Open Agenda

Southwark Council

## Cabinet

Tuesday 21 June 2011 4.00 pm Town Hall, Peckham Road, London SE5 8UB

# **Supplemental Agenda No. 1**

List of Contents

Item No.

Title

Page No.

16. Draft Affordable Housing Supplementary Planning Document - 1 - 227 Appendices

Appendices A – D.

**Contact** Paula Thornton 020 7525 4395 or Everton Roberts 020 7525 7221 or email: <u>paula.thornton@southwark.gov.uk; everton.roberts@southwark.gov.uk</u> Webpage: <u>http://www.southwark.gov.uk</u>

## Agenda Item 16

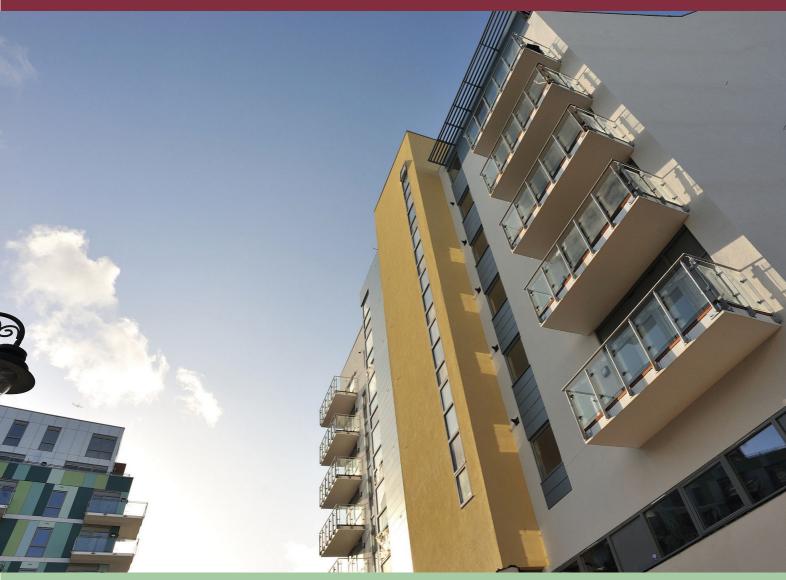
**APPENDIX A** 

Couthwark Council

# Affordable Housing

Draft supplementary planning document

June 2011



1

## TIMELINE FOR CONSULTATION

#### Consultation on the affordable housing supplementary planning document (SPD)

2

We welcome your comments on the affordable housing supplementary planning document (SPD).

The affordable housing supplementary planning document will be:

- Available to the public from 14 June 2011
- Taken to Cabinet for agreement for consultation on 21 June 2011
- Available for formal consultation from 19 August to 30 September 2011

Please send us your response by 5pm Friday 30 September 2011. Any responses received after this date will not be considered.

#### How to make a representation

Representations should be made using our response form found at our website:

#### http://www.southwark.gov.uk/ahspd

If you do not have internet access, the response form or a letter can be sent to:

Alison Squires Team Leader Planning Policy Regeneration and neighbourhoods FREEPOST SE1919/14 London SE17 2ES

#### planningpolicy@southwark.gov.uk

Tel: 0207 525 5471 Fax: 0207 084 0347

#### What do we do with your representation?

When we receive your representation we will:

• Acknowledge your response by email (or letter if an email address is not provided)

• Publish your representations and our officer responses when we take the SPD forward for adoption

## TIMETABLE

After consultation closes on this document, we will look at all the representations we receive and consider whether we need to make amendments to the SPD.

We will then take a final SPD and the comments made on the SPD with the officer comments, to the Council's Cabinet for adoption. The table below sets out the important consultation and adoption dates.

CONSULTATION	TIMETABLE
Consultation on Sustainability Appraisal Scoping Report	17 September – 22 October 2010
Consideration of responses	October 2010 to June 2011
Consultation on draft Affordable Housing Supplementary Planning Document, Sustainability Appraisal, consultation plan and Equalities Impact Assessment (this stage of consultation now)	14 June to 30 September 2011
Consideration of responses	October 2011
Adopt the final version of the Affordable Housing Supplementary Planning Document accompanied by a final Equalities Impact Assessment, final sustainability appraisal and a sustainability and consultation statement.	November 2011

#### Help with your comments

For independent help and advice on this planning document or for any other planning matter you can contact Planning Aid for London on 0207 247 4900 or by emailing info@ planningaidforlondon.org.uk

If you would like a member of planning policy to attend a community meeting to discuss the SPD please get in contact with us.

Со	nte	nts

1. INTRODUCTION	8
<ul> <li>1.1 The Affordable Housing SPD</li> <li>1.2 Why we need the SPD</li> <li>1.3 What does this SPD do?</li> <li>1.4 When to use this SPD</li> <li>1.5 Other important documents you need to know about</li> <li>1.6 How to find your way around this SPD</li> </ul>	8 9 10 11 12
2. WHAT IS AFFORDABLE HOUSING?	14
<ul><li>2.1 What do we mean by affordable housing?</li><li>2.2 Additional guidance</li><li>2.3 Who is eligible for affordable housing?</li><li>2.4 Changes to national affordable housing policy</li></ul>	14 15 17 19
3. GETTING THE RIGHT AMOUNT OF AFFORDABLE HOUSING	20
<ul><li>3.1 Our strategy</li><li>3.2 Our policies</li><li>3.3 Additional guidance</li><li>3.4 Monitoring and review</li></ul>	20 20 24 26
4. GETTING THE RIGHT MIX OF HOUSING	27
<ul> <li>4.1 Our Strategy</li> <li>4.2 Our policies</li> <li>4.3 Additional guidance</li> <li>4.4 Monitoring and review</li> <li>5.1 Our strategy</li> <li>5.2 Our policies</li> <li>5.3 Additional guidance</li> <li>5.4 Monitoring and review</li> </ul>	27 27 32 33 34 34 36 39
5. THE QUALITY AND DESIGN OF AFFORDABLE HOUSING	

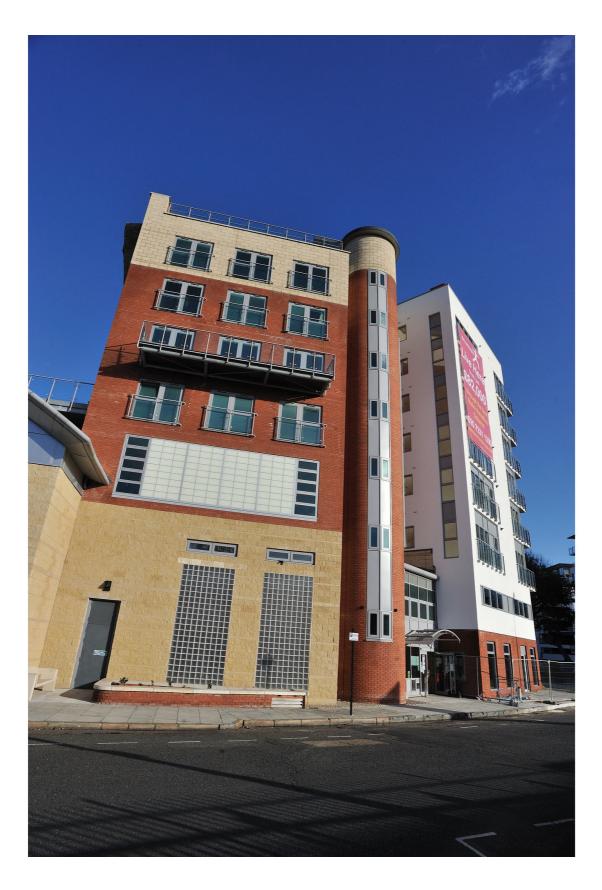
4

5.1 Our strategy	27
5.2 Our policies	27

<ul> <li>5.3 Additional guidance</li> <li>Design and integration</li> <li>Dwelling sizes</li> <li>5.4 Monitoring and review</li> </ul>	28 28 28 30
6. WHERE SHOULD THE AFFORDABLE HOUSING BE PROVIDED?	40
<ul><li>6.1 Our strategy</li><li>6.2 Our policies</li><li>6.3 Additional guidance</li><li>6.4 Monitoring and review</li></ul>	40 40 41 43
7. MAXIMISING AFFORDABLE HOUSING	44
<ul><li>7.1 Our strategy</li><li>7.2 Our policies</li><li>7.3 Additional guidance</li><li>7.4 Monitoring and review</li></ul>	44 44 45 48
8. SHELTERED, SUPPORTED AND EXTRA CARE HOUSING	49
<ul><li>8.1 Our strategy</li><li>8.2 Our policies</li><li>8.3 Additional guidance</li><li>8.4 Monitoring and review</li></ul>	49 49 50 51
9. FINANCING AND SECURING AFFORDABLE HOUSING	52
9.1 Our strategy 9.2 Our policies 9.3 Additional guidance	52 52 53
10. MAKING AN APPLICATION	59
10.1 Pre-application advice 10.2 Engaging with a registered provider 10.3 Submitting a planning application	59 60 61
APPENDIX A. FINANCING AFFORDABLE HOUSING	64

# List of figures and tables

Table 1: Household affordability income limits	17
Table 2: Annual household income range mid-point for intermediate housing units	18
Table 3: Table 4.4 of saved Southwark Plan policy 4.4	22
Table 4: Saved Southwark Plan policy 4.4 Affordable housing tenure mix in designated	
areas	28
Table 5: Minimum dwelling sizes	38
Table 6: Dwelling Size	62
Figure 1: Affordable and private housing requirements (figure 28 of the Core Strategy)	21
Figure 2: Minimum 35% private housing policy areas	23
Figure 3: Tenure Mix	29



## **1.INTRODUCTION**

## 1.1 The Affordable Housing SPD

1.1.1 Our core strategy (2011) and saved Southwark Plan policies (2007) set out how Southwark will change up to 2026 to be the type of place set out in our Sustainable Community Strategy (Southwark 2016).

8

1.1.2 Southwark 2016 sets out the key objective of making the borough a better place for people. To meet this objective we want to provide more and better homes to meet the needs of the community. Our core strategy, saved Southwark Plan and area action plan policies help us to do this. This supplementary planning document (SPD) supports these strategic planning policies by providing guidance on how homes can be provided for people on a wide range of incomes to further improve mixed communities. It will replace the adopted 2008 Affordable Housing SPD.

#### 1.2 Why we need the SPD

- 1.2.1 Southwark has one of the highest amounts of affordable housing in the country and we are the largest landlord in London. In the 1970s approximately 70% of Southwark's housing stock was social rented housing (council housing plus housing association rented). As at April 2010, the percentage of social rented stock was down to 44% but this is still three times the national average and the highest in London. Approximately 1.5% of the housing stock is intermediate housing. Despite having this large amount of affordable housing, there still remains a considerable need for more affordable housing in Southwark.
- 1.2.2 There is a well-documented shortage of affordable homes, in Southwark, across London and the whole of the UK. A key objective of national government, the Greater London Authority (GLA) and Southwark is to provide more affordable housing. National guidance in Planning Policy Statement 3: Housing, sets out the overall policy with a view to ensure that everyone has the opportunity to live in a decent home, which they can afford, in a community in which they wish to live.
- 1.2.3 Our housing studies and statistical evidence support our priority of providing more affordable housing to meet local need. Our Strategic Housing Market Assessment (2010) and Housing Requirements Study (2009) both set out that there is a considerable need for more affrdable housing, including both social rented and intermediate housing. Our core strategy housing background papers set out further information on Southwark's existing housing stock and our housing need.

#### 1.2.4 These can be found at:

#### http://www.southwark.gov.uk/ldf/evidence

1.2.5 Through our planning policies we set out a strategy to bring forward the maximum reasonable amount of affordable housing to help meet the Southwark 2016 and core strategy objective of making the borough a better place for people by providing more and better homes. Through our Housing Strategy 2009-2016 we also set out a strategy to improve existing affordable housing in Southwark to help improve quality of life for residents.

## 1.3 What does this SPD do?

1.3.1 Supplementary Planning Documents (SPDs) are one of a number of documents within a set of planning documents called the local development framework (LDF). Within the LDF development plan documents, the core strategy, area action plans and the saved Southwark Plan set Southwark's policies for affordable housing. SPDs provide further guidance to these policies. SPDs cannot set new policy. SPDs are used to make decisions on planning applications. Information on our website sets out further information on the LDF. This can be found at:

#### www.southwark.gov.uk/planningpolicy

- 1.3.2 This draft SPD will replace the 2008 Affordable Housing SPD and takes into account changes in national, regional and local policies. It provides guidance on the new core strategy and area action plan policies and the saved Southwark Plan policies on affordable housing.
- 1.3.3 The SPD does not provide guidance on the current proposals for changes to affordable housing stemming from the emergence of the Localism Bill and other emerging changes in planning policy associated with the change in national government in May 2010. We may need to update this SPD or produce another LDF once we have clarity on the proposed changes and their implications for Southwark.
- 1.3.4 The LDF documents and the specific policies that this SPD provides guidance on are set out below. All the documents can be found at:

www.southwark.gov.uk/ldf/evidence

#### Core strategy (2011)

- Strategic Targets Policy 2 Improving Places
- Area visions
- Strategic policy 5 Providing new homes
- Strategic policy 6 Homes for people on different incomes

10

- Strategic policy 7 Family homes
- Strategic policy 8 Student homes
- Strategic policy 14 Implementation and delivery

#### Saved Southwark Plan (2007)

- Policy 2.5 Planning obligations
- Policy 3.11 Efficient use of land
- Policy 4.2 Quality of residential accommodation
- Policy 4.4 Affordable Housing
- Policy 4.5 Wheelchair affordable housing
- Policy 4.7 Non self-contained housing for identified user groups

#### Aylesbury Area Action Plan (2010)

- Policy BH3 Tenure mix
- Policy BH4 Size of homes
- Policy BH5 Type of homes
- Appendix 6 Design guidance

#### Canada Water Area Action Plan (publication/submission draft 2010)

- Policy 22 Affordable homes
- 1.3.5 The core strategy (2011) and saved Southwark Plan policies (2007) set out affordable housing policies for the whole borough. The area action plans set additional affordable housing policies for specific areas. Where there is an area action plan policy this is used where it provides more detail to the core strategy and saved Southwark Plan policies.

## 1.4 When to use this SPD

- 1.4.1 We will use this SPD to make decisions on all planning applications that include the development of 10 or more housing units. This includes applications for new build, change of use, conversions, extensions and mixed use developments.
- 1.4.2 We will also use this SPD to make decisions on planning applications that include housing where:

- The site is 0.5 hectares or more in size
- The site is appropriate in size and location to provide 10 or more housing units
- The development is a student housing scheme of 30 or more bedspaces and living spaces, or the development is over 0.5 hectares (whichever is smaller)
- The development includes live-work units and the number of live-work units is 10 or more.
- Also if the number of residential units and live-work units combined is 10 or more

## 1.5 Other important documents you need to know about

1.5.1 There are many important planning and housing documents that provide further information and background to affordable housing and this supplementary planning document. We have set out the key documents that deal with affordable housing below.

## National

1.5.2 Planning Policy Statement 3: Housing sets out national government's policies on housing, including affordable housing. This can be found at:

#### www.communities.gov.uk/publications/planningandbuilding/pps3housing

#### Regional

1.5.3 The London Plan consolidated with alterations since 2004 (2008) is the current adopted London Plan. Together with the development plan documents in our local development framework this is our adopted development plan and together they set out our planning policies. The Mayor has also prepared a draft replacement London Plan (2009) which will eventually replace the adopted London Plan. The Inspector's report is available on the Mayor's website and the plan is expected to be adopted in late 2011. This can be found at:

#### http://www.london.gov.uk/priorities/planning

#### Local

1.5.4 This SPD should be used alongside our other planning documents that set out both policy and detailed guidance. For information on all our planning policy documents visit:

www.southwark.gov.uk/planningpolicy

## **Supporting Documents**

1.5.5 Our supporting documents provide further background information on this SPD. You can also put in representations on any of these supporting documents. These are:

12

#### Equalities Impact Assessment

This examines how the SPD meets the needs of the whole community and looks at the impact of the SPD on the different equality target groups in Southwark.

#### Sustainability appraisal

The sustainability appraisal looks at the economic, environmental and social impacts of the SPD.

#### **Consultation Plan**

This sets out how we will consult the community on the SPD and how we will take representations we receive on the SPD into consideration.

## 1.6 How to find your way around this SPD

1.6.1 This SPD is split into 10 sections:

- Section 1 and 2 set out the introduction and background to why we need affordable housing and what is considered as affordable housing
- Sections 3 to 6 set out guidance on how we get the right amount, mix, quality and location of affordable housing
- Section 7 sets out guidance for specific types of developments
- Section 8 sets out guidance for sheltered, supported and extra needs housing
- Section 9 sets out how affordable housing is financed and secured
- Section 10 sets out guidance on submitting a planning application.
- Appendix A sets out the amount a registered provider will normally pay for a social rented unit

1.6.2 Within sections 3 to 9 we set out:

- Our strategy. This explains the purpose and objectives of our policies and guidance
- Our policies. This sets out the key LDF policies used in making decisions on affordable housing. These are from our core strategy, saved Southwark Plan and area action plans
- Additional guidance. The SPD provides additional guidance and information of a more detailed level than appropriate for a development plan document. These sections set our additional guidance on implementing the policies
- Monitoring and review. This sets out how we monitor our policies and guidance to ensure that our strategy is being effectively delivered

## 2. WHAT IS AFFORDABLE HOUSING?

## 2.1 What do we mean by affordable housing?

#### Core strategy definition

#### 2.1.1 We define affordable housing in the core strategy.

#### Affordable housing:

'Affordable housing, as set out in London Plan policy 3A.8 meets the needs of households whose incomes are not enough to allow them to buy or rent decent and appropriate housing in their borough.'

- 2.1.2 The core strategy sets out that there two types of affordable housing:
  - 1. Social rented housing is housing that is available to rent either from the Council, a registered provider or other affordable housing provider. Access to social rented housing is based on need.
  - 2. Intermediate affordable housing is housing at prices and rents above those of social rented but below private housing prices or rents. It can include part shared ownership (NewBuild Homebuy), Rent-to-Homebuy and intermediate rent housing. Fact box one provides further detail on some of the different types of intermediate affordable housing.

14

## 2.2 Additional guidance

#### 2.2.1 For housing to be considered as affordable it must meet the following criteria.

## Social rented housing

- 2.2.2 Social rented housing is housing that is available to rent either from the council, a registered provider or other affordable housing provider. For social housing to be considered affordable it must meet the following criteria:
  - The government has told local authorities, housing associations and other affordable housing providers to use the same formula for setting rents for social rented housing, known as target rents. The formula is that the rents that tenants pay are based on the value of the unit, its bedsize and the average income of households living in the same area. To qualify as social rented housing, rents must be no greater than these target rents; and
  - Service charges are collected by landlords to recover the costs of providing services to a dwelling. The way the service charge is organised is set out in the tenant's lease or tenancy agreement. The charge normally covers the costs of general maintenance and repairs, insurance of the building and, where the services are provided, central heating, lifts, lighting and cleaning of common areas. The charges may also include the costs of management by the landlord or by a professional managing agent. To qualify as social rented housing, service charges must be at a level that ensures they are affordable to households on a total (or gross) income of less than £18,100 per year and that rents and service charges in total do not exceed 30% of net household income (i.e. after deductions); and
  - Access to social housing should be based or housing need; and
  - It must be available on a long-term basis. In Southwark long-term is considered to be in perpetuity.

#### Intermediate housing

2.2.3 Intermediate housing is housing for people who cannot afford to rent or buy market housing but can afford to pay more than target rents. For intermediate housing to be considered affordable it must meet the following criteria:

16

- It must enable households that do not earn enough to afford market housing but can afford more than target rents, to rent or purchase all or part of their home;
- Rents including service charges must be above the target rents for social housing but must be affordable by households on incomes of less than £61,400 (or £74,000 for homes with more than two bedrooms)
- Purchase prices must be no greater than 3.5 times the average income limit of £61,400 (or £74,000 for homes with more than two bedrooms) or annual housing costs (including rent and service charges) are no greater than 40% of the net household income (assumed to be 70% of total, or gross, income).

#### Fact box one: Types of intermediate housing

Intermediate housing includes shared ownership, housing for rent and other low-cost home ownership products. Two of the main intermediate products in Southwark are shared ownership (also known as NewBuild Homebuy) and Rent-to-Homebuy.

#### Shared ownership (NewBuild Homebuy)

Shared ownership is the main option for intermediate housing in Southwark. It allows households who cannot afford to buy a me outright the opportunity to part buy and part rent a home.

Residents in shared ownership may choose to buy a 25%, 50% or 75% share in their home depending on what they can afford. They pay rent on the share that they do not buy. The bigger the share that is purchased, the less rent has to be paid on the remaining part of the property.

Residents can choose to buy a greater share of their property when they can afford it until eventually they own their home outright. This is known as 'stair casing'.

#### Rent- to-Homebuy

Rent-to-Homebuy is another form of intermediate housing that helps households that experience difficulty in obtaining an affordable mortgage without a deposit. Rent is set at up to 80% of current market rent on a new home for up to 5 years. The tenant is able to purchase the dwelling on Newbuild Homebuy terms at the end of the intermediate rent period or earlier if they have managed to save up for a deposit.

16

## 2.3 Who is eligible for affordable housing?

- 2.3.1 Households earning below a specified income may be eligible for affordable housing. Households earning below these income limits are not normally able to otherwise afford to buy or rent decent and appropriate housing in Southwark.
- 2.3.2 The London Plan sets the planning framework for household income limits for social rented and intermediate housing. These are based on average household incomes and average house prices across London. Households earning above these income limits are not eligible for affordable housing.
- 2.3.3 The Greater London Authority (GLA) updates the London Plan income limits every year through the London Plan Annual Monitoring Report, based on changes in average incomes and house prices. Table 1 sets out the current household affordability income limits. We will update these figures annually to take into account the updates made by the GLA. Please check this section of the SPD on our website to ensure you are using the most up-to-date figures. The figures will be updated at:

#### http://www.southwark.gov.uk/ahspd

2.3.4 The current figures are from the draft replacement London Plan 2009. These are the most up-todate figures at the time of consultation on this SPD.

#### Table 1: Household affordability income limits

Income range	Housing type	
£0 - £18,100	Social rented housing	
£18,100 - £61,400	Intermediate housing	
	For homes with more than two bedrooms, which are particularly suitable for families, the upper end of this range for intermediate housing is £74,000	

2.3.5 We use the London Plan figures as the income limits for social rented housing. We adapt the London Plan income limits to create our own local affordability criteria for intermediate housing to ensure our residents can afford intermediate housing in Southwark. Our figures are within the wider intermediate housing income limits set by the GLA. They represent the mid point between the household income below which households could qualify for social rented housing (£18,100) and the household income required to qualify for a mortgage to purchase housing in the least expensive areas of our borough. These are specific to Southwark, based on our average household incomes. Table 2 sets out our annual household income range mid-point for intermediate housing units.

#### Table 2: Annual household income range mid-point for intermediate housing units

Number of bedrooms	1	2	3	4
Income (range mid-point)	£29,515	£35,943	£42,372	£44,154

Developers will be required to ensure intermediate housing is affordable to households on these incomes through expressing these figures in section 106 agreements relating to securing affordable intermediate housing. We will update these figures annually to take into account changes to local house prices and income levels. Please check this section of the SPD on our website to ensure you are using the most up-to-date figures. We will also update these figures through our Annual Monitoring Report.

We will update our website at:

#### http://www.southwark.gov.uk/ahspd

2.3.6 Registered providers will normally buy the affordable units from the developer. The table in Appendix A indicates how much a registered provider would normally pay a developer for social rented units. We do not have an equivalent table for intermediate accommodation but our affordability levels largely constrain the price that is paid.

## 2.4 Changes to national affordable housing policy

- 2.4.1 Since the change of government in May 2010, there have been a number of suggested changes to the ways in which affordable housing is delivered and what is defined as affordable housing.
- 2.4.2 The Government recently consulted on a change to Planning Policy Statement 3: Housing. The proposed change would include the product Affordable Rent as a form of affordable housing. The council submitted a response to this consultation raising concern whether the product would work in Southwark where there is a high need for affordable housing, particularly social rented housing, and a low average income.
- 2.4.3 At the time of consulting on this SPD, none of the suggested changes have been developed into final policy or legislative changes. This draft SPD for consultation continues to use the current PPS3 and London Plan definitions of affordable housing. We may need to review this and take into account changes in national and regional policy before we take this SPD to Cabinet for final adoption in November 2011.

## 3. GETTING THE RIGHT AMOUNT OF AFFORDABLE HOUSING

## 3.1 Our strategy

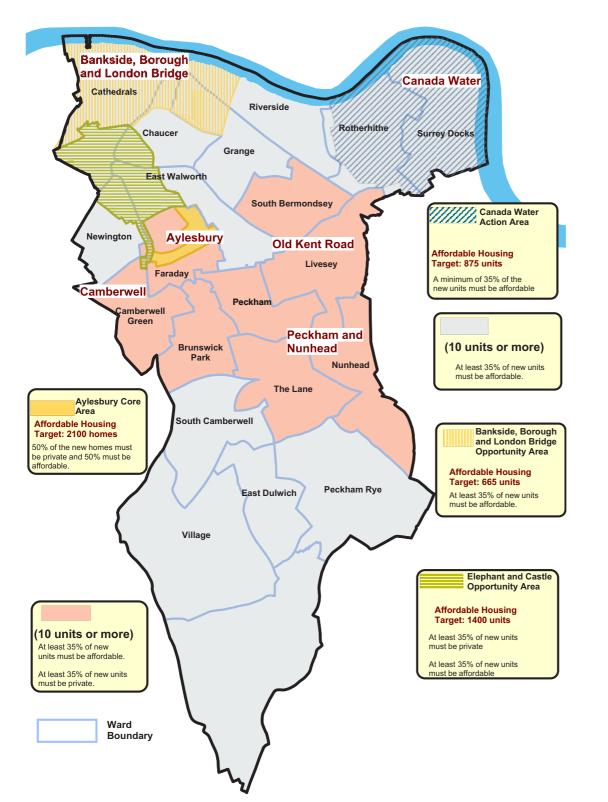
3.1.1 We want to provide a range of housing to meet the Southwark 2016 and core strategy objectives of providing more and better homes. We want to offer housing choices for people on different incomes. We require development to provide as much affordable housing as is reasonably possible whilst also meeting the needs for other types of development and encouraging mixed communities.

## 3.2 Our policies

- 3.2.1 Our policies for getting the right amount of affordable housing are within our core strategy, our saved Southwark Plan policies and our action plans for Aylesbury and Canada Water. These are set out below.
- 3.2.2 Core strategy policy 6 Homes for people on different incomes, sets the policies:
  - Requiring as much affordable housing on developments of 10 or more units as is financially viable
  - Requiring a minimum of 35% affordable housing units on developments with 10 or more units
  - Requiring a minimum of 35% private housing in the Elephant and Castle opportunity area and South Bermondsey, Faraday, Livesey, Nunhead, Peckham, the Lane, Brunswick Park and
  - Camberwell Green wards. Figures 1 and 2 show these areas.
  - Providing a minimum of 8558 net new affordable homes between 2011 and 2026

Figure 1 shows the tenure mix required. This is figure 28 of the core strategy.

- 3.2.3 Core strategy policy 6 and the area visions set affordable housing targets for the following areas. These targets are also set out in the area action plans and supplementary planning document/ opportunity area frameworks for these areas.
  - Bankside, Borough and London Bridge Opportunity Area: minimum of 665 affordable housing units between 2011 and 2026
  - Elephant and Castle Opportunity Area: minimum of 1400 affordable housing units between 2011 and 2026
  - Canada Water Action Area: minimum of 875 affordable housing units between 2011 and 2026
  - Aylesbury Action Area: 2100 affordable housing units between 2009 and 2026



## Figure 1: Affordable and private housing requirements (figure 28 of the Core Strategy)

- 3.2.4 Core strategy policy 8 Student homes, sets the policy:
  - Requiring 35% of student developments as affordable housing in line with policy 6 and figure 28 [of the core strategy]
- 3.2.5 Saved Southwark Plan policy 4.4 Affordable housing, sets the policy:
  - For all schemes capable of providing 10,11,12, 14 and 14 dwellings, on site provision calculated by the proportions outlined in the following table.

#### Table 3: Table 4.4 of saved Southwark Plan policy 4.4

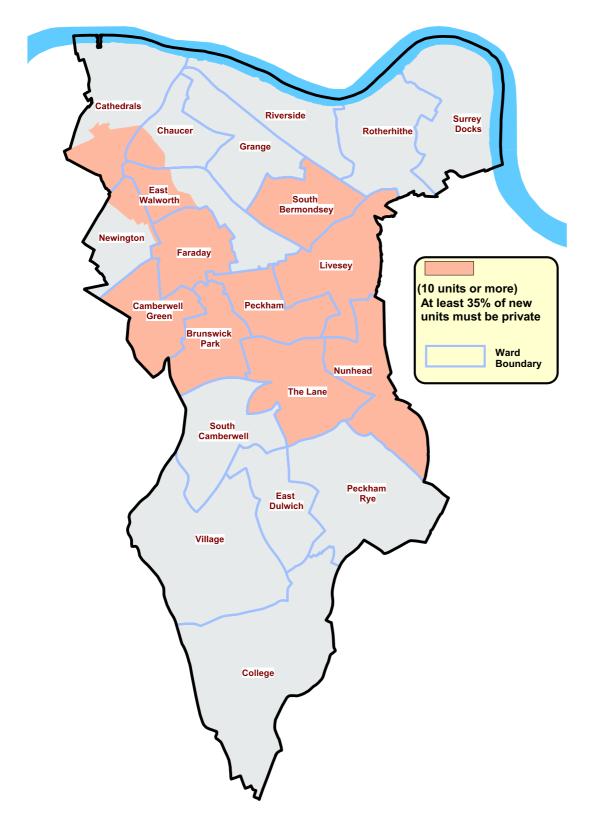
Number of units	10	11	12	13	14
Proportion of affordable units	1	2	3	4	5

3.2.6 Saved Southwark Plan policy 4.5 Wheelchair affordable housing sets the policy:

• For every affordable housing unit which complies with the wheelchair design standards, one less affordable habitable room will be required than otherwise stated in policy 4.4 [now policy 6 of the core strategy and policy BH3 of the Aylesbury Area Action Plan]

3.2.7 Aylesbury Area Action Plan policy BH3 sets the policies for the Aylesbury Action Area:

- 50% of new homes in the action area core will be affordable and 50% will be private
- Of the affordable housing provided, 75% should be social rented and 25% should be intermediate



## Figure 2: Minimum 35% private housing policy areas

## 3.3 Additional guidance

## How we calculate the required amount of affordable housing

#### Developments of 15 housing units or more

3.3.1 For development of 15 housing units or more, the amount of affordable housing to be provided will be calculated in habitable rooms. A habitable room is defined in the core strategy as a room that could be used for sleeping whether it is or not. It includes bedrooms and living rooms.

24

3.3.2 In circumstances where the calculation of affordable housing results in a fraction of a habitable room (e.g. 0.7) we will round the number up or down to the nearest whole habitable room (with 0.5 being rounded up). Any room that is over 27.5 sqm will be considered as two habitable rooms.

#### Development of 10-14 units

3.3.3 For developments of 10-14 housing units, the amount of affordable housing to be provided will normally be calculated on units as shown in table 4.4 of saved Southwark Plan policy 4.4 and in section 3.2 of this SPD.

#### Student developments

- 3.3.4 We require student schemes to provide affordable housing when they include 30 or more bedspaces and living spaces, or the development is over 0.5 hectares (whichever is smaller). This is equivalent to the threshold of 10 units of general needs housing as each bedspace or living space is equivalent to one habitable room.
- 3.3.5 Core strategy policy 8 applies to all student schemes above this threshold. As set out in the policy this is so that we can meet the needs of universities and colleges for new student housing whilst balancing the building of student homes with other types of housing such as affordable and family homes. By requiring an element of affordable housing or a contribution to affordable housing (as conventional affordable housing) we can make sure we work towards meeting the needs for both student accommodation and affordable and family accommodation. The policy applies to all student schemes above the threshold. We require an element of affordable housing on all student sites above the threshold to ensure that we work towards meeting the considerable housing need in Southwark for more affordable housing and more family housing. It will help to ensure we meet our affordable housing targets

## 3.36 Example 1: Calculating the required amount of affordable housing in student schemes

- A developer submits an application for a development of 220 student bedrooms in the Elephant and Castle opportunity area. The bedrooms are arranged within cluster flats with 10 student bedrooms sharing a communal living/dining area
- Each student bedroom and each living/dining area counts as one habitable room.
- There are 220 habitable rooms (200 bedrooms and 20 living /dining areas)
- Core strategy policy 6 requires a minimum of 35% of the development as affordable housing. A minimum of 77 of the 220 habitable rooms should be affordable housing

#### Wheelchair affordable housing

3.3.7 Our wheelchair standards are set out in our Residential Design Standards SPD 2008. For every affordable housing unit that meets these standards one less affordable habitable room will be required as set out in saved Southwark Plan policy 4.5

3.3.8 Example 2 : Calculating the required amount of affordable housing for wheelchair affordable housing

- A developer submits an application for 75 flats in London Bridge
- The application includes 20 one bedroom flats, 40 two bedroom flats and 15 three bedroom flats
- When counting up all of the habitable rooms in the development there are 145 bed rooms and 75 living rooms. This totals 220 habitable rooms.
- Core strategy policy 6 requires a minimum of 35% of the development to be affordable housing. This is a minimum of 77 habitable rooms
- The applicant proposes that 8 of the three bedroom affordable flats are built in accordance with the wheelchair design standards in our Residential Design Standards SPD
- Saved Southwark Plan policy 4.5 allows one less affordable habitable rooms than under normal policy requirement for every affordable unit that means these standards
- The development has to provide 69 habitable rooms as affordable (i.e. subtract 8 from 77)

## 3.4 Monitoring and review

- 3.4.1 Through our Annual Monitoring Report (AMR) we monitor how much housing we deliver every year. This includes monitoring the overall delivery of all housing and the delivery of affordable housing. We monitor how much housing and affordable housing is delivered within each of our areas.
- 3.4.2 We also monitor the number of households which are in priority need and the number of households on the housing register.
- 3.4.3 Together this helps us review whether our policies are meeting our housing targets for all housing and affordable housing. It also enables us to review whether these policies are effective in helping to meet some of our affordable housing need by reducing the number of households which are in priority need and the number of households on the housing register. This will help us to identify whether we need to amend our affordable housing policies through future development plan documents.

## 4. GETTING THE RIGHT MIX OF HOUSING

## 4.1 Our Strategy

4.1.1 We want to provide a range of housing to meet the Southwark 2016 and core strategy objectives of providing more and better homes. We want to offer housing choices for people on different incomes. We want to provide private, intermediate and social rented housing. We also want to provide different sized dwellings and more family homes.

## 4.2 Our policies

4.2.1 Our policies for getting the right mix of housing are within our core strategy, our saved Southwark Plan policies and our area action plans for Canada Water and Aylesbury. These are set out below for both tenure mix and dwelling size mix.

#### Policies for tenure mix

- 4.2.2 Core strategy policy 6 Homes for people on different incomes sets, the policies:
  - Requiring a minimum of 35% affordable housing units on developments with 10 or more units
  - Requiring a minimum of 35% private housing in the Elephant and Castle opportunity area and South Bermondsey, Faraday, Livesey, Nunhead, Peckham, the Lane, Brunswick Park and Camberwell Green wards. Figure 2 on page 21 shows these areas.

Figure 1 shows the tenure mix required. This is figure 28 of the core strategy.

- 4.2.3 Core strategy policy 8 Student Homes, sets the policy:
  - Requiring 35% of student developments as affordable housing in line with policy 6 and figure 28 [of the core strategy]
- 4.2.4 Saved Southwark Plan policy 4.4 Affordable housing, sets the policies:

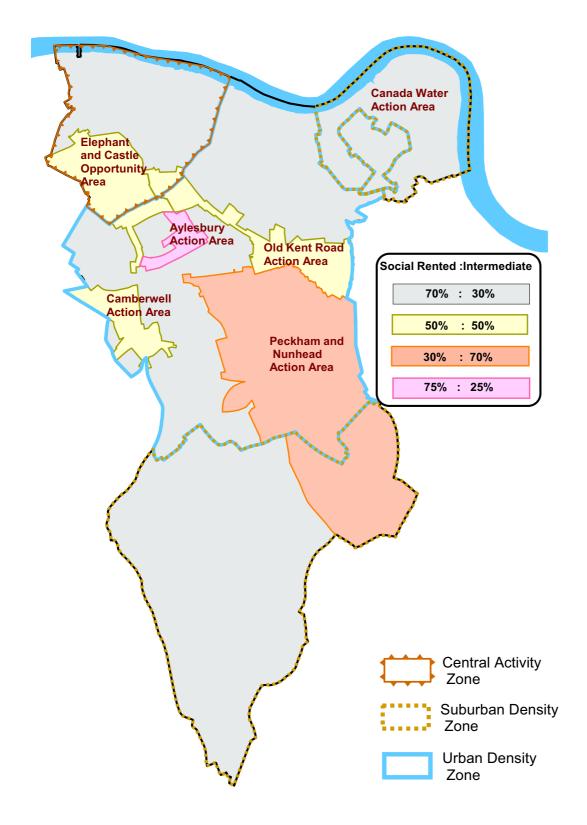
This is set out in Figure 3.

- The affordable housing must be an appropriate mix of dwelling type and size to meet the identified needs of the borough
- A tenure mix of 70:30 social rented: intermediate housing ratio except as stated below for opportunity and local policy areas. Figure 1 shows this.

Area designation	Social rented (%)	Intermediate (%)
Central Activities zone	70	30
Urban zone	70	30
Suburban zone	70	30
Elephant and Castle opportunity area	50	50
Old Kent Road action area	50	50
Peckham and Nunhead action area	30	70
Camberwell action area	50	50

## Table 4: Saved Southwark Plan policy 4.4 Affordable housing tenure mix in designated areas

## Figure 3: Tenure Mix



4.2.5 Aylesbury Area Action Plan policy BH3 Tenure mix, sets the policy for the Aylesbury Action Area:

- 50% of new homes in the action area core will be affordable and 50% will be private.
- Of the affordable housing provided, 75% should be social rented and 25% should be intermediate
- 4.2.6 Canada Water Area Action Plan policy 22 Affordable homes, sets the policy for the Canada Water action area:
  - In schemes of 10 or more units, at least 35% of homes must be affordable. Of the affordable homes, 70% should be social rented and 30% should be intermediate

#### Policies for a mix of dwelling sizes

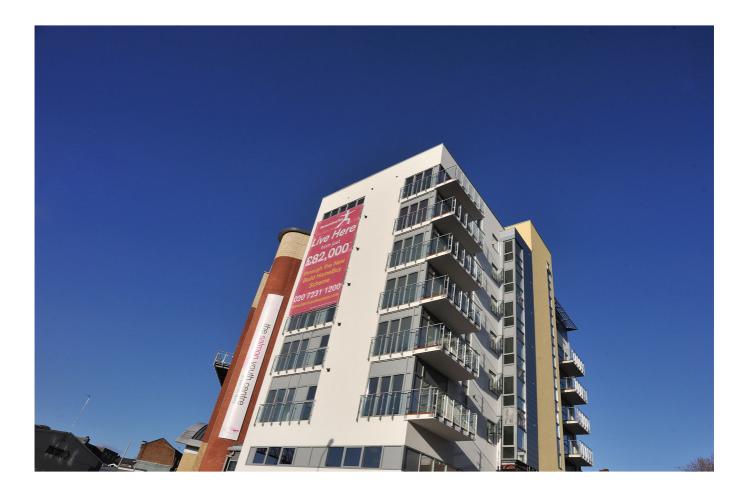
- 4.2.7 Core strategy policy 7 Family Homes, sets the policies:
  - At least 60% 2 or more bedrooms
  - At least 10%, 20% or 30% of units with 3,4 or 5 bedrooms depending on the area of the development
  - This may be split between private, social and intermediate housing
  - A maximum of 5% as studios and only for private housing
- 4.2.8 Saved Southwark Plan policy 4.2 Quality of residential accommodation require development, sets the following policy:
  - Achieve good quality living conditions
- 4.2.9 Saved Southwark Plan policy 4.4 Affordable housing, sets the policies:
  - The affordable housing must be an appropriate mix of dwelling type and size to meet the identified needs of the borough
  - The affordable housing should not be distinguishable from the private housing development

4.2.10 Saved Southwark Plan policy 4.5 Wheelchair affordable housing sets the policy:

• For every affordable housing unit which complies with the wheelchair design standards, one less affordable habitable room will be required than otherwise stated in policy 4.4 [now policy 6 of the core strategy and policy BH3 of the Aylesbury Area Action Plan]

4.2.11 Aylesbury Area Action Plan policy BH4 Size of homes sets the policies:

- A maximum of 3% of studios all in private tenure
- At least 70% of homes to have two or more bedrooms
- At least 20% of homes to have three bedrooms
- At least 7% of homes to have four bedrooms
- At least 3% of homes to have five or more bedrooms



## 4.3 Additional guidance

#### Tenure split

#### Developments of under 15 units

- 4.3.1 For smaller developments of 10-14 units it will not always be possible to get a mix of social and intermediate housing because of high management and maintenance costs. It is often expensive for registered providers to manage and maintain small numbers of units in private developments. As a result, in these circumstances, we may allow all of the affordable housing to be provided as either social rented or intermediate housing. This will be decided on a site by site basis, taking into account the overall housing need, the location of the site and any site constraints.
- 4.3.2 We advise applicants to discuss with us as soon as possible the tenure of smaller schemes.

#### Student schemes

4.3.3 The same policies and guidance as apply to conventional affordable housing apply to the affordable housing element of student developments. The affordable housing provided as part of a student development will be split between social rented and intermediate housing in accordance with saved Southwark Plan policy 4.4, Aylesbury Area Action Plan policy BH3 and Canada Water Area Action Plan policy 22.

#### Mix of housing sizes

- 4.3.4 We want to provide a range of housing sizes to meet the needs of the community.
- 4.3.5 Core strategy policy 7 Family homes, requires a level of family housing based on the area where the scheme is proposed and the ability of the development to provide amenity space for families. Aylesbury Area Action Plan policy BH3 Tenure mix sets out the policy for the Aylesbury. Canada Water Area Action Plan policy 22 Affordable homes repeats the core strategy policy.
- 4.3.6 Core strategy policy 7 allows the family housing to be split between private, social and intermediate housing as our housing studies show that there is a need for more family homes across all tenures.

- 4.3.7 Studio flats are not suitable for affordable housing. Core strategy policy 7, Aylesbury Area Action Plan policy BH4 and Canada Water Area Action Plan 22 only allow studios as private tenure. We will not accept studio flats as affordable housing because they do not meet an identified need. However, private studio flats do generate a requirement for affordable housing just like any other size of unit if they are part of a development of 10 or more units. They therefore count towards the calculation of how many habitable rooms are required as affordable housing.
- 4.3.8 Some smaller schemes may have too few affordable housing units to allow for a mix of unit sizes within the affordable units. In these circumstances, the affordable housing units will be required to have one more bedroom than the majority of the private units in the development. For example if most of the private units have two bedrooms, we would require the affordable units to have three bedrooms. This is because there is a greater need for larger sized family dwellings within the need for affordable housing.
- 4.3.9 The same policies and guidance as apply to conventional affordable housing apply to the affordable housing element of student developments. The affordable housing element of student schemes will be required to meet the policies in core strategy policy 7, Canada Water Area Action Plan policy 22 and Aylesbury Area Action Plan policy BH4.
- 4.3.10 We advise applicants to discuss with us as soon as possible the dwelling mix of your scheme.

#### Wheelchair affordable housing

4.3.11 Saved Southwark Plan policy 4.5 allows one less affordable habitable room for every affordable unit which complies with our wheelchair standards. There is a need for more family sized wheelchair units and so we encourage applicants to provide more 3 bedroom plus wheelchair units, particularly wheelchair affordable housing. We also encourage applicants to speak to our Occupational Therapist who can provide more advice on the type of wheelchair housing needed.

## 4.4 Monitoring and review

4.4.1 We monitor the mix of new dwellings through our Annual Monitoring Report (AMR). This includes indicators on the amount of dwellings which are studios, one bedroom, two bedrooms, 3 bedrooms and 4 bedrooms plus. We also monitor the size of dwelling by tenure type to monitor how much of each size of dwellings are private, social rented and intermediate. This helps us to see whether we need to amend our policies to ensure that the type of housing delivered meets our housing need.

## 5. THE QUALITY AND DESIGN OF AFFORDABLE HOUSING

## 5.1 Our strategy

5.1.1 We want to ensure that new developments are of a high quality design to help create places where people want to live. This will help meet the Southwark 2016 and core strategy objective of making our borough a better place for people. The same design considerations apply to affordable housing as to market housing.

34

## 5.2 Our policies

- 5.2.1 Core strategy policy 7, saved Southwark Plan policies 4.2 and 4.4, and Aylesbury Area Action Plan policy BH5 set out our key policies to ensure high quality housing. There are also other relevant related policies in other LDF documents including core strategy policies 5 and 12, and saved Southwark Plan policies 3.2, 3.12 and 3.13. There is also additional guidance in our supplementary planning documents for residential design standards, design and access statements, and sustainable design and construction.
- 5.2.2 Core strategy policy 7 Family homes, sets the policy:
  - All development will be expected to meet the Council's minimum overall floor sizes
- 5.2.3 Saved Southwark Plan policy 4.2 Quality of residential accommodation requires that residential development:
  - Includes high standards of:[within a list of 7 requirements]
  - Space including suitable outdoor/green space
- 5.2.4 Saved Southwark Plan policy 4.4 Affordable housing, sets the policy:
  - The affordable housing should not be distinguishable from the private housing development
- 5.2.5 Aylesbury Area Action Plan policy BH5 Type of home sets the policy for the Aylesbury:
  - The standards for new housing should comply with the design guidance set out in Appendix
    6.

- 5.2.6 Section A6.7.2 of appendix 6 sets out a table of dwelling space standards for private, intermediate and social rented new homes within the action area.
- 5.2.7 We recently consulted on an amendment to the draft Canada Water Area Action Plan to insert a policy on dwelling sizes. Consultation closed on 2 June 2011. We will update this section of this SPD once we have considered the consultation responses on the Canada Water amendment.
- 5.2.8 We will update this section of this SPD following consultation on the Canada Water Area Action Plan.



# 5.3 Additional guidance

# Design and integration

- 5.3.1 We expect affordable housing to be integrated with market housing through a high standard of design and shared access arrangements as far as is practical.
- 5.3.2 The physical integration of affordable housing among market housing (otherwise known as pepper-potting) is encouraged. However, we recognise that pepper-potting can cause difficulties in managing and servicing properties as this can lead to high housing costs over and above what is considered to be affordable. Applicants should justify why the affordable housing cannot be physically integrated amongst private housing. This issue mostly occurs in the development of flats. In these circumstances we suggest that market and affordable housing could be vertically grouped to keep housing costs affordable. There should be no difference in the appearance and quality of affordable units and private units. Affordable and private tenants should have equal access to communal facilities such as shared gardens and parking areas. Affordable housing should be carefully designed so it can be easily maintained. High service charges and maintenance costs associated with badly designed developments can affect the affordability of housing for residents.
- 5.3.3 Applicants are strongly encouraged to discuss maintenance and management issues with a partner registered provider at an early stage in the design process to make sure that the design of the development is cost efficient, without compromising high quality design.
- 5.3.4 We strongly encourage applicants to discuss at an early stage the design of developments that include affordable housing. Please also refer to section 3.5 of the Residential Design Standards SPD 2008 for further information.

# Dwelling sizes

5.3.5 Core strategy policy 7 highlights the importance of ensuring that all new development is of a high quality with good living conditions. Minimum floor area standards ensure an adequate amount of space is provided in residential development to achieve a pleasant and healthy living environment. This is also a priority for the Mayor, who, through the draft London Plan requires minimum space standards in order to make new homes provide good living conditions for different sized households. We will update this section of the SPD once the draft replacement London Plan is adopted.

- 5.3.6 Table two below sets out the minimum overall dwelling sizes we expect all development to meet. These are minimum standards which developers are encouraged to exceed. They are in line with the requirements of the draft replacement London Plan and are based on the number of people expected to live in a home. This means developers should state the number of occupiers a home is designed to accommodate. Across a scheme, the mix of dwelling types should cater for the full range of household sizes. We will assess this using the average dwelling sizes set out in table two. The standards will apply to both affordable and private homes. This is also being updated in our Residential Design Standards supplementary planning document. We finished consulting on the Residential Design Standards SPD on 2 June 2011. We will be looking at the consultation responses and preparing the final Residential Design Standards SPD for adoption in September 2011.
- 5.3.7 Development within the Aylesbury action area must meet the standards referred to in policy BH5 and set out in appendix 6 of the AAP.

Development type	Dwelling type (bedroom/persons)	Essential GIA (sqm)
Flats	Studios	36
	1b2p	50
	2b3p	61
	2b4p	70
	2b average	66
	3b4p	74
	3b5p	86
	3b6p	95
	3b average	85
	4b5p	90
	4b6p	99
	4+b average	95
2 storey houses	2b4p	83
	3b4p	87
	3b5p	96
	3b average	92
	4b5p	100
	4b6p	107
	4+b average	104
3 storey houses	3b5p	102
	4b5p	106
	4b6p	113
	4+b average	110

Table 5: Minimum dwelling sizes

When designing homes for more than six persons developers should allow approximately 10 sqm per extra person.

# 5.4 Monitoring and review

5.4.1 We monitor some aspects of design through our Annual Monitoring Report (AMR). This includes monitoring the amount of units that meet the Lifetime Homes Standards, our wheelchair standards and environmental standards. We do not currently measure the number of units which meet or exceed the minimum floor areas. We are looking at this as part of our current review of the AMR indicators to take into account the new indicators from the core strategy and look at the best way of measuring how new residential development is built to a high quality of design.

# 6. WHERE SHOULD THE AFFORDABLE HOUSING BE PROVIDED?

# 6.1 Our strategy

6.1.1 We require development to provide as much affordable housing as is reasonably possible whilst also meeting the need for other types of development and encouraging mixed communities.

# 6.2 Our policies

6.2.1 Core strategy policy 6 Homes for people on different incomes, sets the policies:

• Requiring as much affordable housing on development of 10 or more units as is financially viable

- Providing a minimum of 8558 net new affordable homes between 2011 and 2026
- 6.2.2 Core strategy policy 8 Student homes, sets the policy:

• Requiring 35% of student developments as affordable housing in line with policy 6 and figure 28 [of the core strategy]

# 6.3 Additional guidance

# The sequential test

- 6.3.1 We follow a sequential approach to make sure that we get as much affordable housing as possible. This is in accordance with the sequential approach required by national and regional policy.
- 6.3.2 The sequential approach is set out below. This applies to all types of housing development including small schemes and student housing developments:
  - 1. All housing, including affordable housing should be located on the development site.
  - 2. In exceptional circumstances we may allow the affordable housing to be provided off-site. In these circumstances we require that affordable housing is provided on another site or sites in the local area of the proposed development.
  - 3. In exceptional circumstances we may allow a pooled contribution in lieu of on-site of offsite affordable housing. In these circumstances we require a payment towards providing affordable housing instead of the affordable housing being built as part of the proposed development.
- 6.3.3 Where we allow either an off-site or pooled contribution provision, at least as much affordable housing must be provided as would have been provided if the minimum 35% affordable housing policy requirement were achieved on-site.
- 6.3.4 Affordable housing should be delivered at the same time as private housing. This should be the case for on-site, off-site and a pooled contribution provision.

# On-site provision

6.3.5 The general presumption is that affordable housing should be provided on-site. Where an applicant suggests to us that they cannot provide the minimum policy requirement on site, the first option is to discuss with the council how to ensure as much affordable housing as possible is provide on site. This may include varying the affordable housing tenure mix to be provided between intermediate and social rented housing. Applicants are required to submit a financial appraisal to demonstrate why the policy requirement amount or mix of affordable housing cannot be delivered on-site. Further information on financial appraisals in set out in section 8.3 of this SPD. If the financial appraisal demonstrates to our satisfaction that the required level or mix of affordable housing is not financially viable on-site, we may allow off-site provision or a pooled contribution.

# Off-site provision

- 6.3.6 In some cases applicants may demonstrate to us why the affordable housing cannot be built on-site. Applicants must demonstrate this to us through a financial appraisal. Where we accept that the best option for the affordable housing is to be built off-site (for example due to site constraints) we will require the affordable housing to be built on another site near the development.
- 6.3.7 We will only consider off-site affordable housing where an appropriate site or sites have been identified near to the development site. We require applicants to have secured planning permission for the required amount of off-site affordable housing before any occupation of the market housing development. We also required that no more than 50% of the development will be occupied before the affordable housing units are completed and handed over to the registered provider. This will be set out in the section 106 agreement.
- 6.3.8 We will require the off-site affordable housing to be built and ready for occupation at the same time as the on-site market housing. We will also require that off-site affordable housing is additional to what would have come forward through a standard development on that site (ie it results in a net gain of affordable housing units above standard policy requirements). This will usually result in a higher percentage of affordable housing on any sites that are used for the delivery of off-site affordable housing.

# Example 3 : Calculating the requirement for off-site affordable housing

- A developer is required to provide 40 habitable rooms off-site, as it has been demonstrated to our satisfaction that these rooms cannot be provided on-site
- The off-site scheme proposed development is to built 50 residential units, made up of 145 habitable rooms
- Core strategy policy 6 requires a minimum of 35% of habitable rooms to be affordable on all sites of over 15 units
- 35% of 145 habitable rooms is 50.75 habitable rooms required as affordable
- Because the figure is 50.75, we round up the requirement to 51 habitable rooms
- The developer is required to provide 40 habitable rooms as part of the off-site provision plus the 51 habitable rooms required as part of standard policy

In total the developer has to provide 91 habitable rooms as affordable housing (i.e. overall this would be 63% of the scheme)

# Pooling contributions for affordable housing

6.3.9 New housing developments in Southwark may, in exceptional circumstances, provide affordable

42

housing by making a pooled contribution instead of providing the affordable housing on-site or through the developer securing their own off-site affordable housing site. The sequential test must be followed to justify that at least as much affordable housing as would have been provided if the minimum 35% affordable housing requirement were achieved on-site. A minimum of £100,000 of pooled contribution per habitable room of affordable housing will be required. To ensure that the maximum reasonable proportion of affordable housing is negotiated on each development we will determine the exact amount required (above £100 000 per affordable habitable room) using a robust viability assessment. Our current calculations and evidence base demonstrate that this approach is justified and reasonable. This is set out in two of our studies: Payments in lieu of on-site affordable housing: viability testing, and Southwark student study: implementation. Both of these can be viewed on our website at:

# http://www.southwark.gov.uk/ldf/evidence

- 6.3.10 This approach will help us to deliver the core strategy, the 'Housing Strategy 2009 2016' and the Community Strategy 'Southwark 2016' by improving places, increasing housing choice, providing new homes and improving mixed and balanced communities. This will enable Southwark to continue to meet London plan and core strategy affordable housing targets. Without this approach we are unlikely to meet our targets due to the changes in the economic environment and reduced provision of Government and Homes and Communities Agency funding changes. This SPD guidance is to be applied as part of delivering policy 6 and policy 8 of the core strategy and saved Southwark Plan policy 4.4 and must be weighed up alongside all of the policies in the development plan and the Local Development Framework. This is one element in the consideration of whether a residential element of a development is acceptable and should be weighed up alongside all of the other material considerations. The developer will be required to provide on-site affordable housing in line with the Local Development Framework if the pooled contribution cannot be provided as set out in this SPD.
- 6.3.11 We need to comply with national policy and the Mayor's policy of promoting choices and quality in housing and creating sustainable, inclusive and mixed communities. This approach will help to deliver London Plan policies 3A.5 Housing choice and 3A.9 Affordable housing targets. Paragraph 29 of Planning Policy Statement 3 Housing and policy 3A.10 and paragraphs 3.55 and 3.56 of the London Plan 2008 set out that affordable housing should be provided firstly onsite, then off-site and only then in exceptional circumstances as an in-lieu payment. However, paragraph 29 of PPS 3 makes it clear that where it can be robustly justified, off-site provision or a financial contribution in lieu of on-site provision (of broadly equivalent value) may be accepted as long as the agreed approach contributes to the creation of mixed communities in the local authority area. We consider that the pooled contribution is consistent with the strategy of PPS3 as we will be providing additional homes, increasing housing choice, affordable housing and family housing to meet needs within Southwark and London.

- 6.3.12 Payment of the pooled contribution will be in stages based on the progress of the development from obtaining planning permission, to commencement of construction, completion and through stages of occupation. 25% of the contribution should be paid prior to implementation, 50% should be paid prior to practical completion, and the remaining 25% should be paid prior to first occupation of the development. The triggers for payment are to ensure that there is no negative impact on provision of affordable housing. Affordable housing would normally be expected to be provided alongside the initial private units. Therefore the trigger will enable a similar level of timely affordable housing to be completed.
- 6.3.13 The pooled contribution will be secured as part of the section 106 legal agreement for the development and associated planning permission which will expire 2 years from the date granted. This pooled contribution is required in addition to the section 106 requirements of the core strategy, Southwark Plan, the Section 106 Planning obligations SPD and any other Local Development Framework requirements. The section 106 agreement must specify the pooled contribution sum and the developments where this will be spent. To receive support, schemes will be required to demonstrate quality, deliverability and value for money. These will be built by the council alone, or by the council in partnership with a registered provider/developer.

# Calculating the pooled contributions

- 6.3.14 For developments of 15 or more housing units, the required amount of affordable housing (based on habitable rooms will be multiplied by £100,000 to calculate how much the pooled contribution should be. These may be higher if the financial appraisals demonstrates that a higher sum can be achieved.
- 6.3.15 For developments of between 10 and 14 units (including mixed-use schemes where there are only between 10 and 14 residential units) the in-lieu payment will be calculated by:
- Finding out what size most of the housing units are (if they are mostly one bedroom, two bedrooms, three bedrooms etc)
- Calculating how many habitable rooms are in most of the housing units in the development. For example if most of the units are two bedrooms and one living room, than most of the units will have three habitable rooms
- Multiplying this number by how many affordable housing units are required to be provided in accordance with saved Southwark Plan policy 4.4
- Multiplying this by £100,000 . In cases where the financial appraisal demonstrates that a higher sum can be achieved, the figure will need to be multiplied by the higher payment per habitable room.

# 6.4 Monitoring and review

6.4.1 Through our Annual Monitoring Report we measure how much affordable housing is delivered. This is housing that has been delivered on-site or off-site. We also measure how much section 106 money we have secured in lieu of on-site affordable housing. This enables us to see whether our policies which normally require affordable housing on-site are being implemented. We monitor these policies to see whether we need to amend our policies through future development plan documents.



# 7. MAXIMISING AFFORDABLE HOUSING

# 7.1 Our strategy

7.1.2 We require development to provide as much affordable housing as is reasonably possible whilst also meeting the need for other types of development and encouraging mixed communities. We apply our affordable housing policies to all development of 10 units and above.

46

# 7.2 Our policies

- 7.2.1 Core strategy policy 6 Homes for people on different incomes, sets the policies:
  - Requiring as much affordable housing on developments of 10 or more units as is financially viable
  - Requiring a minimum of 35% affordable housing units on developments with 10 or more units
  - Requiring a minimum of 35% private housing in the Elephant and Castle opportunity area and South Bermondsey, Faraday, Livesey, Nunhead, Peckham, the Lane, Brunswick Park and Camberwell Green wards. Figure 2 on page 21 shows these areas.

Figure 3 shows the tenure mix required. This is figure 28 of the core strategy.

- 7.2.2 Saved Southwark Plan policy 3.11 Efficient use of land sets the policies:
  - All developments should ensure that they maximise the efficient use of land, whilst:
  - i. Protecting and amenity if neighbouring occupiers or users; and

ii. Ensuring a satisfactory standard of accommodation and amenity for future occupiers of the site; and

- iii. Positively responding to the local context and complying with all policies relating to design; and
- iv. Ensuring that the proposal does not unreasonably compromise the development potential of, or legitimate activities on, neighbouring sites; and
- v. Making adequate provision for servicing, circulation and access to, from and through the site; and

vi. Ensuring that the scale of development is appropriate to the availability of public transport and other infrastructure

# 7.3 Additional guidance

# Assessing the site capacity and underdevelopment

- 7.3.1 Proposals for development that appear to be designed or sub-divided to avoid the threshold at which affordable housing is required may need to be revised following an assessment of the site capacity. Where this appears to be the case, we will look at:
  - Assessing the application against saved Southwark Plan Policy 3.11 Efficient use of land
  - Looking at whether appropriate density levels have been applied to the site, taking into account core strategy Policy 5 providing new homes
  - Assessing the application against the design and access statement to see if the proposed development is the best design solution
  - Whether the site is artificially sub-divided and whether the planning application should in fact be covering a wider area

# Partial development, additional development and phased development

7.3.2 In addition to the above, we will also look at whether the scheme appears to be one of the following types of developments:

# A. Sites that are partially developed

- 7.3.3 We will look at whether an application is an extension to a building which has an existing planning permission (this may be completed, under construction or yet to begin construction) to see whether it should be more properly considered to be part of a single development. We will take into account:
  - The timing between the previous planning permission and the new planning application, and the extent to which the previous permission has been implemented
  - Whether the fresh application is linked to the previous application. This may include ownership, shared access or shared buildings, level of occupation and other relevant considerations.

# B. Phased developments

7.3.4 Where an application for housing is subject to a single permission, but is due to be delivered in phases, the affordable housing requirements will be applied across the overall scheme. In cases where, following the submission of a viability appraisal, planning permission allows for the provision of less than the core strategy or area action plan requirement of affordable housing in the initial phase, we will set out a process of re-appraisal prior to the commencement of each subsequent phase to assess whether that phase is capable of providing increased levels of affordable housing. This will be secured through the Section 106 agreement.

# C. New applications on sites with planning permission

7.3.5 If a site has an existing planning permission and a new planning application is submitted we will always look at whether the site can accommodate the required level of affordable housing in accordance with our policies. There will be no presumption that the equivalent amount of affordable housing will be required for the new planning permission as for the existing planning permission, as each individual application is assessed on its own merits in line with policy as is exists at that time. The amount of affordable housing required will be calculated by reference to the new total number of units (gross).

# Redevelopment of sites

7.3.6 Much of the development in Southwark is on sites that are already used for housing. Often the redevelopment of sites can help make better use of the plot in accordance with saved Southwark Plan Policy 3.11 Efficient Use of Land. We apply our affordable housing policies to redevelopments of existing housing where the total number of units increases to 10 or above or the site is above 0.5 hectares. The amount of affordable housing required is calculated by using the total (gross) number of housing units proposed in the application.

### Example four

- There are currently 9 private residential units on a site in Canada Water
- These 9 units are being knocked down and rebuilt and a further 8 units are also being built
- This bring the total (or gross) number of housing units proposed in the application to 17
- In accordance with our policies, 35% of the total habitable rooms within the development would need to be affordable
- As the development is over 15 units, we would require this to be calculated by habitable room

# Mixed use

- 7.3.4 We encourage mixed use developments, particularly in our town centres. Mixed use developments help use land more efficiently in line with saved Southwark Plan Policy 3.11. For example housing above a shop or offices can help make the best use of land whilst also encouraging people to use and/or work in the shops and businesses they live near to. Mixed use developments can also improve safety and security by having people around at different hours of the day.
- 7.3.5 We require affordable housing on mixed-use schemes that propose 10 or more housing units. In cases where planning permission has been granted for a mixed use scheme and this is

subsequently amended through a new or amended planning application which increases the amount of residential use, the amount of affordable housing required will need to be recalculated across the whole scheme. In recalculating the affordable housing that is required, the total number of habitable rooms across the whole of the site will need to be taken into consideration.

# Live-work

- 7.3.6 Live-work units combine both residential and employment space in one unit. Our saved Southwark Plan Policy 1.6 Live-work units, requires the employment and residential uses to be separately defined and capable of operating independently.
- 7.3.7 We not do accept live-work units as affordable housing as they do not meet an identified need for affordable housing. However, they do generate a requirement for affordable housing like any other type of residential unit. If the development is for more than 10 live-work units we will require the minimum policy requirement for affordable housing to be met. Similarly if the live-work units are part of a mixed use development alongside other forms of housing, and together the number of residential units and live-work units exceeds 10 units, the minimum policy requirement for affordable housing must be met.

# 100% or mostly one tenure schemes

- 7.3.8 Historically we have received many applications for developments that are mostly or 100% affordable housing which has helped us deliver lots of new affordable housing. However, in some areas of the borough we have found that very little private housing is being developed and that some areas are becoming dominated by affordable housing. In order to ensure that we offer a range of housing choices including private housing to create balanced and mixed communities, core strategy policy 6 require a minimum amount of private housing to be provided in some areas of the borough. This is required by core strategy policy 6. In these specific areas we will not accept 100% affordable housing schemes and the maximum amount of affordable housing permitted will be 65% of the development. Where private housing is to be provided in areas with the minimum private housing policy in accordance with policy 6 of the core strategy, the council will secure it through a planning agreement under Section 106 of the Town and County Planning Act 1990.
- 7.3.9 The saved Southwark Plan Policy 4.4 tenure split within affordable housing is normally required in 100% or mostly affordable housing schemes. In cases where this cannot be met, the applicant must demonstrate to us the specific indentified need for the scheme and specific tenure mix. We encourage applicants for these schemes to talk to us at an early stage in their preparation.
- 7.3.10 In these cases we would normally decide the appropriate tenure within the affordable housing by taking account of:

- The site location including whether it is within the private and affordable housing policy area, and the existing levels of affordable housing in the area
- The need to create a mix and choice of housing across the borough
- 7.3.11 Our standard section 106 (planning obligations) charges will also apply to all 100% or mostly affordable housing schemes of 10 units or more. Our Section 106 Planning Obligations Supplementary Planning Document provides further information.

# Estate regeneration

- 7.3.12 Core strategy policy 6 sets out an overall net affordable housing target of 8558 new homes between 2011-2026. This means that across the whole borough we will ensure we replace any affordable housing which is lost and build more. We also set out affordable housing targets for different areas which are gross targets. This means that they do not take into account the demolition of existing housing, just the new housing built.
- 7.3.13 On some of our estate regeneration schemes we may not replace all of the affordable housing lost during redevelopment on that site. We set this out in core strategy policy 6 where we state that the same 35% minimum affordable housing will apply to both new and replacement housing. We have agreed with the Mayor that we may allow the loss of affordable housing to other tenures in some circumstances. The need to create mixed communities and to improve the quality of our existing homes means that we cannot replace all the affordable housing within estates.
- 7.3.14 Our approach to allow the loss of affordable housing to other tenures will provide for the creation of more mixed communities whilst maintaining growth overall. This will help to create a better mix and choice of housing in areas with high concentrations of social housing. It also allows for investment in housing estates across Southwark, both by private providers and the council in order to make more affordable homes meets the Decent Homes Standard. We are in the process of regenerating many of our estates and have plans to invest and improve more.

# 7.4 Monitoring and review

7.4.1 We monitor how much affordable housing is delivered through our Annual Monitoring Report (AMR). This includes affordable housing delivered from all sources, including new development, extensions, change of use, phased developments and estate regeneration. We record both gross and net figures so we can see how much of the development is net new affordable housing and how much is replacing existing affordable housing. We record housing when it is completed and so this ensures we do not double count for amended or new planning applications on a site already with planning permission.

# 8. SHELTERED, SUPPORTED AND EXTRA CARE HOUSING

# 8.1 Our strategy

8.1.1 We want to provide a range of housing to meet the Southwark 2016 and core strategy objectives of providing more and better homes. We want to provide homes that meet the differing needs of groups within Southwark.

# 8.2 Our policies

8.2.1 Saved Southwark Plan policy 4.7 Non self-contained housing for identified user groups, sets out that appropriate new development or changes of use which provide non self-contained residential accommodation will normally be permitted where:

i. The need for, and suitably of, the accommodation can be demonstrated by the applicant
ii. Its provision does not result in a significant loss of amenity to neighbouring occupiers
iii. There is adequate infrastructure in the area to support any increase in residents and
iv. The development provides a satisfactory standard of accommodation, including shared
facilities. Provision must be made within the development for adequate amenities and facilities
to support the specific needs of the occupiers, including staffing, servicing and management
arrangements, with particular consideration given to the specific needs of children.

# 8.3 Additional guidance

8.3.1 Certain members of the community such as the elderly, people with mental or physical disabilities, and vulnerable people, need to have housing that caters for their specific needs. These types of housing include:

i.Sheltered housing ii. Supported housing iii. Extra care housing

- 8.3.2 Specialist housing of this type needs to be made available at a cost that is affordable to the people that they are intended to house. For this reason, the requirement to provide affordable housing will not normally be applied to these types of housing (refer also to saved Southwark Plan Policy 4.7 and section 4 of the Residential Design SPD).
- 8.3.3 Our priority is to provide conventional housing that meets general needs, we have to make sure that any specialist housing is actually needed in the borough for those people that it is intended to house. This is to make sure that land is developed to build housing that is really needed, more specifically affordable housing and family housing.
- 8.3.4 Saved Southwark Plan policy 4.7 requires applicants to demonstrate a need for specialist nonself contained housing. This is to make sure that there are people in Southwark who need this type of housing and that it is not taking away land from conventional housing, including family and affordable housing.
- 8.3.5 For us to assess if there is a need for housing to meet specific needs, applicants will be required to:
  - a. Demonstrate that there is a local need for such housing

b. Provide evidence that the housing will be affordable to those people that it is intended to house

c. Give details of the long-term lease, management and maintenance arrangements of the accommodation

d. Provide evidence of their experience of delivering and managing high quality schemes of the type of housing they propose to deliver.

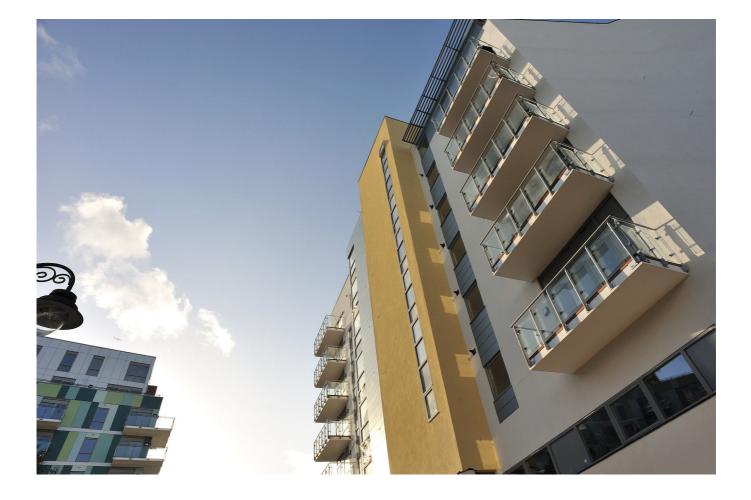
e. Provide evidence that there is a confirmed source of revenue funding for any support or care element of the scheme. For example this may be confirmation from Southwark Health and Social Care.

- 8.3.5 If satisfactory evidence of an identified local need for specialist accommodation is not submitted with a planning application, normal affordable housing requirements will apply in accordance with core strategy policies 6 and 8 and saved Southwark Plan policy 4.4.
- 8.3.6 Applicants are strongly encouraged to discuss proposals for housing for specific user groups with us at an early stage.

8.3.7 If housing for specific needs is converted to general needs housing in the future, normal affordable housing requirements will apply.

# 8.4 Monitoring and review

8.4.1 We monitor how much of these types of housing are completed through our Annual Monitoring Report (AMR). These are normally recorded within the indicator measuring the amount of residential institutions (D1 Use Class) or within the indicator for the amount of hostels.



# 9. FINANCING AND SECURING AFFORDABLE HOUSING

# 9.1 Our strategy

9.1.1 We want to fully implement our affordable housing policies and ensure that as much affordable housing as is reasonably possible is built. Our core strategy and saved Southwark Plan policies set out how we secure affordable housing through section 106 planning obligations.

# 9.2 Our policies

- 9.2.1 Core strategy policy 6 Homes for people on different incomes, sets the following policies:
  - Requiring as much affordable housing on developments of 10 or more units as is financially viable
- 9.2.2 Core strategy policy 14 Implementation and delivery states:
  - Using planning obligations to reduce or mitigate the impact of developments
- 9.2.3 Saved Southwark Plan policy 2.5 Planning obligations, sets out the cases when the Council will enter into planning obligations. These include:
  - Secure an appropriate mix of uses within a development
- 9.2.4 It also sets out that obligations may:
  - Restriction on development; and/or all or part of a development
  - Be a financial contribution.

# 9.3 Additional guidance

# How will affordable housing be financed?

9.3.1 As set out core strategy policy 6 we require as much affordable housing as is financially viable, with the policy requirement being a minimum of 35% affordable housing. Our Affordable Housing Viability Study 2010 shows that a minimum of 35% affordable housing on developments of 10 or more units is a viable, implementable policy over the 15 year timeframe of the core strategy (2011-2026).

56

9.3.2 Where the policy requirement cannot be met, the first option is to discuss with the council how to ensure as much affordable housing as possible is provided on site. This may include varying the affordable housing tenure mix to be provided on site between intermediate and social rented housing.

# **Financial** appraisals

- 9.3.3 Applicants are required to submit the GLA's Development Control Toolkit Model to demonstrate why the policy requirement amount or mix of affordable housing cannot be delivered. The GLA Toolkit comprises of a spreadsheet with borough specific defaults for inputs which applicants can override with their own actual inputs if desired. The financial appraisal indicates the financial viability of delivering affordable housing on any particular scheme. This is based on the residual land value which amounts to the revenue from all house sales minus all non-land costs. This value should demonstrate that the maximum reasonable amount of affordable housing is being achieved.
- 9.3.4 The GLA Toolkit is not suitable for dealing with student housing schemes. Instead some existing commercial tools may be better able to more accurately assess the viability of student housing schemes where applicants suggest that the policy requirement amount of affordable housing cannot be met.
- 9.3.5 When we receive financial appraisals, we will assess them to make sure that we agree with the estimations that have been made, particularly about build costs and house prices. The results of these assessments will be used when we are negotiating and making decisions on planning applications.
- 9.3.6 Unless the financial appraisal justifies to our satisfaction why the delivery of the required level of affordable housing is not financially possible, we will require that it is provided on-site. In the exceptional cases we will allow off-site provision or a pooled contribution in lieu of on-site affordable housing. This will also be subject to a financial appraisal.

- 9.3.7 In making our decision on whether we agree with the estimations that have been made in the financial appraisals, we will take into consideration genuinely abnormal site costs that could not reasonably have been anticipated which may justify a reduction in the level of affordable housing. Examples of abnormal site costs are unexpected costs associated with the extensive preservation of archaeological remains or extensive remediation of contaminated land.
- 9.3.8 We will expect that the applicant has taken into consideration:
  - The need to provide affordable housing and costs associated with other known policy requirements such as renewable energy and section 106 payments in accordance with our section 106 toolkit
  - Any constraints associated with the site, such as if it has been contaminated by previous industrial uses or is in an archeological priority zone
  - Standard development costs such as:
  - » demolition
  - » landscaping
  - » surveys e.g. archaeological or ecological
  - » ground conditions
  - » drainage or flood prevention measures and
  - » noise abatement measures, i.e. earth bunds, etc.
- 9.3.9 Applicants will be required to pay for the costs associated with carrying out financial appraisals and our reasonable costs associated with our subsequent assessment of them. This is because the financial appraisal seeks to justify the planning merits of reduced affordable housing provision or an off-site or pooled conrtribution in lieu of on-site affordable housing provision, as an exception to adopted planning policy.

# **Reviewing viability**

9.3.10 In some cases, based on a financial appraisal we may decide to grant planning permission for a scheme which is not compliant with our policy requirement of 35% affordable housing or our policies on tenure within the affordable housing. In these cases we may require a clause in the section 106 agreement that would require a viability review prior to implementation using the GLA's Development Control Toolkit Model (or in student schemes a suitable commercial viability tool) to see whether the scheme could at that time provide more affordable housing or other section 106 contribution than would have been possible at the time planning permission was granted.

# What happens once it is built?

9.3.11 Once affordable housing is built by a private developer, we will expect it to be transferred to a registered provider or other affordable housing provider. We have a list of registered providers with significant development and housing management role in Southwark. The up-to-date list is on our website at: http://www.southwark.gov.uk/ahspd

58

9.3.12 In circumstances where applicants are looking for a partner registered provider, we will usually refer the developer to a registered provider on this list. The developer should sell the affordable housing to the registered provider or affordable housing provider at a price which accords with the capital funding that the registered provider or affordable housing provider can raise. The amount of funding that a registered provider or affordable housing provider can raise is based on the future income that they will get from the affordable units from rents. Appendix A of this SPD sets out guidance on the amount of money payable by a registered provider to a developer for social rented housing.

# Public subsidy

- 9.3.13 The Homes and Communities Agency (HCA) currently allocate public subsidy. Our role is to advise the HCA if we support an application for public subsidy. The HCA receive bids from its Investment Partners, mainly registered providers and will support those that best meet its funding criteria of value for money, quality, adherence to policy and assurance of delivery.
- 9.3.14 As part of this process, registered providers consult with us prior to submitting a bid and the HCA will consult us to seek our views on how the bids will address local priorities and housing need.

# Securing affordable housing

# How will affordable housing be secured - Section 106 Planning Contributions?

- 9.3.15 Where affordable housing is to be provided, the council will secure it through a planning agreement under Section 106 of the Town and County Planning Act 1990.
- 9.3.16 Applicants are strongly advised to agree the details of the affordable housing to be provided with us at the pre-application stage and certainly before a decision is made on the application.

This would normally cover the following issues:

- Location of the affordable units on the site
- Affordability thresholds housing will have to be available at the costs outlined in section

58

2.1 and 2.2 of this SPD. We will also ensure that intermediate housing is available to households in Southwark in accordance with the annual household income range midpoints for intermediate housing units set out in table one in section 2.1.

- That no more than 50% of the development will be occupied before the affordable housing units are completed and handed over to the registered provider
- Number, tenure and size of the affordable housing units
- Standards which the affordable housing units must meet
- Terms to ensure that we secure local authority nomination rights
- The retention of social housing in perpetuity –to ensure that all the dwellings remain permanently, solely and exclusively available to meet the identified affordable housing need
- 9.3.17 Where 100% affordable housing schemes are proposed the section 106 agreement will include conditions that ensure that that if the scheme is not developed solely for affordable housing it will becomes subject to normal affordable housing requirements.
- 9.3.18 All relevant matters, including arrangements for service charging, should be resolved between all parties before a section 106 agreement is signed. We strongly encourage the involvement of partner registered providers in drafting section 106 agreements. Where a registered provider is not involved, the section 106 agreement will be used to control affordability thresholds and occupancy so that the affordable housing will be available to those in need of it.

# How will private housing be secured in areas with the minimum private housing policy?

9.3.19 Where private housing is to be provided in areas with the minimum private housing policy in accordance with policy 6 of the core strategy, the council will secure it through a planning agreement under Section 106 of the Town and County Planning Act 1990.

# Keeping affordable housing affordable

9.3.20 Given the high demand for affordable housing in the borough and the need for Southwark to meet our strategic housing requirements, we will resist the loss of affordable housing where possible.

# Social rented housing

9.3.21 We will ensure, through a section 106 agreement, that social rented housing remains both affordable and available to those in local housing need in the long term. This is referred to as retaining affordable housing 'in perpetuity'.

9.3.22 Measures which help to make sure that we retain affordable housing in perpetuity are through:

60

- The involvement of a registered provider in the development and management of a scheme
- Nominations agreements between the local authority and registered provider
- Section 106 Agreements, signed before planning permission is granted to ensure that the type of use and approved tenure mix is maintained
- Securing the tenure mix through the Section 106 Agreement

# Intermediate housing

9.3.23 We recognise the benefits of helping people become home owners so we allow intermediate housing that is shared ownership to be 'staircased' to 100%. This means that households in shared ownership housing can eventually buy their home outright. However, we also recognise that intermediate housing needs to be provided for future generations in housing need.

# Other priorities

- 9.3.24 All major applications are required to meet our minimum section 106 requirements. These are set out in the toolkit which supports our section 106 planning obligations supplementary planning document 2007.
- 9.3.25 There may be circumstances where, after the minimum section 106 requirements are met, a financial appraisal shows that it is not viable to provide the full policy requirement of affordable housing due to the scheme providing other exceptional community benefits. The applicant must demonstrate to us that the community benefits are additional to the standard minimum section 106 requirements and that the scheme is exceptionally beneficial to the wider community and meets the council's objectives.
- 9.3.26 In these exceptional circumstances we may review the levels of affordable housing to be provided as part of a scheme, if it is satisfactorily demonstrated that there is an identified need for such facilities, their wider benefit and that it is additional to the minimum section 106 requirements. We will require applicants to submit a financial appraisal to demonstrate why the affordable housing can not be provided due to the cost of the community benefits to be delivered.
- 9.3.27 Applicants are strongly encouraged to discuss such type of proposals with us at an early stage.

60

# **10. MAKING AN APPLICATION**

# 10.1 Pre-application advice

- 10.1.1 We strongly encourage applicants to discuss proposals with us before submitting a planning application.
- 10.1.2 We offer a formal pre-application advice process which we encourage all applicants to make use of. This will help to make the planning process more efficient by allowing the identification and resolution of any potential issues before the application is actually submitted. It increases the likelihood of a submitted scheme being considered acceptable provided the professional advice received from us informs the final application.
- 10.1.3 Applicants are encouraged to complete our pre-application form and provide as much information as possible to inform the pre-application discussions/advice. We will provide written formal pre-application advice following receipt of the pre-application enquiry.
- 10.1.4 We may meet the applicant to discuss the scheme or we may consider that a review of the detailed information submitted is sufficient without a meeting. Our website link below sets out the service we offer and the cost this service.

www.southwark.gov.uk/downloads/download/512/request\_for\_pre-application\_planning\_ advice

10.1.5 The more information that is provided to us at pre-application stage, the more detailed a response we can provide and the more chance there is that any concerns with the proposal will be identified and resolved before the application is submitted to us formally. Development management officers frequently seek advice on pre-applications from other planning teams including policy, transport, and design and conservation. Where appropriate they also involve other specialist officers including our housing team to provide detailed advice, particularly on affordable housing.

10.1.6 The key affordable housing related advice we can offer at pre-application stage is:

62

- Advice on the appropriate amount and mix of affordable housing
- Advice on the standard and quality of the proposed housing, design, layout and other development management matters
- The Head of Term that a Section 106 Agreement will need to cover
- Advice on Registered Providers and partnership working
- Advice on the likely funding for the affordable units
- Exceptions to normal policy requirements
- Assessment of open book financial appraisals submitted to us
- 10.1.7 The form in the web link above sets out the key documents that should be submitted as part of a pre-application discussion. In order to ensure affordable housing can be considered we also require:
  - Total amount of affordable housing proposed, calculated in units, habitable rooms and floorspace (sqm)
  - Percentage of affordable housing proposed calculated in units, habitable rooms and floor area (sqm)
  - Percentage of social rented and intermediate housing proposed
  - Number of bedrooms and floor areas within social rented and intermediate housing units
  - The number of affordable wheelchair units to be provided and whether these will be social rented or intermediate
- 10.1.8 In order to provide as effective and detailed pre-application advice as possible, it is also helpful to have:
  - The weekly cost to occupier of the proposed affordable units, including realistic and affordable service charges
  - Details of the affordability and tenure of the intermediate homes and how these will provide for a range of income groups
  - Mechanism for ensuring adequate management of the properties.

# 10.2 Engaging with a registered provider

- 10.2.1 We can also advise and help with contacting an appropriate registered provider to deliver the affordable housing element of a scheme at both pre-application and application stage if necessary. This will be through contacting one of the Registered Providers on our schedule in appendix C. All the Registered Providers on this schedule have:
  - An existing development role in the borough
  - Existing local infrastructure

- Approved Developer Status with the Homes and Communities Agency
- A satisfactory local housing management service
- Nomination agreements with us
- 10.2.2 We review our list of registered providers on a regular basis and we will update appendix C of this SPD accordingly on our website..
- 10.2.3 We encourage developers to make early contact with a registered provider. Working closely with a registered provider helps to ensure that high quality affordable housing can be delivered, which meets our affordability criteria.
- 10.2.4 In some cases, a registered provider may not be involved in the delivery of affordable housing. Where applicants choose to use other affordable housing providers that are not registered providers, the specific provider will need to be approved by Southwark's Director of Regeneration and Neighbourhoods. We would also encourage developers to seek advice from planning and housing officers on:
  - Management and maintenance arrangements/service charges for occupiers of affordable housing
  - Arrangements for retaining the housing as affordable for successive occupiers.

# 10.3 Submitting a planning application

- 10.3.1 Applicants must demonstrate that the affordable housing in their scheme is deliverable. An application will not be accepted as valid and will not be assessed if the Heads of Terms have not been submitted with the application. Where a registered provider is delivering the affordable housing, their details and confirmation of their involvement should also be provided. We expect the registered provider's requirements to have been designed into the scheme.
- 10.3.2 Where a registered provider is not to be involved in a scheme, additional information will need to be supplied on arrangements for allocation of properties, management arrangement and service charges and arrangements for passing on the affordable housing to successive occupiers.

# Appendix A. Financing Affordable Housing

1. The amount a registered provider will normally pay for a social rented unit. This table indicates how much a registered provider would normally pay a developer for social rented units. The final column of the table shows the amount that would be paid. This amount represents the mortgage debt that a registered provider will be able to meet by charging a rental income to tenants of the affordable units. The columns showing target rents, on-costs and net rent show the components of this sum.

We will update these figures in line with the Homes and Communities Agency's updates.

# Table 6: Dwelling Size

Dwelling size	Target rent (£ per week)	On - costs (£ per week)	Net rent (£ per week)	Sum payable by a registered provider to a developer for the provision of an appropriately sized dwelling (£)
1 bed	98.00	37.65	60.35	57,052
2 bed	112.00	39.65	72.35	68,397
3 bed	120.00	42.37	77.63	73,388
4+ bed	131.00	44.40	86.60	81,864

# 10.5 Notes:

1. Target rents are based on the Homes and Communities Agency's target rent formula. These affordable levels of rent are those at which registered providers are expected to charge rents on schemes involving section 106 agreements. Note rent restrictions also apply to larger units under the target rent formula.

2. In terms of the financial arrangements, the Council would wish the developer to provide the required amount of units/habitable rooms at a discount to allow a registered provider to acquire the affordable housing without public subsidy. The last column indicates how much a registered provider would be able to offer the developer for an affordable housing unit of a particular size.

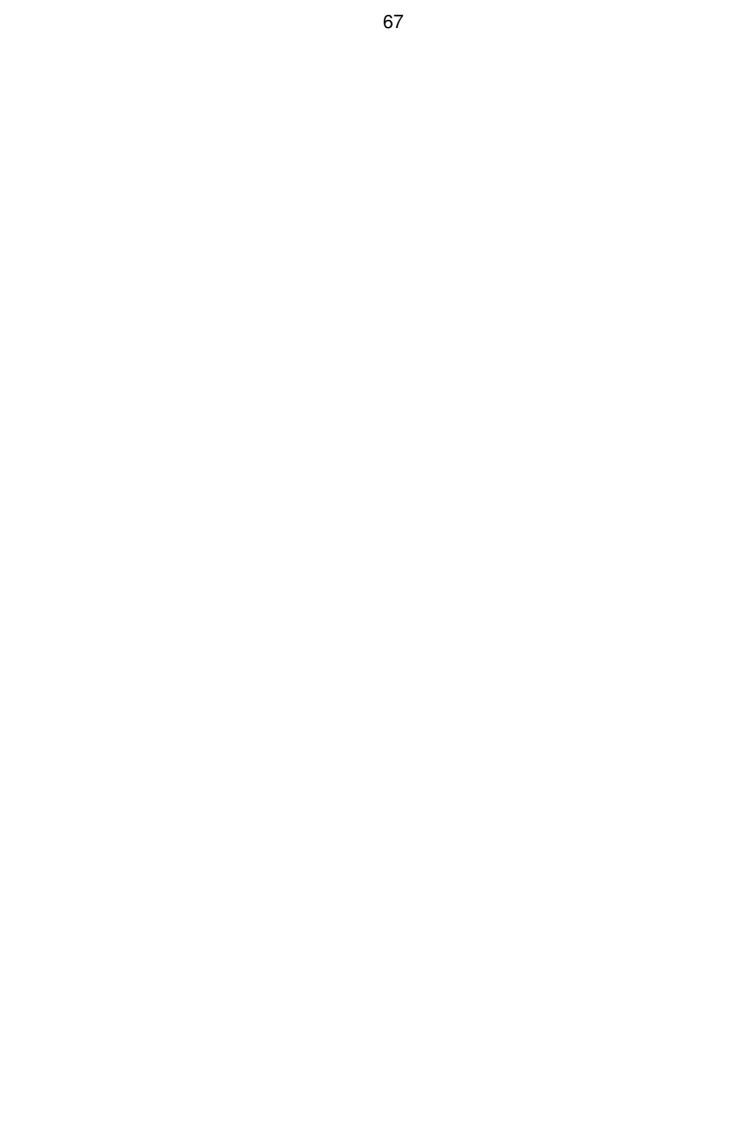
3. On - costs (the difference between target rent and net rent) consist of:

- Management costs of £330 per unit p.a.
- Maintenance costs of £975 per unit p.a.
- Voids and bad debts at 3%
- Major Repairs applied at 1% of works cost

Note, service charges have been excluded from the above.

4. The sum payable to the developer is the amount that a registered provider will pay a developer for affordable housing units and represents the mortgage debt that can be serviced by the net rental income.





If you require this document in large print, Braille or audiotape please contact us on 020 7525 5539.

#### Arabic

هذه الوثيقةِ أعدت من قبل فريق سياسةِ تخطيط بلدية ساوثارك.

هذه الوثيقة ستُأثر على القرارات التي إتّخذت حول تخطيط وتطوير إستعمال الأرض في ساوثارك.

إذا اردت أن تطلب المزيد من المعلومات أو من ألأستشارة بلغتِكَ يرجى القيام بزيارة دكانَ (وان ستوب شوب) وأعلم الموظفين هناك باللغة التي تريدها. إنّ عناوينَ دكاكين (وان ستوب شوب) موجود في أسفل هذه الصفحة ِ

#### Bengali

সাদার্কে কাউসিলের প্র্যানিং পলিসি টিম এই দলিলটি প্রকাশ করেছেন। এই দলিলটি সাদার্কে রুমি ব্যবহারের পরিকন্ত্রনা ৪ উন্নয়ন সম্পর্কিত সিদ্ধান্তগুলির উপর প্রভাব রাখবে। আপনি যদি আপনার ভাষায় অতিরিক্ত তথ্য ৪ পরামর্শ চান তাহলে অনুগ্রহ করে ৪য়ান স্টপ্ শপে যাবেন এবং কি ভাষায় এটা আপনার দরকার তা কর্মচারীদের জানাবেন। ৪য়ান স্টপ শপগুলোর ঠিকানা এই পৃঠার নিচে দেয়া হল।

#### French

Ce document est produit par l'équipe de la politique du planning de la mairie de Southwark. Ce document affectera les décisions prises sur le planning de l'utilisation des terrains et du développement dans Southwark. Si vous avez besoin de plus de renseignements ou de conseils dans votre langue, veuillez vous présenter au One Stop Shop et faire savoir au personnel la langue dont vous avez besoin. Les adresses des One Stop Shops sont au bas de cette page.

#### Somali

Dukumeentigan waxa soo bandhigay kooxda Qorshaynta siyaasada Golahaasha Southwark. Dukumeentigani wuxuu saamaynayaa go'aanaddii lagu sameeyey isticmaalka dhuulka ee qorshaynta iyo horumarinta ee Southwark.Haddii aad u baahan tahay faahfaahin dheeraad ah ama talo ku saabsan luqadaada fadlan booqdo dukaanka loo yaqaan (One Stop Shop) xafiiska kaalmaynta kirada guryaha shaqaalaha u sheeg luqada aad u baahan tahay. Cinwaanada dukaamada loo yaqaan (One Stop Shops) xafiisyada kaalmaynta kirada guryaha waa kuwan ku qoran bogan hoosteedda.

#### Spanish

Este documento ha sido producido por el equipo de planificación de Southwark. Este documento afectará las decisiones que se tomarán sobre uso de terrenos, planificación y desarrollo en Southwark. Si usted requiere más información o consejos en su idioma por favor visite un One Stop Shop y diga a los empleados qué idioma usted requiere. Las direcciones de los One Stop Shops están al final de esta página.

#### Tigrinya

እዚ ሰንድ (ጽሑፍ) ብሳዘርክ ካውንስል (Southwark) ናይ ውሞን መምርሒ ጉጅለ ዝተዳለወ እዩ ። እዚ ሰንድዝ አብ ሳዘርክ ናይ መሬት ኣጠቃቅማ መደብን ራበየትን ኣብ ዝግበሩ ውሳኔታት ለውጪ ከምጽእ ይኽእል ኢዩ ። ተወሳኺ ሓበሬታን ምኽርን ብቋንቋኽም እንተደሊኽም ናብ ዋን ስቶፕ ሾፕ (one stop shop) ብምኻድ ንትረኽቡዎ ሰራሕተኛ ትደልይዎ ቋንቋ ንገርዎ ። ናይ ዋን ስቶፕ ሾፕ ኣድረሻ ኣብ ታሕቲ ተጻሒፉ ይርከብ ።

68

# **APPENDIX B**

# The consultation plan

# Appendix B Affordable Housing Supplementary Planning Document

# Cabinet 21 June 2011

Appendix A	The draft Affordable Housing Supplementary Planning Document (SPD).	
Appendix B	The consultation plan	
Appendix C	The Equalities Impact Assessment	
Appendix D	The Sustainability Appraisal	

1



LOCAL DEVELOPMENT FRAMEWORK

# **CONSULTATION PLAN:**

# Draft Affordable Housing Supplementary Planning Document June 2011

London Borough of Southwark

# 1. Introduction

Our Sustainable Communities Strategy (Southwark 2016) sets out the key objective of making the borough a better place for people. To meet this objective we want to provide more and better homes to meet the needs of our community. Our planning policies help us to do this.

We are preparing a new Affordable Housing Supplementary Planning Document (SPD) to help provide more and better homes. Supplementary Planning Documents (SPDs) sit within a set of planning documents called the local development framework. Within the local development framework, the core strategy, the saved Southwark Plan policies and our area actions plans set out the overarching strategic planning policies for Southwark. SPDs provide further guidance and information on implementing these policies. This supplementary planning document further supports these strategic policies by providing further guidance on how we can provide homes for people on a wide range of incomes whilst also creating mixed communities

We already have a SPD on affordable housing which we adopted in September 2008. This draft SPD will replace the 2008 Affordable Housing SPD and takes into account changes in national, regional and local policies. It provides guidance on the new core strategy and area action plan policies and the saved Southwark Plan policies on affordable housing. The SPD does not provide guidance on the current proposals for changes to affordable housing stemming from the change of national government in May 2010. We may need to update this SPD or produce another Local Development Document once we have clarity on the proposed changes and their implications for Southwark.

## 2. How we are consulting on the SPD

This consultation plan sets out the consultation we are planning to carry out on the draft SPD. This is in accordance with our adopted Statement of Community Involvement (2008), which explains how we will consult the community in the preparation of planning policy documents. The following sections set out how we plan to meet the minimum statutory consultation requirements and how we will exceed these requirements where appropriate.

Once we have finished consulting on the SPD we will collate all the responses we receive and see whether we need to amend the SPD to take into account the responses. We will provide officer comments on all the responses we receive which will set out whether we have changed the SPD to reflect the response, and will explain our reasoning for why we have/have not amended the SPD. The SPD will then be taken to our Cabinet for adoption. We will provide Cabinet with a consultation statement setting out a summary of the responses we receive and how we have taken the comments into consideration, and also a statement showing how we have met the requirements of our Statement of Community Involvement. We will also provide them with the original responses and our officer comments on these responses.

This consultation plan should be read alongside the following documents:

• The draft Affordable Housing SPD 2011

The SPD sets out further guidance to the core strategy, saved Southwark Plan policies and the area action plan policies on affordable housing.

• The sustainability appraisal

The sustainability appraisal looks at the economic, environmental and social impacts of the SPD.

• The Equalities Impact Assessment

This assess the likely impact of the SPD on the nine protected characteristics groups (age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation). It looks at the impact of the SPD in relation to equality, diversity and social cohesion.

All of these documents can be found on our website at: <u>http://www.southwark.gov.uk/ahspd</u>

They will also be available in all of our libraries and locations listed in appendix A.

## 3. The timetable and methods of consultation

#### Consultation timeframe

We have found that the statutory six weeks consultation period is too short for effective consultation on planning policy documents. We will therefore carry out a period of minimum of six weeks of making the SPD publically available in addition to the statutory six week formal consultation period. This is set out in our Statement of Community Involvement. We do this in order to make sure there is enough time for you to read the SPD and submit comments.

The affordable housing supplementary planning document will be:

- Available to the public from 14 June 2011
- Taken to Cabinet for agreement for consultation on 21 June 2011
- Available for formal consultation from 19 August to 30 September 2011.

#### All responses must be received by 5pm on Friday 30 September 2011.

#### Consultation methods

The tables below set out the different consultation methods we propose to use. We hope to consult with as many people as possible, from a range of groups, organisations and areas in Southwark. We aim to engage with many different groups and individuals within Southwark so that the final SPD reflects the needs and aspirations of our diverse community. If you would like us to attend your community meeting to discuss the SPD please let us know.

We set out the statutory minimum required to meet Government regulations and the further methods additional to the statutory requirements that we propose to carry out. We set out dates where we have meetings confirmed. We also set out the key consultee group that the consultation method is aimed at.

Please check our website for an up-to-date list of dates of meetings and events.

#### Table 1 Statutory consultation

METHOD OF CONSULTATION	CONSULTEE	DATE	COMMENTS
Place SPD and supporting documents on the council's website	All	14 June 2011 and the final version agreed at Cabinet by the 19 August 2011.	Our website will continually be updated. The final draft SPD (with any changes from Cabinet if necessary) will be available on our website by the start of the formal consultation period.
Put the SPD and supporting documents in libraries, one stop shops, area housing offices and the Town Hall. List of places to view the documents is set out in appendix A.	All	By 19 August 2011.	
Press notice in local newspaper advertising consultation beginning of formal consultation on the SPD.	All	By 19 August 2011	This will be in the Southwark News.
Mail-out to all statutory consultees on planning policy database	All on planning policy consultee database (see list in appendix B.)	By 19 August 2011.	

#### Table 2 Additional consultation

METHOD OF CONSULTATION	CONSULTEE	DATE	COMMENTS
Mail-out to all non-statutory consultees on	All on planning policy	By 19 August 2011.	
planning policy database. This will set out	consultee database (see list		
the timescale for consultation and how	in appendix B.)		
people can comment on the SPD. The			
letter will also invite local groups to contact			
us if they would like us to attend their			
community meeting to discuss the SPD.			
Attend all community councils to provide a	All who attend community	Between 14 June and	The full list of the 8 community
presentation, workshop or a stall on the	councils.	30 September 2011.	councils and the meeting agendas
SPD.			can be found at:

			http://moderngov.southwarksites.c om/ieDocHome.aspx?bcr=1
Presentation and discussion at Southwark	Registered Providers	Between 14 June and	
Housing Association Group (SOUHAG)	operating in Southwark.	30 September 2011.	
Presentation and discussion at Southwark	Members of SSHP which	Between 14 June and	
Strategic Housing Partnership (SSHP).	include Registered	30 September 2011.	
This is a sub-group of Southwark Alliance	Providers, private landlords		
(our Local Strategic Partnership)	and leaseholders.		
Attend local community events	Community groups and	Between 14 June and	Please contact us if you would like
	individuals	30 September 2011.	us to attend one of your
			community meetings.

## 4. How to comment on the SPD

We welcome your comments on the Affordable Housing Supplementary Planning Document and the supporting documents. Please contact us if you would like to know more about the SPD or to find out more about our consultation.

All comments must be received by 5pm on Friday 30 September 2011.

Representations should be made using our online response form found at our website: <u>http://www.southwark.gov.uk/ahspd</u>

If you do not have internet access, representations can be sent to:

Alison Squires Team Leader Planning Policy Regeneration and neighbourhoods FREEPOST SE1919/14 London SE17 2ES

planningpolicy@southwark.gov.uk

Tel: 0207 525 5471 Fax: 0207 084 0347

## **Appendix A**

# List of locations where the SPD and supporting documents can be viewed

*Council offices* (Opening times 9am-5pm Monday-Friday) Town Hall - Peckham Road, London, SE5 8UB

Libraries (Opening times listed individually below)

Blue Anchor Library - Market Place, Southwark Park Road, SE16 3UQ (Monday, Tuesday and Thursday 9am to 7pm, Friday 10am to 6pm, Saturday 9am to 5pm)

Brandon Library - Maddock Way, Cooks Road, SE17 3NH (Monday 10am to 6pm, Tuesday and Thursday 10am to 7pm, Saturday 10am to 5pm) Camberwell Library - 17-21 Camberwell Church Street, SE5 8TR (Monday, Tuesday and Thursday 9am to 8pm, Friday 10am to 6pm, Saturday 9am to 5pm)

Dulwich Library - 368 Lordship Lane, SE22 8NB (Monday, Wednesday, Thursday and Friday 9am to 8pm, Tuesday 10am to 8pm, Saturday 9am to 5pm Sun 12pm to 4pm)

East Street Library - 168-170 Old Kent Road, SE1 5TY (Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)

Grove Vale Library - 25-27 Grove Vale, SE22 8EQ (Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)

John Harvard Library - 211 Borough High Street, SE1 1JA *(Monday, Tuesday, Wednesday and Thursday, Friday 9am to 7pm, Saturday 9am to 5pm)* 

Kingswood Library - Seeley Drive, SE21 8QR (Monday and Thursday 10am to 2pm, Tuesday and Friday 2pm to 4pm, Sat 1pm to 5pm)

Newington Library - 155-157 Walworth Road, SE17 1RS (Monday, Tuesday and Friday 9am to 8pm, Wednesday and Thursday 10am to 8pm, Saturday 9am to 5pm, Sunday 10am to 4pm)

Nunhead Library - Gordon Road, SE15 3RW

(Monday, Tuesday and Thursday 10am to 7pm, Friday 10am to 6pm, Saturday 10am to 5pm)

Peckham Library - 122 Peckham Hill Street, SE15 5JR (Monday, Tuesday, Thursday and Friday 9am to 8pm, Wednesday 10am to 8pm, Saturday 10am to 5pm, Sunday 12pm to 4pm)

Rotherhithe Library - Albion Street, SE16 7HY (Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)

#### **Area Housing Offices**

#### (Open 9am- 5pm Monday - Friday)

Nunhead and Peckham Rye - 27 Bournemouth Road, Peckham, SE15 4UJ Dulwich - 41-43 East Dulwich Road, SE22 9BY Borough and Bankside - Library Street Borough, London, SE1 0RG Camberwell - Harris Street, London, SE5 7RX Rotherhithe - 153-159 Abbeyfield Road, Rotherhithe, SE16 2LS

#### (Open Saturday, 9am to 1pm)

Peckham -122 Peckham Hill Street, London SE15 5JR

#### (Open 8.30am to 4.45pm Monday - Friday, Saturday 8.30am to 2.45pm)

Walworth - The Municipal Buildings, 151 Walworth Road, London SE17 1RY

#### **One Stop Shops**

#### (Open 9am-5pm Monday – Friday)

Peckham - 122 Peckham Hill Street, London, SE15 5JR (*Saturday 9am to 1pm Peckham only*) Walworth - 151 Walworth Road, London, SE17 1RY Bermondsey -17 Spa Road, London, SE16

## APPENDIX B-LIST OF CONSULTEES

\* Please note this list is not exhaustive and also relates to successor bodies where re-organisations occur.

#### **Statutory**

We must consult the following specific consultation bodies in accordance with The Town and Country Planning (Local Development) (England) Regulations 2004 and The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

- British Telecommunications
- Bromley Council
- Corporation of London
- English Heritage (London Region)
- Environment Agency
- Government Office for London
- Greater London Authority
- Lambeth Council
- Lewisham Council
- LFEDA
- London Development Agency
- Natural England
- Secretary of State
- Secretary of State for Transport
- Thames Water Property Services
- The Coal Authority
- Southwark Primary Care Trust
- Any of the bodies from the following list who are exercising functions or a function in the borough:
  - Person to whom a licence has been granted under section 7

     (2) of the Gas Act 1986
  - 2. Sewage undertakers
  - 3. Water undertakers.
- Any person to whom the electronic communalisations code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003
- Any person who owns or controls electronic communications apparatus situated in any part of the borough,

#### Local consultees

All Councillors

- Liberal
- Labour
- Conservatives
- Green Party

#### Voluntary organisations and community groups

- Aaina Women's Group
- Abbeyfield Society
- ABC Southwark Housing Co-op
- Aborigine
- ACAPS
- Access London
- Action Southwark
- ADDACTION Maya Project
- Adult Education
- Advice UK London Region
- AFFORD
- Agenda for Community Development
- Albert Academy Alumni Association
- Albert Association
- Albrighton Cricket Club
- Alcohol Counselling & Prevention Services 1
- Alcohol Counselling & Prevention Services 2
- Alcohol Recovery Project
- Alcohol Recovery Project
- Alleyn Community Centre Association
- Alone in London
- Anada Fund
- Anchor Sheltered Housing
- Apex Charitable Trust Ltd
- Art in the Park
- ARTLAT
- Artsline
- Artstree / Oneworks
- Ashbourne Centre
- Association of Waterloo Groups
- ATD Fourth World
- Aubyn Graham (The John Graham Group)
- Aylesbury Academic Grassroots
- Aylesbury Day Centre

- Aylesbury Everywomen's Group
- Aylesbury Food and Health Project
- Aylesbury Healthy Living Network
- Aylesbury Learning Centre
- Aylesbury NDC
- Aylesbury Nutrition Project
- Aylesbury Plus SRB
- Aylesbury Plus Young Parent Project
- Aylesbury Sure Start
- BAKOC
- Beacon Project
- Bede Café Training
- Bede House Association and Education Centre
- Bede House Community Development Womens Project
- Bells Garden Community Centre
- Beormund Community Centre
- Bermondsey and Rotherhithe Development Partnership
- Bermondsey Artists Group
- Bermondsey Citizens Advice Bureau
- Bermondsey St Area Partnership
- Bermondsey St Community Association
- Bermondsey Street Area Partnership
- Bermondsey Street Association
- Blackfriars Advice Centre
- Blackfriars Settlement (Community Care Team)
- Blackfriars Work Centre
- Blue Beat Community Centre
- Blue Beat Police Centre
- Blue Elephant Theatre Company
- Book-Aid International
- Borough Community Centre
- Borough Music School
- Borough Partnership Team, Southwark Police Station
- Bosco Centre
- Bradfield Club in Peckham
- Breast Cancer Campaign
- Bredinghurst (day and residential)
- British Film Institute
- Brook Advisory Centre
- Bubble Youth Theatre & Adult Drama
- Burgess Park (Colts) Cricket Club
- Camberwell Advocacy Office

- Camberwell Arts Week
- Camberwell Community Forum
- Camberwell Credit Union
- Camberwell Green Magistrates Court
- Camberwell Grove
- Camberwell ME Support Group
- Camberwell Police Station 212a
- Camberwell Rehabilitation Association
- Camberwell Society
- Camberwell Supported Flats
- Camberwell Working Party
- Cambridge House & Talbot
- Cambridge House Advocacy Team
- Cambridge House Legal Centre
- Canada Water Campaign
- Canada Water Consultation Forum
- Carers Support Group
- Cares of Life
- Carnival Del Pueblo
- Castle Day Centre
- CDS Co-operatives
- Centre Point (40)
- Chair Dulwich Sector Working Group
- Charterhouse in- Southwark
- Cheshire House(Dulwich)
- Cheshire House(Southwark)
- Childcare First
- Childcare Support
- Childminding Project
- Children's Rights Society
- Choice Support Southwark
- Choices
- Chrysalis
- Citizen Advice Bureau Peckham
- Clublands
- Coin Street Community Builders
- Coin Street Festival and Thames Festival
- Colby Road Daycare Project
- Colombo Street Sports and Community Centre
- Committee Against Drug Abuse
- Communicate User Group
- Community Alcohol Service

- Community Care Choices
- Community Drug Project
- Community Metamorphosis
- Community Music Ltd
- Community of DIDA in the UK
- Community Radio Station
- Community Regeneration
- Community Support Group
- Community TV Trust
- Confederation of Passenger Transport UK
- Connect
- Consumers Against Nuclear Energy
- Contact A Family In Southwark
- Cooltan Arts
- Corazon Latino
- Cornerstone Community Project
- Council of Igbo Communities
- CRISP / LSE / Balance for Life
- Crooke Green Centre Association
- Crossways Centre
- Crossways Housing
- CWS Southeast Co-op
- Delfina Studios Trust
- Detainee Support & Help Unit
- Diamond Project
- Divine Outreach Community Care Group
- Dockland Settlement
- Dominica Progressive Charitable Association
- Drugs Apogee
- Drum
- Dulwich Credit Union
- Dulwich Festival
- Dulwich Hamlet Supporters Trust
- Dulwich Helpline
- Dulwich Orchestra
- Dulwich Society
- East Dulwich Society
- East Dulwich Womens Action
- ECRRG
- Education 2000 Project
- Education Action Zone
- Education Links

- Education Support Centre
- Elephant Enterprises
- Elephants Links Project Team
- Elibariki Centre
- Employing People Responsibly
- Empowerment Projects Trust
- Encore Club
- Environmental Computer Communications
- Equinox
- ESOL Project
- Evelina Children's Hospital Appeal
- Evelyn Coyle Day Centre
- EYE (Ethio Youth England)
- Faces in Focus (TIN)
- Fair Community Housing Services
- Fairbridge in London
- Fairbridge South London
- Families Experiencing Drug Abuse
- Fast Forward
- First Place Children and Parents Centre
- First Tuesday Club
- Five Bridges Centre
- Five Steps Community Centre
- Flex-Ability
- Fortress Charitable Trust
- Foundation for Human Development/ Free Press Europe
- Friends of East Dulwich Station
- Friends of Fast Forward
- Funding Advice Consultancy & Training Service
- Garden House Project
- Gateway Project
- Gateway Training Centre
- GEMCE
- Globe Education Centre
- Gloucester Grove Community Association
- Goose Green Centre
- Goose Green Lunch Club
- Grange Rd Carers Support Group
- Greenhouse Trust
- Gye Nyame for Perfoming Arts
- Habitat for Humanity Southwark
- Herne Hill Society

- Holmhurst Day Centre (Social Services)
- HOURBank
- Ideas 2 Vision
- ILETO
- In Tolo Theatre
- Independent Adoption Service
- Independent Advocacy Service
- Inner City Link
- Inspire
- Integratus
- International Family Welfare Agency
- International Shakespeare Globe Centre Ltd
- Isigi Dance Theatre Company
- JAA
- Jennifer Cairney Fundraiser
- John Paul Association
- Joshua Foundation Superkid
- Jubilee Renewal Projects
- Jump
- Juniper House Co-op
- Kairos Community Trust
- Kaizen Initiative
- Keyworth
- Kick Start
- Kite
- Lady of Southwark
- Lambeth Crime Prevention Trust
- Lambeth MIND
- Laura Orsini (New Group)
- Levvel Ltd
- Lewisham & Southwark Jobshare Project
- Liberty Club
- Life Builders
- Lighthours Informal Learning & Support Project
- Lighthouse Developments Ltd.
- Linden Grove Community Centre
- Links Community Hall
- Living in Harmony
- Local Accountancy Project (LAP)
- London Roses Community Services
- London Thames Gateway Forum
- London Voluntary Service Council

- Lorels Broadcasting Service
- Lorrimore Drop In
- M. Hipro Words
- Magdalen Tenants Hall
- Manna Group
- Manna Society and Day Centre
- Marsha Phoenix Memorial Trust
- Mecower
- Media Action
- Meeting Point
- Members of Elephant Links
- Milewalk Project
- Millennium Reachout
- Mine Watch
- Morena
- Moses Basket Charity Care Organisation
- Multiskills Training & Recruitment
- MultisoSoc
- Myasthenia Gravis Association
- NAS International Charity
- New Generation Drug Agency
- New Peckham Varieties @ Magic Eye Theatre
- New Unity Centre Association (NUCA)
- Next Step Project
- North Lambeth Day Centre (BEDS)
- North Peckham Project
- North Southwark Community Care Support Project
- North Southwark Community Development Group
- North Southwark EAZ
- North-West Quadrant Community Development Network
- Nouvel Act
- Nunhead Community Forum
- Oasis Mentoring
- Oasis Trust
- OFFERS
- Old Kent Road Community Training Centre
- Omolara Sanyaolu Open Arms Foundation
- Only Connect
- Opendoor
- Opendoor Community Support Team
- OTDOGS
- Outset

- Outset Jobsearch Project
- Oval House Workshop
- Oxford and Bermondsey Club Forum
- Pachamama
- Panda London
- Papa Mandela London Project
- Parent Talk
- Parents Association
- Patchwork HA
- Pathways Trust
- Peckham Area
- Peckham Befrienders
- Peckham CAB
- Peckham Day Centre
- Peckham Open Learning Centre
- Peckham Pop-In
- Peckham Society
- People Care Association
- People to People
- Peoples Association in Southwark
- Phoenix House
- Pierres Vivantes Charity
- Pitt Street Association
- Plunge Club
- Pneumonia Community Link
- Pool of London Partnership
- Positive Education Learning Centre
- Premier Self Defence
- Prisoners Families & Friends Service
- Psychosynthesis and Education Trust
- Publication
- Pumphouse Eductional Museum
- Queens Road Parents & Carers Support Group
- Queensborough Community Centre
- Radiant Idea
- RAP Academy
- Realise IT Network
- Redriff Community Association
- Right Lines
- Rimin Welfare Charity Association
- Rise and Shine
- Rockingham Community Association

- Rockingham Community Centre
- Rockingham Management Committee
- Rockingham Women's Project
- Rolston Roy Art Foundation
- Rotela Tech Ltd
- RPS Rainer Housing
- RSPCA
- Ruban Educational Trust
- S.E. Lions Football Club
- Saffron Blue Promotions
- Sarcoidosis & Interstitial Lung Association
- SASS Theatre Company
- SAVO
- SCA Renew
- Scoglio Arts @ Community Centre
- SCOPE
- SCREEN
- SE5 Alive
- SELAH Social Action Network
- Selcops
- SETAA, Aylesbury Learning Centre
- Seven Islands Leisure Centre
- Seven Islands Swimming Club
- SGI-UK
- Shaka
- Shakespeare's Globe
- Shep-Su Ancestral Design
- Sicklenemia
- Silwood Family Centre
- Sirewa Project
- SITRA
- SKILL
- South Bank Employers' Group
- South Bermondsey Partnership
- Southside Rehabilitation Association
- Southwark Adult Education
- Southwark Alarm Scheme
- Southwark Alliance Partnership Team
- Southwark Arts Forum
- Southwark CABX (Citizens Advice Bureaux) Service
- Southwark Carers
- Southwark Cares Incorporated

- Southwark Caring Housing Trust
- Southwark Community Care Forum
- Southwark Community Development Agency
- Southwark Community Drugs Project
- Southwark Community Team
- Southwark Community Youth Centre & Arts Club
- Southwark Congolese Centre
- Southwark Consortium
- Southwark Co-op Party
- Southwark Co-operative Development Agency
- Southwark Council Benefits Campaign
- Southwark Dial-a-Ride
- Southwark Domestic Violence Forum
- Southwark Education & Training Advice for Adults (SETAA)
- Southwark Education and Cultural Development
- Southwark Education Business Alliance
- Southwark Habitat for Humanity
- Southwark Heritage Association
- Southwark Law Centre
- Southwark Libraries
- Southwark LSP/Alliance
- Southwark Mediation Centre
- Southwark Mind
- Southwark Model Railway Club
- Southwark Mysteries Drama Project
- Southwark Park Day Centre
- Southwark Park Group
- Southwark Playhouse
- Southwark Police & Community Consultative Group
- Southwark Social Services
- Southwark Trade Union Council
- Southwark Trade Union Support Unit
- Southwark Unity
- Southwark User Group
- Southwark Victim Support
- Southwark Women's Support Group
- SPAM
- Speaking Up
- Sports Action Zone
- Sports Out Music In
- Spreading Vine
- Springboard Southwark Trust

- Springboard UK
- Springfield Lodge
- St Clements Monday Club
- St Georges Circus Group
- St Jude's Community Centre
- St Matthew's Community Centre
- St. Martins Property Investment Ltd.
- Starlight Music Project
- STC Working Party
- Stepping Stones
- Surrey Docks Carers Group
- Sustainable Energy Group
- Swanmead
- Tabard Community Committee
- Tai Chi UK
- TGWU Retired
- Thames Reach
- The Black-Eyed Peas Project
- The British Motorcyclists Federation
- The Livesey Museum
- The Prince's Trust
- The Shaftesbury Society
- The Southwark Mysteries
- Three R's Social Club
- Thresholds
- Tideway Sailability
- Tokei Martial Arts Centre
- Tomorrow's Peoples Trust
- Tower Bridge Magistrates Court
- Trees for cities
- Trios Childcare Services
- Turning Point
- Unite
- United Colour & Naylor House Crew
- Urban Research Lab
- URBED
- Vauxhall St Peters Heritage Centre
- Victim Support Southwark
- Voice of Art
- Voluntary Sector Support Services
- Volunteer Centre Southwark
- Volunteers in Action

- Volunteers in Action Southwark
- Wakefield Trust
- Walworth Triangle Forum
- Waterloo Breakaway
- Waterloo Community Counselling Project
- Waterloo Community Regeneration Trust
- Waterloo Sports and Football Club
- Waterloo Time Bank
- Way Forward
- WCDG
- Welcare Mothers Group
- West Bermondsey '98
- West Bermondsey Community Forum
- Wickway Community Association
- Wild Angels
- Willowbrook Centre
- Windsor Walk Housing
- Woman of Peace Counselling Group
- Women Development Programme
- Women in Harmony
- Women's Ivory Tower Association
- Women's Self-Development Project
- Womens Worker
- Woodcraft Folk
- Workers Educational Ass.
- Working with Men
- XL Project
- Young Carers Project
- Young Womens Group AAINA

#### Major landowners and development partners in the borough

#### Businesses

- 7 Star Dry Cleaners
- A & J Cars
- A J Pain
- A R London Builders
- ABA (International) Ltd
- Abbey Rose Co Ltd
- Abbey Self Storage
- Abbeyfield Rotherhithe Society Ltd
- ABS Consulting

- Academy Costumes Ltd
- Accountancy Business Centre
- Ace
- Ace Food
- Addendum Ltd
- Albany Garage
- Alex Kennedy
- Alfa Office Supplies
- Alpha Employment Services
- Alpha Estates
- Alpha Logistics & Securities Ltd
- AM Arts
- AMF Bowling Lewisham
- Anchor at Bankside
- Andrews & Robertson
- Angie's Hair Centre
- Anthony Gold, Lerman & Muirhead
- Archer Cleaners
- Architype Ltd
- Archival Record Management plc
- Argent Environmental Services
- Argos Distributors Ltd
- Arts Express
- ARUP Engineering Consultants
- ATAC Computing
- Auditel
- Austins
- Australia and New Zealand Banking Group Ltd
- Azhar Architecture
- Bankside Business Partnership
- Bankside Theatre
- Bankside Traders Association
- Barclays Bank PLC
- Barratt East London
- Barrie Howard Shoes
- Barton Willmore
- Baxhor Travel Ltd
- BBI
- BBW Solicitors
- Beaumont Beds Ltd
- Bedford Hill Gallery & Workshops Ltd
- Bells Builders Merchants (Dulwich) Ltd

- Bells Play Group
- Bellway Homes
- Bermondsey Goode Foods
- Bert's Fish Bar
- Big Box Productions Ltd
- Big Metal
- Bims African Foods
- Black Business Initiative
- Blackfriars Wine Bar/Warehouse
- Blakes Menswear
- Bloy's Business Caterers
- Boots the Chemist
- Boyson Car Service
- Bramah Museum
- Brian O'Connor & Co
- Britain at War Experience
- Brixton Online Ltd
- Brockwell Art Services
- Brook Advisory Centre
- Brook Street Bureau
- Brunel Engine House Exhibition
- BTA
- BTCV Enterprises Ltd
- Bubbles
- Burnet, Ware & Graves
- Bursand Enterprises
- C Demiris Laboratory Services Ltd
- C Hartnell
- C S M L (Computer Systems & Network Solutions)
- Caitlin Wilkinson MLIA (Dip)
- Calafield Ltd
- Camberwell Arts
- Camberwell Traders Association
- Cap UK, Confederation of African People
- Capital Careers
- Capital Carers
- Cascade Too Florist
- CB Richard Ellis Ltd
- CD Plumbers
- CGMS Consulting
- Charterhouse in Southwark
- Childsplay

- Choice Support
- Chris Thomas Ltd
- Cicely Northcote Trust
- Citiside Plc
- City Central Parking
- City Cruises PLC
- CityLInk
- Claybrook Group Ltd
- Clean Up Services
- Cleaning Services (South London) Ltd
- Clearaprint
- Club Copying Co Ltd
- Cluttons
- Colliers CRE
- Colorama Processing Laboratories Limited
- Colworth House Ltd
- Community Radio Broadcasting
- Consultants at Work
- Consumers Food and Wine
- Continental
- Continental Café
- Copy Copy
- Copyprints Ltd
- Cosmic Training & Information Services
- CTS Ltd (Communication & Technical Services Ltd)
- Cuke Bar
- Cyclists Touring Club
- Cynth-Sinclair Music Venue
- Cyril Silver & Partners LLP Surveyors
- D E Cleaning Service
- David Trevor- Jones Associates
- Davis Harvey & Murrell Ltd
- Davy's of London (WM) Ltd
- Delta Security UK Limited
- Development Planning Partnership
- Dickens Developments
- District Maintenance Ltd
- Doble, Monk, Butler
- Dolland and Aitchison
- Dolphin Bay Fish Restaurant
- Donaldsons
- Donaldson's Planning

- Douglas Jackson Group
- DPDS Consulting Group
- Dr J Hodges
- Dransfield Owens De Silva
- Driscoll House Hotel
- Drivers Jonas
- Drivers Jonas
- Dulwich Books
- Dulwich Chiropody Surgery
- Dulwich Hamlet Football Club
- Dulwich Sports Club
- Dulwich Village Traders Association
- Duncan Vaughan Arbuckle
- Duraty Radio Ltd
- Dynes Self-Drive Cars
- Eagle Speed Car Services
- East Street Traders
- Easyprint 2000 Ltd
- ECRRG
- Edita Estates
- Edwardes of Camberwell Ltd
- Elephant Car Service
- Eminence Promotions
- Emma & Co Chartered Accountants
- EMP plc
- Employment Service
- English Partnerships (London and Thames Gateway)
- Equinox Consulting
- Etc Venues Limited
- Euroclean Services
- Euro-Dollar Rent-a-Car
- Express Newspapers/United Media Group Services Ltd
- Ezekiel Nigh Club
- F & F General Merchants
- F A Albin & Sons Ltd
- F W Woolworth plc
- Feltbrook Ltd
- Field & Sons
- Fillocraft Ltd
- Finishing Touches
- Firstplan
- Flint Hire & Supply Limited

- Florence Off-Licence & Grocery
- Focus Plant Ltd
- Foster-Berry Associates
- Franklin & Andrews
- Friends Corner
- Fruiters & Florist
- G Baldwin & Co
- G M Imber Ltd
- G Worrall & Son Ltd
- GAAD Support Services
- General Commercial Enterprises
- George Yates Estate Office Ltd
- GHL Commercials
- Gisella Boutique & Design Workshop
- Glaziers Hall Ltd
- Glenn Howells Architects
- Godwin Nede & Co
- Golden Fish Bar
- Gowers Elmes Publishing
- Grace & Mercy Fashion
- Graphic House
- Gregory Signs
- Gretton Ward Electrical Ltd
- Guy's & St Thomas' NHS Foundation Trust
- Haime & Butler
- Hair and Beuaty
- Hair Extension Specialist
- Hairports International
- Hall & Dougan Management
- Harvey's Catering & Equipment Hire Ltd
- Hayward Brothers (Wines) Ltd
- HCS Building Contractors
- Heartbeat International
- Hepburns
- Herne Hill Traders Association
- Hollywood Nails
- Home Builders Federation
- Hopfields Auto Repairs
- Hopkins, Williams, Shaw
- HSBC PLC (Southwark Area)
- Hygrade Enterprises
- Hygrade Foods Ltd

- Iceland Frozen Foods Plc
- Iceni Projects Ltd
- Imperial War Museum
- Implement Construction Ltd
- Indigo Planning
- IPC Magazines Ltd
- Isaac & Co
- Isambard Environmental
- J K Computers Ltd
- J R Davies Associates
- J Sainsbury plc
- Jade Catering Services
- Jani-King (GB) Ltd
- Jay Opticians
- Jet Reproprint
- JETS
- JK Computers
- Jones Yarrell & Co Ltd
- Juliets
- Kalmars
- Kalpna Newsagent
- Kamera Obscura
- Kellaway's Funeral Service
- Ken Creasey Ltd
- King Sturge
- Knight Office Supplies Ltd
- Kumasi Market
- L Tagg Sewing Machines
- Lainco, Lainco
- Lambert Smith Hampton
- Lambrucus Ltd
- Land Securities
- Lane Heywood Davies
- Lanes Butchers Ltd
- Leslie J Sequeira & Co
- Lex Volvo Southwark
- Life Designs
- Light Projects Ltd
- Lloyds Bank plc
- Local Recruitment Brokerage Ltd
- Londis & Jamaica Road Post Office
- London & City Central

- London Bridge Dental Practice
- London Bridge Hospital
- London Builders Merchants
- London Dungeon
- London Self-Storage Centre
- London Tile Warehouse
- London West Training Services
- London's Larder Partnership
- Look Good Design
- Lord Nelson
- Louise Moffatt Communications
- Lovefinders
- Lucy's Hairdressing Salon
- LWTS Ltd
- M & D Joinery Ltd
- M Armour (Contracts) Ltd
- M H Associates
- M H Technical Services
- M V Biro / Bookbiz
- Mackintosh Duncan
- Magreb Arab Press
- Malcolm Judd & Partners
- MARI
- Marks and Spencer Plc
- Marrs & Cross and Wilfred Fairbairns Ltd
- Matthew Hall Ltd
- Mayflower 1620 Ltd
- McCarthy & Stone
- MCQ Entertainments Ltd
- Metrovideo Ltd
- Michael Dillon Architect & Urban Designer
- Minerva PLC
- Ministry of Sound
- Miss Brenda Hughes DMS FHCIMA FBIM Cert. Ed.
- MK1 Ladies Fashion
- Mobile Phone World Ltd
- Mono Consultants Limited
- Montagu Evans
- Motability Operations
- movingspace.com
- Mulcraft Graphics Ltd
- Myrrh Education and Training

- Nabarro Nathanson
- Nandos
- Nathaniel Lichfield & Partners Ltd
- National Provincial Glass Co Ltd
- National Westminster Bank plc
- Neil Choudhury Architects
- Network Rail
- Nevins Meat Market
- New Dome Hotel
- New Future Now
- New Pollard UK
- New Start Up
- Ngomatiya Gospel Record Production
- Nicholas D Stone
- Nichols Employment Agency
- Norman W Hardy Ltd
- Nutec Productions
- & S Builders
- OCR (Quality Meats) Ltd
- Office Angels
- Oliver Ashley Shoes
- Olley's Traditional Fish & Chips
- On Your Bike Ltd
- Over-Sixties Employment Bureau
- P J Accomodation
- Panache Exclusive Footwear
- Patel, K & S (Amin News)
- Paul Dickinson & Associates
- Peabody Pension Trust Ltd
- Peabody Trust
- Peacock & Smith
- PEARL
- Peppermint
- Peterman & Co
- Phil Polglaze
- Philcox Gray & Co
- Pillars of Excellence
- Pizza Hut
- Planning & Environmental Services Ltd
- Planning Potential
- Pocock Brothers Ltd
- Port of London Authority

- Potter & Holmes Architects
- Precision Creative Services
- Premier Cinema
- PricewaterhouseCoopers
- Primavera
- Prodigy Ads
- Prontaprint
- Purser Volkswagen
- Q2 Design
- Quarterman Windscreens Ltd
- Qucksilver
- R B Parekh & Co
- R J Parekh & Co
- R Woodfall, Opticians
- Rajah Tandori and Curry
- Ranmac Employment Agency
- Ranmac Security Ltd
- Rapleys LLP
- Red Kite Learning
- Redder Splash
- Reed Employment
- Richard Harrison Architecture, Trafalgar Studios
- Richard Hartley Partnership
- Rive Estate Agents
- Rizzy Brown
- RK Burt & Co Ltd
- Robert O Clottey & Co
- Rodgers & Johns
- Rodney Radio
- Roger Tym & Partners
- Roosters Chicken and Ribs
- Rose Bros
- Roxlee the City Cobbler
- Roy & Partners
- Roy Brooks Ltd
- Royal Mail
- RPS Planning Transport and Environment
- Rusling, Billing, Jones
- S &S Dry Cleaners
- S C Hall & Son
- S T & T Publishing Ltd
- Sainsbury's plc

- Salon 3A Unisex Hairdressing
- Samuel Brown
- Savages Newsagents
- Savills Commercial Limited
- SCEMSC
- Scenic Art
- SEA / RENUE
  Sea Containers Services Ltd
- SecondSite Property Holdings
- Service Point
- Sesame Institue UK
- SETAA
- Shalom Catering Services
- Shopping Centres Ltd (Surrey Quays)
- Simpson Millar (incorporating Goslings)
- Sinclair Robertson & Co Ltd
- Sitec
- Skalps
- Smile Employment Agency
- Softmetal Web Designer
- South Bank Employers Group
- South Bank Technopark
- South Central Business Advisory Centre
- South East Cars
- South Eastern Trains
- South London Press Ltd
- Southern Railway
- Southwark & Kings Employees Credit Union Ltd.
- Southwark Association of Street Traders
- Southwark Chamber of Commerce
- Southwark Credit Union
- Southwark News
- Spaces Personal Storage
- Spacia Ltd
- St. Michael Associates
- Stage Services (London) Ltd
- Start Consulting
- Stephen Michael Associates
- Steve Cleary Associates
- Stitches Marquee Hire
- Stream Records
- Stroke Care

- Studio 45
- Studio 6
- Sumner Type
- Superdrug Stores Plc
- Supertec Design Ltd
- TA Property Consultants
- Tangram Architects & Designers
- Tate Modern
- Taxaccount Ltd
- Terence O'Rourke
- Tesco Stores Ltd
- Tetlow King Planning
- The Bakers Oven
- The Chapter Group PLC
- The Clink & Bankside Co Ltd
- The Clink Prison
- The Design Museum
- The Dulwich Estates
- The Edge Couriers
- The Financial Times
- The Hive
- The Mudlark
- The New Dome Hotel
- The Old Operating Theatre
- The Peckham Experiment
- The Stage Door
- The Surgery
- Thermofrost Cryo plc
- Thomas & Co Solicitors
- Thrifty Car Rental/Best Self Drive Ltd
- Timchart Ltd
- Tito's
- TM Marchant Ltd
- Tola Homes
- Tom Blau Gallery
- Toucan Employment
- Tower Bridge Travel Inn Capital
- Trade Winds Colour Printers Ltd
- Trigram Partnership
- Turning Point Milestone
- Two Towers Housing Co-Op
- United Cinemas International (UCI)

- United Friendly Insurance PLC
- Unity Estates
- Venters Reynolds
- Victory Stores
- Vijaya Palal
- Vinopolis
- W Uden & Sons Ltd
- Wallace Windscreens Ltd
- Walsh (Glazing Contractors) Ltd
- Walter Menteth Architects
- Wardle McLean Strategic Research Consultancy Ltd
- Watson Associates
- West & Partners
- Wetton Cleaning Services Ltd
- WGI Interiors Ltd
- White Dove Press
- Whitehall Clothiers (Camb) Ltd
- Wilkins Kennedy
- William Bailey, Solicitors
- Wing Tai Super Market
- Workspace Group
- Workspace Ltd (C/o RPS PLC)
- Xysystems Ltd
- Yates Estate
- Yinka Bodyline Ltd

#### Environmental

- Bankside Open Spaces Trust
- Dawson's Hill Trust
- Dog Kennel Hill Adventure
- Dulwich Allotment Association
- Dulwich Society Wildlife Committee
- Friends of Belair Park
- Friends of Burgess Park
- Friends of Geraldine Mary Harmsworth Park
- Friends of Guy Street Park
- Friends of Honor Oak Recreation Ground
- Friends of Nunhead Cemetery
- Friends of Nursery Row Park
- Friends of Peckham Rye
- Friends of Potters Field Park
- Friends of Southwark Park

- Groundwork Southwark
- Lamlash Allotment Association
- Lettsom Garden Association
- London Wildlife Trust
- National Playing Fields Association
- Nature Park
- North Southwark Environmental Network
- One Tree Hill Allotment Society
- Rotherhithe & Bermondsey Allotment Society
- Southwark Biodiversity Partnership
- Southwark Friends of the Earth
- Surrey Docks City Farm
- Victory Community Park Committee
- Walworth Garden Farm

#### **Black and Minority Ethnic groups**

- Afiya Trust
- African Research & Information Bureau (ARIB)
- African Child Association
- African Children and Families Support
- African Community Development Foundation
- African Community Link Project
- African Elders Concern
- African Foundation For Development
- African Graduate Centre
- African Heritage Association
- African Inform
- African Root Men's Project (ARMPRO)
- African Regeneration Association
- African Research
- African's People's Association
- African Women's Support Group
- Afro-Asian Advisory Service
- Afro-Caribbean Autistic Foundations
- Ahwazi Community Association
- AKWAABA Women's Group
- Alliance for African Assistance
- Amannagwu Community Association UK
- Anerley French & Swahili Club
- Anti-Racist Alliance
- Anti-Racist Integration Project
- Arab Cultural Community

- Arab Cultural Community
- Asian Society
- Asra Housing Association
- Association of Minority
- Association of Sri Lankans in UK
- Association of Turkish Women
- Aylesbury Turkish Women's Group
- Aylesbury Turkish Women's Project
- Bangladeshi Women's Group
- Bengali Community Association
- Bengali Community Development Project
- Bengali Women's Group
- Bhagini Samaj Women's Group
- Birlik Cemiyet Centre
- Black Awareness Group
- Black Cultural Education
- Black Elderly Group Southwark
- Black Elders Mental Health Project
- Black Organisation for Learning Difficulties
- Black Parents Network
- Black Training Enterprise Group
- Cara Irish Housing Association
- Caribbean Ecology Forum
- Caribbean Women's Network
- Carr-Gomm Society Limited
- Centre for Inter-African Relations
- Centre for Multicultural Development and Integration
- Charter for Non-Racist Benefits
- Chinese/Vietnamese Group
- Confederation of Indian Organisations (U.K.)
- Daryeel Somali Health Project
- Educational Alliance Africa
- Eritrean Community Centre
- Eritrean Education and Publication Trust
- Ethiopian Refugee Education & Careers Centre
- Ethno News
- French Speaking African General Council
- Ghana Refugee Welfare Group
- GHARWEG Advice, Training & Careers Centre
- Great Lakes African Womens Network
- Greek Community of South London
- Gulu Laity Archdiocesan Association

- Here & There Somali Training Development Project
- Igbo Tutorial School
- Integration Project for the Francophone African Community
- International Ass of African Women
- International Association for Sierra Leoneans Abroad
- Irish Families Project
- Irish in Britain Representation Group
- Istrinsabbha-Sikh Women's Group
- Ivorian Social Aid Society
- Mauritius Association
- Mauritius Association of Women in Southwark
- Mercyline Africa Trust (UK)
- Mitali Asian Women's Project
- Multi- Lingual Community Rights Shop
- RCA/ Southwark Irish Pensioners Project
- Rockingham Somali Support
- Rondalya Phillipino-UK
- Sidama Community in Europe
- Sierra Leone Community Forum
- Sierra Leone Muslim Women Cultural Organisation
- Society of Caribbean Culture
- Somali Community
- Somali Community Association in Southwark
- Somali Counselling Project
- Somali Group
- Somali Health and Education Project
- Somali Mother Tongue & Supplementary Class
- Somali Project
- Somali Women & Children's Project
- South East Asian Elderly
- South London Arab Community Group
- Southwark African Support Services
- Southwark Asian Association
- Southwark Bhagini Samaj
- Southwark Chinese Women's Group
- Southwark Cypriot & Turkish Cultural Society
- Southwark Cypriot Day Centre & Elders Group
- Southwark Cypriot Turkish Association
- Southwark Ethnic Alliance
- Southwark Ethnicare Project
- Southwark Irish Festival
- Southwark Irish Forum

- Southwark Multicultural Link in Education
- Southwark Race and Equalities Forum
- Southwark Somali Advisory Forum c/o CIDU
- Southwark Somali Refugee Council
- Southwark Somali Union
- Southwark Travellers Action Group
- Southwark Turkish & Cypriot Group
- Southwark Turkish Association and Community Centre
- Southwark Turkish Education Group
- Southwark Turkish Perkunlunler Cultural Ass.
- Southwark United Irish Community Group
- Southwark Vietnamese Chinese Community
- Southwark Vietnamese Refugee Association
- Strategic Ethnic Alliance
- Sudanese Welfare Association
- Suubi-Lule African Youth Association
- The Burrow & Carragher Irish Dance Group
- Uganda Refugee Art & Education Development Workshop
- UK Ivorian Space
- Union of Ivorian Women
- Urhobo Ladies Association Ltd
- Vietnamese Women's Group
- Vishvas
- Walworth Bangladeshi Community Association
- West African Community Action on Health & Welfare
- West Indian Standing Conference
- Women of Nigeria International
- Yemeni Community Ass.

#### Religious

- Apostolic Faith Mission
- Bermondsey Methodist Central Hall
- Bethel Apostolic Ministerial Union
- Bethnal Apostolic Ministerial Union
- Brandon Baptist Church
- British Red Cross
- Celestial Church of Christ
- Christ Church (Barry Road)
- Christ Church Southwark
- Christ Intercessor's Network
- Christian Caring Ministries Trust
- Christian Life Church

- Christway Community Centre
- Church of St John the Evangelist
- Churches Community Care Project
- Crossway United Reformed Church
- Daughters of Divine Love Training Centre
- Dulwich Islamic Centre
- Elephant & Castle Mosque
- English Martyrs Church
- Finnish Church in London
- Fountain of Life Ministries
- Gospel Faith Mission
- Grove Chapel
- Herne Hill Methodist Church
- Herne Hill United Reformed Church
- Holy Ghost Temple
- Jamyang Buddhist Centre
- Mary's Association
- Metropolitan Tabernacle
- Muslim Association of Nigeria
- New Peckham Mosque & Muslim Cultural Centre
- Norwegian Church
- Our Lady of La Salette & St Joseph
- Pakistan Muslim Welfare
- Peckham St John with St Andrew
- Pembroke College Mission
- Salvation Army
- Sasana Ramsi Vihara
- Seal of Rastafari
- Single Parents Holistic Ministry
- Sisters Community Delivery Health
- Sisters of the Sacred Heart
- South East Catholic Organisation
- South East London Baptist Homes
- South East Muslim Association
- South London Industrial Mission
- South London Tabernacle Baptist Church
- South London Temple
- Southwark Cathedral
- Southwark Churches Care
- Southwark Diocesan Housing Association
- Southwark Hindu Centre
- Southwark Islam Cultural Trust

- Southwark Multi-Faith Forum c/o CIDU
- Southwark Muslim Council & Dulwich Islamic Centre
- Southwark Muslim Forum
- Southwark Muslim Womens Association
- Southwark Muslim Youth Project
- Southwark Salvation Army
- St Anne's Church, Bermondsey
- St Anthony's Hall
- St Christopher's Church (Pembroke College Mission)
- St Georges Roman Catholic Cathedral
- St Giles Church
- St Giles Trust
- St Hughs Church
- St John's Church, Peckham
- St Mary Magdalene Church Bermondsey
- St Mary's Greek Orthodox Church
- St Matthews at the Elephant
- St Peters Church
- St. Johns Church, Goose Green
- St. Jude's Community Centre
- St. Matthew's Community Centre
- St. Michael's Vicarage
- Sumner Road Chapel
- Swedish Seaman's Church
- Taifa Community Care Project
- The Church Commissioners
- The Church of the Lord (Aladura)
- The Rectory
- Tibetan Buddhist Centre
- Trinity In Camberwell
- Vineyard Community Church
- Walworth Methodist Church

#### Residents and resident's groups

- Abbeyfield T&RA
- Acorn T&RA
- Adams Gardens T&RA
- Alberta T&RA
- Alvey T&RA
- Applegarth House T&RA
- Applegarth TMO
- Astbury Road T&RA

- Atwell T&RA
- Aylesbury T&RA
- Baltic Quay Residents and Leaseholders
- Barry Area T&RA
- Bellenden Residents Group
- Bermondsey Street T&RA
- Bermondsey Street TA.
- Bonamy & Bramcote Tenants Association
- Borough and Scovell T&RA
- Brandon T&RA
- Brayards Rd Estate TRA
- Brenchley Gardens T&RA
- Bricklayers Arms T&RA
- Brimtonroy T&RA
- Brook Drive T&RA
- Browning T&RA
- Brunswick Park T&RA
- Buchan T&RA
- Camberwell Grove T&RA
- Canada Estate T&RA
- Caroline Gardens T&RA
- Castlemead T&RA
- Cathedral Area RA
- Champion Hill T&RA
- Comus House T&RA
- Conant T&RA
- Congreve and Barlow T&RA
- Consort T&RA
- Cooper Close Co-op T&RA
- Cossall T&RA
- Crawford Road T&RA
- Crosby Lockyer & Hamilton T&RA
- Croxted Road E.D.E.T.R.A
- Delawyk Residents Association
- Delawyk T&RA
- D'Eynsford Estate T&RA
- Dickens T&RA
- Dodson & Amigo T&RA
- Downtown T&RA
- Draper Tenants Association
- East Dulwich Estate T&RA
- East Dulwich Grove Estate T&RA

- Elephant Lane Residents Association
- Elizabeth T&RA
- Elmington T&RA
- Esmeralda T&RA
- Four Squares T&RA
- Gateway T&RA
- Gaywood Estate TA
- Gaywood T&RA
- George Tingle T&RA
- Gilesmead T&RA
- Glebe North and South T&RA
- Gloucester Grove T&RA
- Goschen T&RA
- Grosvenor T&RA
- Grove Lane Residents Association
- Haddonhall Residents TMO
- Haddonhall Tenants Co-op
- Halimore TA
- Harmsworth Mews Residents Association
- Hawkstone T&RA
- Hayles T&RA
- Heygate T&RA
- House Buildings T&RA
- Juniper House T&RA
- Keetons T&RA
- Kennignton Park House T&RA
- Kinglake T&RA
- Kipling T&RA
- LT&RA
- Lant T&RA
- Lawson Residents Association
- Lawson T&RA
- Leathermarket JMB
- Ledbury T&RA
- Lettsom T&RA
- Library Street Neighbourhood Forum
- Longfield T&RA
- Lordship Lane & Melford Court T&RA
- Magdalene Tenants & Residents Association
- Magdelen T&RA
- Manchester House T&RA
- Manor T&RA

- Mardyke House T&RA
- Mayflower T&RA
- Meadow Row T&RA
- Metro Central Heights RA
- Millpond T&RA
- Neckinger Estate T&RA
- Nelson Square Gardens T&RA
- Nelson Square Community Association
- New Camden T&RA
- Newington T&RA
- Northfield House T&RA
- Nunhead Residents Association
- Oliver Goldsmith T&RA
- Osprey T&RA
- Parkside T&RA
- Pasley Estate T&RA
- Pedworth T&RA
- Pelier T&RA
- Penrose T&RA
- Plough and Chiltern T&RA
- Puffin T&RA
- Pullens T&RA
- Pullens Tenants Association
- Redriff Tenants Association (Planning)
- Rennie T&RA
- Rochester Estate T&RA
- Rockingham Management Committee
- Rockingham TRA
- Rodney Road T&RA
- Rouel Road Estate T&RA
- Rye Hill T&RA
- Salisbury Estate T&RA
- Sceaux Gardens T&RA
- Setchell Estate T&RA
- SHACCA T&RA
- Silwood T&RA
- Southampton Way T&RA
- Southwark Group of Tenants Assc
- Southwark Park Estate T&RA
- St Crispins T&RA
- St James T&RA
- Styles House T&RA

- Sumner Residents T&RA
- Surrey Gardens T&RA
- Swan Road T&RA
- Sydenham Hill T&RA
- Tabard Gardens Management Co-op
- Tappesfield T&RA
- Tarney Road Residents Association
- Tenant Council Forum
- Thorburn Square T&RA
- Thurlow T&RA
- Tooley Street T&RA
- Trinity Newington Residents Association
- Two Towers T&RA
- Unwin & Friary T&RA
- Webber and Quentin T&RA
- Wendover T&RA
- West Square Residents' Association
- Wilsons Road T&RA
- Winchester Estate TA
- Wyndam & Comber T&RA

#### Housing

- Affinity Sutton
- Central & Cecil Housing Trust
- Dulwich Right to Buy
- Excel Housing Association
- Family Housing Association Development
- Family Mosaic
- Habinteg
- Hexagon Southwark Women's Hostel
- Hexagon Housing
- Hexagon RSL
- Home-Start
- Housing for Women
- Hyde RSL
- Lambeth & Southwark Housing Society
- London & Quadrant Housing Trust
- Love Walk Hostel
- Metropolitan Housing Trust
- Octavia Hill Housing Trust
- Peabody Estate (Bricklayers)

- Pecan Limited
- Rainer South London Housing Project
- Sojourner Housing Association
- South East London Housing Partnership
- Southern Housing Group
- Southwark & London Diocesan H A
- Southwark Park Housing
- Stopover Emergency & Medium Stay Hostels
- Wandle RSL

#### Education/young persons

- 8th East Dulwich Brownies
- Active Kids Network
- After School Clubs
- All Nations Community Nursery
- Alliance for African Youth
- Amott Road Playgroup
- Anti-Bullying Campaign
- Aylesbury Early Years Centre
- Aylesbury Plus SRB Detached Project: Youth Club
- Aylesbury Youth Centre
- Aylesbury Youth Club
- Bede Youth Adventure
- Bermondsey Adventure Playground
- Bermondsey Community Nursery
- Bermondsey Scout Group
- Bethwin Road Adventure Playground
- Blackfriars Housing for Young
- Blackfriars Settlement Youth Club
- British Youth Opera
- Camberwell After-School Project
- Camberwell Choir School
- Camberwell Scout Group
- Cambridge House Young People's Project
- Camelot After School Club
- Caribb Supplementary School and Youth Club
- Caribbean Youth & Community Association
- CASP Playground
- Charles Dickens After School Clubs
- Chellow Dene Day Nursery
- Child and Sound

- Children's Day Nursery
- Community Education Football Initiative
- Community Youth Provision Ass.
- Copleston Children's Centre
- Dyason Pre-School
- Early Years Centre
- Early-Birds Pre-School Playgroup
- East Dulwich Adventure Playground Association
- East Dulwich Community Nursery
- Ebony Saturday School
- Emmanuel Youth & Community Centre
- First Steps Montessori Playgroup
- Founder Union of Youth
- Future Generation Youth Club
- Garden Nursery
- Geoffrey Chaucer Youth Club
- Goose Green Homework Club
- Grove Vale Youth Club
- Gumboots Community Nursery
- Guys Evelina Hospital School
- Half Moon Montessori Playgroup
- Happy Faces Playgroup Under 5's
- Hatasu Students Learning Centre
- Heartbeat After School Project
- Heber After School Project
- Hollington Youth Club
- Joseph Lancaster After School Club
- Justdo Youth Network
- Ketra Young Peoples Project
- Kids Are Us Play centre
- Kids Company
- Kinderella Playgroup
- Kingsdale Youth Centre
- Kingswood Elfins
- Lawnside Playgroup
- Linden Playgroup
- Louise Clay Homework Club
- Millwall Community Sports Scheme
- Mint Street Adventure Playground
- Mission Youth Centre
- Mother Goose Nursery
- NCH Action for Children Eye to Eye Meditation

- Nunhead Community Education Service
- Nunhead Green Early Years
- Odessa Street Youth Club
- Peckham Drop in Creche
- Peckham Park After School Club
- Peckham Rye After School Care
- Peckham Settlement Nursery
- Peckham Town Football Club
- Pembroke House Youth Club
- Pickwick Community Centre & Youth Club
- Playshack Playgroup
- Rainbow Playgroup
- Reconcillors Childrens Club
- Riverside After School Club
- Rockingham Asian Youth
- Rockingham Community Day Nursery
- Rockingham Estate Play
- Rockingham Playgroup
- Rotherhithe Community Sports Project
- Sacred Heart Pre-School Day Care
- Salmon Youth Centre
- Save the Children Fund
- Scallywags Day Nursery
- Scarecrows Day Nursery
- Sesame Supplementary School
- Sheldon Health Promotion Toddlers Group
- Sixth Bermondsey Scout Group
- Somali Youth Action Forum
- South London Children's Scrap Scheme
- South London Scouts Centre
- Southwark Catholic Youth Service
- Southwark Childminding Association
- Southwark Children's Foundation
- Southwark Community Planning & Education Centre
- Southwark Opportunity Playgroup
- Southwark Schools Support Project
- Southwark Somali Homework Club
- Springboard for Children
- St Faiths Community & Youth Association
- St Giles Youth Centre
- St John's Waterloo YC
- St Marys Pre-School

- St Peters Monkey Park
- St. George's Youth Project
- St. Peter's Youth & Community Centre
- Surrey Docks Play Ass.
- Tabard After School Project
- Tadworth Playgroup
- Tenda Road Early Years Centre
- The Ink Tank Arts and Crafts After School Kids Club
- Trinity Child Care
- Tykes Corner
- Union of Youth
- Upstream Children's Theatre
- Westminster House Youth Club
- YCGN UK (Youth Concern Global Network)
- YHA Rotherhithe
- Youth Concern UK
- Anando Pat Community School
- Archbishop Michael Ramsey Sixth Form Centre
- Beormund School
- Boutcher CoE School
- British School of Osteopathy
- Brunswick Park Primary
- Cathedral School
- Cobourg Primary School
- Crampton Primary
- Crampton School (Parents)
- Dachwyng Supplementary School
- Dulwich College
- Dulwich Hamlet Junior School
- Dulwich Village CE Infants School
- Dulwich Wood School
- Emotan Supplementary School
- English Martyrs RC School
- Eveline Lowe School
- Friars School
- Gabriel Garcia Marquez School
- Geoffrey Chaucer School
- Gharweg Saturday School
- Gloucester Primary
- Goodrich Primary
- Grange Primary
- Institute of Psychiatry

- James Allen's Girls School
- Kingsdale School
- Kintmore Way Nursery School
- Lighthouse Supplementary School
- Little Saints Nursery School Ltd
- London College of Printing
- London School of Law
- London South Bank University
- Morley School
- Mustard Seed Pre-School
- Nell Gwynn School
- Notre Dame RC
- Pui-Kan Community Chinese School
- Robert Browning Primary School
- Sacred Heart School
- South Bank University
- Southwark College (Southampton Way)
- Southwark College (Surrey Docks)
- Southwark College (Waterloo)
- Southwark College Camberwell Centre
- St Anthony's RC
- St Francesa Cabrini RC
- St Francis RC
- St George's Cathedral
- St George's CE
- St John's CE School
- St Josephs Infants School
- St Josephs RC School
- St Judes CE School
- St Olave's & St Saviour's Grammar School Foundation
- St Paul's Primary School
- St Peter's Walworth CE School
- St Saviour's & St Olave's CE
- St. George the Martyr School
- Surrey Square Infant and Junior School
- The Archbishop Michael Ramsey Technology College
- The Charter School
- Townsend Primary School
- Victory Primary School
- Walworth Lower School
- Walworth Upper School
- Waverley Upper School

- Whitefield Pre-school
- Whitstable Early Years Centre

#### Health

- Alzheimer's Disease Society
- Bermondsey & Rotherhithe Mental Health Support Group
- Community Health South London
- Daryeel Health Project
- Dyslexia Association of London
- Guys and St. Thomas' Hospital Trust
- Health Action Zone
- Health First
- Hospital and Prison Action Network
- London Dyslexia Association
- London Ecumenical Aids Trust
- LSL Health Alliance
- Maudsley Befrienders & Volunteers
- Maudsley Social Work Team
- Maudsley Volunteers
- Mental Health Project
- Oasis Health Centre
- Phoenix Women's Health
- Southwark Health Alliance
- Southwark HIV & Aids Users Group
- Southwark Phoenix Women's Health Organisation
- St Christopher's Hospice
- Terence Higgins Trust
- Aylesbury Health Centre
- Aylesbury Medical Centre
- Bermondsey & Lansdowne Medical Mission
- Blackfriars Medical Centre
- Borough Medical Centre
- Camberwell Green Surgery
- CHSL NHS Trust
- Elm Lodge Surgery
- Falmouth Road Group Practice
- Guy's and St Thomas' NHS Foundation Trust
- Maudsley Hospital
- Old Kent Road
- Parkside Medical Centre
- Princess Street Health Centre
- SHA Strategic Health Authority Southside

- The Diffley Practice
- The Grange Road Practice
- Townley Clinic
- Walworth Clinic
- Walworth Road Health Centre

#### Transport

- Green Lanes & REPA
- Lambeth and Southwark Community Transport (LASCoT)
- Living Streets
- London Cycling Campaign
- London Transport Users Committee
- Southwark Community Transport
- Southwark Cyclists
- Southwark Living Streets
- Southwark Pedestrian Rights Group
- Southwark Transport Group
- SUSTRANS

#### Pensioners/older people

- Age Concern Carers Support Group
- Age Concern Southwark Community Support
- Age Concern Southwark Primary Care Project
- Age Concern Southwark: Head Office
- Association of Greater London Older Women (AGLOW)
- Aylesbury Pensioners Group
- Bermondsey Care for the Elderly
- Bermondsey Pensioners Action Group
- East Dulwich Pensioners Action Group
- East Dulwich Pensioners Group
- Fifty+ Activity Club
- Golden Oldies Club
- Golden Oldies Community Care Project
- Golden Oldies Luncheon Club
- Local Authority Elderly Home
- Old Age Directorate
- Over 50's Club
- Pensioners Club
- Pensioners' Forum
- Pensioners Pop-In (Borough Community Centre)
- Rockingham Over 50's

- Rotherhithe Pensioners Action Group
- South Asian Elderly Organisation
- Southwark Black Elderly Group
- Southwark Irish Pensioners
- Southwark Muslim Pensioners Group
- Southwark Pensioners Action Group
- Southwark Pensioners Centre
- Southwark Pensioners Forum
- Southwark Turkish Elderly

#### Disability

- Action for Blind People
- Action for Blind People (Training Centre)
- Action for Dysphasic Adults
- Age Concern Southwark Black Elders Mentally Frail
- Bede Learning Disabilities Project
- Cambridge House Literacy Project
- Handicapped Playground Ass
- IBA for Children & Adults with Mental & Physical Disabilities
- Keskidee Arts for Disabled People
- Latin American Disabled People's Project
- Organisation of Blind African Caribbeans
- Sainsbury's Centre for Mental Health
- Sherrie Eugene Community Deaf Association
- Southwark Disabilities Forum c/o CIDU
- Southwark Disablement Association
- Southwark Multiple Sclerosis Society
- Southwark Phoenix and Leisure Club for People with Disabilities

#### **Refugee Groups/Recent Immigrants**

- Refugee Housing Association
- Refugee Youth
- South London Refugee Youth
- Southwark Day Centre for Asylum Seekers
- Southwark Refugee Artists Network
- Southwark Refugee Communities Forum
- Southwark Refugee Education Project
- Southwark Refugee Project
- The Refugee Council

#### Lesbian, gay, bisexual and transgender

• Southwark LGBT Network

#### **Other Consultees**

- Age Concern
- British Waterways, Canal owners and navigation authorities (Port of London)
- Centre for Ecology and Hydrology
- Southwark Chamber of Commerce
- Church Commissioners
- Commission for Architecture and the Built Environment
- Commission for New Towns and English Partnerships
- Crown Estate Office
- Civil Aviation Authority
- English Partnerships
- Commission for Racial Equality
- Department of the Environment, Food and Rural Affairs
- Southwark Primary Care Trust
- Regional Public Health Group London
- Diocesan Board of Finance
- Disability Rights Commission
- Disabled Persons Transport Advisory Committee
- H.M Prison Service
- Highways Agency
- Home Office
- Electricity, Gas, Telecommunications Operators
- National Grid
- Council for the Protection of Rural England
- London Wildlife Trust
- Royal Society for the Protection of Birds
- Equal Opportunities Commission
- Fire and Rescue Services
- Friends of the Earth Southwark
- Forestry Commission
- Freight Transport Association
- Gypsy Council
- Health and Safety Executive
- Help the Aged
- Housing Corporation
- Learning and Skills Council
- Southwark Equalities Council
- Regional Housing Boards
- Railfreight Group

- Road Haulage Association
- House Builders Federation
- Traveller Law Reform Coalition
- London Transport Buses
- London Underground
- National Disability Council Secretariat
- National Grid Company Plc.
- National Playing Fields Association
- Network Rail
- Police/Crime Prevention
- Port of London Authority
- Post Office Property Holdings
- Southern Railway
- Sport England London Region
- Thameslink Trains
- Transport for London
- Women's National Commission
- Southwark Volunteer Centre

## **APPENDIX C**

### **The Equalities Impact Assessment**

### Appendix C Affordable Housing Supplementary Planning Document

### Cabinet 21 June 2011

Appendix A	The draft Affordable Housing Supplementary Planning Document (SPD).
Appendix B	The consultation plan
Appendix C	The Equalities Impact Assessment
Appendix D	The background paper
Appendix E	The Sustainability Appraisal

LOCAL DEVELOPMENT FRAMEWORK

Southwark Council

## Equalities Impact Assessment

## Draft Affordable Housing Supplementary Planning Document June 2011

London Borough of Southwark

#### **EQUALITIES IMPACT ASSESSMENT**

## 1. What policy, strategy or plan is this assessment addressing?

This is the Equalities Impact Assessment for the draft Affordable Housing Supplementary Planning Document (June 2011). The SPD and all the supporting documents can be found on our website at:

www.southwark.gov.uk/ahspd

The Affordable Housing Supplementary Planning Document (SPD) sits within a set of planning documents called the local development framework (LDF). The Planning and Compulsory Purchase Act (2004) introduced the local development framework (LDF) as a replacement for unitary development plans and supplementary planning guidance. LDFs are designed to take a more pro-active approach to the planning system, linking with key partners to deliver specific plans for areas and to cover specific topics.

The Affordable Housing SPD provides further detail and guidance on the strategic planning policies set out in other LDF documents. It provides information on how to implement the housing policies set out in our core strategy, our saved Southwark Plan policies and our area action plans.

The SPD will assist members and council officers in implementing the policies effectively. It will inform the community of the issues associated with affordable housing and how we maximise provision of affordable housing, and will provided detailed guidance to developers, landowners and registered providers to inform their proposals.

#### 2. Is this a new or an existing policy/strategy?

This Affordable Housing SPD will replace the existing adopted Affordable Housing SPD 2008. We need to update and replace the 2008 SPD to take into account changes in national, regional and local policies and guidance. In particular it needs to take into account changes to our policies through our core strategy and our area action plans for Aylesbury and Canada Water. We also need to take into account changes in the way the Government is funding affordable housing schemes.

Since the new Conservative/Liberal Democrat Coalition government came into power in May 2010, there have been a number of suggested changes to the ways in which affordable housing is delivered and what is defined as affordable housing. The Government recently consulted on a change to Planning Policy Statement 3: Housing. The proposed change would include the product Affordable Rent as a form of affordable housing. The council submitted a response to this consultation raising concern whether the product would work in Southwark where there is a high need for affordable housing, particularly social rented housing, and a low average income.

At the time of producing and consulting on this SPD, the Government's proposed changes have not yet been adopted as policy. The draft SPD for consultation continues to use the current PPS3 and London Plan definitions of affordable housing. We may need to review this and take into account changes in national and regional policy before we take this SPD to Cabinet for adoption.

3. If existing, has the policy/strategy already been reviewed under the previous EqIA programme? If so, what were the findings to come out of this and has the agreed action plan been implemented? What has changed since the last assessment was undertaken (in terms of context, nature of the policy/strategy or the type of people affected by the policy/strategy)

We carried out an equalities impact assessment as part of the preparation of the current adopted 2008 Affordable Housing SPD. The EQIA looked at both the impacts of the SPD consultation and impacts associated with the implementation of the SPD. At the scoping stage we identified a number of possible issues around making the guidance clear so that the maximum amount of affordable housing would be delivered. Stage 2 of the EQIA highlighted that overall the SPD would have positive impacts on the equality target groups by helping to provide equality for all by providing more people with a home. We also set out how we would ensure the SPD was applied consistently and fairly including through ensuring our planning permissions are granted in accordance with our policies and monitoring the impact of the SPD. From our Annual Monitoring Report we can see that the amount of affordable housing delivered in Southwark is one of the highest in London, with the fourth highest delivery of affordable housing over the past five years. Over the years 2005-2010 3670 new affordable homes were completed in Southwark.

We also carried out equalities impact assessments of the Southwark Plan, core strategy, the Aylesbury Area Action Plan and the Canada Water Area Action Plan. This SPD provides further guidance and information to the policies in all four development plan documents. We have reviewed these as part of the preparation of the SPD and this has fed into section 4 of this EQIA. The Equalities Impact Assessments for these documents can be viewed on our website at:

#### www.southwark.gov.uk/ldf

The adopted Affordable Housing SPD 2008 provided guidance solely on the Southwark Plan policies. The new draft Affordable Housing SPD provides guidance on the new documents within the Local Development Framework as well as the Southwark Plan. The core strategy and area action plans have replaced some of the Southwark Plan and introduced new policies which are different to the policies the 2008 SPD provided guidance on.

The key policy and wider housing changes which are reflected in the new draft SPD are:

- Requiring a minimum of 35% affordable housing across the whole borough (previously 40% was required in the Central Activities Zone, excluding the Elephant and Castle Opportunity area)
- Setting out numerical targets for the overall amount of affordable housing across the whole borough and different areas
- Requiring a higher percentage of affordable housing through the Aylesbury Area Action Plan
- Requiring student housing developments to provide an element of affordable housing
- Requiring developments in some areas of the borough to provide a minimum of private housing as well as a minimum of affordable housing

- Our approach to estate regeneration
- Less grant available from the Homes and Communities Agency.
- We have updated the guidance on following the sequential test to require affordable housing on-site, off-site or as a pooled contribution in lieu of on-site affordable housing.

In addition, since we adopted the 2008 SPD, the new Equalities Act 2010 was passed on 8 April 2010, and came into effect from October 2010. The Government has also recently consulted on a new public sector duty which is due to come into effect in April 2011. This introduces nine characteristics that we should look at. The previous legislation required us to look at the impacts of our policies and SPD on the six equalities target groups.

Due to the changes in legislation and our changed planning policies since the preparation of the 2008 SPD we feel it is necessary to carry out a new EQIA for the draft Affordable Housing SPD 2011.

# 4. What do you think are the main issues for your policy or strategy in relation to equality, diversity and social cohesion?

We are looking at the impact of the Affordable Housing SPD on the nine characteristics in accordance with the new Act and duty:

- Age
- Disability
- Gender re-assignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

We have identified potential barriers that could prevent our nine protected characteristic groups from benefitting fully from the Affordable Housing SPD. This scoping stage highlights the main issues of the SPD on equality, diversity and social cohesion. The barriers we have identified could create differential impacts on certain groups and reduce social cohesion. We also have identified how the SPD may have positive impacts on these groups and how it may improve social cohesion. We have tried to minimise the negative impacts and maximise the positive impacts through the SPD and its preparation. Following consultation on the draft SPD and the scoping of this SPD we will consider whether there is anything further we can do within the SPD to maximise positive impacts and minimise negative impacts.

These impacts can be split into two categories

1. Impacts created through the production of the SPD in terms of public consultation

2. Impacts associated with the implementation of the SPD and the detailed information and guidance within the SPD.

# 4.1 Impacts associated with consultation on the Affordable Housing SPD

There are a number of barriers associated with consultation on all our planning policy documents which may create problems for social cohesion. It is important that everyone is offered the ability to be involved in the preparation of the SPD and that the final document reflects the views of our diverse community. We have prepared a consultation plan for the SPD which aims to do this. The plan sets out how we plan to consult the local community, developers, landowners, Registered Providers and other stakeholders. After the consultation period we will prepare a consultation statement which will set out the findings of our consultation including a summary of the representations received. We will provide officer comments on all the responses we receive explaining why we have/have not amended the SPD to reflect the comments. We will also provide information on the methods of consultation we used and how these were effective in consulting with our diverse community. This will help us to continually monitor and adapt our consultation methods and techniques to try and be as effective as possible and reach as many different groups as possible.

This is in accordance with our Statement of Community Involvement (SCI). Our SCI sets out how and when we will involve the community in the development of planning documents and applications for planning permission. Within the SCI, we have identified barriers to involving equalities target groups and ways to overcome them. These include English not being someone's first language, problems accessing information, people not feeling safe attending evening meetings and the documents using too much jargon. We have tried to tailor our consultation to try and overcome as many of these barriers as possible. This includes writing the SPD in plain English, offering translation services where required, and attending community meetings when requested. Please refer to <u>Appendix A</u> of this document for the full list of barriers to consultation. We have considered this comprehensive list as part of the preparation of the draft SPD.

Our Annual Monitoring Report also looks at the effectiveness of our consultation and whether we need to change how we consult on our policy documents. As part of the preparation of the Annual Monitoring Report we carry out a survey asking everyone on our mailing list what they think of our consultation and how we could make it more effective. The results of this are reported in our Annual Monitoring Report, and helps inform us how to improve our consultation on future planning documents.

# 4.2 Impacts associated with the objectives and implementation of the Affordable Housing SPD

## The content of the SPD

Our overall strategy is to provide homes including social rented, intermediate and private homes for people on a wide range of incomes. We will negotiate the maximum reasonable amount of affordable housing whilst also meeting the needs for other types of development and encouraging mixed communities. This is set out in the overarching core strategy policy 6 - Homes for people on different incomes. The SPD provides further guidance on delivering this overarching strategy, other core strategy policies, policies in our saved Southwark Plan policies and area action plans. In particular it provides guidance on:

- How we define affordable housing and the income limits for affordable housing
- Securing the maximum reasonable amount of affordable housing
- Achieving mixed and balanced communities with both private and affordable homes

- Achieving a mix of tenures within the affordable housing to include both social rented housing and intermediate housing
- When affordable housing is required including the threshold and type of developments that we required to provide an element of affordable housing
- The mix of dwelling sizes we require within affordable housing
- How we encourage more wheelchair affordable housing
- Where affordable housing must be delivered to follow the sequential test of requiring affordable on-site, and only in exceptional circumstances off-site or as a pooled contribution in-lieu of on-site affordable housing. It sets out that where we allow a pooled contribution this must be at least as much affordable housing as would have been provided if teh minimum 35% affordable housing requirement were achieved on site. A minimum of £100,000 of pooled contribution per habitable room of affordable housing will be required.
- The design and quality of affordable housing
- Sheltered, supported and extra care housing
- Affordable housing in specific types of development to include estate regeneration, live-work units and mixed use developments
- How affordable housing is financed and secured
- How to work with the council at pre-application and application stage

## The possible impacts and issues of the SPD

As part of the preparation of the draft Affordable Housing SPD we considered the following possible impacts and issues:

- The SPD seeks to provide more affordable housing across the whole borough. This helps to promote equality for everyone as it provides more people with a home that can meet their needs. However it may also have differential impacts on some groups with some groups benefitting more from new affordable housing then others. This may include people on a lower income such as single mothers or asylum seekers who are new to the country. There is a risk that this causes friction with other groups who may feel that some groups are being prioritised above them in accessing affordable housing.
- We define affordable housing in accordance with the adopted Planning Policy Statement 3: Housing, and the London Plan.

Within their definition we set target rents for social rented housing and intermediate housing. This may have differential impacts and could create problems with social cohesion for people whose incomes are just outside the maximum thresholds to qualify for social rented housing. This could include groups such a married people with two incomes whose combined incomes are likely to be above the threshold for social rented housing.

- New affordable housing may only meet the needs of some people, and other people may feel it does not meet their needs and that other groups are being prioritised over their needs. In particular people who are just above the threshold for social rented housing may feel that their needs are not being met as they may not be able to afford intermediate housing. This could cause tension between different groups
- To maximise the amount of affordable housing provided we require developers to submit financial appraisals when they cannot meet our policy requirements. This will help to have a positive impact on the most of the target groups by meaning as much affordable housing as possible is delivered. In particular this will have a positive impact on poorer people who cannot afford private housing. This may be particular equality groups such as young people starting their careers. However, it may have a less positive impact on some groups who would rather all development be private housing as it means overall there would be less private housing.
- We set out how we try to ensure mixed and balanced communities with a range of housing types and tenures. This should help to improve social cohesion by helping to meet the needs of more people wanting to live in Southwark. It may also cause friction between different groups by mixing up tenures. For example our policy requires some areas of the borough which are historically predominantly social rented housing, to now provide an element of private housing. In the long term this will help to create mixed and balanced communities. However, in the short term it may harm social cohesion as many of the residents in these areas may not be used to living next to people in private housing who may have more disposable income than the current residents.
- Similarly people currently living in affluent areas dominated by private housing may feel resentful towards affordable housing being developed in their area. This may create tensions between groups.

- As part of affordable housing, we require a percentage to be intermediate housing. One of the most popular and successful types of intermediate housing in Southwark is shared ownership. However, this may not be suitable for all religious groups, as some religious groups may not want to take out a mortgage for religious or cultural reasons. It may also not be suitable for people with certain types of jobs such as temporary work, as banks are often less likely to lend money to someone without a permanent steady job.
- The SPD provides guidance on how affordable housing is calculated and when it is required. If the SPD is not clear enough there is a risk that lower levels of affordable housing may be accepted and this would have less of a positive impact on those groups needing affordable housing.
- Through the core strategy we have introduced a policy requiring affordable housing from student schemes. Most student developments come forward in Elephant and Castle, Borough and Bankside and Peckham. These areas are areas with many people from BME groups. The guidance in the SPD may have a positive impact on these groups by ensuring some affordable housing is built as well as student housing which will help to create balanced communities and meet the needs of people living in those areas.
- The SPD provides guidance on the mix of different sized units to include more affordable family homes. This will have a positive impact on certain groups, especially those with larger families which are often BME groups.
- We encourage more wheelchair affordable housing, particularly family sized wheelchair affordable housing. This will have a positive impact on people using a wheelchair and also older people who are more likely to need a house designed to be wheelchair accessible. It will also have a positive impact on every group as wheelchair housing required larger room sizes which means more space for everyone.
- The SPD sets out where we require affordable housing to be delivered, with the presumption that it should be part of the new development itself. In exceptional cases we may allow it to be delivered off-site or as a pooled contribution. This helps to ensure mixed communities, which will have a positive impact on all groups. The SPD sets out that where a pooled contributed is agreed this must deliver at least as much affordable housing as would be achieved if the 35%

113

requirement was delivered on-site. This will ensure that groups are not adversely affected by a pooled contribution and that there is more affordable housing across the borough.

- The SPD provides guidance on the design of affordable homes. This will have a positive impact on all groups as better designed developments will create a better environment for everyone.
- The SPD includes a table of minimum dwelling sizes. This is a positive for most groups as larger dwelling sizes mean a better quality of life as there is more space for people to live in their homes. However, it could potentially have an impact on some groups as house prices may increase as a result of the larger room sizes and this could have an impact on first time buyers.
- The SPD provides guidance on sheltered, supported and extra care housing and how this type of housing is usually exempt from having to provide affordable housing. The applicant must demonstrate that there is a need for this type of housing. This will have a positive impact on certain groups who need this type of housing which typically are older people and people with a disability.
- The SPD sets out how applicants should engage with us at an early stage in the preparation of the proposal, including securing a register provider to manage the affordable element of the scheme. This section will have a positive impact on all groups as it increases the likelihood of the scheme getting planning permission and being delivered.

## 5. What happens next

We are consulting on this EQIA alongside the draft SPD. Following consultation we will prepare part B and C of this EQIA. This will be taken to Cabinet for agreement for adoption of the SPD in November 2011.

## APPENDIX A: Barriers to community involvement with different equalities target groups and how to overcome them (extract from Southwark Statement of Community Involvement (January 2008)

#### 1. Voluntary groups and organisations – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
The voluntary sector in Southwark is made up of around 18,000 individuals delivering services through 1,600 organisations, groups and projects. In 2001-2 Southwark Council supported around 300 voluntary and community groups with an investment of around £10m in grant-aid, service agreements and contracts.	<ul> <li>These barriers are generic barriers faced by many voluntary groups.</li> <li>Need for prior knowledge and experience;</li> <li>Jargon and legal terms;</li> <li>Other funding commitments and priorities than planning;</li> <li>Lack of time; and</li> <li>Knowledge of how and where to access information.</li> </ul>	<ul> <li>Provision of information and training about planning focused on these groups;</li> <li>Ensure that a range of community involvement methods are used that are accessible to these groups;</li> <li>Make sure that groups are added on to relevant mailing lists; and</li> <li>Hold/attend meetings at appropriate times that are accessible to these groups.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

#### 2. Community groups and organisations – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Southwark is lucky in having a large number of community groups that are involved with a diverse range of	<ul><li>These barriers are generic barriers</li><li>faced by many community groups:</li><li>Need for prior knowledge and</li></ul>	<ul> <li>Provision of information and training in planning focused on these groups;</li> <li>Ensure that a range of community</li> </ul>

issues.	experience; Jargon and legal terms; Lack of time; Other priorities than planning; Accessing information barriers.	<ul> <li>involvement methods are used that are accessible to these groups;</li> <li>Make sure that groups are added on to relevant mailing lists; and</li> <li>Hold/attend meetings at times that are accessible to these groups.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>
---------	---	--

#### 3. Business – Equalities Target Group – all

Description	Barriers to involvement	Measures to overcome barriers to consultation
There are 11 000 businesses in Southwark. These range from large international and national organisations to small family owned businesses. Approximately 96% of the total businesses in Southwark comprise less than 50 employees of which, approximately 20% are Black and Minority Ethnic businesses. Many businesses are members of Southwark Chamber of Commerce and other local groupings.	<ul> <li>Accessing information outside of business hours (this is particularly a problem for small businesses);</li> <li>Attending community meetings that do not address their needs;</li> <li>Not understanding planning influences on their issues;</li> <li>Other priorities than planning.</li> </ul>	<ul> <li>Ensuring that information is available at places which are open outside of normal office hours;</li> <li>Hold/attend meetings at times that are accessible; and</li> <li>Provide information and training focused at businesses.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

#### 4. Environmentalist and amenity groups – Equalities Target Group - all

Description	Barriers to	o involveme	ent	Measures to overcome barriers to
				consultation

A wide range of people express their concern for their environment through membership groups such as Friends of the Earth or Greenpeace. Some of these larger organisations have active local branches. Some people get involved in local groups with the aim	<ul> <li>Other priorities than planning;</li> <li>Attending community meetings that do not address their issues;</li> <li>Jargon and legalistic terms; and</li> <li>May not be aware of how other planning issues may affect their area of interest.</li> </ul>	<ul> <li>Provide information to ensure these groups are aware of how planning influences their area;</li> <li>Use plain English; and</li> <li>Translators and interpreters to be used where appropriate</li> </ul>

#### 5. Neighbourhood, tenants and residents groups – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
There are approximately 232 neighbourhood, tenants and residents groups in Southwark. Many are formally consulted by us to provide residents views about social and private housing. These groups meet, many of them very regularly, to discuss matters affecting the local area including estate improvements.	<ul> <li>Other priorities than planning;</li> <li>Suffer from 'consultation fatigue' as they get consulted on a number of our initiatives and programmes;</li> <li>Need prior understanding and knowledge of planning issues; and</li> <li>Finding the time to get involved in planning.</li> </ul>	<ul> <li>Coordinate consultation between different parts of the council to ensure that groups are not overwhelmed with consultations;</li> <li>Make sure that groups are added on to relevant mailing lists;</li> <li>Provide focused information; and</li> <li>Hold/attend meetings at accessible times.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

6. Health organisations – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Health service organisations provide important services to the community. Formal structures can be used to consult and gain feedback from local health organisations on how healthy living issues and requirements might influence or affect planning.	<ul> <li>Limited time to access and absorb detailed planning information;</li> <li>Other priorities than planning; and</li> <li>May not understand how planning impacts on health.</li> </ul>	<ul> <li>Hold/attend meetings at appropriate times; and</li> <li>Ensure that information is easily accessible, relevant and understandable.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

#### 7. Transport organisations – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Transport for London and the public transport providers are <b>statutory</b> consultees. There are smaller local groups that are interested in the improvement of cycling, walking and public transport infrastructure.	<ul> <li>Other priorities than planning; and</li> <li>May not be aware of how other planning issues may affect their area of interest.</li> </ul>	<ul> <li>Provide information to ensure these groups are aware of how planning affects them.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

#### 8. Refugee and Asylum seekers – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
The Southwark Refugee Communities Forum (SRCF) was established by Refugee Community Organisations (RCO) in 2003 to	<ul> <li>Need for prior knowledge and experience</li> <li>English may not be their first language</li> </ul>	<ul> <li>Avoid jargon and ensure that all information is given in plain English</li> <li>Ensure that all written information is available in different languages</li> </ul>

enable the voices of refugees themselves to be heard. The membership of SRCF currently includes 28 Southwark-based Refugee Community Organisations. An estimated 7,000 people from refugee backgrounds across Southwark are in direct contact with SRCF members and participate in their activities on a regular basis.	<ul> <li>Other priorities than planning</li> <li>Discrimination</li> <li>Lack of knowledge of how and where to access information</li> <li>Difficult to gain access to these groups, as they may not be recognised local community groups on our database</li> </ul>	<ul> <li>Provide information and training that is focused on these groups</li> <li>Use a range of community involvement methods to ensure that they are accessible to all.</li> <li>Source local knowledge about how to engage groups and those for our mailing lists.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>
--	--	---

#### 9. Individuals and groups from other boroughs – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
A number of issues in Southwark have an impact on our neighbouring boroughs such as Lambeth and Lewisham. Groups and residents that are on the borders of Southwark should be included in matters that affect them.	<ul> <li>Need for prior knowledge and experience;</li> <li>Other priorities in their own borough and other than planning;</li> <li>English as a first language; and</li> <li>Lack of knowledge of how and where to access information.</li> </ul>	<ul> <li>Provision of information in appropriate locations;</li> <li>Hold/attend meetings/events at appropriate locations that are accessible and appropriate to these groups.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

#### 10. Residents and individuals (including newcomers to the borough) – Equalities Target Group - all

Description	Barriers to involvement	Measures to overcome barriers to consultation
Residents and individuals in the borough may not belong to a	<ul> <li>Need for prior knowledge and experience;</li> </ul>	<ul> <li>Provision of information and training in planning focused on these groups;</li> </ul>

specific group, but it is important that they are able to engage and get involved with issues and decisions that impact on them.	<ul> <li>Jargon and legal terms;</li> <li>English may not be their first language;</li> <li>Discrimination;</li> <li>Problems accessing information;</li> <li>Other priorities than planning; and</li> <li>Lack of knowledge of how and where to access information.</li> </ul>	<ul> <li>Ensure that a range of community involvement methods are used that are accessible;</li> <li>Source local knowledge about how to engage individuals; and</li> <li>Add onto our mailing lists.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>
---	---	--

#### 11. Black and minority ethnic groups (including travellers and gypsies) - Equalities Target Group – Race

Description	Barriers to involvement	Measures to overcome barriers to consultation
Southwark is a very ethnically diverse borough. As a result there are many established and new groups and organisations that address issues relevant to each different community.	<ul> <li>Jargon and legal terms;</li> <li>Need for prior knowledge;</li> <li>English may not be the first language;</li> <li>Other priorities than planning;</li> <li>Discrimination;</li> <li>Problems accessing information;</li> <li>We may not be aware of their existence.</li> </ul>	<ul> <li>Avoid jargon; Use plain English;</li> <li>Translators and interpreters to be used where appropriate.</li> <li>Training groups in planning and council officers in understanding equality and diversity issues;</li> <li>Coordinate council consultations;</li> <li>Range of involvement methods; and</li> <li>Gain local knowledge about how to engage groups; and</li> <li>Add to mailing lists.</li> </ul>

#### 12. Religious groups - Equalities Target Group –Faith/Belief

Description	Barriers to involvement	Measures to overcome barriers to
		consultation

organisations are a valuable consultation link due to their very strong links to local communities. groups have a contribution to make to social inclusion and community cohesion that is separate from promoting religion. As they are involved in running community services, community development and leadership representing community interests.	<ul> <li>Needs not being understood;</li> <li>Need for prior knowledge and experience;</li> <li>English may not be their first language;</li> <li>Other priorities than planning;</li> <li>Discrimination;</li> <li>Accessing information; and</li> <li>May not understand how planning affects their group.</li> </ul>	<ul> <li>Avoid jargon; Use plain English;</li> <li>Translators and interpreters to be used where appropriate.</li> <li>Training groups and individuals in planning and</li> <li>Training council officers to understand and belief issues;</li> <li>Coordinate our consultations;</li> <li>Range of involvement methods; and</li> <li>Gain local knowledge about how to engage groups; and</li> </ul>
		<ul> <li>Add to mailing lists.</li> </ul>

#### 13. Older people Forum's Equalities Target Group – Age

Description	Barriers to involvement	Measures to overcome barriers to consultation
Pensioner forums help represent older people's views and are able to represent many local people over particular issues that are affected by planning.	<ul> <li>Older people may not feel safe attending meetings in the evenings;</li> <li>A lack of respect for their views; and</li> <li>Lack of knowledge of how and where to access information;</li> <li>Other priorities than planning.</li> </ul>	<ul> <li>Provision of information in appropriate locations;</li> <li>Hold/attend meetings/events at accessible times;</li> <li>We listen to the views and feedback ; and</li> <li>Make information relevant.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

#### 14. Education and young people - Equalities Target Group – Age

Description	Barriers to involvement	Measures to overcome barriers to
		consultation

Schools, colleges, learning institutions and youth agencies are important aspects of the community, particularly as finding ways of involving young people have been identified as a priority by a large number of people	<ul> <li>May not be aware of the impact planning can have on them and/or how they can have an input;</li> <li>English may not be a first language; and</li> <li>May not be able to attend meetings in the evenings or during the day in term time.</li> <li>Other priorities than planning.</li> </ul>	<ul> <li>Provide information that is focused at young people;</li> <li>Attend schools and after-school centres and local youth forums to consult them on planning issues;</li> <li>Translators and interpreters to be used where appropriate; and</li> <li>Hold/attend meetings/events at accessible times.</li> </ul>
---	--	--

## 15. Disability Forum - Equalities Target Group – Disability

Description	Barriers to involvement	Measures to overcome barriers to consultation
This forum helps to identify planning issues including safety, access and housing from the perspective of disabled people.	<ul> <li>Venues for meetings may not be accessible; and</li> <li>Written or verbal material is not always appropriate.</li> <li>Other priorities than planning.</li> </ul>	<ul> <li>Hold/attend meetings/events at accessible locations; and</li> <li>Ensure that all written information is available in different formats such as Braille, large print and audio.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>

#### 16. Lesbian, gay, bisexual and transgender - Equalities Target Group – Sexuality

Description	Barriers to involvement	Measures to overcome barriers to
		consultation

The Southwark Anti Homophobic Forum (SAHF) is the longest established LGBT Forum of its kind and works to meet the needs of the LGBT community in key areas including education, safety in the home, the streets and housing. The Southwark LGBT Network is a social support group for LGBT people and their friends who live and work in Southwark.	<ul> <li>Do not feel secure in raising LGBT issues at open events;</li> <li>Other priorities than planning;</li> </ul>	<ul> <li>Hold specific LGBT consultation events;</li> <li>Avoid jargon and use plain English;</li> <li>Hold/attend meetings/events at convenient times and ensure that the venue is accessible and a safe environment.</li> <li>Translators and interpreters to be used where appropriate.</li> </ul>
--	--	---

## **APPENDIX D**

## The Sustainability Appraisal

## Appendix D Affordable Housing Supplementary Planning Document

## Cabinet 21 June 2011

Appendix A	The draft Affordable Housing SPD
Appendix B	The consultation plan
Appendix C	The Equalities Impact Assessment
Appendix D	The Sustainability Appraisal

AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT

124

DRAFT SUSTAINABILITY REPORT

London Borough of Southwark June 2011

#### TIMETABLE FOR CONSULTATION AND HOW TO COMMENT

SUSTAINABILITY APPRAISAL PRODUCTION STAGE	TIMETABLE
Consultation on Sustainability Appraisal Scoping Report.	17 September to 22 October 2010
Consultation on draft Affordable Housing Supplementary Planning Document, Sustainability Appraisal, consultation plan and Equalities Impact Assessment. (this stage of consultation now)	14 June to 30 September 2011
Consideration of responses	October 2011
Adopt the final version of the Affordable Housing Supplementary Planning Document accompanied by final Equalities Impact Assessment, final sustainability appraisal, and a sustainability and consultation statement.	November 2011

#### HOW TO COMMENT ON THIS REPORT

If you have any queries regarding this sustainability report, please contact the Planning Policy Team:

Comments can be returned by post, fax or email to: Alison Squires Planning Policy PO Box 64529 London SE1P 5LX

Tel: 020 7525 5471 Fax: 020 7084 0347 Email: <u>planningpolicy@southwark.gov.uk</u>

Consultation on this report begins 14 June 2011 and ends on 30 September 2011 All comments must be received by **5pm on Friday 30 September 2011** 

CONTENTS		PAGE
No	on Technical Summary	5
1.	<ul> <li>Introduction</li> <li>1.1 What is this document?</li> <li>1.2 Why do we need to carry out a Sustainability Appraisal?</li> <li>1.3 Strategic Environmental Assessment Directive</li> <li>1.4 Why is the SPD needed?</li> <li>1.5 What are the stages of the SPD production?</li> <li>1.6 Structure of the report</li> </ul>	11
2.	Sustainability Appraisal Methodology2.1Purpose of the Sustainability Appraisal2.2Planning Policy and Sustainable Development2.3Sustainability Appraisal (SA) Process2.4Consultation2.5Compliance with the SEA Directive regulations	15
3.	Interim Policy & Objectives3.1The purpose of the SPD3.2The SPD objectives3.3The key points of guidance	20
4.	<ul> <li>Context and Baseline</li> <li>4.1 Links to other polices, plans and programmes</li> <li>4.2 Summary of Baseline Information</li> </ul>	23
5.	Sustainability Issues and Objectives5.1Sustainability Issues5.2Sustainability Objectives	47
6.	<ul> <li>The Sustainability Appraisal Framework</li> <li>6.1 What is the SA Framework?</li> <li>6.2 The SA Framework</li> <li>6.3 Internal Comparison of the SA objectives</li> </ul>	49
7.	<ul><li>Policy Issues and Options</li><li>7.1 What options have been considered and why?</li></ul>	56
8.	<ul> <li>Effects of the Policy</li> <li>8.1 Consistency with sustainability objectives</li> <li>8.2 What are the significant positive effects of the SPD?</li> <li>8.3 What are the significant negative effects of the SPD?</li> <li>8.4 Cumulative Impacts?</li> <li>8.5 Uncertainties and risks?</li> </ul>	58
9.	<ul> <li>Implementation</li> <li>9.1 What are the next stages in the SPD preparation?</li> <li>9.2 How will the SPD be implemented?</li> <li>9.2 Links to other tiers of plans, programmes and other guidance</li> <li>9.3 Area Action Plans and Supplementary Planning Guidance</li> </ul>	61

9.4 Proposals for monitoring

## APPENDICES

Appendix 1	The SEA Directive Requirements	A1
Appendix 2	Responses to Consultation	A4
Appendix 3	Relevant Plan, Strategies and Programmes	A5
Appendix 4	Appraisal of the SPD	A16
Appendix 5	Abbreviations	A25
Appendix 6	Evidence Documents	A26

#### NON-TECHNICAL SUMMARY

#### 1.0 Background

- 1.1 A Sustainability Appraisal has been carried out as part of the preparation of the Affordable Housing supplementary planning document (SPD). The appraisal tests how well the SPD considers social, economic and environmental issues in order to achieve sustainable development. *Section 19 (5) of the Planning and Compulsory Purchase Act 2004*, requires Sustainability Appraisals of plans to be carried out.
- 1.2 Sustainability Appraisals also need to satisfy the requirements of the *European Directive 2001/42/EC*. The Directive requires a formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. An SEA is required when preparing new or revised Development Plan Documents (DPDs). The SEA Directive was implemented in the UK by the *Environmental Assessment of Plans and Programmes Regulations 2004*. A Sustainability Appraisal (SA) has been carried out to predict the likely social, economic and environmental impacts of the SPD. The appraisal has assessed the extent to which the SPD will contribute towards the borough's objectives for achieving sustainable development.
- 1.3 The Government guidance on sustainability appraisal set out in *Planning Policy Statement 12: Local Spatial Planning, 2008* and the *Plan Making Manual*, incorporates the requirements of the SEA Directive within the SA process. For the purposes of simplicity, the term sustainability appraisal (SA) is used throughout this document to include both the SA and SEA processes.

#### 2.0 What planning document is being appraised?

- 2.1 The council is preparing the SPD as part of the Local Development Framework (LDF). The Local Development Framework is made up of a collection of Development Plan Documents (DPDs), which will be used to guide development in the area, including Area Action Plans (AAPs) and Supplementary Planning Documents (SPDs). The Core Strategy sets out the strategic vision and overall spatial policies that will guide all the other documents in the LDF.
- 2.2 The aim of the SA, as summarised within this report, is to ensure sustainable development is fully integrated within the SPD and forms a key part of evaluation of the sustainability issues that relate to the planning policies for the borough.

A copy of the draft SPD can be downloaded from council's website: www.southwark.gov.uk/ahspd A paper copy can also be requested from the Planning Policy team.

#### 3.0 The Process

- 3.1 The process so far has included:
  - Collection of baseline information on the environmental, social and economic characteristics of the borough and its context;
  - Identification of sustainability issues, objectives and indicators to be used in the SA to assess the likely impacts of the SPD and to enable monitoring of progress in the future

- The preparation of a Scoping report, which set out the proposed method of assessment for the SA, issued for consultation from 17 September 2010 to 22 October 2010.
- A draft SA that tested the likely impacts of the SPD (this document).

#### 4.0 The Sustainability Issues

- 4.1 The SA scoping report identified a range of significant sustainability issues for Southwark, based on a review of relevant policies, strategies and programmes and a survey of baseline data. The key social, economic and environmental issues faced in Southwark that need to be taken into consideration by the SPD include:
  - Relatively high levels of deprivation
  - Employment inequalities and employment opportunities
  - Education, skills and training deprivation
  - Health inequalities and noise nuisances
  - Need to promote equality, diversity and social cohesion
  - High levels of crime and fear of crime
  - Energy efficiency and use of renewables
  - Poor air quality
  - Need to minimise waste arisings and increase recycling rates
  - Need for sustainable use of water resources
  - Protection of landscape features and designated sites and need to address contaminated land issues
  - Ensuring a high quality of design in new developments
  - Need to preserve and enhance built heritage and the archaeological environment
  - Minimising flood risk and improve the quality of controlled waters within the borough
  - Protecting and enhancing biodiversity
  - Providing everyone with a decent and affordable home to live in
  - Need to improve accessibility by public transport and minimise the need to travel by car
  - Need to ensure that there is social, physical and green infrastructure capacity for existing and future needs
  - High proportion of social housing
  - Very high proportion of local authority housing ownership
  - High investment backlog in the social housing sector
  - Substantial current housing development and capacity for future development
  - Substantial current and planned regeneration programme with high component of renewal and area transformation
  - Need to ensure the delivery of mixed and balanced communities.

#### 5.0 The Sustainability Objectives

- 5.1 The likely impacts of the SPD were identified using a set of sustainability objectives, which relate to the strategic vision for the Borough. The objectives reflect the current social, economic and environmental issues affecting the borough and are linked with the aims of Southwark 2016 (Community Strategy).
- 5.2 The objectives set out below were presented in the Scoping Report (stage one of the SA process). Comments were received on the objectives during the consultation process, which have been taken into account and as a result an additional objective, number 8 has been added.

#### Sustainable Development Objectives (SDOs)

- SDO 1 To tackle poverty and encourage wealth creation
- SDO 2 To improve the education and skill of the population
- SDO 3 To improve the health of the population
- SDO 4 To reduce the incidence of crime and the fear of crime
- SDO 5 To promote social inclusion, equality, diversity and community cohesion
- SDO 6 To mitigate and adapt to climate change
- SDO 7 To improve the air quality in Southwark
- SDO 8 To minimise the ambient noise environment
- SDO 9 To reduce waste and maximise use of waste arising as a resource
- SDO10 To encourage sustainable use of water resources
- SDO11 To maintain and enhance the quality of land and soils
- SDO12 To protect and enhance the quality of landscape and townscape
- SDO13 To conserve and enhance that quality of landscape and townscape
- SDO14 To protect and improve open spaces, green corridors and biodiversity
- SDO15 To reduce vulnerability to flooding
- SDO16 To provide everyone with the opportunity to live in a decent home
- SDO17 To promote sustainable transport and minimise the need to travel by car
- SDO18 To provide the necessary infrastructure to support existing and future development.

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

#### 6.0 Key Findings of the Sustainability Appraisal

6.1 The SPD does not create new policy, but provides detailed guidance on how our current planning policies on affordable housing will be applied. It is based on the policies set out in the Core Strategy, saved policies in the Southwark Plan and the area action plans for Aylesbury and Canada Water affordable housing polices. Consequently, the SA of the Core Strategy has been taken as the starting point for this assessment.

A compatibility assessment of the SPD objectives against the Sustainability Objectives was carried out to identify if the guidance was compatible. The results showed that the majority of the objectives were compatible or had no significant link. Where uncertainty was recorded, it is dependent upon implementation and will be addressed in the detailed assessment of planning applications in conjunction with the Core Strategy policies and other specific guidance such as the Sustainable, Design and Construction and Sustainability Assessment SPDs. No incompatibility was recorded.

The SA has been carried out against the Sustainability Framework set out in Section 6 of the Sustainability Report. The SA has shown that the SPD is likely to have a major positive impact upon the following Sustainability Objectives:

SDO1: To tackle poverty and encourage wealth creation SDO3: To improve the health of the population SDO4: To reduce the incidence of crime and fear of crime SDO5: To promote social inclusion, equality, diversity and community cohesion SDO16: To provide everyone with the opportunity to live in a decent home

The SPD has the same impact as the core strategy policy for the majority of the results but would provide increased benefits for the objectives below which scored a minor positive result:

SDO 12: To protect and enhance the quality of landscape and townscape

SDO 13: To conserve and enhance the historic environment and cultural assets

There were uncertain results for:

SDO18: To provide the necessary infrastructure to support existing and future development

The detailed results of the Draft Sustainability Appraisal can be found in Appendix 4 of this report, which is available on the Council's website and from the Planning Policy team.

#### 7.0 Response to consultation

Responses from the following organisations were received on the Scoping report

- The Environment Agency
- English Heritage
- The Coal Authority
- Natural England
- The Highways Agency

The Coal Authority and the Highways Agency had no specific comments on the scoping report.

The Environment Agency, English Heritage and Natural England's comments and our officer responses for how we have taken these into consideration are set out in appendix 2. All three statutory consultees had no substantive comments on the scoping report.

#### 8.0 What difference has the appraisal process made?

The sustainability appraisal process has helped to identify the environmental, social and economic issues that the SPD needs to address and any links between the issues. The preparation of the sustainability appraisal has been carried out alongside the preparation of the SPD as part of an integrated and iterative process. This has helped to inform decisions to ensure that the SPD contributes effectively to achieving sustainable development.

The sustainability appraisal has also performed a key role in providing a sound evidence base for the SPD. As part of the sustainability appraisal we have reviewed the evidence informing the decisions made in the SPD. This has included looking at both statistics and factual evidence about the borough, and also our many studies that underpin our policies.

The sustainability appraisal has informed the decision making process to facilitate the evaluation of options and has helped to demonstrate that the SPD is the most appropriate given the reasonable alternatives. The final approach taken forward through the SPD is considered to be the most effective at achieving sustainable development.

The appraisal process has also provided the opportunity to consider how the SPD should be monitored to keep track of how well it performs. The sustainability indicators indentified through the sustainability appraisal will be used as part of our monitoring process for the SPD. The SPD already sets out the need to monitor and review the outcomes of the policy.

#### 9.0 Next Steps

The SPD is now out for consultation along with the supporting documents, including this sustainability appraisal. Consultation will close on 30 September 2011. We will then look at the responses we receive on the SPD consultation and see whether the SPD and the supporting documents need to be amended. The SPD and final supporting documents will be taken to Cabinet for adoption in November 2011.

Monitoring of the SPD will take place following its adoption to see whether the policy is working in achieving its objectives.

133

## Affordable Housing Supplementary Planning Document

Draft for consultation

# Sustainability Report June 2011

## 1 INTRODUCTION

#### 1.1 What is this document?

- 1.1.1 This report provides the findings of the Sustainability Appraisal of the Affordable Housing supplementary planning document (the SPD). The purpose of an SA is to promote sustainable development through the integration of social, economic and environmental considerations in the preparation of new or revised policies.
- 1.1.2 The SPD is being prepared as part of the Local Development Framework (LDF). The Local Development Framework is made up of a collection of DPDs, including the Core Strategy, Area Action Plans (AAPs), and Supplementary Planning Documents (SPDs), which will be used to guide development in the area. Further explanation of the LDF documents is set out below.
  - Local Development Scheme is a timetable for the preparation of the LDF, setting out the documents that will be produced and the key stages of the programme.
  - Statement of Community Involvement (SCI) sets out how interested people and organisations can be involved in the preparation of the LDF and in future planning decisions.
  - Core Strategy is the principal document of the LDF, setting out the spatial vision for the borough, including a set of key strategic policies from which all other documents flow. Together with the other DPDs, the Core Strategy will replace the Southwark Plan 2007. Southwark's Core Strategy identifies the particular locations and different types of development in the borough that would be appropriate in the future. It sets out the overarching policies for affordable housing for the borough.
  - Area Action Plans (AAPs) provide spatial strategies for key areas of the borough. An AAP for Aylesbury has been adopted. AAPs for Canada Water and Peckham & Nun head are at various stages of preparation.
  - Supplementary Planning Documents (SPDs) provide additional detail around particular priority policies such as affordable housing and sustainable construction. This SA covers the Affordable Housing SPD.

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

#### 1.1.3 This report does the following:

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

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

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

"Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular, they should carefully consider the interrelationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development."

PPS1: Delivering Sustainable Development (paragraph 24)

#### 1.3 Strategic Environmental Assessment

- 1.3.1 Sustainability Appraisals also need to satisfy the requirements of the *European Directive* 2001/42/EC. The Directive requires a formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. An SEA is required when preparing new or revised DPDs. The SEA Directive was implemented in the UK by the *Environmental Assessment of Plans and Programmes Regulations 2004.*
- 1.3.2 The Government guidance on sustainability appraisal set out in *Planning Policy Statement 12: Local Spatial Planning, 2008* and the *Plan Making Manual*, incorporates the requirements of the SEA Directive within the SA process. For the purposes of simplicity, the term sustainability appraisal (SA) is used throughout this document to include both the SA and SEA processes. Further details on the legislative and policy background to sustainability appraisal are set out in **Appendix 1**.

#### 1.4 Why is the SPD needed?

- 9.2.1 Southwark has one of the highest amounts of affordable housing in the country and we are the largest landlord in London. In the 1970s approximately 70% of Southwark's housing stock was social rented housing (council housing plus housing association rented). As at April 2010, the percentage of social rented stock was down to 44% but this is still three times the national average and the highest in London. Approximately 1.5% of the housing stock is intermediate housing. Despite having this large amount of affordable housing, there still remains a considerable need for more affordable housing in Southwark.
- 9.2.2 There is a well-documented shortage of affordable homes, in Southwark, across London and the whole of the UK. A key objective of national government, the Greater London Authority (GLA) and Southwark is to provide more affordable housing. National guidance in Planning Policy Statement 3: Housing, sets out the overall policy with a view to ensure that everyone has the opportunity to live in a decent home, which they can afford, in a community in which they wish to live
- 9.2.3 Our housing studies and statistical evidence support our priority of providing more affordable housing to meet local need. Our Strategic Housing Market Assessment (2010) and Housing Requirements Study (2009) both set out that there is a considerable need for more affordable housing, including both social rented and intermediate housing. Our core strategy housing background papers set out further information on Southwark's existing housing stock and our housing need.

- 9.2.4 Through our planning policies we set out a strategy to bring forward the maximum reasonable amount of affordable housing to help meet the Southwark 2016 and core strategy objective of making the borough a better place for people by providing more and better homes. Through our Housing Strategy 2009-2016 we also set out a strategy to improve existing affordable housing in Southwark to help improve resident's quality of life.
- 9.2.5 The SPD is needed to provide further detail and guidance on the strategic planning policies set out in other LDF documents. It provides information on how to implement the housing policies set out in our core strategy, our saved Southwark Plan policies and our area action plans.
- 9.2.6 The SPD will assist members and council officers in implementing the policies effectively. It will inform the community of the issues associated with affordable housing and how we maximise provision of affordable housing, and will provided detailed guidance to developers, landowners and registered providers to inform their proposals.
- 9.2.7 The SPD will replace the existing adopted Affordable Housing SPD 2008. We need to update and replace the 2008 SPD to take into account changes in national, regional and local policies and guidance. In particular it needs to take into account changes to our policies through our core strategy and our area action plans for Aylesbury and Canada Water.

#### 1.5 What are the stages of the SPD production?

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

Stages in Preparing the SPD		
Scoping Report (Evidence Gathering)	September – October 2010 Gathering information and understanding the key social, economic and environmental issues that affect the Interim Policy.	
	Public Consultation 17 September – 22 October 2010	
Draft SPD and Draft SA	Consultation on the SPD	
report	Public Consultation 14 June to 30 September 2011	
Adoption	<b>November 2011</b> Following consultation and the consideration of the consultation responses, the final SPD and supporting	
	documents (including the sustainability appraisal) will be taken to Cabinet in November 2011for adoption.	

#### **1.6 Structure of the Report**

This report is divided into nine sections.

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

## 2 Sustainability Appraisal Methodology

#### 2.1 Purpose of the Sustainability Appraisal

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

#### 2.2 Planning Policy and Sustainable Development

- 2.2.1 *Planning Policy Statement (PPS) 1: Delivering Sustainable Development;* provides the over-arching policy to deliver sustainable development through the planning process. The guidance suggests that planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:
  - making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life
  - contributing to sustainable economic development
  - protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities
  - ensuring high quality development through good and inclusive design, and the efficient use of resources
  - ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.
- 2.2.2 *Planning Policy Statement 12: Local Spatial Planning*; sets out the Government's policy on local spatial planning including the need to undertake a sustainability appraisal of the plan. The guidance states:

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

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

- 2.2.3 The Government has also published a Sustainable Development Strategy 'Securing the future delivering the UK Sustainable Development Strategy, 2005'. A revision of the 1999 strategy, the document sets out the guiding principles for sustainable development and priorities for action. The strategy sets out five guiding principles to achieve sustainable development.
  - Living within environmental limits
  - Ensuring a strong, healthy and just society
  - Achieving a sustainable economy
  - Promoting good governance
  - Using sound science responsibly

#### Illustration of the Government's Definition of Sustainable Development



The Strategy also gives the following priorities for action:

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

#### 2.3 Sustainability Appraisal Process

- 2.3.1 The Sustainability Appraisal of the SPD has been carried out by council officers in accordance with Government guidance:
  - Planning Policy Statement 12: Local Spatial Planning, 2008.
  - A Practical Guide to the Strategic Environmental Assessment Directive, 2005
  - Plan-Making Manual

The stages of the SA process are set out below. This report provides the results from **Stages B and C**. Stage A is the subject of a previous report, the Scoping Report.

Sustainability Appraisal Stages	Timetable
Stage A	
Setting the context and objectives, establishing the baseline and deciding on the scope	Consultation on the Scoping Report took place from 17 September – 22 October 2010
Stage B	
Developing and refining options and assessing effects against the SA framework.	October 2010 – June 2011
Stage C	
Prepare the draft SA report. This stage involves testing in detail the impacts of the plan. A draft sustainability appraisal report is prepared for consultation with the public along with the draft SPD	Preparation October 2010 – June 2011 Consultation June to September 2011
Stage D	
Consider the responses and adopt the final SPD and SA.	November 2011 adoption
Stage E	
Once the SPD has been agreed by the council, its social, economic and environmental impacts will then be monitored	Monitoring the SPD will take place once it has been adopted.

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

#### 2.4 Consultation

- 2.4.1 As part of the preparation of the SPD and SA, community consultation is being carried out to make sure that local residents and stakeholders are informed of the future plans for the borough. The council has prepared a consultation plan for the SPD setting out how consultation will take place and showing how this relates to the council's Statement of Community Involvement (2008).
- 2.4.2 The Statement of Community Involvement sets out how individuals, community groups and developers should be consulted on planning policy documents. The consultation plan sets out the detail of how we are consulting on the SPD and which groups this will target.
- 2.4.3 *Planning Policy Statement 1: Delivering Sustainable Development* sets out the principles that the Government believes should underpin community involvement in the planning process. We are following this process also to ensure we encourage full stakeholder and public participation. SEA guidance requires that the contents of the Scoping Report must be consulted on with the following 'authorities with environmental responsibility':
  - Natural England
  - Environment Agency
  - English Heritage.
- 2.4.4 Government guidance also recommends that additional bodies can be consulted in order to represent the social and economic aspects of sustainability. The following additional bodies were consulted, in addition to an extensive list of local consultees:
  - British Telecommunications
  - Bromley Council
  - Corporation of London
  - Government Office for London
  - Greater London Authority
  - Homes and Communities Agency
  - Lambeth Council
  - Lewisham Council
  - LFEDA
  - London Development Agency
  - Secretary of State
  - Secretary of State for Transport
  - Thames Water Property Services
  - The Coal Authority
  - Southwark Primary Care Trust
  - Any of the bodies from the following list who are exercising functions or a function in the borough:
    - 1. Person to whom a licence has been granted under section 7 (2) of the Gas Act 1986
    - 2. Sewage undertakers
    - 3. Water undertakers.
  - Any person to whom the electronic communalisations code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003.
  - Any person who owns or controls electronic communications apparatus situated in any part of the borough.

- The Environment Agency
- English Heritage
- The Coal Authority
- Natural England
- The Highways Agency

The Coal Authority and the Highways Agency had no specific comments on the scoping report.

The Environment Agency, English Heritage and Natural England's comments and our officer responses for how we have taken these into consideration are set out in appendix 2. All three statutory consultees had no substantive comments on the scoping report.

#### 2.5 Compliance with the SEA Directive

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

## 3.0 SPD Objectives and Guidance

#### 3.1 The Purpose of the SPD

3.1.1 The SPD provides further detail and guidance on the affordable housing planning policies set out in our core strategy, our saved Southwark Plan policies and our area action plans. These policies seek to ensure that new homes are provided for people on a wide range of incomes. The LDF documents and the specific policies that this SPD provides guidance on are:

Core strategy (2011)

- Strategic Targets Policy 2 Improving Places
- Area visions
- Strategic policy 5 Providing new homes
- Strategic policy 6 Homes for people on different incomes
- Strategic policy 7 Family homes
- Strategic policy 8 Student homes
- Strategic policy 14 Implementation and delivery

Saved Southwark Plan (2007)

- Policy 2.5 Planning obligations
- Policy 3.11 Efficient use of land
- Policy 4.2 Quality of residential accommodation
- Policy 4.4 Affordable Housing
- Policy 4.5 Wheelchair affordable housing
- Policy 4.7 Non self-contained housing for identified user groups

Aylesbury Area Action Plan (2010)

- Policy BH3 Tenure mix
- Policy BH4 Size of homes
- Policy BH5 Type of homes
- Appendix 6 Design guidance

Canada Water Area Action Plan (publication/submission draft 2010)

- Policy 22 Affordable homes
- 3.1.2 The SPD will assist members and council officers in implementing the policies effectively and achieving our affordable housing targets. It will inform the community of the issues associated with affordable housing and how we maximise provision of affordable housing, and will provided detailed guidance to developers, landowners and registered providers to inform their proposals.

#### 3.2 The Objectives of the SPD

- 3.2.1 The objectives of the SPD are as follows:
  - To provide guidance to ensure that new housing provides the maximum amount of affordable housing possible to meet the needs for this type of housing;
  - To provide guidance to make sure that affordable housing is provided throughout the borough in the most appropriate way;
  - To make sure that affordable housing contributes to creating a better mix of housing of different tenures and prices throughout the borough to support households with different needs and incomes.

# 3.3 The key points of guidance

3.3.1 The SPD will apply across the borough. It is split into a number of sections, covering the following key points of guidance:

What is affordable housing?	<ul> <li>Provides factual information on definitions used and emerging changes to national policy.</li> </ul>
Getting the right amount of	<ul> <li>Affordable housing is calculated on habitable rooms for schemes of 15 or more homes.</li> </ul>
affordable housing	Requirements for smaller schemes are set out in Southwark Plan
nousing	<ul><li>policy 4.4.</li><li>Student housing schemes of 30 or more bed spaces and living</li></ul>
	spaces or over 0.5ha will require affordable housing. One bed
	space or living space is the equivilent of one habitable room.
Getting the right mix of housing	Tenure split requirements for schemes under 15 units may be     varied. This will be desided on a site by site basis
mix of nousing	<ul><li>varied. This will be decided on a site by site basis.</li><li>We will not accept studio flats as affordable housing, but they are</li></ul>
	included in calculation of affordable housing requirement.
	<ul> <li>The same policies and guidance as apply to conventional</li> </ul>
	affordable housing apply to affordable housing provided through
	student schemes.
	We encourage applicants to provide more family-sized
-	wheelchair accessible units.
The quality and	We expect affordable housing to be integrated with market     beuging through a high standard of design and charged
design of affordable	housing through a high standard of design and shared access arrangements as far as is practical.
housing	<ul> <li>Applicants will need to justify why this is not possible. Tenures</li> </ul>
J	could be vertically grouped in flat developments.
	• There should be no difference in the appearance and quality of
	affordable and private units. There should be equal access to
	communal facilities.
	Affordable housing should be easily maintained to keep down
	<ul> <li>service charges and maintenance costs.</li> <li>Minimum overall dwelling sizes set out. These are the same as</li> </ul>
	those set out in the draft amendments to the Residential Design
	Standards SPD.
Where should the	Sets out a sequential approach to providing affordable housing.
affordable	In all cases affordable housing should be delivered at the same
housing be	time as private housing. We set out guidance on how we will
provided	ensure this.
	<ul> <li>The presumption is that affordable housing will be provided on site. This will be tested through financial appraisal.</li> </ul>
	<ul> <li>In exceptional circumstances we may allow off-site, nearby to the</li> </ul>
	proposed development or a pooled contribution. This must result
	in at least as much affordable housing being provided as would
	have if the minimum 35% requirement was met on-site. Where a
	pooled contribution is agreed this will be a minimum of £100,000
	per required affordable habitable room.
Affordable	<ul> <li>Sets out guidance for how we ensure the maximum amount of</li> </ul>
housing in	affordable housing is provided in different situations such as
specific types of	phased development, alterations to existing permissions and
development	extensions to existing schemes.
	• We will not accept live-work units as affordable housing, but they
	are included in calculation of affordable housing requirement.

	·
	<ul> <li>We will expect the tenure split requirements to be met in 100%, but will consider context in applications for a variation to the mix.</li> <li>On some estate regeneration schemes we may not replace all of the affordable housing.</li> </ul>
Sheltered, supported and extra care housing	<ul> <li>Specialist housing should be made available at a cost affordable to its intended occupants.</li> <li>We will not normally apply affordable housing requirement to these schemes if there is a demonstrated need. Sets out guidance for how we will assess if there is a need for special needs housing.</li> </ul>
Financing and securing affordable housing	<ul> <li>Sets out guidance on financial appraisals.</li> <li>We may include in S106 agreements requirement for a review prior to implementation of a development to see whether more affordable housing could be provided.</li> <li>Sets out information on securing affordable housing and minimum private housing requirements through S106 agreements.</li> <li>We will expect standard S106 charges to be met.</li> </ul>
Making an application	Provides information on the planning application process.

# 4 Context and Baseline Information

## 4.1 Links to other policies, plans and programmes

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

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

## 4.2 Summary Baseline Information

- 4.2.1 Baseline information has been used to measure the current characteristics of the area, to enable an assessment of how it is likely to change in the future and to monitor future implementation. The data that has been collected describes the social, environmental and economic characteristics of the borough. The background paper to the Core Strategy Submission Version sets out the baseline data in further detail. A summary of the data is given below:
- 4.2.2 Housing is a key issue in Southwark, as it is across London. One of our key objectives, set out in both Southwark 2016 (our sustainable community strategy) and our Core Strategy is to provide more and better homes. Our objective is that the whole borough will offer more housing of a range of different types to meet the needs of the community. All the housing will be built to a high quality of design and there will be a choice of housing types including more family housing, housing for students and more affordable housing.

## Existing stock

There is a high percentage of flats within the borough, which accounts for the high population density. The Housing Requirements Study 2008 identified that our dwelling stock comprises 74% flats, 20% terraced houses and 6% semi-detached houses/detached houses. Southwark has the eighth highest proportion of flats/maisonettes in the Greater London area and one of the lowest proportions of detached dwelling stock in London.

The Housing Requirements study also shows that of our existing households, 34% are 3 bedroom plus, 35% are 2 bedroom, 26% are 1 bedroom and 5% are bedsits. The current provision does not meet the need for more family homes in Southwark.

Southwark has one of the highest amounts of affordable housing in the country. In the 1970s, approximately 70% of Southwark's housing stock was social rented housing (council rented plus housing association rented). As at April 2009, the percentage of affordable housing was down to 45% but is still 3 times the national average and the highest in London, with 33% of this figure council rented and 12% housing association rented. Our Housing Strategy 2009 shows that 28% of the stock is owner occupied (well below national and London averages) and 27% of the stock is private rented (this figure has risen significantly over recent years). Southwark remains the largest local authority landlord in London having retained a lot of its stock. However, whilst there has been a steady increase in the amount of housing built in the last 15 years there has been a decrease in the local authority housing stock within the borough (inclusive of stock owned by other local authorities). Registered social landlord stock has risen over this period, as has private dwelling stock. This loss may be attributed to the high uptake of the Right to Buy scheme,

as well as redevelopment resulting in a decrease of council homes, and an increase in RSL homes.

Much of the housing stock in Southwark does not meet the Decent Home Standards ('nondecent'). The Private Sector Stock Conditions Survey 2008 and the Housing Strategy 2009-2015 show that 47% of owner occupier and private rented homes are 'non-decent' compared to the national rate of 38%. In addition, 35% of council stock classified as 'nondecent', and although investment programmes are ongoing, as additional homes are made decent, others will be failing the standard. We are committed to improving our existing housing stock to provide better homes.

#### Previous housing trends

Southwark have historically delivered one of the largest amounts of housing in London, including both general needs housing and affordable housing. In our 14 years of monitoring we have delivered a total of 21,533 net new homes. This is an annual average of 1,538 net new homes a year. Over the last financial year (2009-2010) we completed 1,536 net new homes.

The borough has continued to add to our large stock of affordable homes, by delivering large amounts of affordable housing. In the financial year 2009-2010 we delivered 710 affordable homes (424 social rented homes, 277 intermediate homes), despite the impact of the recession stalling a number of large schemes.

There has also been an increase in the delivery of more family housing. Over the 3 years of monitoring from 2006/07 to 2008/09 between 8 and 12% as 3 bedroom or more dwellings were delivered. This demonstrates that our Southwark Plan policy to provide 10% of housing as family housing is being successfully implemented. However, there is a need for more family housing and so our Core Strategy introduces a policy requiring more family housing linked to the density of the area.

The Southwark Plan sets out a policy on density, which is being changed through the Core Strategy. Both policies divide the borough into different density zones based on the character of the area and the accessibility to public transport, with different zones being more suitable for higher density schemes. Our monitoring shows that the many schemes are not within the density ranges identified because these are a guide for development and site circumstances may mean a scheme can sometimes be above the density ranges. We will continue to monitor the density ranges to see if the policy is being implemented effectively.

#### Housing need

Despite the inclusion of such a large proportion of affordable housing in the borough's stock and our high delivery of affordable housing, there is still a significant requirement for more affordable housing. The housing need comprises a mixture of market, social rented and intermediate housing. Our Strategic Housing Market Assessment (SHMA) shows that Southwark needs to provide between 36.9% and 47.3% of new housing as market housing, between 34.8% and 41.5% as social rented housing and between 17.9% and 21.6% as intermediate housing. Our Housing Requirements Study shows that there is a need for 10,660 net new homes over the next five years, with a split of 5,066 market, 6,458 social rented and -862 intermediate houses. It will not be possible to meet all the identified need for affordable housing whilst also creating mixed and balanced communities. Our Housing Viability Study shows that 35% of affordable housing can be justified and in some areas up to 50% affordable housing could be achievable.

As with most of London, we also have a large need for more family housing. Our Strategic Housing Market Assessment and Housing Requirement Study identify that there is a need for more family housing in the borough across all tenures. The Strategic Housing Market Assessment shows there is a 60% need for 3 bedroom plus dwellings when modelled

against the London Plan targets. The London SHMA and paragraph 3.41 of the draft replacement London Plan refers to the failure to provide enough larger homes, which has seen over-crowding among families grow by a third over the decade to 2007. Providing more family housing will help to meet the housing requirements of local residents, which will help to reduce poverty in the borough and mean that families do not need to move out of the borough to find suitable accommodation. At the moment, as identified in our Housing Requirements Study, 13,986 households live in overcrowded accommodation. Providing more family housing will help reduce overcrowding in the borough and ensure more people have access to high quality accommodation which will help to improve the health of the population.

## Capacity, targets the housing trajectory

The housing targets cover both the overall housing supply and affordable housing and are based on the strategic targets in the adopted London Plan 2008 and the draft replacement London Plan 2009. The new housing targets are set out in our Core Strategy. Within the Core Strategy we set an overall housing target for 2011-2026 of a minimum of 24,450 net new homes, which equates to an annual monitoring minimum target of 1,630 net new homes in conformity with the adopted London Plan. The draft replacement London Plan proposes a higher target of 2,005 net new homes a year. We have been working with officers at the Greater London Authority to discuss the most appropriate target.

The Core strategy also sets out our affordable housing target, at a minimum of 8,558 net new affordable homes between 2011 and 2026. Our Affordable Housing Viability Assessment shows this is a financially viable target to pursue. Overall and affordable housing targets have also been set for different areas of the borough through our Core Strategy and area action plans. The minimum targets are as follows:

- Bankside, Borough and London Bridge Opportunity Area 1,900 net new homes, 665 affordable homes
- Elephant and Castle Opportunity Area -4,000 net new homes, 1,400 affordable homes
- Canada Water Action Area -2,500 net new homes, 875 affordable homes
- Aylesbury Action Area.
   4,200 new homes (around 1,450 net new homes),2,100 affordable homes.

We have also provided input to the Mayor's Strategic Housing Land Availability Assessment 2009 (SHLAA), which looked at the land capacity to deliver housing across the whole of Southwark. A Development Capacity Assessment (2010) has also been developed, which takes the information from the SHLAA and looks in more detail at every site and also smaller sites. Together these two documents identify:

- land that could potentially be used to deliver housing
- the amount of housing that could come forward
- the possible timescales.

It is not anticipated that all of the possible sites identified in the assessment will come forward as it is a capacity study. Through these studies and through our housing trajectory we have forecast that a minimum of 1630 new homes a year can be delivered to meet our overall target. Through implementing our policy for 35% of new developments to be affordable housing, the target of 8,558 net affordable homes should also be met.

## Specialist housing

There were around 18,000 full-time students resident in Southwark when the 2001 census was carried out. Evidence through the council's Research into the Need for Additional Student Housing in Southwark 2008 suggests that if figures increase at the same level as predicted across London of 2% per annum, then Southwark will have 24,000 full-time students living in the borough by 2010. As set out in the council's study, we already have

the highest amount of specialist purpose build student accommodation and overall, when combined with private bed spaces, we have the second largest amount of student homes in London. We already have 5,207 bed spaces in student halls of residents, as set out in our Southwark Student Study 2010. The study also sets out that we have a further 1,605 student bedrooms in the pipeline and one scheme of 230 bed spaces already under construction. In addition, a student scheme has recently been approved at appeal for a further 232 student bed spaces. Together this gives us 2,067 bed spaces with planning permission across 9 schemes. We need to balance meeting this need for student accommodation with the pressing need for conventional housing, especially affordable housing and family housing. Our Core Strategy policies 6, 7 and 8 seek to do this.

4.2.3 We have 38 Traveller and Gypsy authorised pitches across four sites: Bridale Close, Burnhill Close, Ilderton Road and Springtide. All four sites have permanent planning permission. These sites account for 7% of the total authorised pitches across London. We are protecting all four sites through our Core Strategy.

## 4.2.4 Socio-Economic Characteristics

The key sources of data for the socio-economic characteristics for the borough are the Census 2001 (due to be updated in 2011) and the Indices of Multiple Deprivation.

## Population

Since the Census in 2001, the population of Southwark has risen from 258,087 to 285,600 (2009 Office for National Statistics estimate<sup>1</sup>), an increase of 10.6%. The government has projected the population will rise further to 303,514 (17.6%) by 2016 and 337,482 (30.8%) by 2026. The population density across the borough as a whole averages at around 84 persons per hectare, which is nearly double the Greater London average of 46 persons per hectare<sup>2</sup>. The fact that Southwark has an especially high population density has implications for housing, health and the local environment. The age breakdown of the population is as follows:

AGE GROUP	NO. OF PEOPLE		NO. OF PEOPLE		NO. OF PEOPLE	
TOTAL	285,600		7,753,600		51,809,700	
Years	Southwark <sup>1</sup>	%	London	%	England	%
0-15	50,000	17.5	1,498,700	19.3	9,704,400	18.7
16-24	37,800	13.2	909,400	11.7	6,237,400	12.0
25-49	139,000	48.7	3,342,100	43.1	18,110,900	35.0
50-64	29,100	10.2	938,300	12.1	7,735,000	14.9
65+m/60+f	29,700	10.4	1,065,000	13.7	10,022,000	19.3
16-64	205,900	72.1	5,189,800	66.9	32,083,300	61.9

There are far more adults aged 25-49 years in the borough than in England as a whole (percentage comparison), but the population share for children is just below the national average. Southwark also has proportionally fewer older persons (60 years and over) compared to England. Older people comprise 10.5% of Southwark's population compared to 19% of the population within England.

## • Deprivation

The Index of Multiple Deprivation (IMD) 2007 combines a number of indicators, chosen to cover a range of economic, social and housing issues, into a single deprivation score for each small area in England. This allows each area to be ranked relative to one another according to their level of deprivation. Released on the 6<sup>th</sup> December 2007 by the Department of Communities and Local Government, the 2007 IMD is currently the most recent version available. Appendix 4 sets out Southwark's IMD rankings based on

<sup>&</sup>lt;sup>1</sup> Office for National Statistics, Neighbourhood Statistics for Southwark, June 2009, resident population estimates,

<sup>&</sup>lt;sup>2</sup> Office for National Statistics, Neighbourhood Statistics for Southwark

6 indicators: Income, Employment, Health/disability, Education/skills/training, Housing and Crime.

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

## • Ethnic composition

The ethnic composition of residents of the borough is currently as set out below<sup>3</sup>:

Ethnic Group	Southwark		Londe	on	Englan	d
	No.	%	No.	%	No.	%
White British	127,752	52.17	4,287,861	59.79	42,747,136	86.99
White Irish	7,674	3.13	220,488	3.07	624,115	1.27
White Other	18,890	7.71	594,854	8.29	1,308,110	2.66
Mixed: White and Black Caribbean	3,350	1.37	70,928	0.99	231,424	0.47
Mixed: White and Black African	1,954	0.80	34,182	0.48	76,498	0.16
Mixed: White and Asian	1,343	0.55	59,944	0.84	184,014	0.37
Mixed: Other	2,499	1.02	61,057	0.85	151,437	0.31
Asian or Asian British: Indian	3,655	1.49	436,993	6.09	1,028,546	2.09
Asian or Asian British: Pakistani	1,118	0.46	142,749	1.99	706,539	1.44
Asian or Asian British: Bangladeshi	3,642	1.49	153,893	2.15	275,394	0.56
Asian or Asian British: Other	1,536	0.63	133,058	1.86	237,810	0.48
Black or Black British: Caribbean	19,555	7.99	343,567	4.79	561,246	1.14
Black or Black British: African	39,349	16.07	378,933	5.28	475,938	0.97
Black or Black British: Other	4,512	1.84	60,349	0.84	95,324	0.19
Chinese	4,492	1.83	80,201	1.12	220,681	0.45
Chinese or other ethnic group	3,545	1.45	113,034	1.58	214,619	0.44

The table above shows that Southwark's largest ethnic group is white British (52.17%), although this is lower than the averages for London (59.79%) and Nationally (86.99%). Southwark also has a high percentage (16.07%) of residents of Black or Black British African descent, considerably higher than both the London and National averages, which are 5.28% and 0.97% respectively

## Religion

The composition of religious groups is as follows<sup>4</sup>:

Religious Groups	Southwark		Londo	n	England		
	No.	%	No.	%	No.	%	
Christian	150,781	61.58	4,176,175	58.23	35,251,244	71.74	
Buddhist	2,621	1.07	54,297	0.76	139,046	0.28	
Hindu	2,664	1.09	291,977	4.07	546,982	1.11	
Jewish	1,011	0.41	149,789	2.09	257,671	0.52	
Muslim	16,774	6.85	607,083	8.46	1,524,887	3.10	
Sikh	578	0.24	104,230	1.45	327,343	0.67	
Other	884	0.36	36,558	0.51	143,811	0.29	
No religion	45,325	18.51	1,130,616	15.76	7,171,332	14.59	
Not stated	24,228	9.89	621,366	8.66	3,776,515	7.69	

The majority of residents in Southwark who stated their religion in the 2001 Census were of Christian faith (61.58%) with the second highest category being 'No religion'

<sup>&</sup>lt;sup>3</sup> Office for National Statistics, Neighbourhood Statistics for Southwark, April 2001 Resident Population Estimates by Ethnic Group

(18.51%). By comparison 58.23% were of Christian faith in London and 71.74% nationally, with 15.76% of London residents expressing no religion and 14.59% nationally.

## 4.2.5 Employment

## • Employment rate

The employment rate for Southwark is 67.5%, lower than both the London and UK averages (68% for London and 73% for the UK<sup>5</sup>). The unemployment rate in Southwark is 9.9%, which is higher than London at 9.1% and the National level of 7.9%. Unemployment has risen from 8.0% in 2008. Since January 2008 there has also been a rise in the number of Job Seekers' Allowance (JSA) claimants, rising from 3.0% to 4.7% in August 2010.

## Economic activity

The number of active enterprises (VAT and or PAYE registered businesses) in Southwark is 12,845 (2008) which is a 4.7% increase on the 2007 active enterprise count of 12,265. Southwark's 2008 count compares favourably to neighbouring boroughs Lambeth and Lewisham, counts for these boroughs were 11,305 and 7,470 respectively.

## Business Size

Small businesses contribute heavily to employment in the borough. Approximately 10,742 companies in Southwark employ between one and ten employees, comprising 84.1% of all companies registered in the borough and 19.3% of the workforce. The number of small businesses has grown over the period 1997-2008. The number of large companies which employ over 200 people is 114, approximately 0.9% of all of the companies registered in the borough. This is equivalent to 52.4% of the workforce. <sup>6</sup>

## • Types of employment

Southwark has a wide mix of industries and types of employment, which vary between the different areas of the borough. The main employment areas in the borough are the traditional industrial areas at the Old Kent Road and South East Bermondsey, the more localised industrial areas of Mandela Way and Parkhouse Street in the north, and the rapidly growing commercial office locations of Bankside, Borough and London Bridge in the north west. There are also other pockets of industrial land throughout the borough, ranging in size from small estates to single premises.

#### • Employment Sectors

The majority of residents in Southwark are employed in the banking and financial services sector representing 42.4% of the employment in the borough. The second largest employment sector is the public administration, education and health services sector, which represents 21.2% of the employment in the borough.

Other key sectors of employment include the Hotels and Catering services, creative and cultural industries and tourism sectors. The tourism sector has also seen rapid growth in recent years, with employment increasing from 6,207 in 1998 to 10,734 in 2007. Employment numbers in the creative and cultural industries have risen from 2,430 to 2,978 over the period 1998 to 2007.

The Employment Land Review, Employment Strategy and Enterprise strategy show that there is currently 1,255,000sqm of office space in Southwark and around 165,800 people employed. The Employment Land Review shows we have the capacity to

<sup>&</sup>lt;sup>5</sup> Nomis Official Labour Market statistics Employment and unemployment (Apr 2009-Mar 2010)

<sup>&</sup>lt;sup>6</sup> Annual Business Inquiry 2008

increase the amount of office space to 1,674,885sqm and create an additional 32,000 new jobs to 190,800 new jobs between now and 2026. This is in line with the current London Plan targets for the borough.

## 4.2.4 Education

The table below sets out the number of early years, primary and secondary schools, special schools and higher education establishments currently in the borough as well as any proposed facilities.

Early Years		Primary		Secondary		Special		Higher Education	
Early year centres (0- 5 yrs)	9	Primary Schools	71	Secondary Schools	16	Special Schools	3	Colleges	4
Nursery Schools	5	Community Schools	42	Academies	9	Pupil Referral Unit	1	University	1
Children's centres (9 on school sites)	20	Voluntary aided schools	24	Voluntary aided schools (1 to become an academy)	5				
		Foundation Schools (becoming academies)	4	Foundation Schools	2				
		Academies (3 – 18 yrs)	1						
ADDITIONAL NEEDED			PROPOSED						
				Secondary Schools	2	Special schools	2		

The borough received over 3,292 first preference applications for reception places in September 2010, which is very close to the available capacity. It is projected that a range of between 5 and 14.5 new reception class places will be required across the borough by September 2015. In the north of the borough there is a projected reception class shortfall of between 3.5 and 7.5 Form Entry (FE) by 2015. In the centre of the borough the projected reception shortfall is between 1.5 and 4 FE by 2015.

As at January 2010, there was capacity for 23,520 primary places, with a surplus of 3,320 places or 14.1%. Eight primary schools had surplus capacity above 25%. It is predicted the primary school population will rise (based on different assessments of the numbers of 4 year olds) to between 23,319 and 23,771 by 2018 – which is between less than 1% below our current capacity and 1.5% more than capacity.<sup>7</sup>

Forecasts for the borough have confirmed that new primary provision will be required for the area over the next few years. The Council is proposing to meet this pressure for places by a combination of temporary bulge classes along with some permanent increases in school size<sup>8</sup>.

## Special Education School provision

Southwark currently maintains 1,520 statements of special educational need, which represents 2.5% of the population under 20 years old. This compares to a national average of 1.9%. Overall, 66% of all pupils with statements of special educational need attend mainstream schools, compared with 60% nationally. As at January 2007, 27% of pupils had a special educational need (SEN). There are two special schools proposed for redevelopment

- Tuke School
- Cherry Garden

## Secondary School provision

As at January 2010, there was capacity for 12,130 secondary places in the borough. Through the Government's Building Schools for the Future (BSF) and the Academies programme, every secondary school in the borough will be refurbished or re-built by 2012. Several developments which would increase capacity have either recently been completed or are in progress:

- Tuke school (secondary)
- Bredinghurst (secondary)
- Highshore (secondary)

Funding for these projects is committed in the council's capital programme and has not been affected by the Government's Comprehensive Spending Review.

Due to population growth and the cumulative impact on school place provision in the borough, there is also a need to accommodate further expansion for secondary school provision. The need to provide two new secondary schools has been identified, to be located in Rotherhithe and Walworth. These schools would accommodate one 5FE (750 pupil) school in Rotherhithe and one 5FE school with a 300 place 6th form in the north of the Aylesbury estate to serve the Elephant and Castle and Aylesbury Estate regeneration projects<sup>9</sup>.

## • Higher Education provision

Over a third (35%) of working age residents in 2001 had higher education qualifications, which is nearly double the national norm. However, the proportion of those with no

<sup>&</sup>lt;sup>7</sup> Southwark Primary Strategy for Change 2008

<sup>&</sup>lt;sup>8</sup> Southwark Updated Primary Capital Programme 2010

<sup>&</sup>lt;sup>9</sup> Southwark Schools for the Future: New school provision, September 2006

qualifications (24%) was above the London average<sup>10</sup>. In 2001, Southwark was also home to 18,800 full time students. This is almost double the national average and the third highest in London. Southwark has a number of tertiary education institutions offering a range of higher education courses including:

154

- Southwark College
- London South Bank University
- Camberwell College of Arts
- London College of Communication
- Morley College.

#### 4.2.5 Community and Cultural Facilities

## • Community facilities

There are currently:

- 210 Council owned community buildings of which approximately 110 are Tenants and Residents association halls (TRA). The remainder are in predominantly VCS occupation;
- 25 non-school buildings currently managed by Children's services (youth buildings, play rooms/one o-clock clubs, adventure playgrounds, sports sites), which are currently used or have the potential to be used by the Voluntary and Community Sector (VCS).
- There are also day centres for older people, people with mental health problems and for adults with physical disabilities.

## Cultural Facilities

The north of the borough and the wider South Bank area provide a world-class cultural quarter with the Tate Modern and Shakespeare's Globe, Bankside Gallery, Southwark Playhouse, Vinopolis, The Golden Hinde, Inago Jones Theatre, the Clink Prison Museum, HMS Belfast, Southwark Cathedral, the George Inn Public House, Operating Theatre, museum and garden. Other cultural facilities in the borough include the Imperial War Museum, Design Museum, Fashion and Textile museum, Bermondsey Antiques Market, Dulwich Picture Gallery, South London Gallery, Café Gallery, Unicorn Theatre for Children and other galleries, theatres, orchestras, music and dance organisations of national and regional importance. The borough contains 12 libraries including the John Harvard library, which has recently been refurbished.

#### • Faith premises

In London, many faith communities are currently constrained by inadequate facilities that fail to provide the level and range of social services and activities that are needed. The Mayor's Supplementary Planning Guidance Planning for Equality and Diversity and Planning (2007) includes a sub-section on supporting places of worship (Implementation Point 4.5c, p.87) that explores the finer-grain spatial implications of worship space location for local areas and encourages multi faith spaces where possible.

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

At present, there is a lack of suitable buildings classified as D1 Use Class (Non-Residential Institutions) the class suitable for faith groups. The rapid growth in the

<sup>&</sup>lt;sup>10</sup> Office for National Statistics, Neighbourhood Statistics for Southwark, 2001

number and size of faith groups in the borough has created additional pressure on established places of worship. The unauthorised use of industrial buildings by faith groups for places of worship has been identified as the most significant breach of planning control involving change of use in Southwark and is considered to be taking place at a larger scale than in any other London Borough.

The Council has been working through its Community Involvement and Development Unit (CIDU) and the borough's multi faith forum 'Southwark for Jesus' to understand more about the needs of faith groups. The Council is undertaking an assessment of the sites within the borough currently being used as places of worship by means of a questionnaire survey. The outcome will provide a much more comprehensive understanding of the activities and development requirements of faith groups, adequacy of current provision, and travel patterns.

## 4.2.6 Leisure and Recreation

## • Leisure facilities

Southwark's public leisure centres and the Southwark Park Sports Centre are managed by Fusion Leisure Trust, a non-profit and community based organisation. The leisure centres are located in the areas listed below:

Leisure Centre	Address
Camberwell Leisure Centre	Artichoke Place, off Camberwell Church Street, London SE5 8TS
Dulwich Leisure Centre	45 East Dulwich Road, London SE22 9AN
Elephant & Castle Leisure Centre	22 Elephant and Castle, London SE1 6SQ
Geraldine Mary Harmsworth Sports Facility	St Georges Road, London SE1 6ER
Peckham Pulse	10 Melon Road, Peckham, London SE15 5QN
Seven Islands Leisure Centre	Lower Road, Rotherhithe, London SE16 2TU
Southwark Park Sports Centre	Hawkstone Road, Rotherhithe, London SE16 2PA

Other facilities of borough importance include:

Leisure Facility	Address
Surrey Docks Watersports Centre	Located at Rope Street, off Plough Way, Greenland Dock, this centre has recently undergone a £2.39m refurbishment programme. It has a fully equipped gym, fitness studios, a club room for sailing courses and functions and wet and dry changing rooms.
Burgess Park Tennis Centre	Seven professionally surfaced courts A practice wall Floodlighting
South Dock Marina	South Dock Marina is London's largest marina. Located in South Dock and Greenland Dock on the south bank of the Thames on the Rotherhithe Peninsula. Offering over 200 berths and plenty of facilities, the Marina is available all year round.

There are also leisure facilities run by private companies across the borough that provide for the needs of the community such as Herne Hill Community Velodrome which is operated by the Dulwich Estate.

The Fusion leisure centre is located on the Elephant and Castle gyratory, adjacent to the Tabanacle listed building. The council's cabinet has approved the recommendation

to redevelop and improve facilities on the current Elephant and Castle leisure site. A public consultation has been underway to obtain feedback from the community to address what could be included within a new centre.

## Children and Young people facilities

A range of facilities and services are available, supervised and unsupervised, for children and young people in Southwark. The audited facilities include: after-school clubs; holiday play schemes; youth centres; and mobile services. It is also acknowledged that Children's Centres, day nurseries, parent and toddler groups, breakfast clubs, one o'clock playrooms, certain sports provision and other supervised activities will include elements of play activity.

The borough has 40 fixed play sites, 6 enclosed children's play areas catering for 2–14 year olds, informal games areas and a variety of sports facilities. There are also 200 play areas on housing estates comprising fixed metal play equipment.

#### - After-school provision

Southwark After-School service, provides 33 school based clubs for 5 -11 year olds, open 5 days a week. Programmes are designed within a service curriculum framework and include art, dance and drama, games and sport activities. Four council holiday play schemes operate during the Easter and summer in North West, North East, South West and South East areas of the borough.

## - Adventure playgrounds / Supervised Free Play opportunities

There are 10 adventure playgrounds, 7 managed by the council and 3 by voluntary management committees. Adventure playgrounds in Southwark are open during out of school hours, on various days between Monday and Saturday during term-time and Monday to Friday for 11 weeks during school holidays. A pilot Mobile Sport and Play project, delivers play opportunities to areas of the borough where limited access has been identified.

#### - Other provision

In addition to the above main provisions, there are other supportive provisions:

- o supervised, open access playrooms for 0-5 years in term-time/holiday periods,
- Burgess Park Kart and BMX Track for 8-16 year olds
- White Grounds Skateboard Park.
- The Brimmington Outdoor Sports and Play facility (SPARKS).
- Mobile Toy and Resource library.

## 4.2.7 Health and Safety

The health of people in Southwark shows a mixed picture. Life expectancy for men and women in Southwark is lower than the England average. Life expectancy for men who live in the least deprived parts of the borough is over 7 years higher than for those who live in the most deprived parts. The difference for women is almost 5 years.

Deaths from smoking in people 35 years and over were significantly higher than the national average, at 254 per 100,000 people compared to 206 nationally. A similar trend occurs for early deaths from heart disease and stroke (87 per 100,000 compared to 74.8 nationally) and cancer (129 per 100,000 compared to 114 nationally)<sup>11</sup>.

The proportion of children in reception year classified as obese is among the highest in England, with 14.2 % classified as obese, compared to a 9.6% average in England. Southwark also has a high rate of infant deaths. There were around 7 deaths per 1,000 live births, compared to the national average of 4 deaths<sup>12</sup>.

Southwark has one of the highest teenage pregnancy rates in England, with 73 per 1,000, compared to 41 per 1,000 nationally. However, levels of smoking during pregnancy and breastfeeding initiation are better than the England average<sup>13</sup>.

Southwark has a high rate of people claiming incapacity benefit with mental or behavioural problems, with a rate of 31 people per 1,000 working age population, compared to 27.6 per 1,000 nationally<sup>14</sup>.

Southwark experienced a rate of 53.7 road injuries and deaths per 100,000 population compared with 51.3 nationally<sup>15</sup>.

The level of crime and fear of crime is one of the most commonly cited influences on people's quality of life. There are many links between crime and health. Some of the most obvious are the effects of personal violence and assault, which can have both mental and physical consequences for health in the short and long term. Crime is associated with social disorganisation, low social capital, relative deprivation and health inequalities. Violent crime is significantly higher in Southwark than the national average, with a rate of recorded violence of 32.5 per 1,000 population compared to 16.4 nationally.

## Health Facilities

Southwark's Primary Care Trust (PCT) is continuously improving and helping to improve health across the whole borough. The primary care estate in Southwark contains a large number of properties across the Borough<sup>16</sup>:

PCT premises (of which 17 are operational clinical sites)	26
GP practice properties	48
Community pharmacies	63
Ophthalmic Practices	23
Dentists	37
Total sites	196

There is a wide variation of the PCT estate in terms of age, size, tenure, quality and condition. Significant investment has been made in recent years in developing a number of purpose-built premises including Lister Health Centre, the Artesian Health and Podiatry Centres and Sunshine House Child Development Centre. These provide

<sup>14</sup> Ibid

<sup>&</sup>lt;sup>11</sup> Southwark Health Profile, 2010

<sup>&</sup>lt;sup>12</sup> Southwark Health Profile 2010

<sup>&</sup>lt;sup>13</sup> Southwark Health Profile 2010

<sup>&</sup>lt;sup>15</sup> Ibid

<sup>&</sup>lt;sup>16</sup> NHS Southwark Commissioners Investment & Asset Management Strategy (CIAMS), 2009

very high-quality clinical and patient environments but with high comparative rental costs. Just over a third of the operational floor space is now under 10 years old.

The PCT still has an inherited legacy of a number of pre-1948 buildings – making up 38% of total floor space - as well as a number of 1960s to 1980s developments of variable quality. However, the majority are in reasonable physical condition and with sufficient investment in their refurbishment and adaptation can continue to operate efficiently at least in the short to medium term (up to 10 years). The exceptions are the following, which require further investment:

- Dulwich Community Hospital.
- Aylesbury Health Centre
- Bermondsey Health Centre
- Bowley Close Rehabilitation Centre
- Townley Road Clinic.

There are 48 separate GP premises within the borough. As with the PCT estate, although significant investments have been made in developing new purpose-built facilities, approximately 25 per cent of floorspace is in pre-1948 buildings and approximately half is in adapted premises, either residential or commercial. There are a small number of very poor premises that are of an unacceptable standard in providing a sufficient quality of patient care. The Primary Care Directorate are currently considering what action should be taken to deal with these properties<sup>17</sup>. The table below provides a list of all of the GP practices located within the Opportunity Area boundary or just on the border of the boundary.

Practice	Av.Patient list 08/09	Net usable area (m2)	Ratio pat / m2
Princess Street Group Practice	13,745	781	17.6
Falmouth Road Group Practice	10,421	673	15.5
Borough Medical Centre	5,392	5,392 403	
Manor Place Surgery	10,825	395	27.4
Villa Medical Practice	5,706	323	17.7
The Surgery, 182-184 Old Kent Rd	5,736	283	20.2
The Surgery, 33 Penrose Street	4,136	210	19.7
The Surgery, 249 Old Kent Road	1,063	73	14.6

## 4.2.8 Climate Change and Sustainability

## • Energy and Carbon

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

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

<sup>&</sup>lt;sup>17</sup>NHS Southwark Commissioners Investment & Asset Management Strategy (CIAMS), 2009

accordance with sustainability principles. The Government requires all new dwellings to be rated in accordance with the requirements set out in the Code for Sustainable Homes.

The scale of regeneration and estate renewal planned across the borough means that housing and commercial uses in particular can make a very large contribution to achieving our climate change targets. Southwark therefore requires new housing to meet Code level 4 and commercial development to meet BREEAM 'excellent'. These targets will also help achieve Government targets to reduce CO<sub>2</sub> emissions from new development in accordance with the building regulations.

Major development should achieve a 44% saving in carbon dioxide emissions above the building regulations from energy efficiency, efficient energy supply and renewable energy generation. A reduction in carbon dioxide of 20% from using on-site or local low and zero carbon sources of energy should also be achieved.

The emerging London Plan Policy 5.5 ' Decentralised Energy Networks' sets out boroughs should, as a minimum, identify opportunities for expanding existing networks and establishing new networks and develop energy master plans for specific decentralised energy opportunities.

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

#### Water

Southwark is within an area of serious water stress - the amount of water being used is close to the total amount of water available, and demand for water is rising. Climate change may result in hotter, drier summers, which could reduce the amount of water available. In the short-term there could be an increase in water restrictions. Longer-term consequences could include water shortages and rising water prices.

Currently, all mains water is treated to drinking standard. This is an expensive and energy intensive process, particularly considering that at least 40% of water consumed in homes and workplaces does not need to be of drinkable quality (for example water used for flushing toilets, washing laundry and watering parks and gardens). The draft Core Strategy sets a target for major housing development to achieve a potable water use target of 105 litres per person per day.

Influencing consumer behaviour is recognised as being vital to the success of an integrated water management programme and in this regard the Council are working closely with the GLA, the Environment Agency, Thames Water and its community to promote water saving schemes and education programmes. In addition, initiatives to eliminate leakage associated with aged pipe work are planned. There will also need to be significant investment in new potable and non-potable water distribution mains.

In line with Thames Water advice, all new dwellings will be required to meet the water usage targets set out in the Code for Sustainable Homes and agree that the new dwellings should comply with the Code 3 rating as a minimum.

## • Waste and Recycling

National Government has set targets for Southwark Council to increase recycling rates and reduce the amount of waste going to landfill. The Mayor has also set waste targets for boroughs through the London Plan including the need to allocate enough land to process at 323,000 tonnes of waste per year by 2015 and 379,000 tonnes per year by

2020. This will help meet the London-wide target of processing at least 85% of the city's waste within London by 2020.

Further guidance on how the waste targets will be achieved will be set out in a future Development Plan Document and our Waste Management Strategy. Within Southwark land is being safeguarded to meet the Mayor's waste processing target including 11ha of land at Old Kent Road. A new facility is being built on part of this land by Veolia Environmental Services, the Council's waste management partners, in order to help meet the targets by processing 88,350 tonnes of waste per annum with the potential to treat further waste by converting it into biomass fuel. Using the GLA's generic standard, the residual part of the Old Kent Road gasworks site, may be capable of processing 256,000 tonnes of waste per annum.

Southwark's Waste Management Strategy, 2003-2021 sets out the council's proposals for moving Southwark towards more sustainable waste management. The key features include:

- a reduction in the amount of municipal solid waste generated in Southwark to below 3% by 2005, and below 2% by 2010. In real terms, due to population growth (estimated at a further 27,000 residents by 2021) the absolute amount of waste will rise but the strategy aims to deliver a decrease in the actual rate of growth
- achievement of 30% recycling and composting standards for household waste by 2010-11 and 40% by 2015-16 and 50% standards by 2020-21
- recovery of value from 45% of municipal solid waste by 2010-11, 67% by 2015-16 and 75% by 2020-21.

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

## Flood Risk

A Strategic Flood Risk Assessment has been prepared to understand flood risk in Southwark. The northern half of the borough is within the Thames flood plain, which contains over two thirds of Southwark's properties in well established communities. A large part of the borough is located within the indicative flood zone 3, which has the highest level of risk. However, it should be noted that all the land in the borough is defended by the Thames Barrier and defences so that the risk from tidal flooding is a residual risk.

The flood plain area also contains major regeneration and growth areas of importance to Southwark and London including: the Central Activities Zone; Elephant and Castle Opportunity Area; Bankside, Borough, and London Bridge Opportunity Area; and Canada Water Action Area.

The Government (and the Environment Agency) would like to see all development located in areas of low flood risk (zone 1). This is not always going to be possible and so new development will need to be directed to sites where the risk of flooding is appropriate to the "vulnerability" of the land use proposed. The Environment Agency has produced Flood Risk Maps. This map designates land in the borough in one of three zones:

• **Zone 1** – land at low risk of flooding from the Thames (land south of Camberwell and Peckham), which is at low risk from flooding from the Thames

- **Zone 2** land at medium risk of flooding from the Thames (we don't have much of this in the borough)
- **Zone 3** land at high risk of flooding from the Thames (this is in the north of the borough and includes the Central Activity Zone, Elephant and Castle Opportunity Area and Bermondsey and Canada Water)

Two thirds of the sites identified in the council's Development Capacity Assessment are located in flood zone 3. These sites are needed to meet our housing targets. In the southern parts of the borough, where flood risk from the Thames is low, there are limited sites available for development.

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

The Environment Agency has identified areas in Southwark that are susceptible to surface water localised flooding in heavy rainfall as a result of old water mains; poorly designed and maintained drainage; and too many hard surfaces. The areas which are susceptible include Herne Hill, Camberwell, Peckham and pockets spread out throughout the north of the borough.

## • Sewerage

The volume and frequency of untreated sewage overflowing into the River Thames is unacceptable and also contravenes the European Urban Wastewater Treatment Directive. Thames Water has a programme to replace old Victorian Water mains and they are planning to build the Thames Tunnel which will help stop sewerage overflowing into the river. Thames Water is currently in consultation on its preferred route for the main tunnel which will generally follow the route of the River Thames to Limehouse, where it then continues north-east to Abbey Mills Pumping Station near Stratford. There it will be connected to the Lee Tunnel, which will transfer the sewage to Beckton Sewage Treatment Works.

The Thames Tunnel Project will address the overflows from the Combined Sewer Overflows (CSOs), either by directly connecting them to the tunnel, or by making other alterations to the sewerage system which will utilise the existing capacity more effectively. The flows diverted into the Thames Tunnel will be stored in the tunnel and pumped out for treatment at Beckton Sewage Treatment Works in east London. The CSOs will still be needed after the Thames Tunnel has been built to direct flows to the River Thames in exceptional circumstances when the new tunnel system is full. This is only expected to occur very occasionally.

## Pollution

Vehicle emissions are the cause of 50% of air pollution and estimated to cause 24,000 deaths per year in the UK<sup>18</sup>. Southwark has particularly high levels of air pollution, mainly caused by traffic. As a result, the entire borough north of the A205 has been declared an Air Quality Management Area and the establishment of an Air Quality Strategy and Improvement Plan (AQSIP) has been undertaken.

Southwark is required to periodically review and assess the effectiveness of the Air Quality Strategy and Improvement Plan and do this through regular Update and Screening Assessments (USA). The last Southwark USA was undertaken in 2006 and

<sup>&</sup>lt;sup>18</sup> Southwark Air Quality Management and Improvement Plan

this identified that only two of the set targets, those for particulate matter less than 10 microns in diameter ( $PM_{10}$ ) and nitrogen dioxide ( $NO_2$ ), would be exceeded<sup>19</sup>.  $NO_x$  emissions are primarily nitric oxide (NO) but this is converted into  $NO_2$  in the atmosphere through chemical reactions with ozone ( $O_3$ ). The figures overleaf show the modeled  $NO_2$  and  $PM_{10}$  concentrations in Southwark for 2010<sup>20</sup>.

The most significant local pollutants,  $NO_x$  and  $PM_{10}$ , are mainly associated with vehicular emissions, especially those of buses, lorries, coaches and taxis. It is envisaged that these pollutants will reduce significantly over the next 15 years, through initiatives such as the London Low Emission Zone which covers all of Southwark, limiting access to heavy vehicles that can demonstrate compliance with strict emissions criteria and technological advances in reducing exhaust emissions.

The council has installed two air quality monitoring stations in 2010 in the borough. These monitoring stations will collect information on  $NO_x$  and  $PM_{10}$  and are located at:

- Old Kent Road, by the gasworks
- Elephant and Castle, at St Mary's Newington Church Yard (expected Dec 2010)

These two air quality monitoring stations, however, only provide details for those specific locations. To complement the stations, it is proposed to use the outputs from the council's traffic count programme to look at trends in road borne traffic. Although traffic counts do not directly measure air quality, they can be used as a proxy measurement if we assume that as traffic volume increases, air quality will decrease<sup>21</sup>.

## Noise

The Secretary of State for Environment, Food and Rural Affairs formally adopted Noise Action Plans for 23 agglomerations (large urban areas), major roads, and major railways in England on 15 March 2010. The purpose of Noise Action Plans is to assist in the management of environmental noise and its effects, including noise reduction if necessary, in the context of government policy on sustainable development. Noise Action Plans are based on the results of the strategic noise maps published in 2008. Defra has produced a noise strategy map and action plan for the London Agglomeration. As with air pollution, noise levels are greatest where traffic levels are highest, and where vehicles are halting and accelerating.

#### 4.2.9 Historic Buildings, Sites, Views and Conservation Areas

Throughout the borough there are many attractive and historic buildings, monuments, important local views and sites that reflect Southwark's rich history and add to the unique character and identity of places.

## Listed Buildings

There are approximately 2,500 listed buildings and monuments in Southwark. A listed building can be a building, object or structure that is of national, historical or architectural interest. 29 of those buildings are on the English Heritage buildings at risk register

## • Conservation Areas and Historic Sites

There are 40 conservation areas covering 686ha (23% of the borough). Conservation area and character area appraisals have therefore been undertaken for the majority of these areas. The Tower of London, a World Heritage Site, is located across the River from London Bridge. There are also archaeological remains that cannot be seen that

<sup>&</sup>lt;sup>19</sup> Southwark Draft Air Quality Strategy and Action Plan 2010

<sup>&</sup>lt;sup>20</sup> Southwark Draft Air Quality Strategy and Action Plan 2010

<sup>&</sup>lt;sup>21</sup> Draft Southwark Transport Plan 2010

provide important evidence of our past. We have identified 9 Archaeological Priority Zones (APZs) covering 679ha (23% of the borough).

## Character areas

Southwark has many places with their own unique character. The Central Activities Zone is a setting for activity and large scale development including tall buildings which give Southwark and London a distinct skyline. There are fewer and smaller open spaces and fewer trees and gardens, but there is a close relationship with the River Thames.

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

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

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

#### • Views

There are a number of views to and across Southwark that are important to both local people and all Londoners. These include views of landmarks and panoramas that make Southwark and London distinctive. The designated strategic views are identified on the Mayor's London View Management Framework (LVMF) 2010. It is important that new buildings do not block or detract from these views.

#### Tall buildings

The London Plan, Policy 4B.9 sets out that the Mayor will work with boroughs and the strategic partnerships to help identify suitable locations for tall buildings that should be included in DPDs and Sub-Regional Implementation Frameworks. These may include parts of the Central Activities Zone and some Opportunity Areas.

Tall buildings are those which are higher than 30 metres (or 25 metres in the Thames Policy Area) and/or which significantly change the skyline. 30 metres is approximately the height of a 10 storey block of flats or a 7-10 storey office building. In areas which have a character that is dominated by low rise buildings, any building that is significantly higher than surrounding buildings will be regarded as a tall building even if it is lower than 30 metres.

In Southwark there has been a general focus for tall building development around the riverfront areas, major transport interchanges, town centres and around 1960s and 70s housing estate developments. The riverfront areas of Blackfriars Road, Bankside and London Bridge have a number of prominent buildings visible on the skyline including Tate Modern, Kings Reach Tower, Guy's Hospital Tower and New London Bridge House.

The Shard of Glass, currently under construction, at 306 metres will form a new pinnacle within the existing cluster of tall buildings around London Bridge station and Guy's Hospital. Blackfriars Road and Bankside have also seen a number of consents for tall buildings applications, including No 1 and No. 20 Blackfriars Road and Neo Bankside.

There are a number of other locations where tall buildings are found, generally in the form of 1970s housing estates, such as the Aylesbury Estate. Other tall buildings are located generally around the town centres, including a few taller elements at Peckham and Canada Water.

## 4.2.10 Open Space and Biodiversity

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

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

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

Southwark has four major parks and 34 local parks. Added to this are 39 other public green spaces and two green links (i.e. green walks). Southwark's Open Spaces Evidence Base Report 2009 looks at the supply of open spaces in the borough. The report has identified that the supply of open spaces across Southwark is not evenly distributed. Half of the open space is focussed in the south of the borough in the Dulwich, Nunhead and Peckham Rye community council areas. The north of the borough has less open space provision although there is access to two major parks, Burgess Park and Southwark Park. The areas in the north also have fewer trees and gardens and therefore smaller spaces are considered particularly important by local people. The report also identifies the importance of amenity space, particularly in areas which are densely populated and that may be deficient in other types of open spaces.

## • Play facilities

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

Southwark's Play Strategy 2007 identified the following broad areas of need:

- Lack of play provision in the south of the borough
- Lack of play provision that is suitable for 11 -16 year olds
- Lack of transport for children and young people with special educational needs (i.e. this is a particular barrier to accessing term-time provision)
- Lack of closed access play opportunities for disabled children, particularly those with special educational needs, requiring a secure environment
- Lack of family-friendly play spaces
- Girls under-represented in some open access provision, including adventure playgrounds.

A major programme to upgrade equipment and provide new play spaces on 30 sites was completed in 2006/2007 at a cost of £750,000. To address concerns about safety, four community warden teams patrol in the parks and open spaces.

Whilst there is currently a good supply of play spaces in the north of the borough, the housing growth expected here will put pressure on supply and it is important that the quality of spaces is improved as well as making sure they are located close to homes.

## Biodiversity

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

Southwark's Biodiversity Action Plan 'Work for Wildlife' 2006, aims to provide a comprehensive overview of the biodiversity in Southwark and a clear direction in ensuring it is conserved, managed and enhanced. The action plan is designed to be a valuable toolkit that provides a unified strategic framework for managing the Borough's natural resources.

70 Sites of Importance for Nature Conservation (SINC) have been identified across the borough as well as four Local Nature Reserves (LNRs), protected areas of land which are set aside for ecology and provide visitors with an opportunity to connect with nature. Together, these sites provide diverse habitats that play home to many different species of flora and fauna, some of which are regionally or nationally scarce. All of these habitats and species make a contribution to the quality of life experienced by people living in Southwark.

Habitat loss is a major concern in the Borough, with the constant demand for new homes and other buildings resulting in sites being lost to development. In addition, local wildlife is still under threat. The headline aims and objectives of the Biodiversity Action Plan include:

- conserving and enhancing existing natural habitats and existing species within Southwark
- increasing grassland, wetland and woodland habitat resources in Southwark
- tackling ecological threats
- increasing public awareness of ecology
- engaging children and young people and other key stakeholders and communities
- promoting national and regional priority habitats and species relevant to Southwark.

## Allotments

There are currently 17 allotment sites in Southwark that are leased to groups who are responsible for their management. Consultation and user trends have indicated that further allotment provision is required to meet current and future demand, with many sites now over subscribed. As with other types of open space, it is acknowledged that it will be very challenging to deliver additional provision, given the density of development in the borough and competing demands for space. In order to deliver a qualitative increase in provision, innovative solutions are likely to be required.

## 4.2.11 Transport

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

## Walking

Currently, 12% of Southwark residents walk to work<sup>22</sup>, which is similar to other inner London boroughs. Given the business centre in the north of the borough this area experiences a high proportion of commuter walking as well as walking as part of the journey. There are two London strategic walking routes that pass through Southwark:

- The Jubilee Walkway
- The Thames Path National Trail.

## • Cycling

The rise in the number of people cycling in London has been significant, with a 117% increase on London's major roads since 2000. Forty per cent of households in London have access to a bike, however one in five of these are unused<sup>23</sup>. Around 28.5% of households in Southwark have at least one bicycle with more households storing their bicycle inside their property<sup>24</sup>. The Mayor has also recently introduced a central London cycle hire scheme, with around 6,000 bikes for hire in central London.

The Thames cycle route, which is Route 4 of the national cycle network, travels along the Thames River from the Rotherhithe peninsula through Bermondsey and London Bridge to Lambeth. The Council has introduced small schemes in the borough to support the cycling network.

The London cycle network plus (LCN+) is a London wide 900km formal network, which is being implemented incrementally across London. There are 5 LCN+ routes in Southwark:

- Route 0 Southwark Bridge Imperial War Museum
- Route 2 Lambeth (Imperial War Museum) Deptford
- Route 22 London Bridge Brockley
- Route 23 Southwark Bridge Crystal Palace Route 25 Herne Hill - Nunhead

## • Public transport

The coverage and accessibility of public transport varies significantly across the borough. Public Transport Accessibility Levels (PTALs) are a method of assessment utilised by Transport for London (TfL) and the majority of London boroughs to produce a consistent London wide public transport access mapping facility. PTALs assess the level of service, walk and wait times to produce indices of accessibility to the public transport network. These levels are often shown as contours on a local map.

## - Bus services

Bus services cover a large part of the borough and provide the main public transport provision in areas away from rail stations. The network is more extensive in the northern half of the borough, which is served by approximately 60 bus services (including 11 24-hour services), and 15 night bus services that

<sup>&</sup>lt;sup>22</sup> ONS Census Data 2001

<sup>&</sup>lt;sup>23</sup> Cycling revolution London 2010, Mayor of London

<sup>&</sup>lt;sup>24</sup> Southwark Housing Requirement Study 2008

run through Southwark. These are run on behalf of TfL by 11 different companies, run on 42km of bus lanes and serve 650 bus stops<sup>25</sup>.

## - The Underground network

Four different underground lines run through the borough: the Northern, Bakerloo, Jubilee and East London Lines. The underground network is concentrated in the north of the borough where there are nine underground stations: London Bridge, Borough, Elephant & Castle, Kennington, Surrey Quays, Rotherhithe, Southwark, Bermondsey and Canada Water.

The Jubilee line is capable of carrying 39,000 passengers per hour. The line carries over 405,000 passengers each weekday and requires 47 trains to meet demand for both AM and PM peaks. The Southwark section of the Jubilee line (westbound), experiences significant crowding at peak times. During the AM peak, the line is classed as crowded between Canada Water and Bermondsey, rising to very crowded to the west of Bermondsey Station. The Mayor plans to increase the capacity of the Jubilee line by the end of 2012<sup>26</sup>.

The Northern line carries over 660,000 passengers each weekday and requires 91 trains to meet demand for both AM and PM peaks. The Mayor plans to increase the capacity of the Northern line by 2012<sup>27</sup>. The Southwark section of the Northern line (northbound) experiences severe crowding during the AM peak.

The Bakerloo line carries around 300,000 passengers each weekday and the Mayor plans to upgrade the line to include new energy efficient and high capacity rolling stock and signalling by 2020<sup>28</sup>. The Southwark section of the Bakerloo line (northbound) is classed as un-crowded during the AM peak.

The East London Line has recently been extended. Phase 1 of the project involved the extension of the original line at its northern and southern ends. The northern extension runs from Whitechapel to Highbury & Islington, connecting with the North London Line. A full service began in May 2010. The core section of the line, between Dalston and Surrey Quays, is served by 16 trains per hour. New Cross Gate to Sydenham has 8 trains per hour. The remainder of the line is served by four trains per hour.

Phase 2 of the project will extend the line from Surrey Quays on to the Network Rail Inner South London Line. Trains on this route will run to Clapham Junction via Queens Road Peckham, Peckham Rye, Denmark Hill, Clapham High Street and Wandsworth Road. Funding for this phase was announced in February 2009. The line is expected to be open by the start of the 2012 Summer Olympics in July 2012 with trains running every 15 minutes. A total of 30 stations will serve the new line by 2012.

Rail

There are 11 surface rail stations in the borough: London Bridge, Elephant and Castle, South Bermondsey, Queens Road Peckham, Peckham Rye, Denmark Hill, Nunhead, East Dulwich, North Dulwich, West Dulwich, and Sydenham Hill. Whilst the number of stations may give the impression of a comprehensive network, there are two major gaps in the network within Southwark. One is

<sup>&</sup>lt;sup>25</sup> Draft Southwark Transport Plan 2010

<sup>&</sup>lt;sup>26</sup> Major's Transport Strategy 2010

<sup>&</sup>lt;sup>27</sup> Major's Transport Strategy 2010

<sup>&</sup>lt;sup>28</sup> Ibid

centred on the Burgess Park area (from Camberwell to Bermondsey) and the other is centred on the area between Peckham Rye Park and Dulwich Park.

London Bridge station is located on the edge of the Central Business District with the majority of passengers needing to interchange onto other services on arrival. This leads to significant congestion around the station, for interchange onto Underground services, buses and taxis. The capacity of the routes on the approach to London, particularly into London Bridge Station, is limited by the physical and financial constraints. Peckham Rye is identified as a strategic interchange and as having the potential to relieve interchange capacity pressures at London's rail termini and reduce travel times.

- River travel

There are eight piers on the south bank of the Thames within Southwark's boundaries. These piers serve varying functions including public passenger transfer, private passenger trips. Riverboat services call at London Bridge, Hilton Docklands Nelson Dock Pier and Greenland Pier in Southwark (temporarily closed).

Many of the large new economic drivers for London are located in the east with the majority of these lying north of the river (Canary Wharf; Excel; City Airport, the Olympic Park). Opportunities for travelling to these new destinations from some areas south of the river such as North Bexley and parts of Greenwich are restricted. This growth coupled with fare changes and frequency improvements has meant that the Thames Clippers service has experienced a surge in demand with passenger numbers more than doubling between 2007 and 2008. In 2009, pay-as-you-go technology was introduced on certain River services including 10% off single tickets with Oyster pay-as-you-go on Thames Clippers.

#### • Streets

There are approximately 415km of road in Southwark, 23km of which form part of the Transport for London Road Network (TLRN). TLRN roads are not managed or maintained directly by Southwark Council but fall under the control of Transport for London (TfL). Southwark's road network can generally be characterised by the main east west and north south routes that are utilised, not only by local traffic, but a high level of through traffic, seeking access to central London and routes along the south side of the river.

Car ownership is low in the Elephant & Castle area, with almost 73% of households in Walworth Ward not having access to a car or van, compared to an average of 61% of households across the whole of Southwark.<sup>29</sup> A combination of both local and through trips made by private vehicles has resulted in many parts of the road network becoming heavily congested. The borough experiences congestion and delay in key areas including access to the Rotherhithe Tunnel, Tower Bridge, Peckham High Street and Old Kent Road. London's projected growth will add extra pressures on the highway network and the limited capacity in central London. Congestion levels are predicted to worsen across London and this may lead to more congestion for central London as well.

The Council is pursuing overall traffic reduction through managing the demand for travel. Examples of initiatives include:

- Management of on-street parking through Controlled Parking Zones (CPZs)
- Management of off street car parks
- Introduction of car clubs

<sup>&</sup>lt;sup>29</sup> Southwark Housing Requirements Survey 2008

- Supporting low-car and car-free developments, including restriction of on-street parking permits for new developments
- Encouraging walking and cycling as alternatives to car use through a number of initiatives.

## • Freight distribution

The main driver of the growth in freight traffic is the significant population growth forecast over the next ten years, and the associated increase in demand for goods and essential materials, for example in the construction industry. Increased population and employment brings with it the requirement for additional food and services to support this activity.

Road freight currently makes up 89 per cent of London's freight by tonnage and is expected to grow to meet the demand from London and the rest of the country. The number of vans (Light Goods Vehicles, LGVs) is forecast to grow by 30 per cent between 2008 and 2031, with a lower level of growth in Heavy Goods Vehicles (HGV) activity<sup>30</sup>.

<sup>&</sup>lt;sup>30</sup> Draft Southwark Transport Plan 2010

# 5 Sustainability Issues and Objectives

## 5.1 Sustainability Issues

- 5.1.1 This section sets out the main sustainability issues that need to be taken into consideration. These issues have been identified by considering the baseline information, consultation responses and the messages from related plans, policies and programmes.
  - Relatively high levels of deprivation
  - Employment inequalities and employment opportunities
  - Education, skills and training deprivation
  - Health inequalities and noise nuisances
  - Need to promote equality, diversity and social cohesion
  - High levels of crime and fear of crime
  - Energy efficiency and use of renewables
  - Poor air quality
  - Need to minimise waste arisings and increase recycling rates
  - Need for sustainable use of water resources
  - Protection of landscape features and designated sites and need to address contaminated land issues
  - Ensuring a high quality of design in new developments
  - Need to preserve and enhance built heritage and the archaeological environment
  - Minimising flood risk and improve the quality of controlled waters within the borough
  - Protecting and enhancing biodiversity
  - Providing everyone with a decent and affordable home to live in
  - Need to improve accessibility by public transport and minimise the need to travel by car
  - Need to ensure that there is social, physical and green infrastructure capacity for existing and future needs
  - High proportion of social housing
  - Very high proportion of local authority housing ownership
  - High investment backlog in the social housing sector
  - Substantial current housing development and capacity for future development
  - Substantial current and planned regeneration programme with high component of renewal and area transformation
  - Need to ensure the delivery of mixed and balanced communities

## 5.2 Sustainability Objectives

5.2.1 Eighteen Sustainability Objectives have been identified, which are set out below. The objectives reflect the current social, economic and environmental issues affecting the area and were consulted on as part of the scoping report. As a result a new objective (SDO8) was added.

# 6 The Sustainability Appraisal Framework

## 6.1 What is the SA Framework?

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

## 6.2 The SA Framework

Sustainability Issue	Sustainability Objective and Questions	Sustair	nability Indicators
Economy, Regeneration and Employment Opportunities	SDO 1: To tackle poverty and encourage wealth creation Will it improve the range of job opportunities? Will it help to diversify the economy? Will it help to diversify the economy? Will it encourage the retention and /or growth of local employment? Will it close the gaps between equalities target groups compared with the National average? Will it encourage business start-ups and support the growth of businesses?	1.2 C b 1.3 N S 1.4 S 1.4 S 1.5 N	Employment land available Change in VAT registered ousinesses Numbers and % jobs in Southwark by sector Southwark compared to London (broken down by nicro, small and medium sized businesses) Numbers of unemployed/ eceiving benefit (by sector)
Education	SDO2: To improve the education and skill of the population Will it provide opportunities to improve the skills and qualifications of the population, particularly for young people and adults? Will it help improve employee education/training programmes? Will it help reduce skills shortages? Will it help reduce skills shortages? Will it help to reduce the disparity in educational achievement between different ethnic groups?	2.2 9 h 2.3 9 2.4 F a a E	ndices of multiple deprivation; Education deprivation % of the population with higher education qualifications % of population with no qualifications Proportion of resident pupils attending Southwark schools achieving 5+ A-Cs including English and Maths split by equality group

Sustainability Issue	Sustainability Objective and Questions	Susta	ainability Indicators
Health	SDO3: To improve the health of the population	3.1 3.2	Health life expectancy at age 65 by equality group Indices of multiple deprivation: Health deprivation
	<ul><li>Will it promote and facilitate healthy living and active lifestyles?</li><li>Will it reduce health inequalities?</li><li>Will it promote non-polluting forms of transport?</li><li>Will it improve access to health and social care/treatment?</li></ul>	<ul><li>3.3</li><li>3.4</li><li>3.5</li><li>3.6</li><li>3.7</li></ul>	Rate of obesity in children Mortality from cancer, heart disease and stroke Incapacity benefit for mental illness Distance to GP premises from home Admissions to hospital per 1,000 people
Crime and Community Safety	SDO4: To reduce the incidence of crime and the fear of crime Will it improve safety and security? Will it incorporate measures to reduce crime and the fear of crime, including anti-social behaviour?	<ul><li>4.1</li><li>4.2</li><li>4.3</li><li>4.4</li></ul>	Indices of multiple deprivation: Crime deprivation Numbers of crime per annum Percentage of residents who feel fairly safe or very safe outside during the day/night Reports of anti-social behaviour
Social Inclusion and Community Cohesion	SD05: To promote social inclusion, equality, diversity and community cohesion Will it help support voluntary sector and promote volunteering? Will it support active community engagement? Will it support a diversity of lifestyles? Will it address equality's groups?	5.1 5.2 5.3	Proportion of people who think they can influence decision-making in their locality Employment/Skills/Health/ Homelessness waiting list by equality group Satisfaction with area
Mitigation of and adaption to climate change	<ul> <li>SDO6:</li> <li>To mitigate and adapt to the impacts of climate change</li> <li>Will it reduce consumption of energy?</li> <li>Will it result in a reduction of carbon emissions?</li> <li>Will it use renewable sources of energy?</li> <li>Will it help local people cope with hotter drier summers and warmer wetter winters?</li> <li>Will it mitigate against the urban heat island effect?</li> </ul>	<ul><li>6.1</li><li>6.2</li><li>6.3</li><li>6.4</li></ul>	CO2 emissions and energy consumption (break down by source/type) No. of extreme weather events by type No. of hospital admissions as a result of extreme weather SAP rating of borough's housing stock

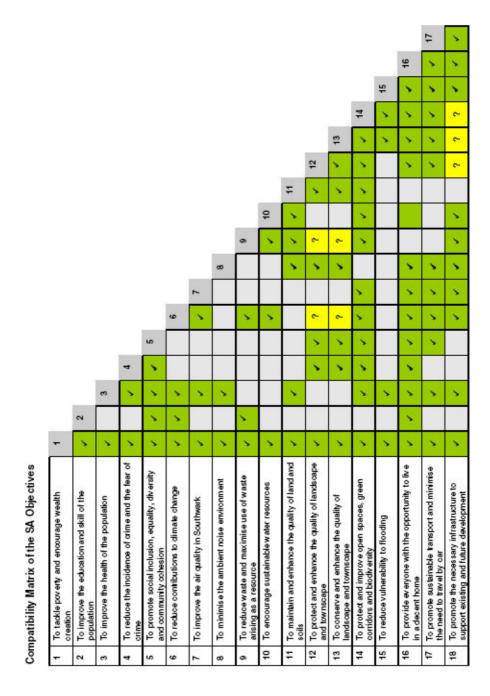
Sustainability Issue	Sustainability Objective and Questions	Susta	inability Indicators
Air Quality	SD07: To improve the air quality in Southwark Will it help to reduce emissions of PM10, NO2? Will it encourage a reduction in amount and length of journeys made by car?	<ul><li>7.1</li><li>7.2</li><li>7.3</li></ul>	Number of days of high pollution Annual average concentrations and number of hourly exceedences of nitrogen dioxide in air Annual average concentrations and number of daily exceedences of
Noise	SDO8: To minimise the ambient noise environment Will it help to reduce the ambient noise environment in the borough? Will it improve the soundscape of the area? Will it introduce new noise sources to the area?	8.1	PM10 in air Number of Priority Areas in the borough The number of persons affected by a noise level above 55 dB(A) Lden
Waste Management	SDO9: To reduce waste and maximise use of waste arising as a resource Will it promote the reduction of waste during construction / operation? Will it minimise the production of household and commercial waste? Will it promote sustainable processing of waste?	9.1 9.2 9.3	Municipal waste land-filled (tonnes) Residual household waste per household (tonnes) Percentage of municipal waste sent for reuse, recycling and composting
Water Resources	SDO10: To encourage sustainable use of water resources Will it encourage reuse of water? Will it maximise use of rainwater or other local water supplies? Will it reduce discharges to surface and groundwater?	10.1	Average domestic and commercial potable water consumption (l/head/day) Water quality measures (by no./type)
Soil and Land Quality	SD011: To maintain and enhance the quality of land and soils Will it encourage the remediation of land identified as potentially contaminated? Will it prevent further contamination of soils?	11.1	Number of contaminated sites Number of contaminated sites not remediated

Sustainability Issue	Sustainability Objective and Questions	Susta	inability Indicators
Quality in Design	SD012: To protect and enhance the quality of landscape and townscape Will it have a negative impact on important strategic/local views? Will it improve the quality of public spaces and street? Will it improve the relationship between different buildings, streets, squares, parks and waterways and	12.1 12.2 12.3	Satisfaction with local area People who can identify with their local area Number of Building for Life Assessments approved
Conservation of	other spaces that make up the public domain?	13.1	Amount of Southwark
the Historic Environment	To conserve and enhance the historic environment and cultural assets Will it involve the loss or damage to historic buildings and remains and	13.2	covered by Conservation Area or APZ Numbers of heritage assets in the borough on the English Heritage at Risk Register
	their setting? Will it improve the historic value of places?	13.3	Changes in numbers of listed buildings
	Will it promote the historic environment and also contribute to better understanding of the historic	13.4 13.5	Number of scheduled ancient monuments at risk Number of conservation areas at risk
	environment?	13.6	Number of conservation areas with up-to-date appraisal/ management plans
Open Space and Biodiversity	SDO14: To protect and improve open spaces, green corridors and	14.1 14.2	Change in quantity of open space (ha) Resident satisfaction with
	biodiversity Will it encourage development on previously developed land?	14.3	open space Change in SINCS and LNRs
	Will it improve the quality and range of open spaces?	14.4	Change in quality of open space (ha)
	Will it improve access to open space and nature?	14.5 14.6	Open space deficiency Deficiency in access to
	Will it improve the quality and range of habitat for wildlife?	14.7	nature Number/types of habitats
	Will it avoid harm to protected and priority species?	14.8	Number of green roofs/ facades approved

Sustainability Issue	Sustainability Objective and Questions	Susta	inability Indicators
Flood Risk	SDO15: To reduce vulnerability to	15.1	Number of flooding incidents (including sewer
	flooding Will it minimise the risk of and from flooding? Will it protect and improve flood	15.2	flooding) Condition of flood defences
	defences and allow them to be maintained?		
Housing	SDO16: To provide everyone with the	16.1	Amount of homes in the borough (by type/tenure)
	opportunity to live in a decent home	16.2	Percentage of households living in temporary accommodation
	Will it contribute towards meeting housing need, in particular affordable housing and family homes?	16.3	No. of households in housing need
	Will it improve the supply and range of housing?	16.4	No. of households on housing register
	Will it contribute towards improving the quality of homes and the living environment?	16.5	No. of households unintentionally homeless and in priority need
	Will it reduce overcrowding?	16.6	Income to average house price ratio
		16.7	No. of families living in overcrowded properties
Sustainable Transport	SDO17:	17.1	Estimated traffic flows per annum (million vehicle km)
Transport	To increase walking, cycling, public transport and reduce car journeys	17.2	The number of people killed or seriously injured in road traffic collisions
	Will it reduce car use? Will it promote walking and cycling? Will it reduce the number and length of journeys?	17.3	Proportion of personal travel made on each mode of transport overall and by equalities groups
	Will it improve public transport? Will it reduce road traffic accidents?		
Infrastructure	SDO18: To provide the necessary infrastructure to support	18.1	No. and type of existing infrastructure (social, physical and green)
	existing and future development	18.2	Capacity of existing infrastructure (social, physical and green)
	Will it provide enough social infrastructure ? Will it provide enough physical	18.3	No. and type of proposed infrastructure (social, physical and green)
	infrastructure? Will it provide enough green infrastructure?	18.4	Capacity of future infrastructure (social, physical and green)

## 6.3 Internal Comparison of the SA Objectives

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





✓	positive impact
	no significant impact
?	uncertain impact

- 6.3.2 The compatibility of SDO 6: To mitigate and adapt to the impacts of climate change and SDO 9: To reduce waste and maximise use of waste arising as a resource with SDO12: To protect and enhance the quality of landscape and townscape and SDO13: To conserve and enhance the historic environment and cultural assets score an uncertain result as the impact will depend upon implementation. The careful application of renewable technologies and waste disposal facilities will be needed to ensure that quality in design or the setting of the historic environment is not compromised.
- 6.3.3 An uncertain impact is also given for SDO 18: To promote the necessary infrastructure to support existing and future development against the following objectives:

SDO12: To protect and enhance the quality of landscape and townscape SDO13: To conserve and enhance the historic environment and cultural assets SDO14: To protect and improve open spaces, green corridors and biodiversity

The impact will depend on the provision of new infrastructure being implemented in a sensitive manner, although such impacts are likely to be short term and temporary in nature. Suitable mitigation measures will need to be identified to offset any adverse impacts.

# 7 Plan Issues and Options

# 7.1 What options have been considered and why?

7.1.1 The following have been considered in developing the preparing for the SPD:

Getting the right amount of affordable	<ul> <li>An alternative was to not provide any of the guidance and implement the Core Strategy on a case by case basis. This could lead to inconsistencies.</li> </ul>
housing	<ul> <li>An alternative was to require all affordable housing to be calculated in terms of dwellings. But this would not encourage larger units to be provided, for which there is a need in Southwark.</li> </ul>
	<ul> <li>An alternative would be to not have a threshold for student housing, but this would be inconsistent with the approach to conventional housing.</li> </ul>
Getting the right mix of housing	• An alternative was to not provide any of the guidance and implement the Core Strategy on a case by case basis. This could lead to inconsistencies.
	<ul> <li>Counting studio flats as affordable was discounted because our needs analysis show that they will not contribute to meeting need for affordable housing, especially as there is a particular need for larger sized dwellings compared to private housing.</li> </ul>
The quality and design of affordable housing	• An alternative was to not provide any of the guidance and implement the Core Strategy on a case by case basis. This could lead to inconsistencies as well as the quality of affordable housing not being as good as private housing.
	<ul> <li>The minimum overall dwelling sizes are already set out in the draft Residential Design Standards SPD amendment as well as the draft replacement London Plan.</li> </ul>
Where should the affordable housing be	<ul> <li>An alternative was to not provide any of the guidance and implement the Core Strategy on a case by case basis. This could lead to inconsistencies.</li> </ul>
provided	<ul> <li>An alternative would be to not allow off-site provision or pooled contribution in any cases. However this may not be possible in all circumstances and could result in less affordable housing being provided. It would also be contradictory to national and regional policy.</li> </ul>
Affordable housing in specific types of	<ul> <li>An alternative was to not provide any of the guidance and implement the Core Strategy on a case by case basis. This could lead to inconsistencies and opportunities to maximise affordable housing provision being missed.</li> </ul>
development	<ul> <li>An alternative would be to accept live-work units as affordable housing, however our needs analysis shows they do not meet affordable housing need.</li> <li>An alternative was to require all affordable housing to be replaced</li> </ul>
	<ul> <li>An alternative was to require all affordable housing to be replaced on estate regeneration schemes. But this does not consider the need to create mixed and balanced communities and the fact that some estates are located within areas where we have a minimum private housing policy.</li> </ul>
Sheltered, supported and extra care	<ul> <li>An alternative was to not provide any of the guidance and implement the Core Strategy on a case by case basis. This could lead to inconsistencies.</li> </ul>
housing	<ul> <li>An alternative would be to require affordable housing as part of specialist housing schemes, however this would affect the ability of</li> </ul>

	this housing to be provided at a cost affordable to its intended occupants.
Financing and securing affordable housing	• An alternative was to not provide any of the guidance and implement the Core Strategy on a case by case basis. This could lead to inconsistencies.

- 7.2.2 The SPD does not create new policy. The Core Strategy, saved Southwark Plan and area action plan policies have formed the basis of the guidance. These policies have already been tested through sustainability appraisals. As a consequence the SA of the Core Strategy has been used as the starting point for this assessment as the core strategy sets the overarching approach for affordable housing for the borough. We compare the findings of the Core Strategy SA with those of the SPD to assess how effective it is likely to be.
- 7.2.3 Detailed assessments have not been undertaken for each point of guidance as it expands upon the policies that have already been assessed as part of the Core Strategy SA report. We have provided an overall assessment of the impact of all the guidance together and compared this against the Core Strategy SA results for Strategic Policy 6 and Strategic Policy 8. The results of the Core Strategy SA are provided in Section 8 and Appendix 7 of the core strategy SA report, which can be found on the Council website.

### 8 Effects of the Policy

#### 8.1 Consistency with sustainability objectives

- 8.1.1 An appraisal of the SPD objectives against the Sustainability Objectives was carried out to check that the plan's objectives were compatible with the need to address sustainable development. The results showed that none of the objectives were incompatible and, therefore, the overall compatibility of the SPDs objectives is considered to be positive.
- 8.1.2 Some uncertainty was identified, where it was considered that the impact will be dependent upon implementation. The Sustainability Objectives, where an uncertain impact was most prevalent included:

SDO 6:To reduce contributions to climate change SDO 7:To improve the air quality in Southwark SDO 8:To avoid waste and maximise, reuse, or recycle waste arising as a resource SDO 9 To encourage sustainable use of water resources SDO 12: Quality in Design SDO 13: Conservation of the Historic Environment

8.1.3 Proposals will be assessed at the application level both against the Core strategy policies, saved Southwark Plan policies, area action plan policies and the further specific guidance within the SPD itself and other guidance, Sustainable Design and Construction and Sustainability Assessment SPDs. It is therefore considered that any potential negative impacts can be addressed through suitable mitigation measures elsewhere.

### 8.2 What are the significant positive effects of the policy?

- 8.2.1 The draft SA has been carried out against the Sustainability Framework set out in Section 6 of the Sustainability Report. The SA has shown that the SPD is likely to have a major positive impact upon the following Sustainability Objectives:
  - SDO1: To tackle poverty and encourage wealth creation
  - SDO3: To improve the health of the population

SDO4: To reduce the incidence of crime and fear of crime

SDO5: To promote social inclusion, equality, diversity and community cohesion

SDO16: To provide everyone with the opportunity to live in a decent home

The policy has the same impact as the Core Strategy Policy for the majority of the results but would provide increased benefits for the objectives below which scored a minor positive result:

SDO 12: To protect and enhance the quality of landscape and townscape SDO 13: To conserve and enhance the historic environment and cultural assets

The key major positive impact would be on SD06: To provide everyone with the opportunity to live in a decent home. The guidance would ensure a more consistent and clear approach to delivering affordable housing and help maximise opportunities to provide suitable affordable housing that meets need. The provision of new affordable homes would reduce the number of people in housing need by providing new housing that people can afford. This would also have a very positive impact on improving the health of the population, reducing incidence of crime, and improving social cohesion. It would also help

to tackle poverty by delivering better quality and more suitable homes and providing more homes that people can afford.

### 8.3 What are the significant negative effects of the policy?

- 8.3.1 Whilst none of the results were considered negative, some of the results were given an uncertain result. These were the same uncertainties as under the core strategy policies 6 and 8. These were also identified in the sustainability appraisal for the core strategy.
- 8.3.2 The following Sustainability Objective received an uncertain score:

SDO18: To provide the necessary infrastructure to support existing and future development

The uncertainty around SDO18 on infrastructure is to ensure that there is enough supporting infrastructure for new developments. As in the core strategy option, this is mitigated through the implementation plan set out as part of the core strategy and area action plans.

#### 8.3 Cumulative Impacts

- 8.3.1 The SEA Directive requires an assessment of secondary, cumulative, and synergistic effects, which should be incorporated in the SA. Collectively these effects are called cumulative impacts. Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects (e.g. noise, dust and visual) have a combined effect.
- 8.3.2 Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.
- 8.3.3 In assessing the cumulative impacts of the SPD the impacts across the borough are considered to be particularly beneficial in terms of improving the delivery of high quality affordable housing.

#### Please see Appendix 4 for the detailed results.

#### 8.4 Uncertainties and Risks

- 8.4.1 The conclusions that were reached in undertaking the SA of the policies were a result of qualitative (i.e. subjective) judgement, albeit by planning professionals within the Council. Where possible, the quantitative impacts of the SPD guidance will be considered in the Annual Monitoring Report, e.g. the number of listed buildings at risk in the area and the amount of affordable housing completed each year.
- 8.4.2 In addition, predicting the outcome of a potentially complex mix of social, economic and environmental factors is an inherently difficult task to undertake, and can only be undertaken on the basis of the background data that is available. Consequently, there may be some questions about the way some policies were ranked against particular sustainability objectives. However, whilst some individual rankings may possibly be challenged at this level, it is the overall performance of a policy against the Sustainability Framework taken as a whole, which is the most important element to consider.

Please see Appendix 4 for the detailed results.

# 9 IMPLEMENTATION

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

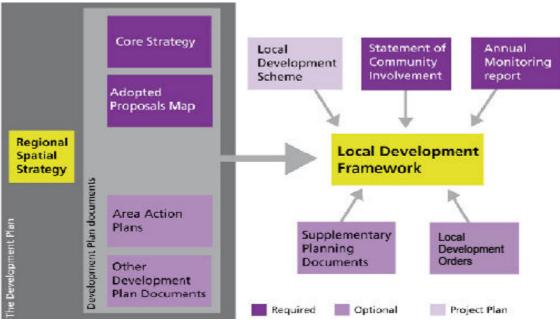
The SPD and supporting documents (including this sustainability appraisal) are now out for consultation until 30 September 2011. Once consultation closes, we will look at the comments received and see whether we need to amend the SPD. We will also look at the comments received in the sustainability appraisal and any changes we make on the SPD to see whether the SA needs to be amended. The SPD and supporting documents will be taken to Cabinet for adoption in November 2011. This will include a consultation and sustainability report setting out how the SA has impacted the production of the final SPD.

### 9.2 How will the SPD be implemented?

9.2.1 The SPD will assist members and council officers in implementing the Core Strategy policies effectively. It will be used to inform the community of the issues associated with affordable housing and how we maximise provision of affordable housing, and will provided detailed guidance to developers, landowners and registered providers to inform their proposals. It will be a material consideration in decisions on planning applications.

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

- 9.3.1 The LDF for Southwark will guide development in the future and is made up of a series of documents, prepared in stages. More information on the LDF can be viewed on the Council's website. This includes the Local Development scheme which sets out the programme for the production of documents.
- 9.3.2 It should be noted that local planning policy is produced within a framework set by national and regional government planning guidance. This guidance indicates the broad principles that local policy should adopt. For example, the need to provide further housing as established in guidance means that it would not be possible to have an option of no further housing provision.



#### The Development Plan process

### 9.4 Area Action Plans and Supplementary Planning Guidance

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

#### 9.5 Proposals for monitoring

9.5.1 It is important that the SPD is monitored to keep track of whether it is working in the way it should. This report has identified indicators that should be used to monitor the policy. We will use these to monitor the impact of the SPD through our Annual Monitoring Report.

April 2011

# APPENDICES

		PAGE
Appendix 1	The SEA Directive Requirements	A1
Appendix 2	Consultation Responses	A4
Appendix 3	Relevant Plans, Strategies and Programmes	A5
Appendix 4	Sustainability Appraisal of SPD	A16
Appendix 5	Abbreviations	A25
Appendix 6	Evidence Base Documents	A26

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

#### Strategic Environmental Assessment and Sustainability Appraisal

The Core Strategy and SPD fall within the definition of a 'plan or programme' under European Directive 2001/42 (the SEA Directive). Policies and plans likely to have significant environmental effects must also undergo a Strategic Environmental Assessment (SEA) as part of the sustainability appraisal.

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

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

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

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

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

### APPENDIX 2 Responses to consultation

Scoping Opinion Responses			
Name	Section of Reports	Comment	Officer response
Coal Authority		No comment	
Natural England		Natural England is pleased to see consideration of Climate Change Sustainability (paragraph 4.2.7) and Open Space and Biodiversity (paragraph 4.2.9) included under the Baseline Information section of this Report.	Support noted.
		In respect of new development opportunities and in order to ameliorate issues of deprivation to access to open/green spaces the Council may wish to consider Natural England's ANGST (Accessible Natural Green Space standards), which should be referenced in the Core Strategy for the Borough and a link to this can be included within this document.	This SPD is on affordable housing and does not deal with access to open/green spaces. We will look at Natural England's ANGST through other relevant SPDs and DPDs.

<ul> <li>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 green-spaces 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:</li> <li>No person should live more than 300 metres from their nearest area of natural green-space;</li> <li>There should be at least one accessible 20 hectare site within 2 kilometres;</li> <li>There should be one accessible 100 hectares site within 5 kilometres;</li> </ul>	Noted. This SPD is on affordable housing. We look at open spaces including access to open spaces through our other DPDs and SPDs and through out open spaces strategy that is currently being prepared.
<ul> <li>There should be one accessible 500 hectares site within 10 kilometres</li> <li>Sustainability Issues – this section lists eighteen issues which can be broadly supported, and in particular the following;</li> <li>Protection of landscape features and designated sites and need to address</li> </ul>	Support noted.
contaminated land issues; Protecting and enhancing biodiversity Sustainability Objectives – there are seventeen objectives listed under this section which again can be broadly supported, and in particular;	Support noted. We maintain the
SDO6 To reduce contributions to Climate Change	two objectives to ensure a detailed and thorough sustainability appraisal.
<u>SDO 11 and 12</u> To protect and enhance and conserve the quality of landscape and townscape The Council may wish to consider combining these two objectives	
Overall and subject to the above Natural England has no substantive comments to make on this consultation document, the issues, areas and themes Natural England would wish to see considered by such a document are raised in this document, together with relevant and appropriate plans, policies and programmes.	Support noted.

Highways Agency	No comment	
English Heritage	As a matter of general approach, it is essential that all heritage assets, their setting and the wider historic environment are identified and valued when developing planning policy, in line with Planning Policy Statement 5: Planning for the Historic Environment and the accompanying Practice Guide. This includes consideration of buildings, spaces and other features that may not be statutorily protected, but make an important contribution to the character and distinctiveness of a place.	Noted.
	<ul> <li>English Heritage has published guidance, Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment (2010), available online at http://www.helm.org.uk/upload/pdf/Strat-env-ass.pdf?1273116043. This guidance recommends that scoping reports should make appropriate and proportional reference to the historic environment dependent on the plan in question, making use of the following process:</li> <li>Review the objectives of other relevant policies, plans and programmes, and provide information on synergies or inconsistencies;</li> <li>Establish the historic environment baseline including trends and gaps in data with notes on sources and any problems encountered;</li> <li>Identify issues and opportunities for the historic environment;</li> <li>Set out the sustainability appraisal framework, SEA/SA objectives, indicators and targets where proposed, for the historic environment;</li> <li>Provide sufficient information on the proposed methodology for the appraisal to assess whether effects upon the historic environment will be properly addressed; and</li> <li>Consider cross-boundary issues.</li> </ul>	Noted. The draft Affordable Housing SPD does not look in detail at the design and context of new housing as this is covered in other policy documents including the core strategy, saved Southwark Plan policies and the adopted Residential Design Standards SPD. Section 5 of the draft SPD sets out more general design guidance for affordable housing.

With regards to the future production of the SPD, English Heritage seeks to promote good design principles and this should be applied when proposing new homes. English Heritage believes the right approach is to be found in examining the historic context for any proposed development in detail and relating the new building to its surroundings through an informed character appraisal. Such an appraisal would include consideration of how the development will relate to any heritage assets, their setting and the wider historic environment, in terms of design quality, location, scale, form and materials.	
Further guidance in relation to the historic environment can be found on the Historic Environment Local Management website www.helm.org.uk. In particular I would like to draw your attention to English Heritage and CABE guidance on Building in Context available at <u>http://www.helm.org.uk/server/show/nav.7709</u> . We would also endorse use of the English Heritage/CABE Tall Buildings Guidance 2007 to help inform policy formulation (available at <u>http://www.helm.org.uk/upload/pdf/tall_buildings07.pdf</u> ).	Noted. The Affordable Housing SPD does not look in detail at the design and context of new housing as this is covered in other policy documents including the core strategy, saved Southwark Plan policies and the adopted Residential Design Standards SPD.
Conclusion Finally, English Heritage would strongly advise that the local authority's conservation staff are involved throughout the preparation and implementation of the SA, as they are often best placed to advise on: local historic environment issues and priorities, sources of data; and consideration of options relating to the historic environment.	Noted.
This advice is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the environment.	

	. 10	We welcome inclusion of consideration of historic buildings and conservation	<b>T</b>
Page para	a 4.2.8	areas in the baseline information. We would encourage the local authority to employ the language used in PPS5 to refer to heritage assets rather than 'historic buildings and conservation areas' which is a more holistic definition comprising all designated and non-designated heritage assets. It will be important to identify undesignated heritage assets such as locally listed buildings/assets, other valued historic landscapes/townscapes, areas of	The baseline used for the Affordable Housing SPD takes into account a wider definition to include designated and non- designated assets.
		archaeological importance or areas of potentially unrecorded archaeology, as housing proposals if poorly designed can cause harm to heritage assets and the wider historic environment. We also recommend use being made of the Heritage at Risk Register – the 2010 list includes 29 buildings, one registered park and garden, two scheduled monuments and one Conservation Area at Risk and these should form part of the environmental baseline.	The Affordable Housing SPD does not provide detailed guidance on the design or location of new housing development. This is covered on other LDF documents.
		We would also recommend considering listing and reviewing existing documents held by Southwark such as Conservation Area Character Appraisals, Urban design frameworks, Area Action Plans, Supplementary Planning Documents, cultural strategies, characterisation studies etc. in order to better assess those areas that are sensitive to housing scheme impacts, or could benefit from enhancement opportunities.	
Page para	a 5.1	Sustainability Issues and Objectives There appears to be a typing error on page 24. Objectives SDO11 and 12 are very similar, however SDO12 on page 28 has been amended. We welcome this objective but suggest the following wording amendments to ensure consistency with PPS 5:	We have amended the wording in the SA.
		'conserve and enhance all cultural and heritage assets and the wider historic environment and increase enjoyment of the historic environment public realm' The questions relating to this objective should also use PPS5 language and refer to heritage assets rather than the more narrow questions asked about historic buildings.	
		You may also wish to consider including further indicators (examples of which can be found in the EH SEA guidance available on the HELM website). Further indicators we suggest include: • Number of assets removed from the 'At Risk' Register • Number of locally listed buildings • Number of archaeological priority zones maintained	

Environment Agency	Question 1 – We have no additional programmes, plans or strategies to recommend	Noted.
	Question 2 – We have no additional baseline information to recommend	Noted.
	Question 3 – We are pleased to see that the report identifies flood risk, waste, water resources, water quality, land contamination and biodiversity as key sustainability issues.	Support noted.
	Question 4 - We advise that, under "Sustainability Objective 14: To reduce vulnerability to flooding" reference is made to the application of the Sequential Test. In terms of allocating housing, the main tool, with which to minimize flood risk, is the application of the Sequential Test, in accordance with Planning Policy Statement 25 (PPS25). The flood risk sustainability objective should assess the possible effects of the SPD on the application and effectiveness of the Sequential Test, although we recognise that a large part of the Borough is in Flood Zone 3 and areas are undergoing regeneration within that area.	We have policies in place through our Southwark Plan and core strategy and through the Sustainable Design and Construction supplementary planning document which require the sequential test to be followed.
	Question 5 – The structure of the report is good.	Support noted.

195

### APPENDIX 3 Relevant Plans, Policies and Programmes

#### International:

Policy or Plan
Kyoto Protocol to the United nations Framework convention on climate change (1997)
Johannesburg Declaration on Sustainable development
European:
Policy or Plan
EU Biodiversity Strategy (1998)
EU Biodiversity Action Plan (2006)
European Landscape Convention (ratified by the UK Government in 2006)
EU Sixth Environment Action Plan (Sustainable Development Strategy) (2002)
European Spatial Development Perspective Report (1999)
EU Sustainable Development Strategy 2002 (revised 2006) (reviewed 2009)
EU Directives
Air Quality Framework (EU Directive 96/62/EC and daughter directives (99/30/EC), (2000/69/EC), (2002/3/EC)
Assessment of the Effects of Certain Public and Private Projects on the Environment (EIA Directive 85/337/EEC)
Assessment and Management of Environmental Noise (END Directive 2002/49/EC)
Conservation on Natural Habitats and of Wild Fauna and Flora (Directive 92/43/EEC)
Conservation of Wild Birds (Directive 79/409/EEC)
Energy Performance of Buildings (EU Directive 2002/91/EC)

Floods Directive (EU Directive 2007/60/EC)

Landfill Directive 1999/31/EC

Promotion of the use of Biofuels or other Renewable Fuels for Transport (EU Directive 2003/30/EC)

Renewable Energy (EU Directive 2009/28/EC)

Strategic Environmental Assessment(**SEA Directive** 2001/42/EC)

Policy or Plan	
EU Directives	
Urban Waste Water Directive (91/271/EEC)	
Waste Framework Directive 75/442/EEC	
Water Framework Directive (EU Directive 2000/60/EC)	

#### National:

Policy or Plan
Regulations
Air Quality Standards Regulations (2010)
Building Regulations: England and Wales (Part L – Conservation of Fuel and Power, 2006) and (Part G Sanitation, hot water safety and water efficiency, 2010)
Climate Change Act (2008)
Energy Act 2008
Environmental Assessment of Plans and Programmes regulations 2004
Environmental Noise (England) Regulations 2006 (as amended)
Local Government Act 2000
Local Government White Paper: Strong and Prosperous Communities (2009)
Natural Environment and Rural Communities Act (2006)
Planning and Compulsory Purchase Act (2004)
Planning and Energy Act (2008)
Planning Act (2008)
Town and Country Planning Act (1990)
The Town and Country Planning (Environmental Impact Assessment) Regulations 2010 – Consultation on draft regulations, CLG)
The Town and Country Planning (Environmental Impact Assessment) (Amendment) (England) Regulations 2008
The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999

The Town and Country Planning (Environmental Assessment and Permitted Development) Regulations 1995

Policy or Plan
Regulations
The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2010
The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2008
The Town and Country Planning (General Development Procedure) (Amendment) (No. 2) (England) Order 2006
The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2010
The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2008
The Town and Country Planning (General Permitted Development) Order 1995
The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2009
The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008
The Town and Country Planning (Major Infrastructure Project Inquiries Procedure) (England) Rules 2005
The Town and Country Planning (Modification and Discharge of Planning Obligations) Regulations 1992
The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010
The Town and Country Planning (Use Classes) Order
Planning Policy Statements (PPS)
PPS1: Delivering Sustainable Development (2005)
Planning and Climate Change: Supplement to PPS1 (2007)
Planning for a Low Carbon Future in a Changing Climate (2010) - Draft Supplement to PPS1
PPS3: Housing (2006)
PPS4: Planning for Sustainable Economic Development (2009)
PPS5: Planning for the Historic Environment (2010)
PPS5: Planning for the Historic Environment: Historic Planning Practice Guide
PPS9: Biodiversity and Geological Conservation (2005)
PPS10: Planning for Sustainable Waste Management (2005)
PPS12: Local Spatial Planning (2008)
PPG13: Transport (2001)

#### PPG17: Planning for Open Space, Sport and Recreation (2002)

PPS22: Renewable Energy (2004)

Policy or Plan Planning Policy Statements (PPS)
PPS23: Planning and Pollution Control (2004)
PPG24: Planning and Noise (1994)
PPS25: Development and Flood Risk (2006)
Draft PPS Planning for the Natural and Healthy Environment (2010) Planning Circulars
Planning Circular 05/10 Changes to Planning Regulations for Dwelling Houses and Houses in Multiple Occupation (2010)
Planning Circular 07/09 Protection of World Heritage Sites (2009)
Planning Circular 04/07 Planning for Travelling Show people
Planning Circular 02/07 Planning for the Strategic Road Network
Planning Circular 01/06 (ODPM) Planning for Gypsy and Traveller Caravan Sites (2006)
Planning Circular 05/05 (ODPM)
Government Strategies
Air Quality Strategy (2007)
Biodiversity – The UK Action Plan (1994)
Code for Sustainable Homes: Setting the standard in sustainability for new homes (2008)
Conserving Biodiversity – the UK approach (2007)
Heat and Energy Saving Strategy (2009) (Draft)
Health inequalities: progress and next steps (2008)
Healthy Weight Healthy Lives: A Cross Government Strategy for England (2008)
Natural England's – England Biodiversity (2002)
Noise Policy Statement for England (DEFRA 2010)
Securing the Future – UK Sustainable Development Strategy (2005)
Sustainable Communities: Building for the Future (2003)

**Draft Sustainability Appraisal:** Affordable Housing Supplementary Planning Document

Sustainable Construction Strategy (2008)
UK Climate Change Programme (2006)
UK Low Carbon Transition Plan (2009)
Policy or Plan
Government Strategies
UK Renewable Energy Strategy (2009)
UK Sustainable Procurement Action Plan (2007)
Water Strategy – Future Water: The Government's Water Strategy for England (2008)
Waste Strategy (2007)
Guidance and Other Reference Documents
A Practical Guide to the Strategic Environmental Assessment Directive (2005)
By Design – Urban design in the planning system: towards better practice. DETR / CABE (2000)
BREEAM (Building Research Establishment Environmental Assessment Method) (2008)
Department of Health: Next Step Review: High Quality Care for All (2008)
Environment Agency – Creating a better place. Our corporate strategy (2010-2015)
Environment Agency – Climate Change, adapting for tomorrow (2009)
Environment Agency – Building a better environment. A guide for developers (2006)
Environment Agency State of Environment Report for Southwark (2010)
English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)
English Heritage, Guidance on Environmental Assessment, Sustainability Appraisal and the Historic Environment (2010)
English Indices of Deprivation 2010
Guidance on Tall Buildings CABE and English Heritage (2007)
Model Dragedures for the Management of Conteminated Land. Environment Agency

Model Procedures for the Management of Contaminated Land- Environment Agency.

### Regional:

Policy or Plan
Air Quality
Air Quality Strategy (2010) (Draft)
Cleaning London's Air, The Mayor's Air Quality Strategy (2002)
The control of dust and emissions from construction and demolition – Best Practice Guidance (2006)
Accessibility and Equity
Accessible London: Achieving an Inclusive Environment. Mayor's Supplementary Planning Guidance (2004)
Planning for Equality and Diversity in London. Mayor's Supplementary Planning Guidance (2007)
Culture
Cultural Strategy (2009) (Draft)
London: Cultural Capital – Realising the potential of a world-class city. The Mayor's Culture Strategy (2004)
Policy or Plan
Economy
Mayors Economic Development Strategy (2010)
GLA Economics- Evidence Base (2009)
GLA Economics- Working Paper 39 – Borough Employment Projections to 2031 (2009)
GLA Economics- Working Paper 38 – Employment Projections for London by sector
Technical paper 1: London employment sites database (2009)
Technical paper 2: Accessibility-based employment projections (2009)
London Office Policy Review (2009)
Industrial Capacity Mayor's Supplementary Planning Guidance (2008)
GLA Hotel Demand Study (2006)
Energy and Climate Change
Climate Change Adaption Strategy for London (2010) (Draft)
Climate Change Mitigation and Energy Strategy (2009) (Draft)
Green Light to Clean Power. The Mayor's Energy Strategy (2004)

April 2011

Policy or Plan Flood Risk
Thames Region Catchment Flood Management Plan, 2009
Regional Flood Risk Appraisal (2009) Health
The London Health Inequalities Strategy (2010)
NHS London: Strategic Plan (2008)
Healthcare for London: A Framework for Action (2007)
South East London Housing Market Assessment (2009) and sub reports Heritage
English Heritage's Heritage at Risk- London 2010 Housing
London Housing Strategy (2010)
GLA Housing Design Guide 2010 Interim edition
Housing – Mayor's draft revised Housing SPG (2009) Housing
South East London Student Sub Report, Strategic Housing Market Assessment (2009)
GLA 2008 Round Population Projections
London Student Housing Requirements Study (2007)
Housing Mayor's Supplementary Planning Guidance (2005) Infrastructure
Central London Infrastructure Study (2009) London Plan
Consultation Draft replacement London Plan (October 2009) London Plan
Minor Alterations to the draft replacement London Plan (2009)
The London Plan: Spatial Development Strategy for Greater London consolidated with alterations since 2004 (2008) Noise
London Agglomeration Noise Action Plan (2010)
Sounder City: The Mayors Ambient Noise Strategy (2004)

Policy or Plan
Open Space and Biodiversity
Providing for Children and Young People's Play and Informal Recreation. Mayor's Supplementary Planning Guidance (2008)
Connecting with London's Nature. The Mayor's Biodiversity Strategy (2002)
Sustainability
Sustainable Design and Construction. Mayor's Supplementary Planning Guidance (2006)
Adapting to Climate Change: A checklist for development (2005)
Sustainable Development Framework for London. London Sustainable Development Commission (June 2003)
Sustainable Communities Plan for London: Building for the Future (2003)
Transport
Mayors Transport Strategy (2010)
Land for Transport Functions. Mayor's Supplementary Planning Guidance (2007)
Views
Draft Revised London View Management Framework. Mayor's Supplementary Planning Guidance (2009)
London View Management Framework. Mayor's Supplementary Planning Guidance (2007)
Waste
Mayors Draft Replacement Municipal Waste Management Strategy (2010)
London Waste Apportionment Study (2007) – update and further sensitivity testing
London Waste Apportionment Study (2006)
London Remade Demolition Protocol Report (2005)
Rethinking Rubbish in London. The Mayor's Waste Management Strategy (2003)
Water
Water Strategy (2009) (draft)
Thames River Basin Management Plan (2009)
Taking Care of Water- Our Plan for the next 25 years (Thames Water Utilities 2007)
Water Resources Management Plan (Thames Water Utilities) 2010-2035
Our Plans for Water (Thames Water Utilities) 2010-2015
Draft Strategic Proposals for Sludge Management (Thames Water Utilities) 2008
Thames Corridor Catchment Abstraction Management Strategy (CAMS)

### Local:

Policy or Plan
Community
London Borough of Southwark: Sustainable Community Strategy 2006-16
Southwark, Children and Young People's Plan 2010-2013
Southwark Supporting People Strategy (2005-2010)
Southwark Statement of Community Involvement (2008)
Metropolitan Police Estate – Asset Management Plan (2007)
Economy and Employment
Southwark Employment Land Review 2010
South Bank Partnership Manifesto, "Under pressure and on the edge: London's South Bank – a Manifesto for Action" (2006)
Southwark Tourism Strategy: 2005-2010
Southwark: Enterprise Strategy: 2005 – 2016
Southwark: Employment Strategy: 2005 – 2016
Education
Southwark School Organisation Plan and Education Development Plan
Review of Primary School Places, Report to Executive, Nov 2009
Southwark Schools for the Future BSF Outline Business Case report 2007
Flood Risk
Southwark Strategic Flood Risk Assessment (SFRA) (February 2008) Health
Southwark PCT Commissioning Strategy Plan 2009-2012 (2007)
Southwark PCT Asset Management Strategy (2006)
Southwark Children and Young Peoples Health plan
Southwark Health: Strategy to reduce health inequalities within Southwark 2009-2020
NHS Southwark Strategic Plan 2010/11-2014/15
Southwark Crime and Drugs Strategy 2005 – 2008

Policy or Plan
Heritage and Archaeology
Southwark Conservation Area Appraisals
Southwark Archaeology Priority Zones
Housing – General
Southwark Affordable Housing Viability Study (2010)
Southwark Housing Requirements Study ( and sub reports ) 2010
Southwark Housing Strategy 2009
Southwark Housing Development Capacity Assessment (2010)
Housing – Student accommodation
Research into the need for additional student housing in Southwark (2008)
Neighbouring boroughs:
Lambeth Council Sustainable Community Strategy (2008-2020)
Lewisham Council Sustainable Community Strategy (2008-2020)
Open Spaces and Biodiversity
Southwark Open Space Study and Schedules (2010)
Southwark Open Spaces Strategy, 2003
Parks and Public Spaces Strategy, February 2006
Southwark Play Strategy 2008-2011
Southwark Biodiversity Action Plan
Planning
Southwark Core Strategy DPD submission version (2010)
Southwark Plan Saved Policies (2010)
Southwark Core Strategy DPD submission version (2010) – Background evidence papers
Southwark Plan Proposals Map (updated 2010)
Southwark Canada Water AAP submission version (2010)
Southwark Canada Water AAP submission version (2010) – Background evidence papers
Aylesbury Area Action Plan 2010

Policy or Plan
Planning
Aylesbury Area Action Plan (2010) – Background evidence papers
Draft Peckham and Nunhead Area Action Plan – Issues and Options (2009)
Elephant & Castle Enterprise Quarter SPD 2008
Southwark adopted Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPGs)
Southwark's Unitary Development Plan (2007)
Pollution
Southwark Air Quality Management and Improvement Plan
Southwark Contaminated Land Strategy (2001)
Retail
Southwark Retail Capacity Study (February 2009)
Southwark Council documents
Southwark Corporate Plan 2009-2011
Southwark Annual Monitoring Reports (2004-2009)
Southwark: Local Area Agreement (2008)
Sustainability
Southwark Climate Change and Sustainability Strategy (2006)
Transport
Southwark Local Implementation Plan (LIP)
Southwark Development Impact Report (Canada Water) 2010
Waste
Southwark Waste Management Strategy: 2003 – 2021
Southwark Waste Minimisation Strategy 2007-2010

# APPENDIX 4 Sustainability Appraisal of SPD

# Comparison of Sustainability Objectives

Compatibility Matrix			A	ffordable	Hous	ing SPD Objectives
Sustainability Objectives	AH1	AH2	AH3	AH1		vide guidance to ensure that new
SDO 1 To tackle poverty and encourage wealth creation	✓	×	×			g provides the maximum amount of
SDO 2						ble housing possible to meet the
To improve the education and skill of the population	0	0	0	1	needs	for this type of housing;
SDO 3 To improve the health of the population	1	<ul> <li>✓</li> </ul>	<ul> <li>✓</li> </ul>			
SDO 4				AH2	To pro	vide guidance to make sure that
To reduce the incidence of crime and the fear of crime	0	?	0	6	afforda	ble housing is provided throughout the
SDO 5	1	1	1			h in the most appropriate way;
To promote social inclusion, equality, diversity and community cohesion	•					
SDO 6 To reduce contributions to climate change	0	?	0	AH3 <sup>-</sup>	To mal	ke sure that affordable housing
SDO 7						utes to creating a better mix of housing
To improve the air quality in Southwark	0	?	0			rent tenures and prices throughout the
SDO 8	0	?	0			
To avoid waste and maximise, reuse or recycle waste arising as a resource SDO 9	v		U			h to support households with different
To encourage sustainable use of water resources	0	?	0	1	needs	and incomes.
SDO 10				-		
To maintain and enhance the quality of land and soils	0	0	0	-		
SDO 11 To protect and enhance quality of landscape and townscape	0	?	0			
SD0 12		-	-			
To conserve and enhance the historic environment and cultural assets	0	?	0			
SDO 13	0	0	0	Key	1	compatible
To protect and enhance open spaces, green corridors and biodiversity	U	U	U	Rey		compatible
SDO 14 To reduce vulnerability to flooding	0	0	0		X	incompatible
SDO 15						
To provide everyone with the opportunity to live in a decent home	<ul> <li>✓</li> </ul>	<ul> <li>✓</li> </ul>	✓		0	no significant link
SDO 16	0	0	0		?	dependent on implementation
To promote sustainable transport and minimise the need to travel by car SDO 17	v		, v	4		
To provide the necessary infrastructure to support existing and future development	0	0	0			

### **Commentary of results**

The majority of the objectives for the SPD are shown to be compatible or have no significant link with the Sustainability Objectives. Some uncertainty is recorded; where it is considered that the impact will be dependent upon implementation. For example the guidance provided on how affordable housing should be designed could impact upon climate change as a result of the energy efficiency level of new affordable homes. Proposals will be assessed at the planning application level to ensure that impacts are minimised and best practice followed. Schemes will also have to show how the Core Strategy and other Supplementary Planning Documents have been addressed e.g. the Sustainable Design and Construction and Sustainability Assessment SPDs.

None of the objectives is considered to be incompatible and, therefore, the overall compatibility of the SPDs objectives is considered to be positive.

### Summary of Results of Sustainability Appraisal

Sustainability Objectives		
	Option 1	Option 2
SDO 1:To tackle poverty and encourage wealth creation	<b>√</b> √	~~
SDO 2:To improve the education and skill of the population	-	-
SDO 3:To improve the health of the population	<b>~ ~</b>	~~
SDO 4:To reduce the incidence of crime and the fear of crime	<b>~ ~</b>	~~
SDO 5:To promote social inclusion, equality, diversity and community cohesion	<b>√</b> √	~~
SDO 6:To reduce contributions to climate change	-	-
SDO 7:To improve the air quality in Southwark	-	-
SDO 8 : To minimise the ambient noise environment	-	-
SDO 9:To reduce waste and maximise use of waste arising as a resource	_	_
SDO 10:To encourage sustainable use of water resources	-	-
SDO 11:To maintain and enhance the quality of land and soils	_	_
SDO 12: To protect and enhance the quality of landscape and townscape	?	✓

**Draft Sustainability Appraisal:** Affordable Housing Supplementary Planning Document

SD0 13: To conserve and enhance the historic environment and cultural assets	?	~
SDO 14: To protect & improve open spaces, green corridors & biodiversity	-	-
SDO 15: To reduce vulnerability to flooding	-	-
SDO 16: To provide everyone with the opportunity to live in a decent home	~~	~~
SDO 17: To promote sustainable transport and minimise the need to travel by car	~	~
SDO 18: To provide the necessary infrastructure to support existing and future development	?	?

# Detailed Results

Sustainability Objectives		Timescale		ale	Option 1: Core Strategy (no SPD)
	1	S	м	L	Commentary on Results
SDO 1 : To tackle poverty and encourage wealth creation	<u> </u>	×	<u> </u>	<u> </u>	Setting different requirements for social and intermediate housing in certain areas will help to address existing inequalities. Increasing the amount of affordable housing will mean that more people can afford to live in good accommodation helping to reduce poverty. Southwark currently has one of the highest amounts of affordable housing in the whole country with 45% of the 123,948 dwellings being affordable. However, there is still a shortage of affordable homes in Southwark as identified in the Strategic Housing Market Assessment and Housing requirement Study. Given the current economic environment and reduced provision of Government and Homes and Communities Agency funding there could be reduced affordable housing completions over the short to medium term.
SDO 2 : To improve the education and skill of the population					in the borough have access to suitable accommodation that is affordable.
	-	-	-	-	No significant impact
SDO 3 : To improve the health of the population	<u> </u>	<ul> <li>✓</li> </ul>	<u> </u>	<u> </u>	The provision of new affordable housing will improve living conditions for many residents ensuring that they have high quality homes they can afford.
SDO 4 : To reduce the incidence of crime and the fear of crime	~~	<ul> <li>✓</li> </ul>	~~	~~	The provision of new affordable homes within mixed communities should have a positive impact upon the incidence of crime and fear of crime.
SDO 5 : To promote social inclusion, equality, diversity and community cohesion	<b>~</b> ~	~	~~	<b>√</b> √	The policy addresses the need to provide more affordable homes within the borough whilst creating mixed and balanced communities with a range of types of housing in all areas. Providing more affordable housing, especially as part of regeneration schemes will result in more development in the areas of the borough that require regeneration and provide a focus for promoting social inclusion, equality, diversity and community cohesion by reducing existing inequalities. New development will provide 8,558 net new affordable homes which equates to 35% affordable housing on all sites over 10units (based on the amount of housing that is expected to be delivered between 2011 and 2026). The Affordable Housing Viability Study shows that this amount of affordable housing is achievable. Given the current economic environment and reduced provision of Government and Homes and Communities Agency funding there could be reduced affordable housing completions over the short to medium term.
SDO 6 : To mitigate and adapt to the impacts of climate change	-	-	-	-	No significant impact
SDO 7 : To improve the air quality in Southwark	-	-	-	-	No significant impact
SDO 8 : To minimise the ambient noise environment	-	-	-	-	No significant impact

# **Draft Sustainability Appraisal:** Affordable Housing Supplementary Planning Document

Sustainability Objectives		Timescale			Option 1: Core Strategy (no SPD)
	1	s	м	L	Commentary on Results
SDO 9 : To reduce waste and maximise use of waste arising as a resource	-	-	-	-	No significant impact
SDO 10 : To encourage sustainable use of water resources	-	-	-	-	No significant impact
SDO 11 : To maintain and enhance the quality of land and soils	-	-	_	-	No significant impact
SDO 12 : To protect and enhance the quality of landscape and townscape	?	?	?	?	The type and quality of affordable housing will determine how development will impact on the landscape and townscape. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.
SD0 13 : To conserve and enhance the historic environment and cultural assets	?	?	?	?	The type and quality of affordable housing will determine how development will impact on the historic environment and cultural assets. Tall buildings will be required to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The height and design of development will need to protect and enhance the strategic views and be appropriate to its context and important local views. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.
SDO 14 : To protect and improve open spaces, green corridors and biodiversity	-	-	-	-	No significant impact
SDO 15 : To reduce vulnerability to flooding	-	-	-	-	No significant impact
SDO 16 : To provide everyone with the opportunity to live in a decent home	<b>VV</b>	~	~~	~~	New affordable housing will help to reduce the number of people in housing needs and provide everyone with the opportunity to live in a decent home. Given the current economic environment and reduced provision of Government and Homes and Communities Agency funding there could be reduced affordable housing completions over the short to medium term.
					Requiring student homes to have an affordable element will help to provide everyone with the opportunity to live in a decent home.
SDO 17 : To promote sustainable transport and minimise the need to travel by car	~	-	~	~	Providing more affordable housing may help to reduce the amount of cars generated by developments and promote sustainable travel patterns as car ownership is generally lower amongst affordable housing occupants.
SDO 18 : To provide the necessary infrastructure to support existing and future development	?	?	?	?	The impact of providing a range of homes for people on different incomes on infrastructure will depend on the quantity and location of new housing. This will be determined by the individual schemes that are delivered and these will be subject to a sustainability assessment and other supporting studies which will need to

Sustainability Objectives		Timescale			Option 1: Core Strategy (no SPD)
	1	s	м	L	Commentary on Results
					demonstrate how the infrastructure demands of new development will be met. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

Sustainability Objectives		Timescale			Option 2 : Affordable Housing SPD
	2	s	м	L	Commentary on Results
SDO 1 : To tackle poverty and encourage wealth creation	~~	<b>~</b>	~~	~~	The SPD will help maximise the amount of affordable housing delivered. The guidance on keeping maintenance and service charges low will also provide a benefit to households on low incomes.
SDO 2 : To improve the education and skill of the population	-	-	-	-	No significant impact
SDO 3 :To improve the health of the population	~~	<b>~</b> ~	~~	~~	The SPD will help maximise the amount of affordable housing delivered. The guidance will also help ensure that the quality of affordable housing is comparable to private housing. This will help ensure that people on low incomes can live in good quality accommodation. The guidance for special needs housing will ensure that where a genuine need exists new accommodation is provided for different types of people.
SDO 4 : To reduce the incidence of crime and the fear of crime	~~	<b>~</b>	~~	<b>√</b> √	The SPD sets a priority that affordable housing should be integrated with private housing to create mixed communities. It should be designed so that the affordable housing cannot be distinguished visually from the private housing.
SDO 5 : To promote social inclusion, equality, diversity and community cohesion	~~	~~	~~	~~	The SPD will help maximise the amount of affordable housing delivered. The guidance will help ensure people on low incomes have access to high quality homes. The guidance on dwelling mix ensures that inappropriate accommodation (studios and live-work) are not provided as affordable housing as these do not meet need. The priority is to integrate affordable housing with private housing to ensure mixed and balanced communities The guidance for special needs housing will ensure that where a genuine need exists new accommodation is provided for different types of people.
SDO 6: To mitigate and adapt to the impacts of climate change	-	-	-	-	No significant impact
SDO 7: To improve the air quality in Southwark	-	-	-	-	No significant impact
SDO 8 : To minimise the ambient noise environment	-	-	-	-	No significant impact

#### **Draft Sustainability Appraisal:** Affordable Housing Supplementary Planning Document

Sustainability Objectives		Timescale		le	Option 2 : Affordable Housing SPD
	2	S	м	L	Commentary on Results
SDO 9 : To reduce waste and maximise use of waste arising as a resource	-	-	-	-	No significant impact
SDO 10 : To encourage sustainable use of water resources	-	-	-	-	No significant impact
SDO 11 : To maintain and enhance the quality of land and soils	-	-	-	-	No significant impact
SDO 12 : To protect and enhance the quality of landscape and townscape	V	×	V	V	The design of development should be tenure blind and so the same standard of design of development should be built for on-site and off-site affordable housing and private housing. We have policies for the quality of housing for all tenures. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.
SD0 13 : To conserve and enhance the historic environment and cultural assets	V	✓	V	V	The design of development should be tenure blind and so the same standard of design of development should be built for on-site and off-site affordable housing and private housing. We have policies for the quality of housing for all tenures. Further guidance is provided in the Design and Access SPD, AAPs and Sustainable Design and Construction SPD. The Southwark Design Review Panel will be used to assess the design quality of development proposals.
SDO 14 : To protect and improve open spaces, green corridors and biodiversity	-	-	-	-	No significant impact
SDO 15 : To reduce vulnerability to flooding	_	_	_	_	No significant impact
SDO 16 : To provide everyone with the opportunity to live in a decent home	<u> </u>	44	<u> </u>	<u> </u>	New affordable housing will help to reduce the number of people in housing needs and provide everyone with the opportunity to live in a decent home which can they afford. The SPD will help maximise the amount of affordable housing delivered and ensure it is of a good quality of design. The guidance for special needs housing will ensure that where a genuine need exists new accommodation is provided for different types of people.
SDO 17 : To promote sustainable transport and minimise the need to travel by car	<b>_</b>	-	<b>√</b>	×	Providing more affordable housing may help to reduce the amount of cars generated by developments and promote sustainable travel patterns as car ownership is generally lower amongst affordable housing occupants
SDO 18 : To provide the necessary infrastructure to support existing and future development	?	?	?	?	The impact of providing more affordable homes on infrastructure will depend on the quantity and location of new housing. This will be determined by the individual schemes that are delivered and these will be subject to a sustainability assessment and other supporting studies which will need to demonstrate how the infrastructure demands of new development will be met. An infrastructure plan has been prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales.

# **Cumulative Impact Results and Commentary**

Sustainability Objectives		Cumulative Impacts
	С	Commentary on Results
SDO 1 To tackle poverty and encourage wealth creation	~~	The SPD will provide new affordable housing and help meet our housing targets. This will help to tackle poverty as there will be new affordable homes for people who cannot afford market housing.
SDO 2 To improve the education and skill of the population	-	No significant impact
SDO 3 To improve the health of the population	$\checkmark\checkmark$	The provision of quality new affordable homes that meet minimum dwelling size standards will have a major positive benefit on health. Restrictions on studios being counted as affordable will also ensure that over the long-term appropriately sized affordable housing is built, targeting overcrowding.
SDO 4 To reduce the incidence of crime and the fear of crime	<u></u>	Integrating affordable housing with private housing and making housing design "tenure blind" should help provide positive benefits with regard to crime
SDO 5 To promote social inclusion, equality, diversity and community cohesion	<b>√√</b>	The provision of new affordable housing should help to promote social inclusion, equality, diversity and community cohesion.
SDO 6 To mitigate and adapt to the needs of climate change	-	No significant impact
SDO 7 To improve the air quality in Southwark	-	No significant impact
SDO 8 To minimise the ambient noise environment	-	No significant impact
SDO 9 To reduce waste and maximise use of waste arising as a resource	-	No significant impact
SDO 10 To encourage sustainable use of water resources	-	No significant impact
SDO 11 To maintain and enhance the quality of land and soils	-	No significant impact
SDO 12 To protect and enhance the quality of landscape and townscape	<b>~</b>	Affordable housing will be expected to be built to the same quality as private housing. The type and quality of development will determine the impact, which will be managed through the use of the Design and Access SPD, AAPs and Sustainable Design and Construction SPD
SD0 13 To conserve and enhance the historic environment and cultural assets	~	Affordable housing will be expected to be built to the same quality as private housing. The type and quality of development will determine the impact, which will be managed through the use of the Design and Access SPD, AAPs and Sustainable Design and Construction SPD
SDO 14 To protect and improve open spaces, green corridors and biodiversity	-	No significant Impact
SDO 15 To reduce vulnerability to flooding	-	No significant Impact
SDO 16 To provide everyone with the opportunity to live in a decent home	<b>~</b> ~	The policy will increase the number of new affordable homes.
SDO 17 To promote sustainable transport and minimise the need to travel by car	<ul> <li>✓</li> </ul>	Providing more affordable housing may help to reduce the amount of cars generated by developments and promote sustainable travel patterns as car ownership is generally lower amongst affordable housing occupants.
SDO 18 To provide the necessary infrastructure to support existing and future development	?	Providing new homes could have an adverse impact on infrastructure if it is not carefully managed. An infrastructure plan has been prepared to identify existing capacity and to help identify future needs. Individual scheme will also need to demonstrate how the infrastructure needs of the development can be met.

# **APPENDIX 5**

## Abbreviations

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

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

## Appendix 6 – Evidence Documents

#### International

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

## EU

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

CDEU20. Floods Directive (2007/60/EC)

#### National

- CDN1. Planning Policy Statement 1 Planning for Sustainable Development (2005)
- CDN2. Planning Policy Statement: Planning and Climate Change Supplement to Planning Policy Statement 1 (2007)
- CDN3. Planning Policy Guidance 2 (Green Belts) (1995)
- CDN4. Planning Policy Statement 3 Housing (2006)
- CDN5. Planning Policy Statement 4: Planning for Sustainable Economic Growth (2009)
- CDN6. Planning Policy Statement 9: Biodiversity and Geological Conservation (2005)
- CDN7. Planning Policy Statement 10: Planning for Sustainable Waste Management (July 2005)
- CDN8. Planning Policy Statement 12 Local Spatial Planning (2008)
- CDN9. Planning Policy Guidance 13: Transport (Communities and Local

Government, April 2001)

- CDN10. Planning Policy Guidance15: Planning and the Historic Environment
- CDN11. Planning Policy Guidance 16: Archaeology and Planning
- CDN12. Planning Policy Guidance 17 (PPG17) Planning for Open Space, Sport and Recreation (2002)
- CDN13. Assessing Needs and Opportunities: Planning Policy Guidance 17 Companion Guide (2003)
- CDN14. Planning Policy Statement 22: Renewable Energy
- CDN15. Planning For Renewable Energy: Implementing PPS22 - Guidance for Preparing Renewable Energy Planning Policies in Development Plan Documents

A31

CDN16.	Planning Policy Statement 23: Planning and Pollution Control (2004)
CDN17.	Planning Policy Statement 25: Development and Flood Risk (PPS25) (2006)
CDN18.	Circular 05/05 Planning Obligations
CDN19.	Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites
CDN20.	Circular 04/2007 Planning for Travelling Showpeople
CDN21.	Circular on the Protection of World Heritage Sites (July 2009)
CDN22.	Planning and Compulsory Purchase Act (2004)
CDN23.	UK Renewable Energy Strategy (2009)
CDN24.	UK Strategy for Sustainable Development (2005)
CDN25.	Guidance on Tall Buildings, (CABE & English Heritage, July 2007)
CDN26.	Understanding Place: Historic Characterisation For
	Planning And Development Draft Document (English
	Heritage, July 2009)
CDN27.	By Design – Urban Design in the planning system:
	towards better practice (DETR/CABE, 2000)
CDN28.	Recommendation for living at Superdensity, Design for Homes (July 2007)
CDN29.	Waste Strategy (2000)
CDN30.	Waste Management Licensing Regulations (1994)
CDN31.	Code for Sustainable Homes: Technical Guide Version 2 (May 2009)
CDN32.	DCLG Guidance Notes on Employment Land Reviews (2004)
CDN33.	ONS Annual Population Survey 2007
CDN34.	ONS Annual Population Survey 2008
CDN35.	ONS Annual Population Survey 2009
CDN36.	ONS Annual Business Inquiry 2007
CDN37.	Census 2001, Neighbourhood Statistics
CDN38.	BREEAM Offices 2008 Assessor Manual (BES 5055:
	ISSUE 3.0), 2009)
CDN39.	BREEAM Education 2008 Assessor Manual (BES 5051 ISSUE 3.0), 2009

CDN40.	UK Climate Change Act (2008)
CDN41.	Building A Greener Future: Policy Statement (July 2007)
CDN42.	DCLG 'Proposals for amending Part L and Part F of the Building Regulations', (June 2009)
CDN43.	DCLG Mandating Water Efficiency in New Buildings - A
CDN44.	Consultation (December 2006)
CDIN44.	Office of Climate Change, 'Stern Review on the Economics of Climate Change' (October 2006)
CDN45.	Planning Policy Statement 6: Planning for Town
	Centres, Communities and Local Government, March
	2005
CDN46.	Planning Policy Guidance 24: Planning and Noise, 1994
CDN47.	Climate Change: The UK Programme, 2006
CDN48.	Air Quality Strategy, 2007
CDN49.	Future Water Strategy, 2008
CDN50.	Energy Act, 2008
CDN51.	Strategy for Sustainable Construction, 2008
CDN52.	Draft Heat and Energy Saving Strategy, 2009
CDN53.	Towards Zero Carbon Homes, Consultation, 2009
CDN54.	Local Government White Paper, Strong and Prosperous
	Communities, 2009
CDN55.	Local Government Act 2000
CDN56.	England Biodiversity 2002 Communities Plan – Sustainable Communities:
CDN57.	Building for the Future (2003)
CDN58.	UK Climate Change Regulations (2009)
CDN59.	UK Sustainable Procurement Action Plan (2007)
CDN60.	English Heritage Conservation Principles: for the
ODITOU.	sustainable management of the historic environment
	(2008)
CDN61.	Department of Health: Next Step Review: High Quality
	Care for All (2008)
CDN62.	Health inequalities: progress and next steps (2008)
CDN63.	Healthy Weight Healthy Lives: A Cross Government
	Strategy for England (2008)
CDN64.	Model Procedures for the Management of

CDN64. Model Procedures for the Management of Contaminated Land- Environment Agency (2004)

CDN65.	Environment Agency: Adapting to Climate Change Strategy
CDN66. CDN67.	Environment Agency Strategies, Plans and Reports Department for Transport 10 Year Transport Plan (2000)
CDN68.	Biodiversity and the Built Environment. A report by the UK-GBC Task Group
CDN69.	Biodiversity by Design – a Guide for Sustainable Communities, TCPA, 2004
CDN70.	Design and quality standards, Housing Corporation, April 2007
CDN71.	Żero Carbon for New Non-domestic Buildings: Consultation on Policy Options, Communities and Local Government, November 2009
CDN72.	A cost review of the Code for Sustainable Homes, Cyril Sweett on behalf of English Partnerships and the Housing Corporation, February 2007
CDN73.	Cost Analysis of The Code for Sustainable Homes – Final Report, Communities and Local Government, July 2008
CDN74.	Putting a price on sustainability, BRE Centre for Sustainable Construction and BRE Trust, and Cyril Sweett, 2005
CDN75.	Research to Assess the Costs and Benefits of the Government's Proposals to Reduce the Carbon Footprint of New Housing Development, DCLG, September 2008
CDN76.	Schools for the Future: The cost of BREEAM compliance in Schools, Faithful & Gould, 2006
CDN77.	Consultation Response Government Consultation on a National Heat and Energy Saving Strategy, NHS Sustainable Development Unit, April 2009
CDN78.	Flood Risk Data Report for England and Wales: An analysis of the National Flood Risk Assessment 2006 and the Flood Map for England and Wales, Environment Agency, March 2007

CDN79.	Planning Policy Statement 25: Development and Flood Risk - Practice Guide, Communities and Local Government, 2009
CDN80.	Local Development Framework Core Output Indicators, Department for Communities and Local Government, October 2005
CDN81.	English Indices of Deprivation 2004, Department for Communities and Local Government, June 2004
CDN82.	UK Climate Change Programme 2006
CDN83.	Building Regulations: England and Wales (Part L – Conservation of Fuel and Power, 2006 and Part G - Sanitation, hot water safety and water efficiency, 2010)
CDN84.	UK Low Carbon Transition Plan, 2009
CDN85.	The Fourth Assessment Report of the
	Intergovernmental Panel on Climate Change (IPCC), September 2007
CDN86.	Town and Country Planning Act (May 1990)
CDN87.	Town and Country Planning (General Development Procedure) Order (June 1995)
CDN88.	Town and Country Planning (Applications) Regulations (December 1998)
CDN89.	Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations (March 1999)
CDN90.	Town and Country Planning (Mayor of London) Order (July 2000)
CDN91.	Town and Country Planning (Development Plan)
	(England) Regulations 1999 (January 2000)
CDN92.	Planning and Compulsory Purchase Act (May 2004)
CDN93.	Planning Act (2008)
CDN94.	Planning and Energy Act 2008
CDN95.	A Practical Guide to the Strategic Environmental Assessment Directive, 2005
CDN96.	Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, November 2005
CDN97.	The Plan-Making Manual

CDN98.	Draft PPS15 Planning for the Historic Environment, 2009
CDN99.	Department for Health: Draft Guidance on SEA, 2007
CDN100.	Planning for a Sustainable Future White Paper, 2007
Regional	
CDR1.	The London Plan Consolidated with alterations (2008)
CDR2.	Consultation draft replacement London Plan (October 2009)
CDR3.	Minor alterations to the draft replacement London Plan (December 2009)
CDR4.	Draft London Housing Strategy (May 2009)
CDR5.	London Economic Development Strategy (January 2005)
CDR6.	Mayor's Housing SPG (2005)
CDR7.	Mayor's Draft revised interim Housing Supplementary Planning Guidance (October 2009)
CDR8.	GLA Industrial Capacity Supplementary Planning Guidance (SPG) (March 2008)
CDR9.	London Tourism Action Plan 2009-2013
CDR10.	London Development Agency's Corporate Plan 2007- 2010
CDR11.	Providing for Children and Young People's Play and Informal Recreation SPG (March 2008)
CDR12.	Mayor's Sustainable Design and Construction SPG (2006)
CDR13.	Draft Revised Supplementary Planning Guidance London View Management Framework (May 2009)
CDR14.	The Mayor's Climate Change Action Plan 2007
CDR15.	The Mayor's Energy Strategy 2004
CDR16.	Strategic Housing Market Assessment in London. Statement from Government Office for London, the Greater London authority and London Councils (March 2008)
CDR17.	Addressing PPS3 requirements for a 15-year housing land supply (interim approach). Statement from

	Government Office for London and the Greater
	London Authority (March 2008)
CDR18.	GLA Economics- Economics Evidence Base – October
	2009
CDR19.	The GLA Hotel Demand Study (2006)
CDR20.	GLA Strategic Housing Land Availability Assessment
	and Housing Capacity Study 2009
CDR21.	Gypsies and Travellers Accommodation Needs
	Assessment (May 2008)
CDR22.	Central London Infrastructure Study 2009
CDR23.	London Student Housing Requirements Study (2007)
CDR24.	GLA London Town Centre Health Check (2009)
CDR25.	London Office Policy Review (2009)
CDR26.	Mayor of London – Biodiversity Strategy (2002)
CDR27.	South London Sub-regional Development Framework
00000	(Mayor of London, May 2006)
CDR28.	London: Cultural Capital – Realising the potential of a
00000	world-class city. The Mayor's Culture Strategy (2004)
CDR29.	Draft City Fringe Opportunity Area Framework, (Mayor
	of London, Feb 2008)
CDR30.	London Waste Apportionment Study (December 2006)
CDR31. CDR32.	Mayor's Municipal Waste Management Strategy (2003)
CDR32.	Mayor's draft replacement Municipal Waste Management Strategy (2010)
CDR33.	GLA Consumer Expenditure and Comparison Goods
CDR33.	Retail Floorspace Need in London (March 2009)
CDR34.	Experian Goad Category Report (July 2007)
CDR34. CDR35.	North East and South East London Industrial Baseline
CDIX55.	(2007)
CDR36.	Industrial and Warehousing Demand in London (2004)
CDR37.	www.visitlondonmediacentre.com - Press Release
OBI(07)	(London's hotel room supply set to increase by 2012
CDR38.	GLA Demand and Supply for Land for Logistics (2007)
CDR39.	GLA Economics – Working Paper 38- Employment
	Projections for London by sector (Nov 2009)
CDR40.	GLA Economics –Working Paper 39 Borough
	Employment Projections to 2031 (Nov 2009)

CDR41.	Mayor's 'Evidence Base: Climate Change in the further alterations to the London Plan' (April 2007)
CDR42.	London View Management Framework, The London Plan Supplementary Planning Guidance, Mayor of London, July 2007
CDR43.	Tower of London World Heritage Site Management Plan, Historic Royal Palaces, 2007
CDR44.	Westminster World Heritage Site Management Plan, May 2007
CDR45.	CAP 738, Safeguarding of Aerodromes, Civil Aviation Authority, December 2006
CDR46.	GLA Strategic Housing Market Assessment (CCC)
CDR47.	GLA Housing Space Standards 2006
CDR48.	GLA draft Housing Design Guide 2009
CDR49.	Building for Life, CABE, November 2008
CDR50.	Recommendation for living at Superdensity, Design for Homes, July 2007
CDR51.	GLA 2008 Round Population Projections (High)
CDR52.	Accessible London: Achieving an Inclusive
	Environment. Mayor's Supplementary Planning Guidance (2004)
CDR53.	A Sustainable Development Framework for London. London Sustainable Development Commission (June 2003)
CDR54.	Sustainable Communities Plan for London: Building for the Future (2003)
CDR55.	Adapting to Climate Change: A checklist for Development (2005)
CDR56.	Integrating renewable energy into new developments: toolkit for planners, developers and consultants, 2004
CDR57.	Sounder City: The Mayors Ambient Noise Strategy (2004)
CDR58.	Cleaning London's Air, The Mayor's Air Quality Strategy (2002)
CDR59.	Planning for Equality and Diversity in London. Mayor's Supplementary Planning Guidance (2007)

CDR60.	Land for Transport Functions. Mayor's Supplementary Planning Guidance (2007)
CDR61.	London Remade Demolition Protocol Report (2005)
CDR62.	English Heritage's Heritage at Risk- London 2008
CDR63.	Thames Region Catchment Flood Management Plan
CDR64.	Thames River Basin Management Plan
CDR65.	Regional Flood Risk Appraisal
CDR66.	Taking Care of Water- Our Plan for the next 25 years
021000	(Thames Water Utilities 2007)
CDR67.	Draft Water Resource Management Plan (Thames
0210011	Water Utilities) 2008
CDR68.	Our Plans for Water (Thames Water Utilities) 2008
CDR69.	Draft Strategic Proposals for Sludge Management
	(Thames Water Utilities) 2008
CDR70.	Thames Corridor Catchment Abstraction Management
	Strategy (CAMS)
CDR71.	Living Well in London: The Mayor's draft Health
	Inequalities Strategy (2008)
CDR72.	NHS London: Strategic Plan (2008)
CDR73.	Healthcare for London: A Framework for Action (2007)
CDR74.	State of the Environment Report for London
CDR75.	Thames Path National Trail – Management Strategy
	2006-11
CDR76.	Improving Londoner's Access to Nature, Mayor of
~~~~~	London, 2008
CDR77.	The London Rivers Action Plan, 2009
CDR78.	Mayor's Draft Transport Strategy, October 2009
CDR79.	Mayor's Draft Economic Strategy, October 2009
CDR80.	Mayor's Draft Air Quality Strategy, 2009
CDR81.	Mayor's Draft London Water Strategy, 2009
CDR82.	Mayor's Draft London Climate Change Adaptation, 2008
CDR83.	GLA working paper on Economics Retail in London: small retailers (2005)

#### LOCAL

#### General

- CDL1. Southwark Plan (2007)
- CDL2. Southwark 2016: Sustainable Community Strategy (2006)
- CDL3. Southwark Corporate Plan 2009-2011
- CDL4. Southwark Statement of Community Involvement (2008)
- CDL5. Southwark Local Development Scheme (January 2010)
- CDL6. Annual Monitoring Report (2008-2009)
- CDL7. Annual Monitoring Report (2007-2008)
- CDL8. Annual Monitoring Report (2006-2007)
- CDL9. Annual Monitoring Report (2005-2006)
- CDL10. Annual Monitoring Report (2004-2005)
- CDL11. Southwark Plan Proposals Map (2007)
- CDL12. Local Area Agreement (2007)
- CDL13. Southwark Land Use Survey 2004, Southwark Council
- CDL14. Southwark unitary development plan Inspector report (2006)
- CDL15. Secretary of State direction (2007)

# Core strategy development plan document and supporting documents

- CDCS1. Core Strategy Submission/Publication 2009
- CDCS2. Core Strategy Submission/Publication Consultation plan 2009
- CDCS3. Core Strategy Submission/Publication EQIA 2009

- CDCS4. Core Strategy Submission/Publication Sustainability Appraisal and appendices 2009
- CDCS5. Core Strategy Submission/Publication Appropriate assessment 2009
- CDCS6. Core Strategy Submission/Publication Consultation statement and appendices 2009
- CDCS7. Core Strategy Submission/Publication Changes to proposals map document and maps 2009
- CDCS8. Core strategy issues and options report 2008
- CDCS9. Core strategy preferred options report 2009
- CDCS10. Core strategy submission/ publication questionnaire 2009
- CDCS11. Core Strategy Sustainability Appraisal Scoping Report and Appendices 2008
- CDCS12. Core Strategy Issues and Options Interim Sustainability Appraisal and Appendices 2008
- CDCS13. Core Strategy Preferred Options Draft Sustainability Appraisal and Appendices 2009
- CDCS14. Core Strategy Submission Version Sustainability Appraisal Report and Appendices 2009

### **Background papers**

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

### Canada Water area action plan and supporting documents

CDAAP2 Canada Water AAP submission/publication 2010

CDCW1.	Canada Water AAP submission/publication Sustainability Appraisal 2010
CDCW2.	Canada Water AAP submission/publication Consultation Plan 2010
CDCW3.	Canada Water AAP submission/publication Consultation Statement 2010
CDCW4.	Canada Water AAP submission/publication Equalities Impact Assessment 2010
CDCW5.	Canada Water AAP submission/publication Appropriate Assessment 2010
CDCW6.	Canada Water AAP Preferred Options 2009
CDCW7.	Canada Water AAP Consultation Statement Preferred Options 2009
CDCW8.	Canada Water AAP Issues and Options 2008
	Canada Water AAP Sustainability Appraisal Scoping Report 2008
CDCW10.	Canada Water AAP Issues and Options Interim Sustainability Appraisal 2008
CDCW11.	Canada Water AAP Preferred Options Draft Sustainability Appraisal 2009
CDCW12.	Canada Water AAP Submission Version Final Sustainability Appraisal Report 2009

#### Canada Water AAP background papers

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

#### Environment

- CDEN1. Southwark Climate Change Strategy (2006)
- CDEN2. Strategic Flood Risk Assessment (2008)
- CDEN3. Southwark Open Space Study (2010)

- CDEN4. Southwark Play Strategy (2008-2011)
- CDEN5. Southwark's Biodiversity Action Plan 2006-2010 (Work for Wildlife) (2007)
- CDEN6. Southwark Local Implementation Plan (LIP)
- CDEN7. Southwark Waste Management Strategy 2003 2021
- CDEN8. Southwark Waste Minimisation Strategy 2007 2010
- CDEN9. Southwark Contaminated Land Strategy (2001)
- CDEN10. Southwark Air Quality Management and Improvement Plan
- CDEN11. The Canada Water Area Action Plan Energy Study (2009)
- CDEN12. Southwark State of the Environment Fact Sheet
- CDEN13. Southwark Sustainability Policy and Strategy, 2004-09
- CDEN14. Elephant and Castle -Sustainable Community Infrastructure, Southwark Council
- CDEN15. Elephant and Castle Position Paper on Low and Zero Carbon Energy
- CDEN16. Background paper: Sustainable design and construction strategy Aylesbury Area Action Plan, Ramboll, 2009
- CDEN17. Southwark Climate Change and Sustainability Strategy (Emerging)
- CDEN18. State of Environment Report for Southwark (March 2009), Environment Agency <u>www.environment-</u> <u>agency.gov.uk/static/documents/Research/SOUTHWAR</u> <u>K\_factsheet.pdf</u>
- CDEN19. Reserved Matters Application Planning Energy Statement 31/01/09, Fulcrum Consulting, submitted with reserved matters application for Aylesbury Phase 1a
- CDEN20. Canada Water Area Action Plan Energy Study, Aecom, 2009

## Housing

- CDH1. Draft Strategic Housing Market Assessment (2009) key findings report
- CDH2. Draft Strategic Housing Market Assessment (2009) core data report

CDH3.	Draft Strategic Housing Market Assessment sub report – students (2009)
CDH4.	Southwark Housing Requirements Study (2009)
CDH5.	Southwark Housing Requirements Study sub report – Camberwell (2009)
CDH6.	Southwark Housing Requirements Study sub report – Bermondsey (2009)
CDH7.	Southwark Housing Requirements Study sub report – Rotherhithe (2009)
CDH8.	Southwark Housing Requirements Study sub report – Dulwich (2009)
CDH9.	Southwark Housing Requirements Study sub report – Borough and Bankside (2009)
CDH10.	Southwark Housing Requirements Study sub report – Aylesbury Estate (2009)
CDH11.	Southwark Housing Requirements Study sub report – Walworth (2009)
CDH12.	Southwark Housing Requirements Study sub report – Peckham (2009)
CDH13.	Southwark Housing Requirements Study sub report – Nunhead and Peckham Rye (2009)
CDH14.	Southwark Housing Strategy (2009)
CDH15.	Research into the need for additional student housing in Southwark (December 2008)
CDH16.	Southwark Affordable Housing Viability Study (2010)
CDH17.	Southwark Private Sector Stock Condition Survey (2009)
CDH18.	Study of residential density within the London Borough of Southwark, Southwark Council, January 2005
CDH19.	Southwark Housing Capacity Study (2005)
CDH20.	Southwark Housing Development Capacity Assessment January 2010
CDH21.	South-East London Housing Strategy 2006
CDH22.	South East London Guide for RSLs and developers (2007)
CDH23.	South East London Wheelchair Homes Design Guidelines (revised August 2009)

CDH24. Southwark Supporting People Strategy 2005-2010

# CDH25. Developing minimum standards for permanent gypsy and traveler sites in South East London

CDH26. Study of residential density within the London Borough of Southwark (2005)

#### Design, heritage, conservation and tall buildings

- CDD1. Core Strategy Borough-wide Tall Buildings Research Paper, (December 2009)
- CDD2. Core Strategy Bankside, Borough and London Bridge Opportunity Area Tall Buildings Research Paper, (December 2009)
- CDD3. Draft Bankside, Borough and London Bridge SPD/ OAPF -Tall Buildings Study (December 2009)
- CDD4. Canada Water Site A Environmental Statement (Barratt Homes and British Land Canada Quays Limited) (August 2009)
- CDD5. Canada Water Town Centre Feasibility Study, Benoy, (Nov 2009)
- CDD6. Background paper: Visual impact assessment, Aylesbury Area Action Plan (May 2009)
- CDD7. Old Barge House Alley Conservation Area Appraisal, Southwark Council
- CDD8. Bankside and Bear Gardens Conservation Area Appraisal, Southwark Council
- CDD9. Union Street Conservation Area Appraisal, Southwark Council
- CDD10. Thrale Street Conservation Area Appraisal, Southwark Council
- CDD11. Borough High Street Conservation Area Appraisal, Southwark Council
- CDD12. Tooley Street north and south Conservation Area Appraisal, Southwark Council
- CDD13. Bermondsey Street Conservation Area Appraisal, Southwark Council
- CDD14. Kings Bench Conservation Area Appraisal, Southwark Council

CDD15.	St Georges Circus Conservation Area Appraisal, Southwark Council
CDD16.	West Square Conservation Area Appraisal, Southwark Council
CDD17.	Tower Bridge Conservation Area Appraisal, Southwark Council
CDD18.	Trinity Church Square Conservation Area Appraisal, Southwark Council
CDD19.	St. Saviour's Dock Conservation Area Appraisal, Southwark Council
CDD20.	Pullen Estate Conservation Area Appraisal, Southwark Council
CDD21.	Dulwich Village Conservation Area Appraisal, Southwark Council
CDD22.	Sunray Estate Conservation Area Appraisal, Southwark Council
CDD23.	Camberwell Grove Conservation Area Appraisal, Southwark Council
CDD24.	Camberwell Green Conservation Area Appraisal, Southwark Council
CDD25.	The Gardens Conservation Area Appraisal, Southwark Council
CDD26.	Holly Grove Conservation Area Appraisal, Southwark Council
CDD27.	Nunhead Cemetery Conservation Area Appraisal, Southwark Council
CDD28.	Sceaux Gardens Conservation Area Appraisal, Southwark Council
CDD29.	Stradella Road Conservation Area Appraisal, Southwark Council
CDD30.	Thorburn Street Conservation Area Appraisal, Southwark Council
CDD31.	Caroline Gardens Conservation Area Appraisal, Southwark Council
CDD32.	Blackfriars Road Character Area Appraisal, Southwark Council

CDD33.	North of Southwark Street Character Area Appraisal, Southwark Council
CDD34.	South of Southwark Street, Southwark Council
CDD35.	South of Union Street Character Area Appraisal, Southwark Council
CDD36.	Borough Market, Clink Street and Southwark Cathedral Character Area Appraisal, Southwark Council
CDD37.	Borough High Street Character Area Appraisal, Southwark Council
CDD38.	London Bridge and Guy's Hospital Campus Character Area Appraisal, Southwark Council
CDD39.	Tooley Street Character Area Appraisal, Southwark Council
CDD40.	Bermondsey Village Character Area Appraisal, Southwark Council
CDD41.	Southwark Alliance, Neighbourhood Renewal Strategy 2002 – 2004
CDD42.	Southwark Archaeology Priority Zones
CDD43.	South Bank Partnership Manifesto, "Under pressure and on the edge: London's South Bank – a Manifesto for Action" (2006)
CDD44.	Canada Water Site A Design and Access Statement, Barratt Homes, British Land, Canada Quays Limited and Glenn Howells Architects, August 2009
CDD45.	Canada Water Public Realm Improvements Study, The Landscape Partnership, September 2009
CDD46.	Canada Water Sites A & B Revised Design Code, Urban Strategies Inc, British Land and Canada Quays Limited, 2006
CDD47.	Canada Water CBRE Financial Viability Study 2010
CDD48.	Canada Water St. George's Wharf Study 2010
CDD49.	Inspector's Report, 1 Blackfriars Road and 20
	Blackfriars Road, The Planning Inspectorate, December 2008
	Decision letter 1 Blackfriars Road and 20 Blackfriars

CDD50. Decision letter, 1 Blackfriars Road and 20 Blackfriars Road, The Planning Inspectorate, March 2009

CDD51.	Inspector's Report, Upper Ground and Doon Street
	East, The Planning Inspectorate, May 2008

- CDD52. Decision letter, Upper Ground and Doon Street East, The Planning Inspectorate, August 2008
- CDD53. Inspector's Report to the First Secretary of State, Land Adjoining London Bridge Station, The Planning Inspectorate, July 2003

CDD54. Decision letter, Land Adjoining London Bridge Station, Office of the Deputy Prime Minister, November 2003

#### Employment

- CDE1. Southwark Employment Land Review (2009)
- CDE2. Southwark's Tourism Strategy 2005- 2010
- CDE3. Southwark Employment Strategy 2005 2016 (June 2006)
- CDE4. Southwark Enterprise Strategy 2005 2016 (June 2006)
- CDE5. Southwark Retail Study (2009) and appendices
- CDE6. Strategic Review of Southwark Markets & Street Trading Service October – December 2008
- CDE7. Camberwell Creative Industries Mapping Report (2007)
- CDE8. LB Southwark, Sector Skills Agency
- CDE9. Business Incubators Managed and Affordable Workplace Feasibility Study (2004)
- CDE10. Market Measures, Southwark profile (March 2008)
- CDE11. Background paper: Economic development Aylesbury Area Action Plan (March 2009)
- CDE12. <u>www.elephantandcastle.org.uk</u> regeneration programme

#### Infrastructure

- CDI1. London Borough of Southwark, Children and Young People's Plan (2008)
- CDI2. London Borough of Southwark School Organisation Plan and Education Development Plan
- CDI3. Southwark PCT Involving People Strategy 2009-2012 (2009)
- CDI4. Southwark PCT Asset Management Strategy (2007)
- CDI5. Schools for the Future Programme
- CDI6. Metropolitan Police Estate Asset Management Plan, Southwark, 2007
- CDI7. Southwark Walking Plan, 2006
- CDI8. Southwark PCT Commissioning Strategy Plan 2009-2012 (2007)
- CDI9. Southwark PCT Asset Management Strategy (2007)
- CDI10. Southwark Play Strategy 2007-12
- CDI11. Southwark Voluntary and Community Sector Asset Management Strategy
- CDI12. Canada Water Site Utilities Infrastructure Study, Hoare Lea, 2005
- CDI13. Review of primary school places, Report to Executive, November 2009
- CDI14. Southwark Schools for the Future: Strategic Business Case for Investment in Secondary Mainstream and Special Schools under the BSF Programme, and Associated Investments in Academies and Primary Schools, including Primary Special Schools, July 2006
- CDI15. Southwark Schools for the Future: New school provision, September 2006
- CDI16. Development Impact Report Canada Water 2010

#### **Area Action Plans**

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

#### Draft and Adopted SPDs/SPGs

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

#### Neighbouring borough's plans

- CDNB1. Bexley Unitary Development Plan
- CDNB2. Bexley Local Development Framework http://www.bexley.gov.uk/index.aspx?articleid=608
- CDNB3. Waste Management Strategy for Bexley 2009 2014
- CDNB4. Bromley Unitary Development Plan 2006
- CDNB5. Bromley Local Development Framework http://www.bromley.gov.uk/environment/planning/planningpoli cy/ldf/
- CDNB6. Bromley Draft Waste Management Strategy
- CDNB7. Bromley Draft Waste Minimisation Plan
- CDNB8. Greenwich Unitary Development Plan 2006
- CDNB9. Greenwich Local Development Framework <u>http://www.greenwich.gov.uk/cgibin/MsmGo.exe?grab\_i</u> <u>d=202&page\_id=4724992&query=local+development+fr</u> <u>amework&hiword=DEVELOP+DEVELOPED+DEVELO</u> <u>PING+DEVELOPMENTAL+DEVELOPMENTS+DEVEL</u> <u>OPS+FRAMEWORKS+LOCALITY+LOCALLY+LOCAL</u>

<u>S+LOCATE+LOCATED+LOCATION+development+fra</u> mework+local+

- CDNB10. Lewisham Unitary Development Plan
- CDNB11. Lewisham Local Development Framework <u>http://www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/LocalDevelopmentFramework/</u>
- CDNB12. Lewisham Draft Waste Management Strategy
- CDNB13. Lewisham Employment Land Study (2009)
- CDNB14. Metropolitan Views Draft Supplementary Planning Guidance, City of Westminster, October 2007
- CDNB15. St. Paul's Monument View Supplementary Planning Guidance, City of London, December 2007
- CDNB16. Lewisham Council Sustainable Community Strategy (2008-2020)
- CDNB17. Lambeth Council Unitary Development Plan (2007)
- CDNB18. Lambeth Council Sustainable Community Strategy (2008-2020)

This page is intentionally blank.

#### CABINET AGENDA DISTRIBUTION LIST

#### MUNICIPAL YEAR 2011-12

**NOTE:** Original held by Constitutional Team; all amendments/queries to Paula Thornton/Everton Roberts Tel: 020 7525 4395/7221

	Copies	То	Copies
Cabinet Members	1 each	Officers	
P John / I Wingfield / F Colley / D Dixon-Fyle /		Constitutional Team, Tooley Street	4
B Hargove / R Livingstone / C McDonald /		Doreen Forrester-Brown	1
A Mohamed / V Ward		Jennifer Seeley	1
Other Councillors	1 each	Trade Unions	
C Bowman / A Simmons / T Eckersely /		Roy Fielding, GMB	1
G Edwards / D Garfield / D Hubber / V Mills /		Mick Young, Unite	1
D Noakes/ the Right Revd E Oyewole / M		Chris Cooper, Unison	1
Williams / T McNally		Tony O'Brien, UCATT	1
		Michael Davern, NUT	1
Group Offices		James Lewis, NASUWT	1
		Pat Reeves, ATL	1
Alex Doel, Cabinet Office	1	Sylvia Morriss, NAHT	1
Steven Gauge, Opposition Group Office	1	Irene Bishop, ASCL	1
Press		Others	
Southwark News	1	Shahida Nasim, Audit Commission	1
South London Press	1	Robin Campbell, Press Office	1
Members of Parliament		Constitutional Officer	20
Harriet Harman, MP	1	Total:	73
Tessa Jowell, MP	1	lotan	70
Simon Hughes, MP	1		
Corporate Management Team			
Annie Shepperd	1		
Romi Bowen	1		
Deborah Collins	1		
Gill Davies	1		
Eleanor Kelly	1		
Gerri Scott	1		
Susanna White	1		
Duncan Whitfield	1		
Stephen Platts	1		
	•		
		Dated: 26 May 2011	