study sub report – Nunhead and Peckham Rye (2009)

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CDH20. Southwark Housing Development Capacity Assessment January 2010

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CDD10. Thrale Street Conservation Area Appraisal, Southwark Council

CDD11. Borough High Street Conservation Area Appraisal, Southwark Council

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CDD13. Bermondsey Street Conservation Area Appraisal, Southwark Council

CDD14. Kings Bench Conservation Area Appraisal, Southwark Council

CDD15. St Georges Circus Conservation Area Appraisal, Southwark Council

CDD16. West Square Conservation Area Appraisal, Southwark Council

CDD17. Tower Bridge Conservation Area Appraisal, Southwark Council

CDD18. Trinity Church Square Conservation Area Appraisal, Southwark Council

CDD19. St. Saviour's Dock Conservation Area Appraisal, Southwark Council

CDD20. Pullen Estate Conservation Area Appraisal, Southwark Council

CDD21. Dulwich Village Conservation Area Appraisal, Southwark Council

CDD22. Sunray Estate Conservation Area Appraisal, Southwark Council

CDD23. Camberwell Grove Conservation Area Appraisal, Southwark Council

CDD24. Camberwell Green Conservation Area Appraisal, Southwark Council

CDD25. The Gardens Conservation Area Appraisal, Southwark Council

CDD26. Holly Grove Conservation Area Appraisal, Southwark Council

CDD27. Nunhead Cemetery Conservation Area Appraisal, Southwark Council

CDD28. Sceaux Gardens Conservation Area Appraisal, Southwark Council

CDD29. Stradella Road Conservation Area Appraisal, Southwark Council

CDD30. Thorburn Street Conservation Area Appraisal, Southwark Council

CDD31. Caroline Gardens Conservation Area Appraisal, Southwark Council

CDD32. Blackfriars Road Character Area Appraisal, Southwark Council

CDD33. North of Southwark Street Character Area Appraisal, Southwark Council

CDD34. South of Southwark Street, Southwark Council

CDD35. South of Union Street Character Area Appraisal, Southwark Council

CDD36. Borough Market, Clink Street and Southwark Cathedral Character Area Appraisal, Southwark Council

CDD37. Borough High Street Character Area Appraisal, Southwark Council

CDD38. London Bridge and Guy's Hospital Campus Character Area Appraisal, Southwark Council

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CDE5.   Southwark Retail Study (2009) and appendices
CDE6.   Strategic Review of Southwark Markets & Street Trading Service   October – December 2008
CDE7.   Camberwell Creative Industries Mapping Report (2007)
CDE8.   LB Southwark, Sector Skills Agency
CDE9.   Business Incubators Managed and Affordable Workplace Feasibility Study (2004)
CDE10.   Market Measures, Southwark profile (March 2008)
CDE11.   Background paper: Economic development Aylesbury Area Action   Plan (March 2009)
CDE12.   www.elephantandcastle.org.uk - regeneration programme

Infrastructure
CDI1.   London Borough of Southwark, Children and Young People's Plan (2008)
CDI2.   London Borough of Southwark School Organisation Plan and Education Development Plan
CDI3.   Southwark PCT Involving People Strategy 2009-2012 (2009)
CDI4.   Southwark PCT Asset Management Strategy (2007)
CDI5.   Schools for the Future Programme
CDI6.   Metropolitan Police Estate – Asset Management Plan, Southwark, 2007
CDI7.   Southwark Walking Plan, 2006
CDI8.   Southwark PCT Commissioning Strategy Plan 2009-2012 (2007)
CDI9.   Southwark PCT Asset Management Strategy (2007)
CDI10.   Southwark Play Strategy 2007-12
CDI11.   Southwark Voluntary and Community Sector Asset Management Strategy

CDI12.   Canada Water Site Utilities Infrastructure Study, Hoare Lea, 2005
CDI13.   Review of primary school places, Report to Executive, November 2009
CDI14.   Southwark Schools for the Future: Strategic Business Case for Investment in Secondary Mainstream and Special Schools under the   BSF Programme, and Associated Investments in Academies and   Primary Schools, including Primary Special Schools, July 2006
CDI15.   Southwark Schools for the Future: New school provision, September 2006
CDI16.   Development Impact Report – Canada Water 2010

Area Action Plans
CDAAP1. Aylesbury Area Action Plan (Jan 2010)
CDAAP2. Draft Canada Water Area Action Plan Submission/Publication Report (Jan 2010)
CDAAP3. Draft Peckham and Nunhead Area Action Plan 2009 – Stage 1: Issues and Options (Mar 2009)
CDAAP4. Aylesbury AAP background paper, Housing density

Draft and Adopted SPDs/SPGs
CDSPD1. Draft Bankside, Borough and London Bridge SPD/ OAPF (2009)
CDSPD2. Draft Dulwich SPD (2009)
CDSPD3. Draft Sustainable Transport SPD (2008)
CDSPD4. Southwark Sustainable Design and Construction SPD (2009)
CDSPD5. Sustainability Assessments SPD (2009)
CDSPD6. Southwark Section 106 Planning Obligations SPD 2007
CDSPD7. Affordable Housing SPD (2008)
CDSPD8. Residential Design Standards SPD (2008)
CDSPD9. Design and Access Statement SPD (2007)
CDSPD10. Elephant and Castle Development Framework SPG (2004)
CDSPD11. Elephant and Castle Enterprise Quarter SPD (2008)
CDSPD12. Walworth Road SPD (2008)
CDSPD13. Canada Water SPG (2005)

Neighbouring borough's plans

CDNB1. Bexley Unitary Development Plan
CDNB2. Bexley Local Development Framework
http://www.bexley.gov.uk/index.aspx?articleid=608
CDNB3. Waste Management Strategy for Bexley 2009 – 2014
CDNB4. Bromley Unitary Development Plan 2006
CDNB5. Bromley Local Development Framework
http://www.bromley.gov.uk/environment/planning/planningpolicy/ldf/
CDNB6. Bromley Draft Waste Management Strategy
CDNB7. Bromley Draft Waste Minimisation Plan
CDNB8. Greenwich Unitary Development Plan 2006
CDNB9. Greenwich Local Development Framework
http://www.greenwich.gov.uk/cgibin/MsmGo.exe?grab_id=202&page_id=4724992&query=local+development+framework&hiword=DEVELOP+DEVELOPED+DEVELOPING+DEVELOPMENTAL+DEVELOPMENTS+DEVELOPS+FRAMEWORKS+LOCALITY+LOCALLY+LOCALS+LOCATE+LOCATED+LOCATION+development+framework+local+
CDNB10. Lewisham Unitary Development Plan
CDNB11. Lewisham Local Development Framework
http://www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/LocalDeve lopmentFramework/
CDNB12. Lewisham Draft Waste Management Strategy
CDNB13. Lewisham Employment Land Study (2009)
CDNB14. Metropolitan Views Draft Supplementary Planning Guidance, City of Westminster, October 2007
CDNB15. St. Paul's Monument View Supplementary Planning Guidance, City of London, December 2007
CDNB16. Lewisham Council Sustainable Community Strategy (2008-2020)
CDNB17. Lambeth Council Unitary Development Plan (2007)
CDNB18. Lambeth Council Sustainable Community Strategy (2008-2020)