

## APPENDIX B

### Officer responses to the consultation on the Further Modifications (March 2007) to the emerging Southwark Plan

Consultee	Policy	Objection	Details of objection	Officer response
Mrs Mary Roe	Policy 4.1	Objection	I would like to support other protests from East Dulwich against the proposed urbanisation of East Dulwich. I have just returned from York where I was struck by the wholly negative effect of high-density, high-rise buildings on the quality of local life, most of these in flat, arid shades of concrete. Your proposals would result in the creation of a wholly unsuitable environment in which cities I would not wish to continue to live. I am against your projected changes they are neither welcome nor democratic. I have not been aware of any consultation. Let me have either consultation or the dropping of these plans.	Reject The urban density provides a framework for development of a similar character and height to the current situation. It is necessary to make this change for the emerging Southwark Plan to be in conformity to the London Plan and to meet the requirements of the Secretary of State's direction. Consultation has been carried out at each stage.
Mr and Mrs S J Pearse	Policy 4.1	Objection	We are writing to voice our objection to the Proposed Further Modification of policy 4.1 in relation to the classification of East Dulwich as 'urban'. We respectfully request that a further enquiry into the matter is conducted before further action is taken.	Reject The urban density provides a framework for development of a similar character and height to the current situation. It is necessary to make this change for the emerging Southwark Plan to be in conformity to the London Plan and to meet the requirements of the Secretary of State's direction. The issues were considered by the Planning Inspector as part of the inquiry into the Southwark Plan in April to July 2005. Therefore there is no need for a further inquiry into this matter.

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M H Dyke	Policy 4.1	Objection	I wish to object to the proposed further modification of policy 4.1 and call for a further enquiry.	Reject The urban density provides a framework for development of a similar character and height to the current situation. It is necessary to make this change for the emerging Southwark Plan to be in conformity to the London Plan and to meet the requirements of the Secretary of State's direction. The issues were considered by the Planning Inspector as part of the inquiry into the Southwark Plan in April to July 2005. Therefore there is no need for a further inquiry into this matter.
J Costello	Policy 4.1	Objection	I write to say that I have lived in East Dulwich for almost 11 years and would like it kept as a suburban area.	Reject The urban density provides a framework for development of a similar character and height to the current situation. It is necessary to make this change for the emerging Southwark Plan to be in conformity to the London Plan and to meet the requirements of the Secretary of State's direction

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S Jenkins	Policy 4.1	Objection	<p>I am sixty-eight years old and I have been under the mental health act for many years. I have been living near the Elephant and Castle for twenty years in a council estate. The building works close by and on going roadworks, some of which, are carried out after midnight by Transport for London's street management - the noise levels caused me to have a heart attack. Urban life had taken it's toll, I could not believe how lucky I was to find a flat to exchange with in East Dulwich (it was like winning the lottery). Suburban life was so theraputic, centuring to the local library, the local park, the village, had brought a smile to my face, something I had not experienced in London for sometime. There was familys and happy children and communities from all backgrounds that actually got on with one another. Please please have a rethink, do not allow the Mayor or the Secretaryof State to change suburbia. It will have a long term effect on the future of such places, if it is designated as urban. Health and well being and peace of mind is so essential to have in such a problematic world.</p>	<p>Reject The urban density provides a framework for development of a similar character and height to the current situation. It is necessary to make this change for the emerging Southwark Plan to be in conformity to the London Plan and to meet the requirements of the Secretary of State's direction.</p>
John Payne	Policy 4.1	Objection	<p>I am writing to object to the Proposed Modification of Policy 4.1 and ask that the London Borough of Southwark defend the position originally taken by all political parties and the community that the suburbs within Southwark should not be urbanised. Any such change imposed by the Mayor of London or Ruth Kelly is undemocratic. I ask that a further enquiry into this matter be instigated in advance of any decision being taken.</p>	<p>Reject The urban density provides a framework for development of a similar character and height to the current situation. It is necessary to make this change for the emerging Southwark Plan to be in conformity to the London Plan and to meet the requirements of the Secretary of State's direction. The issues were considered by the Planning Inspector as part of the inquiry into the Southwark Plan in April to July 2005. Therefore there is no need for a further inquiry into this matter.</p>

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Mrs D M Payr	Policy 4.1	Objection	<p>I am writing to object to the Proposed Modification of Policy 4.1 and ask that the London Borough of Southwark defend the position originally taken by all political parties and the community that the suburbs within Southwark should not be urbanised. Any such change imposed by the Mayor of London or Ruth Kelly is undemocratic. I ask that a further enquiry into this matter be instigated in advance of any decision being taken.</p>	<p>Reject The urban density provides a framework for development of a similar character and height to the current situation. It is necessary to make this change for the emerging Southwark Plan to be in conformity to the London Plan and to meet the requirements of the Secretary of State's direction. The issues were considered by the Planning Inspector as part of the inquiry into the Southwark Plan in April to July 2005. Therefore there is no need for a further inquiry into this matter.</p>
Mayor	Policy 4.1	Withdraw objection	<p>In relation to density, the proposed further modifications PFMOD 3, PFMOD 6, PFMOD 7 create a single urban zone in place of the previous suburban north zones. This approach is consistent with the density zones that were included on the First Deposit Proposals Map and which were, in my view, a more accurate reflection of the density descriptions in the London Plan. The proposed further modifications set two density ranges for the new urban zone: 200 to 450 habitable rooms per hectare in areas with a public transport accessibility level of 2 - 3 and 200 to 700 habitable rooms per hectare in areas with public transport accessibility level of 4 to 6. These ranges are consistent with Table 4B.1 of the London Plan, which provide a density range of 200 to 700 habitable rooms per hectare, which is to be applied flexibly taking into account local characteristics. The revised density zones and ranges set out in the proposed further modifications are consistent with the London Plan and I strongly support these amendments.</p>	<p>Noted</p>

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Mayor	Policy 4.2	Withdraw objection	In relation to Lifetimes Homes standards, proposed further modification PFMOD 4 reintroduces reference to 'seeking to ensure that all new housing is built to Lifetime Homes standards'. As set out in my letter to the Secretary of State dated 6 March 2007 my view is that the inclusion of Lifetime Homes standards as a policy aim within UDPs is a matter of general conformity with the London Plan. I therefore support PFMOD 4.	Noted
Mayor	Policy 4.3	No objection	The other proposed further modifications PFMOD.1, PFMOD.2, PFMOD.5 give effect to the Secretary of State's direction stated that such a blanket policy provision for a payment in lieu failed to meet national policy. I have no objections to these proposed further modifications.	Noted
Major	General	Conformity	The proposed further modifications bring the UDP into general conformity with the London Plan. I therefore support the adoption of the Southwark UDP with these modifications.	Noted
GVA Grimley	Policy 4.1	Objection	In light of the above we recommend that Policy 4.1 is amended - the lower and medium Urban Zone density ranges should be removed and the policy should state that 'residential density should take into. Draft policy 4.1 refers to four density standards within Southwark which are based on the general character of the area and its accessibility by public transport. The standards set out in the appendix reflect the density and parking matrix 4B.1 in the London Plan. We welcome the Council's aim to encourage the highest densities of development which is consistent with guidance set out in the London Plan and PPS3, although the Council should adopt a flexible approach to the consideration of densities having regard to the circumstances of individual sites and the nature of the proposed development. Therefore we consider the sub-classification of the urban zone at point (ii) of policy 4.1 into medium and lower densities to be overly restrictive. The application of these classifications will result in a significant reduction in capacity on some individual sites compared to the capacity that would be generated by the application of London Plan	Reject. The Mayor has withdrawn his objection. He has stated that he now considers the emerging Southwark plan to be in conformity with the London Plan. The Secretary of State has now stated that the changes meet the requirements of her direction. Therefore the suggested changes are not required as the emerging Southwark Plan provides an appropriate policy.

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Berkley Home	Policy 4.1	Objection	<p>As recognised in Part 1, Section 10.5.3 at the previous affordable housing level of 14 units, your council was subjected to planning applications below 14 units. By setting the affordable housing level at 10 units will this not result in planning applications now being submitted for developments of less than 10 units? In addition this policy should be more flexible by not simply discounting the 'in lieu' payments option. Instead of the modifications proposed the following modification should be considered. <u>..'within the plan payment in lieu will be considered for developments of 10 - 14 units and on-site provision for larger developments where justified and subject to site circumstances.'</u> The above suggested amendments are particularly relevant considering the comments made by LBS in part 1, section 10.5.3; the level of affordable housing provided by housing associations has been supported by payments in lieu from developers. The removal of this affordable housing provision option will make it even more difficult for housing associations to deliver affordable housing.</p>	<p>Reject The further modification was a requirement of the Secretary of State direction. She considered this to be necessary to make the emerging Southwark Plan in line with national guidance set out in Planning Policy Guidance note 3. Therefore although the council considers the original policy to be more effective and appropriate the change is a necessary requirement to enable the council to adopt the emerging Southwark Plan.</p>
Berkley Home	Part 1, Section 10.5.3	Objection	<p>On the basis that the level of affordable housing provided by housing associations has been supported by payments in lieu from developers, surely the removal of this affordable housing provision option will make it even more difficult for housing associations to deliver affordable housing. Rather than removing this funding stream part 1 section 10.5.3 should be more flexible by supporting the 'in lieu' payments option, as well as seeking to find other new funding streams.</p>	<p>Reject The further modification was a requirement of the Secretary of State direction. She considered this to be necessary to make the emerging Southwark Plan in line with national guidance set out in Planning Policy Guidance note 3. Therefore although the council considers the original policy to be more effective and appropriate the change is a necessary requirement to enable the council to adopt the emerging Southwark Plan.</p>

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East Dulwich Society	Policy 4.1	Objection	<p>Following the compromise achieved the negotiations with Secretary of State, Ruth Kelly's Department, it may seem to some that the Urban/Suburban controversy has been settled. We do not accept that this is the case. We object to the proposed further modification of policy 4.1. The modification should be withdrawn and replaced with wording that signals this Borough's intention to defend the position originally taken by all the political parties and the community; namely that the suburbs within Southwark should not be zoned as urban. The compromise that was achieved, whereby lower area densities are limited to a maximum of 450 hr/ha is illusory. The zoning designation 'urban' and the densities associated with such a status will prevail, sooner or later, over any such density limit, because that limit (and hence the compromise) rests on a current measure of transport accessibility. That measure can change as a consequence of TFL policy to improve public transport accessibility. We do not object to that policy itself. But it is not a secure basis on which to stand a limitation of housing densities.</p>	<p>Reject The urban density provides a framework for development of a similar character and height to the current situation. It is necessary to make this change for the emerging Southwark Plan to be in conformity to the London Plan and to meet the requirements of the Secretary of State's direction. The issues were considered by the Planning Inspector as part of the inquiry into the Southwark Plan in April to July 2005. Therefore there is no need for a further inquiry into this matter. The changes do not have significant impacts, therefore there is no need for an impact assessment as the issues have been dealt with as part of the ongoing sustainability appraisal and equalities impact assessment processes.</p>
F A Rose	Policy 4.1	Objection	<p>I wish to oppose the urban status given to East Dulwich. Having been a resident at this address for 40 years, I like the part of London and I do not want it changed. A further inquiry is clearly needed.</p>	<p>Reject The urban density provides a framework for development of a similar character and height to the current situation. It is necessary to make this change for the emerging Southwark Plan to be in conformity to the London Plan and to meet the requirements of the Secretary of State's direction. The issues were considered by the Planning Inspector as part of the inquiry into the Southwark Plan in April to July 2005. Therefore there is no need for a further inquiry into this matter.</p>
English Heritage	None	English Heritage do not wish to make any representations	Noted	