

**Draft Sustainability Appraisal Report
Appendix E: Responses to External Comments on the Scoping
Report and the Interim Sustainability Appraisal
January 2008**

**Report prepared on behalf of
London Borough of Southwark
Aylesbury New Deal for Communities**

Project Director: Kelvin Campbell
Project Manager: Daniel Hill
Urban Initiatives
1 Fitzroy Square
London W1T 5HE
t: +44 (0) 20 7380 4545
f: +44 (0) 20 7380 4546

Responses to External Comments on the Scoping Report

Comment number	Name	Report section which representation refers to	Objection/ support	Representation	Council's response
1.	Councillor Bates	0. Introduction	Objection	In point 0.1, you refer to "Aylesbury". I think this needs to be specific - can we say "Aylesbury estate footprint". No regeneration is planned or likely in the Portland, Kingston, Pathmeads estates - it is unfair to raise hopes. The wording needs to be tightened.	Agree in part: The wording has been changed to refer to the Aylesbury Estate. The AAP area is wider, however, than just the estate and it is important that we continue to refer to the surrounding area to ensure the estate is looked at in its context, and not just in isolation.
2.	Councillor Bates	0. Introduction	Objection	Point 0.12 discusses the consultation approach. I'd like to see a more innovative programme of outreach based on outputs and tangible proposals and options. The current consultation scheme smacks of paper-based or PowerPoint tick-boxing: this rarely elicits much that is meaningful.	Noted: We have prepared a comprehensive consultation strategy which seeks to ensure that the community can meaningfully engage in the preparation of the AAP.
3.	Councillor Bates	1. Aylesbury Area Action Plan and future planning documents	Objection	Point 1.12 discusses Housing - I think a little more detail needs to be inserted on how "affordability" will be secured. There's no mention of RSL, shared ownership and so on. Without being overly prescriptive, I would like to see at least an approximate percentage projection of affordable to private homes in this section. In the final bullet, mention is made of "lifetime homes". I support this, but would want to see the DCLG standards exceeded, not just "met". There are large numbers of older people on the Aylesbury - and many of them want a lifetime home standard to be written into any strategy explicitly. We also need to have some thoughts about accessible design for people with disabilities. I don't see any mention of that.	<p>Agree in part: Paragraph 1.13 sets out a strategic objective to ensure that a range of tenures is provided. We are not in a position to set out specific tenure splits at this point in time. This will however form part of the AAP. We will be consulting on appropriate tenure splits in the issues and options report and will be undertaking further financial modeling to ensure that the tenure split is deliverable.</p> <p>Providing the right type of housing to meet people's needs will be very important. The housing objectives in paragraph 1.13 state specifically that we want to provide accommodation that addresses a variety of local needs including those of the elderly and vulnerable.</p>

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					<p>To reinforce this, sustainable development objective (SDO) 5 (the sustainable development objectives are listed in the framework in section 6) seeks to promote social inclusion, equality, diversity and community cohesion, and SDO 3 is to provide everyone with the opportunity to have a decent home. Subject to agreement from the Secretary of State, the AAP will require new dwellings to meet lifetime homes standards. These standards are also an indicator against which the sustainability of the scheme will be assessed (see appendix 6, p. 145).</p> <p>Accessibility is an issue that has been raised in section 5 (p. 34) of the report and baseline evidence on this issue is provided in appendix 6, p. 150.</p>
4.	Councillor Bates	1. Aylesbury Area Action Plan and future planning documents	Objection	Within this section, I think it is important to include something on crime and the fear of crime. There also needs to be mention made about the need to create a new community which is multi-generational and has a genuine mix of incomes.	Noted: The environment objectives in paragraph 1.13 emphasise the importance of reducing the fear of crime. Sustainable development objective 4 is to reduce the incidence of crime and the fear of crime. The sustainability issues in section 5 which relate to crime (p. 20) give a brief description of the current situation and note that it will be important that new development meets Secured by Design standards.
5.	Councillor Bates	1. Aylesbury Area Action Plan and future planning	Objection	What I am driving at here is a specific insertion of a separate section on "Community Cohesion" - referencing crime, social interaction and community development through relevant facilities (i.e. Community halls for example).	Noted: Paragraph 1.13 refers to the importance of ensuring that the needs of all groups are taken into account. While it does not mention crime, the community support section under paragraph 1.13

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		documents			does recognise the need to provide support for the young, elderly, and people with disabilities through the provision of appropriate infrastructure and services. Sustainable development objective 5 seeks to promote social inclusion, equality, diversity and community cohesion. The AAP will also be subject to a separate Equalities Impact Assessment.
6.	Councillor Bates	1. Aylesbury Area Action Plan and future planning documents	Objection	In the schematic on page 15, the final stage (E) discusses monitoring of the plan to identify sustainability objectives. How will this be done? By whom? What input will stakeholders have in to this, or will it be officer desk-research?	Noted: The full sustainability appraisal will set out in more detail how the objectives will be monitored. Every year the council submits an annual monitoring report (AMR) to the government. This contains key indicators which the council uses to measure the performance of its planning policies. These indicators include the numbers of social rented and intermediate housing completed in the borough as a proportion of all housing, and whether new housing has met lifetimes homes standards. Where policies have not been successful, the information in the AMR helps the council decide whether a change in policy is required.
7.	Councillor Bates	3. Relationship to other plans and programmes	Objection	Could you detail the "potential synergies" in 3.1 between the AAP and SPD? This isn't for insertion in the document necessarily, but I'm curious about this point. What sort of synergies are we expecting?	Noted. National legislation obliges local authorities to examine not only immediate effects of policies on the environment, economy and community, but also secondary, cumulative and synergistic effects. An example of the latter would be where a higher density development taken on its own might not be appropriate due to lack of

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					access to public transport, but several such developments taken together may make new public transport services more viable, which in turn would be able to support the new residential development.
8.	Councillor Bates	3. Relationship to other plans and programmes	Objection	I'm really pleased that the Parks and Public Places strategy will form part of the check-list for the AAP. I am personally really interested in how we can draw Burgess Park deeper into the regeneration scheme, and not just from a land values perspective. As part of the consultation into various plans, it might be worth including the annual or forward plans of the Aylesbury NDC programme and the strategic development of the successor vehicle. This will be a key document to reference.	Noted. Section 3 and appendix 5 set out key plans and programmes which must be taken into account in preparing the AAP. The entry for The Aylesbury New Deal for Communities has been amended to read: The Aylesbury New Deal for Communities – Delivery Plan 2005-06 (and any subsequent plan of the successor to the NDC)
9.	Councillor Bates	4. Social, economic and environmental context	Objection	Can we insert "mental and physical health" into the baseline topics table at 4.3 on page 22. It's important we consider mental health as well as physical. Major regeneration schemes have a major deleterious effect on mental health - there is already a high incidence of depression etc. on the estate. Also, is it worth adding a new bullet: "Access to open spaces"? I am concerned that this be prioritised at every stage. The existing green spaces are wholly underused, but are deeply popular. I'd like to see us making an explicit commitment not to see any net loss of green space as part of the scheme to rebuild new homes on the Aylesbury footprint (this to be inserted into table 2).	Agree in part: Further information has been added in section 5 on health, including mental health (p. 28) and the health baseline topic in appendix 6 has been amended to read: Physical and mental health Section 5 outlines a number of sustainability issues around open space. It also refers to the council's open spaces accessibility and deficiency maps which are included in appendices 16 and 17. We recognise the importance of open space. Different options for how open space can be enhanced will be set out in the issues and options report and consulted on widely. The quality of open spaces and access to those spaces may be as important as the quantity of open space in appraising the long

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					term sustainability of the estate and area. Therefore at this stage we do not consider that the sustainability appraisal should target no net loss of open space.
10.	Councillor Bates	4. Social, economic and environmental context	Objection	I have already made the point about the need to create local procurement opportunities for SMEs who operate in the area. It seems logical to insert this into section 2 of the Key Sustainability Issues table (section 2, page 24).	Agree: We have amended the sustainability issues in section 5 (p. 24) and included more details about businesses and jobs in the borough. We are currently considering the role which procurement might play in strengthening local SMEs and may be able to address this in the issues and options report.
11.	Councillor Bates	5. Key sustainability issues	Objection	Are the figures on educational attainment in section 3 correct? I was under the impression that Aylesbury students were performing at or around the average. Can you clarify this? The query relates to the "education, skills and training deprivation" section of the sustainability table.	Agree: Section 5 as well as appendix 6 have been clarified to differentiate more between different schools and also between primary (where pupils have been performing well) and secondary schools.
12.	Councillor Bates	5. Key sustainability issues	Objection	At section 5 of the same table (page 25), mention is made of the EQIA. How will these figures be monitored - I'm most keen that we try to capture respondents who are young. I do worry how we might audit respondents by sexual orientation. That is not going to be easy to collate!	Noted. EqIA will be undertaken at each stage in preparing the AAP. This will seek to ensure that the needs of all groups are being considered. We will also monitor consultation and participation in preparing the AAP to ensure that where possible we engage with groups which are harder to reach or identify. This will be reviewed at each stage in the process to help determine whether there are additional things we need to do to help involve as many groups and people as possible.
13.	Councillor Bates	5. Key sustainability issues	Objection	In the energy efficiency section of the table, no mention is made of the Combined Heat and Power project which was mooted a few years ago and for which budget was set aside. Is this now off the agenda (I suspect it is, but if there is any	Agree: We have amended the sustainability issues in section 5 (Energy efficiency and the use of renewables, p. 30) to refer specifically to the combined heat and power scheme, also known

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				possibility of it being driven forward, it may be worth referencing it).	as the Rodney-Taplow Community Energy scheme.
14.	Councillor Bates	5. Key sustainability issues	Objection	I'm really skeptical about the section on air quality. It is a very bold, brave assertion to state that you expect a reduction in polluting activities. How will this happen? We will inevitably be increasing density - so we need to be imaginative about this. More people may equal more environmental problems, so we should highlight recycling facilities and also how the Council intends to lever support from the Air Quality Management Area (in fact, the surveys reveal Walworth Rd to be an area of exceptionally high pollution. It's unlikely to change).	Noted. The section on air quality in appendix 6 (p. 127) states that we must consider how the AAP can promote development and regeneration without reducing air quality. Whilst it may be difficult we must nevertheless consider what measures we can put in place to mitigate the growth in population. These measures could, for example, include minimising the number of parking spaces provided and encouraging cycling and walking, or improving biodiversity in parks or through features such as green roofs. Dust also contributes to air quality so care must be taken to ensure dust generation is minimised during demolition and construction.
15.	Councillor Bates	5. Key sustainability issues	Objection	14. Can we separate out the open space section and add an additional section on Burgess Park? The more we highlight this as an important and explicit issue, the more thinking will be done by residents, stakeholders and the wider community.	Disagree: Burgess Park is more important than other green spaces in the Aylesbury Estate area. However, the park is one of a number of green spaces in the area that all need attention – it is appropriate to have one general sustainability issue to do with open space. The issues and options report will contain specific options for Burgess Park which should help address the issue raised.
16.	Councillor Bates	5. Key sustainability issues	Objection	15. Section 13 talks about conservation areas, but doesn't mention protection of them. More buy-in will be achieved from residents in conservation areas if the Sustainability Report gives an explicit commitment to protect these areas (Octavia Hill and Addington Square are my key priorities).	Agree: The sustainability issue box in section 5 (p. 33) which relates to the built heritage has been changed to read: Need to preserve, enhance, and protect the built heritage and the archaeological environment
17.	Councillor	Appendix 4:	Objection	16. My final point centres on Appendix 4 and the need to do	Agree: We are only obliged to consult with

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	Bates	Consultees and Methods of Consultation		more than just "meet statutory requirements". We should be aiming to exceed these in many areas by a considerable way.	Natural England, English Heritage, and the Environment Agency. However consultation on the scoping report has been far wider than this and we have written to a large number of organisations and residents seeking their comments. We considered however that it would be more effective to focus our efforts on areas where the community can really make a difference to the AAP and that is in preparing and consulting on the issues and options and then the preferred options.
18.	Councillor Bates	N/A	Support	17. All in all, I think the draft report is an excellent document. My unease about the current AAP bounday (<i>sic</i>) aside, it is a potentially exciting route-map which can achieve enormous amounts. What I want to prioritise is: the need for the plan to raise standards way above statutory minimums in terms of consultation and audit of it, the need for Burgess Park to be enhanced as an opportunity which could drive the entire scheme, the need to consider Cross River Tram as a "possible" as opposed to a "probability" (this report suggests the latter and is a bit optimistic) and the urgent need to better communicate the value of the scheme to those residents on the periphery of the estate without raising expectations too high of benefits which may accrue.	Noted.

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19.	Environment Agency	3. Relationship to other plans and programmes	Objection	<p>PPS25: Development and Flood Risk</p> <p>The guidance aims are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. Where new development is, exceptionally, necessary in such areas, policy aims to make it safe without increasing flood risk elsewhere and where possible, reducing flood risk overall.</p> <p>Table 1 does not mentioned PPS25 although it is included in Appendix 5 as PPG25. All references to PPG25 should now change to PPS25.</p> <p>The section on PPG25 (Appendix 5) (now PPS25) is inadequate because it does not highlight the need for a strategic flood risk assessment (SFRA). This is needed for the sequential test to be fully applied.</p> <p>PPS25 makes the requirement of SFRA very clear. Annex E, E5 states:</p> <p>“ The SFRA should be used to inform the Sustainability Appraisal (incorporating the SEA Directive) of the Local Development Documents (LDDs), and will provide the basis from which to apply the Sequential Test and Exception Test in the development allocation and development control process (see Annex D).’</p> <p>Other than provide a framework at local/strategic level to help apply the sequential test and inform site allocations, SFRA is also used to identify sustainability objectives and test policy options in SA/SEA.</p> <p>In addition SFRA will allow the Council to:</p> <ul style="list-style-type: none"> • prepare appropriate policies for the management of flood risk • identify the level of detail required for site specific Flood Risk Assessments in particular locations, and, • determine the acceptability of flood risk in relation to emergency planning capability. • determine the potential increase from flood risk due to increase in surface water run off and the identification of opportunities for the sustainable management of surface water 	<p>Agree: All references to PPS25 have been corrected and we have added it to Table 1. The council is currently carrying out an SFRA and this will inform the selection of preferred options. We also recognise the need to carry out a sequential test. We have amended the information on PPS25 in appendix 5 which relates to relevant plans and programmes to read: This document explains how flood risk should be considered at all stages of the planning and development process in order to reduce future damage to property and loss of life. It sets out the importance the Government attaches to the management and reduction of flood risk in the land-use planning process, to acting on a precautionary basis and to taking account of climate change. The planning system should ensure that new development is safe and not exposed unnecessarily to flooding by considering flood risk using a strategic flood risk assessment by the Environment Agency of all options presented in a planning scheme. It should seek where possible to reduce and certainly not to increase flood risk. The planning policy statement also outlines how flood risk issues should be addressed in regional spatial strategies, development plans and in the consideration of planning applications.</p>

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20.	Environment Agency	3. Relationship to other plans and programmes	Objection	PPS9: Biodiversity and Geological Conservation PPS9 is not listed in Table 1 though it appears in Appendix 5. National Planning guidance is increasingly urging Local Authorities to adopt a positive planning approach and look at achieving enhancement of the environment through planning (as outlined within PPS1 and PPS9).	Agree: PPS9 has been added to Table 1.
21.	Environment Agency	3. Relationship to other plans and programmes	Objection	PPS23: Planning and Pollution Control 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. This appears in Appendix 5 but it is missing in Table 1.	Agree in part: PPS 23: Relevant Objectives and Targets in Appendix 5 now reads: PPS 23 urges local authorities to invoke the precautionary principle (which asserts that 'where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation') in circumstances when harmful effects may occur to human, animal or plant health or to the environment, or when such risk cannot be confidently assessed. It advises that the planning and pollution control systems are separate but complementary: the planning system should focus on whether the development itself is an acceptable use of the land, and the impact of those uses, rather than the control of processes or emissions themselves. Table 1 represents a summary with key documents. Whether PPS23 is mentioned in the main body of the report or the appendix,

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					the key point is that it has been identified and will be taken into account.
22.	Environment Agency	3. Relationship to other plans and programmes	Objection	<p>Code for Sustainable Homes: A step change in sustainable home building practice</p> <p>This guidance was published by CLG in December 2006. It is a standard for key elements of the design and construction, which offers the sustainability of a new home. It will become the single national standard for sustainable homes, used by home designers and builders as a guide to development, and by home –buyers to assist in their choice of home.</p>	<p>Agree: This document will be added to Table 1 under national plans and programmes. The Key message will read: To make a single national standard for sustainable homes. In Appendix 5, Relevant Objectives and Targets for the Code for Sustainable Homes now reads: This guidance was published by CLG in December 2006. It is a standard for key elements of the design and construction, which offers the sustainability of a new home. It will become the single national standard for sustainable homes, used by home designers and builders as a guide to development, and by home–buyers to assist in their choice of home. Implications for AAP now reads: Possible inclusion of the Code for Sustainable Homes into housing policy in the AAP.</p>
23.	Environment Agency	3. Relationship to other plans and programmes	Objection	<p>Planning Policies for Sustainable Building</p> <p>We recommend the inclusion of “ Planning Policies for Sustainable Building”- a Guidance to Local Development Frameworks (Local Government Association-Oct 2006). It recommends ways of integrating benchmarks for sustainable building into Local Development Frameworks. The report provides a set of suggestions and guidance, which reflect emerging and current good practice, and will help to deliver key policy objectives in areas such as energy, water and the use of materials.</p>	<p>Agree: A reference has been added in appendix 5.</p>

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24.	Environment Agency	3. Relationship to other plans and programmes	Objection	<p>Light Pollution Guidance on reducing light pollution has been prepared by the Institution of Lighting Engineers (ILE) Guidance notes for the reduction of obtrusive light, GN01, 2005</p> <p>The council should require development proposals to demonstrate how it is intended to contribute towards reducing light pollution. Information on these measures may be submitted with an application. The council will require that major developments provide lighting schemes that are designed to reduce the occurrence of light pollution and will expect such schemes to employ energy efficient forms of lighting that also reduce light scatter.</p>	Agree: A reference has been added in appendix 5.
25.	Environment Agency	3. Relationship to other plans and programmes	Objection	<p>Adapting to Climate Change: A checklist for development This guidance on designing developments in a changing climate was published by the Greater London Authority in November 2005. The main actions are summarised in a simple to use checklist, however, it is not intended to be a design manual, although it does contain signposts to more detailed guidance.</p>	Agree: A reference has been added in appendix 5.
26.	Environment Agency	3. Relationship to other plans and programmes	Objection	<p>Adapting to climate change: a case study companion to the checklist for development (March 2007) Adapting to climate change: a case study companion to the checklist for development applies the Checklist's guidance to provide built environment case studies that incorporate climate change adaptation in their design and construction. The latest UK climate change scenarios indicate that, on average, summers will become hotter and drier; there will</p>	Agree: A reference has been added in appendix 5.

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				also be an intensification of the urban heat island effect in urban areas. Winters will be milder and wetter leading to increased flood risk. As well as seasonal changes, there will be more extreme climate events for example, very hot days and intense downpours of rain. The companion guide provides case studies of developments or buildings that use techniques relevant to key climate change adaptation issues.	
27.	Environment Agency	3. Relationship to other plans and programmes	Objection	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.	Agree: A reference has been added in appendix 5.
28.	Environment Agency	3. Relationship to other plans and programmes	Objection	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.	Disagree: This plan can be taken into account once it has been completed.
29.	Environment	3. Relationship to	Objection	Thames Corridor Catchment Abstraction Management	Agree: The CAMS for the Thames Corridor

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	Agency	other plans and programmes		<p>Strategy (CAMS) - produced by the Environment Agency June 2004 - looks at water resources management and the implications for the River Thames. A copy is available at our website: http://www.environment-agency.gov.uk/subjects/waterres/564321/309477/309483/315125/?Version=1&Lang=_e</p> <p>CAMS are strategies for management of water resources at a local level. They make available information on water resources and licensing practice publicly available and allow the balance between the needs of the water abstractors, other water users and the aquatic environment to be considered in consultation with the local community and interested parties.</p>	<p>will be added into Appendix 5. Relevant Objectives and Targets now reads: 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. Implications for AAP now reads: Possible requirement in the AAP to implement the CAMS in consultation with Thames Water and local commercial ratepayers.</p>
30.	Environment Agency	6. Sustainability appraisal framework	Objection	<p>SDO 14: Flood Risk- Strategic Flood Risk Assessments</p> <p>Appendix 6 includes SDO 14 on reduction of vulnerability to flooding. However, PPS25 creates a duty to first demonstrate whether a development is being sited in the lowest flood risk zone. The Draft Sustainability Appraisal recognises that almost the whole area lies in the floodplain. The Sequential Test and where appropriate the Exceptions Test are prerequisites and reducing the vulnerability to the development area is not a substitute for this. The sustainability issues are therefore not adequately addressed due to lack of a strategic flood risk assessment (SFRA). SFRA should inform sustainability Appraisal. Without such an assessment, the sustainability appraisal would be considered incomplete. All references to PPG25 in this section should now change to PPS25</p> <p>As you will appreciate, any housing development at the</p>	<p>Agree: The council is in the process of preparing an SRFA and the baseline will be updated, once this has been completed. A sequential test will be undertaken and this together with the SFRA will inform the selection of preferred options. In the meantime, the sustainability issues section on page 136 has been amended to open with:</p> <p>A Flood Risk Assessment has been undertaken, in accordance with PPS25, for the south west corner of the Aylesbury Estate, known as phase 1a (Levitt Bernstein Associates Ltd, February 2007). As part of the assessment a review of the River Thames modelled flood levels was undertaken, and it is considered that the development is not at risk from fluvial or tidal flooding for return period events up to and</p>

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				Aylesbury Estate will have to take account of the findings of the SFRA to satisfy the sustainability appraisal and the tests of soundness.	including 1000 years, due to the existing Thames flood defences and the Thames Barrier. The report finds that the development would therefore be at low risk of flooding throughout its design life. We are also currently preparing an SFRA.
31.	Environment Agency	Appendix 6: The Evidence Base (Social, Environmental and Economic Context)	Objection	<p>Baseline data needs to be compiled for flood risk issues. This is needed to allow the assessment of change and policy performance against key indicators. Examples include: -the number of dwellings in Flood Zone 3, the number of new or replacement dwellings permitted in Flood Zone 3 and the number of highly vulnerable premises within flood Zone 3 (as per PPS25 Annex D). It may be possible to compile some baseline data using the flood zones.</p> <p>Information on planning permissions granted contrary to the advice of the Environment Agency on flood risk could be accessed using our external website link provided below:</p>	<p>Agree: The following indicator has been added:</p> <p>iii) Number of dwellings in flood zone 1, 2 and 3.</p> <p>Baseline information has been added on permissions granted contrary to EA advice and on the number of dwellings in the 3 flood zones.</p>

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32.	Environment Agency	5. Key sustainability issues	Objection	<p>Sustainable Drainage Systems (SUDS) Planning for Sustainable Drainage System (SuDs) early in a project's design is essential to enable integration of the system into the overall site concept and layout, and agreement on adoption, maintenance and operation of the systems.</p> <p>Selection of the most appropriate SUDS approach should be based on meeting the same principles of hydrology and hydraulics as traditional drainage systems, but also taking into account the interests of the landscape and the environment. As a general principle, techniques based control of run-off near its source are to be preferred to downstream solutions.</p> <p>For good practice we recommend the following:</p> <ul style="list-style-type: none"> • New development should provide appropriate sustainable drainage systems (SUDS) for the disposal of surface water; • SUDS should be applied within the curtilage of the development site. If this is not possible, developments should contribute towards the cost of off-site SUDS; • SUDS can be designed to provide multi-use benefits, such as public amenity and wildlife improvements; and • Use permeable paving rather than concrete. This type of paving allows rainwater to infiltrate into the ground, topping up groundwater supplies. By reducing the rate of surface water run-off it can help to reduce the risk of flooding. <p><u>Surface Water Flood Risk</u></p> <p>1.) Planning Policy Statement 25: Development and Flood Risk - Annex F relates specifically to surface water. 2.) Development and Flood Risk: A Practice Guide Companion to PPS25 - Chapter 4 relates to managing surface water.</p> <p>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 a drainage assessments". The CIRIA</p>	<p>Agree: The second paragraph of the sustainability issues section on page 136 has been revised to read: There is a need to consider what implications this may have in terms of sustainable urban drainage. PPS 25 advises that all sites require flood risk assessments. Selection of the most appropriate SUDS approach should be based on meeting the same principles of hydrology and hydraulics as traditional drainage systems, but also taking into account the interests of the landscape and the environment. As a general principle, techniques based control of run-off near its source are to be preferred to off-site solutions.</p> <p>The following information has been added in comparators and targets:</p> <p>The Environment Agency requires that the drainage proposals for a site achieve the following criteria:</p> <ul style="list-style-type: none"> • Greenfield discharge rates on greenfield sites (8l/s/ha) • Aspire to greenfield rates on brownfield sites, where possible (8l/s/ha). If not brownfield sites needs to show a reasonable reduction in existing runoff rates. • Demonstrate that opportunities to implement sustainable drainage techniques at the site have been maximised. • Demonstrate that the surface water design can accommodate any storm 15 event up to the critical duration 1 in 100 year storm (with climate change) event for the site without the flow balancing system being bypassed. Sufficient information must be provided to

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33.	Environment Agency	6. Sustainability appraisal framework	Objection	<p>SDO 6: Energy Efficiency and Renewable Energy: To reduce contribution to Climate Change</p> <p>The council should require development proposals to take account of the expected changes in local climate conditions, throughout the proposed lifetime of the development, by adaptation or flexibility to allow future adaptation. Information on these measures must be submitted with an application.</p> <p>Specifically, the council should require major developments to:</p> <ul style="list-style-type: none"> • Identify the type of and extent of the main changes expected in the local climate throughout the lifetime of the proposed development; • Identify the potential impacts of these changes on the proposed development and its neighbours; and • 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 gas emissions. 	<p>Noted: An additional question in SDO 6 will read: Does the urban, landscape, and building design take account of changes to the local climate and its impacts throughout the expected lifetime of the development on the local built and natural environment?</p>
34.	Environment Agency	6. Sustainability appraisal framework, 5. Key sustainability issues and Appendix 6: The Evidence Base (Social,	Objection	<p>SDO 10: Soil, Water, and Land Quality: Surface and Ground Water Quality and Sewerage Infrastructure</p> <p>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. In both cases the infrastructure should be sufficient to guarantee both surface and ground water quality</p>	<p>Noted: The information about Soil, Water and Land Quality (SDO 10) in appendix 6 has been amended to read:</p> <p>The Southwark Plan includes provisions to ensure that land is remediated where it is considered to be contaminated.</p>

Comment number	Name	Report section which representation refers to	Objection/ support	Representation	Council's response
		Environmental and Economic Context)		<p>would not be detrimentally affected.</p> <p>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.</p> <p>A key sustainability objective for the preparation of the AAP is for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 4.9 of PPS12 states:</p> <p>'LPAs should ensure that delivery of housing and other strategic and regional requirements is not comprised by unrealistic expectations about future availability of infrastructure, transportation and resources. Annex B sets out further guidance on resources, utilities and infrastructure provision'</p> <p>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 and pollution of land and watercourses.</p> <p>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. This must also be considered.</p> <p>Under Aims and Objectives: the final one is that Soil after</p>	<p>Paragraph 4.9 of PPS12 states:</p> <p>'LPAs should ensure that delivery of housing and other strategic and regional requirements is not comprised by unrealistic expectations about future availability of infrastructure, transportation and resources'</p> <p>Soil after development should not be able to be determined as Contaminated Land under Part IIA of the Environmental Protection Act 1990.</p> <p>One of the aims of the redevelopment should be to improve groundwater quality by improving the quality of surface water drainage and cleaning up soil and groundwater contamination.</p> <p>SDO 10 has been revised to read: Water, Land, and Soil Quality: To maintain and enhance the quality of water, land, and soils. The criteria question Will it lead to a reduction in the quality of surface water / waterways? has been moved to SDO 10.</p>

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				<p>Development is not contaminated. It would be better to change this to say that Soil after development should not be able to be determined as Contaminated Land under Part IIA of the Environmental Protection Act 1990.</p> <p>Under base line topics: Groundwater quality is not discussed. One of the aims of the redevelopment should be to improve groundwater quality by improving the quality of surface water drainage and cleaning up soil and groundwater contamination.</p> <p>Sustainability issue 11 relates to <u>water</u> resources. However the first section of summary of evidence is all about <u>waste</u> and waste recycling targets.</p>	
35.	Environment Agency	6. Sustainability appraisal framework	Objection	<p>SDO 9: Water Resources Water efficiency standards Although there is currently no requirement for water efficiency in the Building Regulations, we support efficient use of this resource. The design standards for buildings in the area must be pitched significantly higher.</p> <p>The Area Action Plan should require current best practice in energy and water efficiency that significantly exceed the current standards required by the Building Regulations and the Water Regulations. The requirement to achieve high levels of water efficiency is critical to all new and existing development. Lack of progress on demand management will place too much emphasis on resource development solutions, which are inflexible</p>	Noted. No change to SDO 9 is required.

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				<p>The Draft Sustainability Appraisal recognises potential for development to increase the pressure on water resources and mentions the recent drought and water rationing to the existing community as a pointer to the magnitude of the problem.</p> <p>A pro-active approach should be taken on water efficiency, working closely with the Water Company on capacity of available water supplies to accommodate any proposed development.</p> <p>We produce a number of publications about Water Conservation. To receive a hard copy of any of these publications, please email savewater@environment-agency.gov.uk or telephone 01903 832275.</p> <p>For more information on our publications, please use the link below: http://www.environment-agency.gov.uk/subjects/waterres/286587/286911/?version=1&lang=_e</p>	
36.	Environment Agency	6. Sustainability appraisal framework and Appendix 6: The Evidence Base (Social, Environmental and Economic	Objection	<p>15. SDO13: Open Space and Biodiversity</p> <p>The Environment Agency would support mention of riverine/lake green corridors within the sustainability appraisal due to the benefits that they provide for biodiversity and public amenity. This would tie with the sustainability objective SDO 10 and include the objective of the Water Framework Directive to get all water bodies to 'good ' quality status. We would like to see a further indicator in this section relating to</p>	<p>Noted: Ecological value of river/lake corridors has been added as a criteria in Appendix 6, SDO 10 with the following added to Sustainability Issues: Achieve the objective of the Water Framework Directive to get all water bodies to 'good ' quality status.</p>

Comment number	Name	Report section which representation refers to	Objection/ support	Representation	Council's response
		Context)		<p>waterways such as: "Ecological value of river/lake corridors".</p> <p>Biodiversity is recognised as being vital in stimulating economic regeneration and contributing human welfare. Biodiversity has its own intrinsic value as well as providing essential environmental services, such as ameliorating pollution and building resilience to climate change. The Agency champions the role and value of semi-natural wetland habitats in planning to ensure that biodiversity and the services it provides is not degraded, for the benefit of future generations.</p> <p>The Environment Agency considers new development in urban areas an opportunity to create enhancements and opportunities for biodiversity. This AAP provides an ideal opportunity for enhancement of low value conservation sites</p> <p>Applicants proposing major developments should appoint a suitably qualified ecologist to prepare appraisal of the proposals and, if appropriate a biodiversity action plan for the site.</p> <p>The AAP should also recognise the importance of external private open space, which is important for wildlife as a potential corridor, recreation and access. External private space such as allotments and gardens can contribute to sustaining biodiversity, sustainable drainage, and opportunities for composting and create healthier, more attractive places.</p>	<p>The following has been added to the Sustainability Issues of SDO 13: The Environment Agency considers new development in urban areas an opportunity to create enhancements and opportunities for biodiversity. This AAP provides an ideal opportunity for enhancement of low value conservation sites</p> <p>Applicants proposing major developments should appoint a suitably qualified ecologist to prepare appraisal of the proposals and, if appropriate a biodiversity action plan for the site.</p> <p>The AAP should also recognise the importance of external private open space, which is important for wildlife as a potential corridor, recreation and access. External private space such as allotments and gardens can contribute to sustaining biodiversity, sustainable drainage, and opportunities for composting and create healthier, more attractive places.</p>
37.	Natural	1: Aylesbury	Support/	Natural England is pleased to see that the document has	Noted: The following Indicator has been

Comment number	Name	Report section which representation refers to	Objection/ support	Representation	Council's response
	England	Area Action Plan and Future Planning Documents	Objection	<p>recognised the issue of open space provision, which can be strengthened by consideration of Biodiversity and Ecology.</p> <p>Paragraph 1.13 provides a list of objectives under the headings of Housing, Education, Social/Healthcare, Community Support, Transport and Movement, Environment and Employment & Enterprise. These issues are similar to those identified in other Borough Area Action Plans and would seem appropriate for this document.</p> <p>Under the Transport objective there is the promotion/consideration of public transport usage, new and improved connections together with pedestrian and cycling opportunities, which is welcomed and supported.</p> <p>The Environment heading does not appear to include biodiversity, open spaces here are referred to as 'leisure/recreational resources'.</p> <p>Natural England would be supportive of any initiatives to increase the provision of open and green spaces and the following comments may be of use to the Council.</p> <p>Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of greenspaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system:</p>	<p>added to SDO 13:</p> <p>Matching the quality and quantity of green space to the population of the area</p> <p>with the following baseline data in Appendix 6:</p> <p>Population of Aylesbury Area Action Plan: 24,474</p> <p>Total amount of greenspace in AAP: 50.6ha</p> <p>Large Parks: Burgess Park, 46ha. Distance: 0km</p> <p>Hyde Park, 140ha, 4.5km</p> <p>Richmond Park, 1100ha, 11.5km</p> <p>and the following Comparators and Targets:</p> <p>Local communities have access to an appropriate mix of greenspaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population and:</p> <ul style="list-style-type: none"> • No person should live more than 300 metres from their nearest area of natural green-space; • There should be at least one accessible 20 hectare site within 2 kilometres; • There should be one accessible 100 hectares site within 5 kilometres; and • There should be one accessible 500 hectares

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				<ul style="list-style-type: none"> No person should live more than 300 metres from their nearest area of natural green-space; There should be at least one accessible 20 hectare site within 2 kilometres; There should be one accessible 100 hectares site within 5 kilometres; and There should be one accessible 500 hectares site within 10 kilometres. <p>This is recommended as a starting point for consideration by local authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/authorities than others, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough. This can assist the Council with identifying the needs of the local community and increase awareness of the value of accessible natural green-space, along with the levels of existing green-space provision, resources and constraints.</p>	site within 10 kilometres.
38.	Natural England	2. SA Methodology and the timetable for the SA's of the AAP and SPD	Support	This section is acceptable and Natural England have no further comments to make.	Noted.
39.	Natural England	3. Relationships to other Plans and Programmes	Support/Objection	The Council has referenced a number of relevant and appropriate documents, policies and plans under this section, however, there appears to be no mention of PPS9 – Biodiversity, which links in to the reference to biodiversity	Agree: PPS9 has been added to Table 1.

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				<p>under the Executive Summary – Key Findings paragraph 4.2 (b) Baseline Information.</p> <p>The inclusion of Design for Biodiversity is however welcomed and commended.</p>	
40.	Natural England	4. Social, Economic and Environmental Context	Support	Baseline data is held in Appendix 6 and will be commented upon later, although the inclusion of 'open spaces and biodiversity' as a topic heading is encouraging.	Noted.
41.	Natural England	5. Key Sustainability Issues	Support	<p>The eighteen issues identified here cover the areas that Natural England would wish to see covered and are similar to issues identified by other London Boroughs.</p> <p><u>Issue 7 - Accessibility</u> This issue recognises the need to improve access to public spaces as well as public transport, and any initiative by the Council to improve access to these services/facilities would be supported by Natural England.</p> <p><u>Issue 12 – Need to maintain and enhance open space</u> Improvements to biodiversity in the area are mentioned solely in the last line of this issue. I would refer you to PPS 9 – Biodiversity document as mentioned above, together with the ANGST Standards also mentioned above, which may be of use to the Council in their deliberations.</p> <p><u>Issue 18 – Improving walking and cycling infrastructure within the action area</u></p>	Noted: We recognise the interconnections between issues 16 and 18 regarding walking and cycling, and between 6 and 17 regarding crime and safety in the built environment.

Comment number	Name	Report section which representation refers to	Objection/ support	Representation	Council's response
				<p>Natural England welcomes initiatives to support and promote walking and cycling but could these issues be combined with Issue 16 – Public Transport Accessibility and reducing the need to travel by car – these two issues would appear to be complimentary.</p> <p>Similarly is it not possible to combine Issue 6 – High Levels of Crime and Fear of Crime, together with Issue 17 – Need to improve safety in streets and the public realm?</p>	
42.	Natural England	6. Sustainability Appraisal Framework	Support	<p>The sixteen objectives listed are broadly supported, and in particular the following:</p> <p>SDO 6 – To reduce contributions contributing to Climate Change;</p> <p>SDO 13 – To protect and enhance open spaces, green corridors and biodiversity; This objective considers the appropriate management or enhancement of existing open spaces or the creation of open spaces and this is both welcomed and supported. Consideration as to whether this plan/proposal will help achieve the goals for the Biodiversity Action Plan is also supported, however, it is not clear which Biodiversity Action Plan the Council are referring to, perhaps this could be clarified.</p> <p>SDO 16 - To promote sustainable transport and minimise the need to travel by car; The inclusion of pedestrian and cycling facilities together with</p>	<p>Noted. One question in SDO 13 has been changed to read: Will it help achieve the goals of the Southwark Local Biodiversity Action Plan?</p>

Comment number	Name	Report section which representation refers to	Objection/ support	Representation	Council's response
				<p>alternative fuelled vehicles is also supported and to be encouraged.</p> <p>The Council may also wish to give consideration to improved connections and integration of public transport services/facilities wherever possible.</p>	
43.	Natural England	Appendix 5 – Relevant Plans, Programmes and Environmental Protection Objectives	Support/Objection	<p>PPS 9 – Biodiversity is mentioned on Page 66 and references the need to take this document in to account in respect of the Area Action Plan, which is welcomed and supported, however, the main document appears not to recognise the importance of this document.</p> <p>For example the following may be of use:</p> <p><u>Paragraph 14 – Biodiversity within Developments</u> Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. When considering proposals, local planning authorities should maximise such opportunities in and around developments, using planning obligations where appropriate.</p> <p>Examples of this could be green or brown roofs where appropriate, as part of the overall design for the area.</p>	<p>Agree: The following text has been added to the sustainability issues on page 66: Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. When considering proposals, local planning authorities should maximise such opportunities in and around developments, using planning obligations where appropriate.</p>
44.	Natural England	Appendix 6: The Evidence Base (Social, Environmental and Economic	Objection	<p>Under Open Space and Biodiversity on page 133, the sustainability issues consider the importance of open space and that development should create, preserve or enhance open spaces, green corridors and biodiversity, this consideration is supported.</p>	<p>Agree: The following indicator description has been added to SDO13: Maintain and enhance biodiversity.</p>

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		Context)		<p>Natural England's ANGST Standards mentioned earlier may be of assistance here.</p> <p>Indicators include provision for open spaces to have approved management plans/proposals and this is welcomed and supported, as is the number of parks/green spaces with Green Flag status.</p> <p>It would be advisable for the Council to set figures for these indicators, either a specific number or percentages in order to help with management and monitoring of the Plan.</p> <p>The Baseline indicates that there has been no net loss in SINC's in the action area and this to be commended and encouraged to remain as a base line minimum.</p> <p>In order to provide the Council with suitable baseline biodiversity/species information the Council may find the following of use.</p> <p>Greenspace Information for London (GIGL) can provide biodiversity data including details of statutory and non-statutory sites, distribution of protected species and location of habitats of nature conservation value. You can contact GIGL on 020 7803 4278 or at GIGL@wildlondon.org.uk</p>	<p>We have amended the baseline to read: Within the Southwark BAP the following key habitats and species are identified within Burgess Park:</p> <ul style="list-style-type: none"> • Lake; • Grassland; • Young woodland; • Bats; • Waterfowl; • The stag beetle; and • Scrubland. <p>Source: Southwark Biodiversity Action Plan</p> <p>Comparators and Indicators: Five key steps are identified, namely:</p> <ul style="list-style-type: none"> • Consultation and scoping study; • Detailed surveys and impact assessment; • Design of development to incorporate biodiversity objectives; • Enhancement, mitigation and compensation; and • Management and aftercare.

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					Source: Design for Biodiversity
45.	Southwark Primary Care Trust	N/A	Objection	<p>It appears that no effective consultation has taken place with the public health department in the Primary Care Trust. This is a major omission, and is extremely surprising, given the potential impact on health, and the joint council: PCT responsibilities to improve health and well being in the borough.</p> <p>The enclosed amendments start to address this, but means of effective engagement must be established as soon as possible.</p>	<p>Disagree: We were in contact with the PCT while preparing the sustainability appraisal and have been given information about the PCT's priorities for improving health and well being in the Aylesbury AAP area, including new facilities.</p> <p>This document, "Aylesbury – Health space specification for masterplanning" outlines the PCT's priorities and desires for providing a local healthcare centre in the estate. We are continuing to engage with the PCT to ensure that its objectives for the Aylesbury Estate can be achieved.</p>
46.	Southwark Primary Care Trust	3. Relevant Plans and Programmes	Objection	<p>Omitted the following:</p> <ul style="list-style-type: none"> - Annual Public Health Report 2005, Southwark Primary Care Trust; - Annual Public Health Report 2006, Southwark Primary Care Trust (forthcoming); and - Asset Management Strategy, Southwark Primary Care Trust. 	<p>Agree in part: Rather than referring to the annual public health reports, however, we have added information about the local health profile for Walworth and Borough 2005, as this document is more specific to the action plan area.</p> <p>The following therefore has been added to the Borough/Local Section of Appendix 5: Locality Health Profile: Walworth & Borough (2005) Relevant Objectives and Targets: This document contains data on the health issues more prevalent in the Walworth and Borough area than other areas of London and</p>

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					<p>Southwark. These issues include an increased prevalence of hypertension, diabetes, lung cancer, colon cancer (in males), cervical cancer, mental illness, smoking, obesity, and teenage pregnancies. Implications for AAP: The AAP should take account of the health impacts of policies, which could be informed by a Health Impact Assessment.</p> <p>We have not included the asset management strategy as the Aylesbury – health space specification for masterplanning document provides more specific information.</p>
47.	Southwark Primary Care Trust	5. Key sustainability Issues	Objection	<p>Section 4 should be renamed 'Improving health and reducing health inequalities', as noise is covered in section 9.</p> <p>Section 4 must state that a Health Impact Assessment is required to inform the sustainability appraisal reports. Areas that are likely to be important are</p> <ul style="list-style-type: none"> • Stress, anxiety, and mental health; • Chronic disease (diabetes, sickle cell, coronary heart disease etc); • Alcohol and drugs; • Sexually transmitted diseases and teenage pregnancy; and • Access to services. <p>Section 5 must stress the importance of social capital especially as regards health, and measures identified to</p>	<p>Agree in part: Sustainability issue 4 has been changed to read: Improving health and reducing health inequalities.</p> <p>Section 4: We will consider the need to carry out a health impact assessment and the extent to which elements of such an assessment can be incorporated into the sustainability appraisal. We would like to discuss this further with the PCT to ensure that health impacts of the AAP are fully accounted for.</p> <p>Section 5: We recognise the importance of maintaining and creating social capital but consider that it is covered by the sustainable development objective on social cohesion.</p>

Comment number	Name	Report section which representation refers to	Objection/ support	Representation	Council's response
				<p>measure progress in this area.</p> <p>Section 7 should mention importance of access to leisure facilities, to improve opportunities to participate in physical activity.</p> <p>Section 12 should also stress importance of access to green space, to improve opportunities to participate in physical activity.</p>	<p>Section 7: The following: Improve access to green space and leisure activities in order to improve health by promoting physical activity.</p> <p>Section 12: This statement has been covered in sustainability issue 7.</p>
48.	Southwark Primary Care Trust	6. Sustainability Appraisal Framework	Objection	<p>Under Health, need the following prompts:</p> <p>Will it promote healthy living in a number of key areas – increasing physical activity, opportunities to improve diet, reduce problematic alcohol consumption, smoking, drug misuse.</p> <p>Will it reduce stress, anxiety and mental disorders?</p> <p>Will it promote social capital, social interaction and a sense of belonging?</p> <p>Will it encourage the prompt recognition and early intervention of important health conditions?</p> <p>Will it help residents manage their chronic disease?</p> <p>Will it reduce accidents and injuries?</p> <p>Under Quality in Design, need the following prompts:</p> <p>Will it be cost effective for residents to maintain their property?</p> <p>Will the quality of the structure be retained for the life of the building?</p>	<p>Agree in part: We have replaced the criteria in SDO 3: Health with the following questions:</p> <p>Will it promote healthy living in a number of key areas – increasing physical activity, opportunities to improve diet, reduce problematic alcohol consumption, smoking, drug misuse.</p> <p>Will it reduce stress, anxiety and mental disorders?</p> <p>Will it promote social capital, social interaction and a sense of belonging?</p> <p>Will it encourage the prompt recognition and early intervention of important health conditions?</p> <p>Will it help residents manage their chronic disease?</p> <p>Will it reduce accidents and injuries?</p> <p>We do not agree that the first prompt should be added to the quality and design section as this is</p>

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					covered under social inclusion and community cohesion. The second prompt has been integrated into the criteria to read: Will it enhance and maintain the quality and attractiveness of the built environment?
49.	Theatres Trust	N/A	Support	As it is unlikely the Council will be building a theatre within the new development this consultation is not directly relevant to the Trust's work and we therefore have no specific comment to make. However we suggest that the performing arts are an important community element providing social, cultural, environmental and economic benefits. The ODPM's publication (now the DCLG) Sustainable Communities: People, Places and Prosperity ODPM 2005, advises that a sense of place, good quality community and cultural facilities are essential components in the development of sustainable communities.	Noted.
50.	Theatres Trust	N/A	Objection	A modest well designed community centre with a performance area and film screen would provide participation opportunities for groups excluded from, or less able to access, mainstream services, such as younger or older people. Local activities can promote social inclusion, bringing together the new community, where good quality, accessible local cultural facilities are key to creating communities where people will continue to want to live and work.	Noted. We will take this into account in preparing the AAP.
51.	Transport for London	1. Aylesbury Area Action Plan and future planning documents	Support/Objection	Section 1: TfL recognises that the Aylesbury Estate is currently a challenging area with a range of social problems. Poor accessibility and permeability throughout the estate, as well as poor links to surrounding areas and amenities have helped contribute to these problems. These must be addressed in any future plans.	Noted: Paragraph 1.5 has been changed to read: The possible provision of the Cross River Tram could significantly improve public transport into the Aylesbury Estate and its surrounding area. The Cross River Tram will likely pass through the Aylesbury Estate;

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				Section 1.13:- TfL supports the Transport and Movement objectives.	however the final route has not been determined. Consultation on the preferred route option is currently scheduled to be held during late 2008.

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52.	Transport for London	3. Relevant Plans and Programmes	Objection	<p>Question 1 – Under the Plan or Programme section TfL expects the following documents to be added:</p> <p>London Plan SPG: Land for Transport Functions, March 2007, GLA - To safeguard land for future transport infrastructure as well as protecting existing infrastructure.</p> <p>Transport 2025, 2007, TfL - Transport Vision for a growing world city.</p> <p>London Cycle Design Standards environment, 2005, GLA/TfL – A guide to designing for cycling.</p> <p>Making London a Walkable City: The Walking Plan for London, 2004, GLA/TFL - Improving conditions for walking in London.</p> <p>Improving Walkability, 2005, GLA/TFL - Good Practice guidance on improving pedestrian conditions as part of development opportunities.</p>	<p>Agree: The London Plan SPG and Transport 2025 have been added to Table 1 under regional guidance. All of the documents have been added to Appendix 5 under regional guidance.</p> <p>The following has been added to the Borough/Local Section of Appendix 5: London Plan SPG: Land for Transport Functions (2007) Relevant Objectives and Targets: To ensure that efficient and effective use of land for transport purposes is delivered in order to meet broader sustainability objectives. It provides more detailed guidance to boroughs, developers, operators and landowners on the specific land requirements needed to support different modes of transport. It also suggests how these requirements can be supported in boroughs' UDP/LDF policies. Implications for AAP: Take into account land take requirements for bus lanes and bus stops in the AAP area (Thurlow Street / Albany Street).</p> <p>Transport 2025 (2007) Relevant Objectives and Targets: To accommodate further dispersed housing growth by supporting economic development, tackling climate change and enhancing the environment, and improving social inclusion. Implications for AAP: Take into account the strategic goals of the document to set goals for modal split.</p> <p>Making London a Walkable City: The Walking Plan for London (2004) Relevant Objectives and Targets: To promote walking, improve street conditions, and improve developments and interchanges Implications for AAP: Improving the public realm for walking and cycling should be part</p>

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53.	Transport for London	Appendix 6: The Evidence Base (Social, Environmental and Economic Context)	Objection	<p>In relation to the proportion and average number of person trips made by each mode of transport i) over ii) to work the use of 2001 Census data can be a useful starting point. However since 2001 there have been some significant changes to travel behaviour in Central London most notably as a result of initiatives such as the introduction of congestion charging as well as significant improvements to bus services. It is therefore suggested that baseline data is supplemented by additional data sources such as up to date surveys of the Aylesbury Estate area and where appropriate TRICS and TRAVL.</p> <p>Through our ongoing contact with the Councils consultants this should ensure that the most relevant and up to date data is being used.</p>	Noted: We have undertaken travel surveys to inform the preparation of the issues and options report.
54.	Transport for London	5. Key Sustainability Issues	Support	TfL considers the data and sources to be generally acceptable specifically in relation to sustainability issues 7, 9, 16, 17 and 18. TfL welcomes any requests for further data/acceptance of data sources to inform the preparation of the AAP.	Noted.
55.	Transport for London	6. Sustainability appraisal framework	Support/Objection	<p>TfL supports 'SDO.16 to promote sustainable transport and minimise the need to travel by car'. TfL suggests the addition of the following criteria questions to the existing list:</p> <ul style="list-style-type: none"> - Will it support a car free or restraint based approach to the provision of residential car parking? - Will it promote a car club for the area and provide incentives for residents to become members? - Will it safeguard land for future transport schemes? - Will it encourage a high level and high standard of cycle storage provision throughout the development? 	<p>Noted: The following criteria have been added to SDO 16:</p> <p>Will it support a car free or restraint based approach to the provision of residential car parking?</p> <p>Will it safeguard land for future transport schemes?</p> <p>Will it encourage a high level and high standard of cycle storage provision throughout the development?</p>

Comment number	Name	Report section which representation refers to	Objection/ support	Representation	Council's response
					The potential for car clubs will also be considered in the preparation of the AAP.
56.	English Heritage	N/A	Support	In our assessment the Aylesbury Estate has local historic environment significance by virtue of the conservation areas and archaeological areas adjoining the regeneration area. The council's in-house conservation and archaeological advisers should be involved in discussion on the impacts of the plan's policies on these areas.	Noted. We will keep the council's conservation officers appraised of all documents associated with this AAP
57.	Friends of the Earth	6. Sustainability appraisal framework	Objection	SDO 3 – Health Firstly we believe that, as well as allotments, private gardens should be added for this section as well as open green space. One thought we have had is, because open space of any type helps towards the wellbeing of people in general, the provision of a wide diversity of flora and fauna in an area helps towards reducing carbon emissions, thus making the air cleaner for the residents to breathe, we believe that SDO13 should be part of SDO3.	Agree in part: We have replaced the criteria in SDO 3: Health with the following questions: Will it promote healthy living in a number of key areas – increasing physical activity, opportunities to improve diet, reduce problematic alcohol consumption, smoking, and drug misuse. Will it reduce stress, anxiety and mental disorders? Will it promote social capital, social interaction and a sense of belonging? Will it help residents manage their chronic disease? Private gardens can help residents achieve healthy living and general well-being, and the benefits of more private open space (and remembering that public open space can provide some of these benefits to all as well) will be assessed in the interim sustainability report against this and several other SDOs.
58.	Friends of the	6. Sustainability	Objection	SDO 5 – Social Inclusion and Community Cohesion.	Noted. The Best Value Performance Indicator

Comment number	Name	Report section which representation refers to	Objection/ support	Representation	Council's response
	Earth	appraisal framework		Whilst we agree that accessibility for any potential user of the estate, regardless of their age, ability or situation means that all should be able to find their way around the estate and its buildings safely and easily, we are very well aware that most of Southwark is designed for the wheelchair users and not the blind or partially-sighted of the borough. We would very much like to see a far greater concentration of ways to guide these visually-impaired residents to all the same facilities as the able-bodied and wheelchair users. It is simply due to the fact that these people have never been regarded as 'disabled' and this should change now.	(BVPI) standards applied to pedestrian crossings and walkways should take into account the visually-impaired, and the AAP policies for public space must take account of them.
59.	Friends of the Earth	6. Sustainability appraisal framework	Support	SDO 14 – Flood Risk To keep hard surfaces to a minimum to allow natural soaking away of rainwater.	Noted. The options for redevelopment will produce different amounts of hard surfaces in the short, medium and long term and will be assessed in the interim sustainability report against this and several other SDOs.
60.	Friends of the Earth	6. Sustainability appraisal framework	Support/ Objection	SDO 16 – Sustainable Transport This should also read: 'To minimise the need for car ownership' and should also ask: 'Will it provide car club schemes'? The transport hierarchy should be: walking, cycling, and then public transport but reducing the need to travel.	Disagree: Car club schemes, additional public transport, increased bicycle use, and more walking are all ways of minimising the need for car ownership and it is not necessary to add each individually to the criteria.

Responses to External Comments on the Interim Sustainability Appraisal

Comment number	Name	Report section which representation refers to	Objection/ support	Representation	Council's response
1.	English Heritage	4. Baseline and Context	Objection	<p>No reference has been made to PPG 16 Archaeology and Planning. There may be unknown archaeological evidence not yet identified which may during the course of redevelopment of the area may be found. This possibility needs to be recognised in the SA process.</p> <p>In addition it is noted that reference has been made to the joint CABE English Heritage Guidance. The version quoted is out of date. A revised version was published in July of this year. The key message of this document is to understand the existing context, including the historic environment before establishing the appropriateness of tall buildings in an area.</p> <p>At the local level we would seek to ensure that any heritage assets and their settings are carefully considered as part of this SA process. For example we would suggest that any conservation area appraisals and conservation management plans that relate to land within the AAP or adjoining it are identified, assessed and fed into this SA. This includes the listing of the relevant documents in Table 2.</p>	Noted. The relevant documents have been considered and included in Table 3 (Section 4 Sustainability Objectives, Baseline and Context) of the Sustainability Appraisal Report.
2.	English Heritage	4. Baseline and Context	Objection	<p>We welcome the need to preserve, enhance and protect the built heritage and the archaeological environment. However in the summary and source of evidence, there are concerns over the limited identification of heritage assets and their settings. For example no reference is made to the <u>many</u> various listed buildings found within or adjoining the land bounded by the AAP. Also of importance is the lack of recognition and therefore consideration given to the setting of the areas heritage assets. Finally the SA should also consider</p>	Noted. Listed and unlisted character buildings located in the AAP were referenced in the Baseline Report. They have also been considered and reference has been made to them in Table 5 (Section 4 Sustainability Objectives, Baseline and Context) of the Sustainability Appraisal Report.

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				the value of the wider historic environment, which may not be statutorily protected but be of value to the local community. These unprotected features should be carefully considered as they could be used in conjunction with heritage assets to help provide a sense of place and inform the development of a sustainable community.	
3.	English Heritage	4. Baseline and Context	Objection	We support the need to improve safety in streets and the public realm, but we would wish to ensure that interventions proposed are based on good design principles which include understanding and appreciating the positive elements of the existing character and townscape features of the area. This includes existing heritage assets, their setting and the wide historic environment. For example some of the listed descriptions make specific reference to key historic streetscape features (i.e. 1,1A, 3-11 and <u>attached railings</u> , Portland Street - grade II). English Heritage has published a variety of guidance and best practice which should be considered as part of this process, such as <i>Streets for All</i> . This sets out a series of principles of good practice that should inform improvements in street safety and enhancement of the public realm.	Noted. The interventions proposed to improve safety in the streets will be based on the principles of good design. We will ensure an understanding and appreciation of the positive elements of the existing character and townscape features will influence any design interventions. We will be particularly sensitive if developing close to key historic streetscape features.
4.	English Heritage	5. Sustainable Development Objectives	Objection	We welcome the identification of objectives for Quality in Design and Conservation of Historic Environment under a single list of sustainable development objectives. However we would suggest that the conservation objective should be expanded to include the issue of 'setting' for heritage assets. In addition the criteria questions need to recognise the various types of heritage assets, such as conservation areas, listed buildings and archaeology and whether future change will have an impact upon them and their setting.	Noted. In Table 6 (Section 4 Sustainability Objectives, Baseline and Context) of the Sustainability Appraisal Report the criteria questions have been modified to recognise the various types of heritage assets and their setting.

Comment number	Name	Report section which representation refers to	Objection/ support	Representation	Council's response
5.	English Heritage	6. Appraisal of the Issues and Options Report	Objection	We would suggest that conservation of the historic environment is compatible with the 4 th priority of Community: Enhanced social and economic opportunities. It has been demonstrated through past and existing examples, that conservation-led regeneration can provide both economic and social benefits to a local community. We believe that the same could be achieved for this AAP, by using the existing historic environment as a platform in which to develop a sustainable community with a local identity.	Agreed. In Table 7 (Section 5 Appraisal of the Preferred Options Report) of the Sustainability Appraisal Report the score for the 4 th Place Making Objective, Community: Enhanced social and economic opportunities has been modified to reflect the compatibility of this objective with that of Conservation of the Historic Environment.
6.	Environment Agency	4. Baseline and Context	Support	<p>We are pleased to note that all comments and issues raised in our previous consultation have fully been incorporated in this document. The Sustainability Appraisal has identified sustainable use of water resources and flood risk as key issues in the borough notwithstanding the presence of the defences and the Thames Barrier.</p> <p>It is commendable to note that you have already undertaken a detailed flood risk assessment and the preparation of SFRA is in the process. The SFRA should inform the sustainability appraisal and identify opportunities for reducing flood risk. This will enable the council to apply the sequential test and allocate appropriate sites for development</p> <p>We welcome the weight supporting text has given to flood risk management including urban surface water flooding. We are in support of paragraphs 2.2.20 -2.2.22 which give a succinct examination, explanation and justification of flood risk levels. We hope the Area Action Plan will have strong policies which offer the developers a guidance of what will be expected of them when submitting development</p>	Noted.

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				<p>proposals and planning applications.</p> <p>Information on improving the flood performance of new buildings would be obtained from <i>Flood resilient construction (Defra May 2007)</i>. This document aims to provide guidance to developers and designers on how to improve the resilience of new properties in low or residual flood risk areas by the use of suitable materials and construction details. These approaches are appropriate for areas where the probability of flooding is low (e.g. flood zone 1 as defined by PPS 25) or areas where flood risk management or mitigation measures have been put in place. Specifically this guidance document provides:</p> <ul style="list-style-type: none"> • practical and easy-to-use guidance on the design and specification of new buildings (primarily housing) in low or residual flood risk areas in order to reduce the impacts of flooding • recommendations for the construction of flood resistant and resilient buildings 	
7.	Environment Agency	4. Baseline and Context	Support	Other than the risk of flooding from the Thames River, flooding in Aylesbury can occur from many sources: sewer flooding and surface flooding. Often these types of flooding happen in combination and it is difficult to distinguish between the different types. The management of the drainage systems and associated flooding is the responsibility of several bodies, making the risks of flooding even more complex. We do appreciate that this information is contained in the sustainability appraisal.	Noted.
8.	Environment Agency	4. Baseline and Context	Support	Current climate change predictions anticipate that the intensity of storms is likely to increase. This will mean that the	Noted.

Comment number	Name	Report section which representation refers to	Objection/ support	Representation	Council's response
				<p>threat from surface water flooding is likely to increase and the sporadic nature is likely to continue. The application of the drainage hierarchy (Further Alterations to the London Plan-FALP Policy 4A.5vii) should improve the ability of the urban area as a whole to cope with such storm events but individual locations will still be affected.</p> <p>We do understand that lack of recorded data limits a definitive assessment of options. For development with large roof area it would be prudent to design in surface water storage areas to cope with heavy localised storms. This could be done through maximising surface water storage and/or by building in oversized drainage pipework. Green roofs and other surface water storage or infiltration may help to reduce the flood risk, these are actively encouraged in FALP policies and the AAP.</p>	
9.	Environment Agency	General	Support	The sustainability appraisal and the AAP are quite detailed and have considered our concerns for flood risk management, sustainable water resources, biodiversity and renewable energy. If implemented well, it will transform the local community way of life and provide environmental enhancement and protection.	Noted.
10.	Natural England	4. Baseline and Context	Support	Natural England is pleased to see the clear links and references to PPS 9 – Biodiversity and geology Conservation in the Sustainability Appraisal.	Noted.
11.	Natural England	4. Baseline and Context	Support	<p>Sustainability Issues for the Area Action Plan and Supporting Evidence (Table 4 – pages 26 to 34) lists the eighteen issues identified in respect of the Plan and these seem appropriate.</p> <p>Issue 12 relates to the need to maintain and enhance Open Space provision, and states that the Area Action Plan should</p>	Noted.

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				<p>consider how it can improve the provision of open spaces as well as improving biodiversity and access to nature, and this statement is both welcomed and supported.</p> <p>Issue 16 relates to the need to improve accessibility by public transport and minimise the need to travel by car, this aspiration is also supported and the Council's intention/consideration of lower parking levels, and in the future the Cross River Tram should help deliver this.</p> <p>Issue 18 relates to improving the walking and cycling infrastructure within the Area Action Plan, Natural England is supportive of any schemes or initiatives that promote walking or cycling and is pleased to see the Council's commitment to the infrastructure for the area.</p>	
12.	Natural England	5. Sustainable Development Objectives	Support	<p>Table 5 on pages 35 to 38 lists the sixteen Sustainable Development Objectives which as stated previously Natural England are broadly supportive of, especially the following;</p> <p>SDO 6 "To reduce contributions to Climate Change".</p> <p>SDO 13 "To protect and enhance Open Spaces, Green Corridors and Biodiversity". Under this Sustainable Development Objective, Natural England welcomes and supports the clarification as to which Biodiversity Action Plan is referred to, in this instance the Southwark Biodiversity Action Plan.</p> <p>SDO 16</p>	Noted.

Comment number	Name	Report section which representation refers to	Objection/ support	Representation	Council's response
				"To promote sustainable transport and maximise the need to travel by car".	