

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

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

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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**

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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 policies. 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 identified 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.

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 & Nunhead 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 inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development.”

PPS1: Delivering Sustainable Development (paragraph 24)

1.3 Strategic Environmental Assessment

- 1.3.1 Sustainability Appraisals also need to satisfy the requirements of the *European Directive 2001/42/EC*. The Directive requires a formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. An SEA is required when preparing new or revised DPDs. 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 provide 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 report	Consultation on the SPD Public Consultation 14 June to 30 September 2011
Adoption	November 2011 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 2011 for 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:

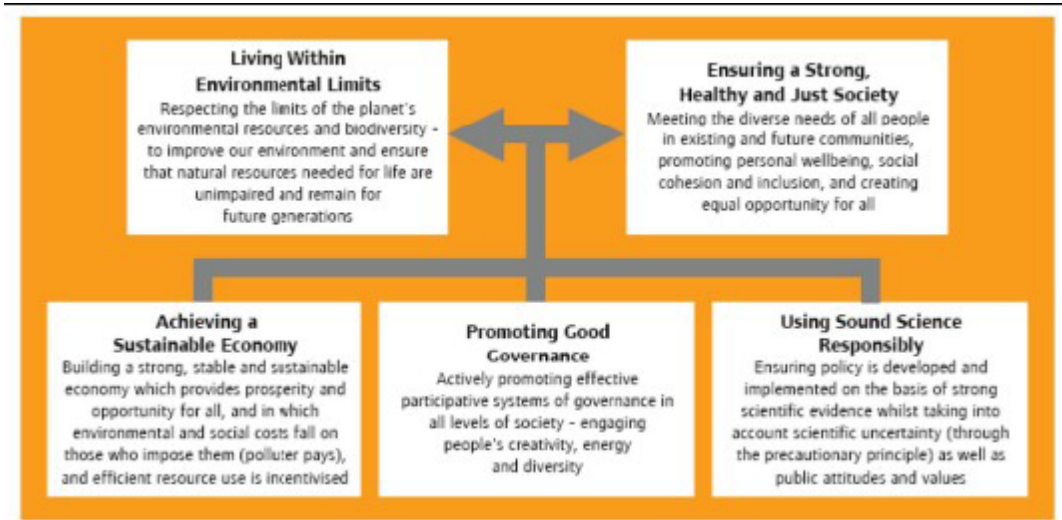
'SA should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process.' **PPS12 para. 4.43**

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 communications code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003.
 - Any person who owns or controls electronic communications apparatus situated in any part of the borough.

2.4.5 Consultation was carried out on the Scoping Report from 17 September to 22 October 2010. Responses were received from the following organisations:

- 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 provide 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 style="list-style-type: none"> • Provides factual information on definitions used and emerging changes to national policy.
Getting the right amount of affordable housing	<ul style="list-style-type: none"> • Affordable housing is calculated on habitable rooms for schemes of 15 or more homes. • Requirements for smaller schemes are set out in Southwark Plan policy 4.4. • Student housing schemes of 30 or more bed spaces and living spaces or over 0.5ha will require affordable housing. One bed space or living space is the equivalent of one habitable room.
Getting the right mix of housing	<ul style="list-style-type: none"> • Tenure split requirements for schemes under 15 units may be varied. This will be decided on a site by site basis. • We will not accept studio flats as affordable housing, but they are included in calculation of affordable housing requirement. • The same policies and guidance as apply to conventional affordable housing apply to affordable housing provided through student schemes. • We encourage applicants to provide more family-sized wheelchair accessible units.
The quality and design of affordable housing	<ul style="list-style-type: none"> • 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. • Applicants will need to justify why this is not possible. Tenures 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 service charges and maintenance costs. • Minimum overall dwelling sizes set out. These are the same as those set out in the draft amendments to the Residential Design Standards SPD.
Where should the affordable housing be provided	<ul style="list-style-type: none"> • Sets out a sequential approach to providing affordable housing. In all cases affordable housing should be delivered at the same time as private housing. We set out guidance on how we will ensure this. • The presumption is that affordable housing will be provided on site. This will be tested through financial appraisal. • In exceptional circumstances we may allow off-site, nearby to the 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 housing in specific types of development	<ul style="list-style-type: none"> • Sets out guidance for how we ensure the maximum amount of affordable housing is provided in different situations such as phased development, alterations to existing permissions and 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 style="list-style-type: none"> • We will expect the tenure split requirements to be met in 100%, but will consider context in applications for a variation to the mix. • On some estate regeneration schemes we may not replace all of the affordable housing.
Sheltered, supported and extra care housing	<ul style="list-style-type: none"> • Specialist housing should be made available at a cost affordable to its intended occupants. • 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.
Financing and securing affordable housing	<ul style="list-style-type: none"> • Sets out guidance on financial appraisals. • 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. • Sets out information on securing affordable housing and minimum private housing requirements through S106 agreements. • We will expect standard S106 charges to be met.
Making an application	<ul style="list-style-type: none"> • 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 ('non-decent'). 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 'non-decent', 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 estimate¹), 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 hectare². 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 ¹	%	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 6th 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

¹ Office for National Statistics, Neighbourhood Statistics for Southwark, June 2009, resident population estimates,

² 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 below³:

Ethnic Group	Southwark		London		England	
	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 follows⁴:

Religious Groups	Southwark		London		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'

³ Office for National Statistics, Neighbourhood Statistics for Southwark, April 2001 Resident Population Estimates by Ethnic Group

⁴ Office for National Statistics, Neighbourhood Statistics for Southwark, 2001, religion

(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 UK⁵). 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.⁶

- **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

⁵ Nomis Official Labour Market statistics Employment and unemployment (Apr 2009-Mar 2010)

⁶ 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		

- **Reception and Primary School Provision**

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.⁷

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 size⁸.

- **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 projects⁹.

- **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

⁷ Southwark Primary Strategy for Change 2008

⁸ Southwark Updated Primary Capital Programme 2010

⁹ Southwark Schools for the Future: New school provision, September 2006

qualifications (24%) was above the London average¹⁰. 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:

- 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

¹⁰ 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:

- 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 Brimington 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)¹¹.

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 deaths¹².

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 average¹³.

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 nationally¹⁴.

Southwark experienced a rate of 53.7 road injuries and deaths per 100,000 population compared with 51.3 nationally¹⁵.

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 Borough¹⁶:

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

¹¹ Southwark Health Profile, 2010

¹² Southwark Health Profile 2010

¹³ Southwark Health Profile 2010

¹⁴ Ibid

¹⁵ Ibid

¹⁶ 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 properties¹⁷. 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 (m ²)	Ratio pat / m ²
Princess Street Group Practice	13,745	781	17.6
Falmouth Road Group Practice	10,421	673	15.5
Borough Medical Centre	5,392	403	13.4
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 CO₂ emissions across Southwark. In 2006, Southwark adopted a climate change strategy that aims to reduce CO₂ 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

¹⁷NHS 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 CO₂ 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 UK¹⁸. 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

¹⁸ 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 (PM₁₀) and nitrogen dioxide (NO₂), would be exceeded¹⁹. NO_x emissions are primarily nitric oxide (NO) but this is converted into NO₂ in the atmosphere through chemical reactions with ozone (O₃). The figures overleaf show the modeled NO₂ and PM₁₀ concentrations in Southwark for 2010²⁰.

The most significant local pollutants, NO_x and PM₁₀, 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 PM₁₀ 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 decrease²¹.

- **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

¹⁹ Southwark Draft Air Quality Strategy and Action Plan 2010

²⁰ Southwark Draft Air Quality Strategy and Action Plan 2010

²¹ 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 tree-lined streets of houses and terraces rather than flats. Areas such as Aylesbury Estate and Peckham are being regenerated and improved.

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

- **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 work²², 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 unused²³. Around 28.5% of households in Southwark have at least one bicycle with more households storing their bicycle inside their property²⁴. 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

²² ONS Census Data 2001

²³ Cycling revolution London 2010, Mayor of London

²⁴ 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 stops²⁵.

- **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 2012²⁶.

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 2012²⁷. 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 2020²⁸. 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

²⁵ Draft Southwark Transport Plan 2010

²⁶ Major's Transport Strategy 2010

²⁷ Major's Transport Strategy 2010

²⁸ 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.²⁹ 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

²⁹ 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) activity³⁰.

³⁰ 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.

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 the impacts of 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

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	Sustainability Indicators	
Economy, Regeneration and Employment Opportunities	<p>SDO 1: To tackle poverty and encourage wealth creation</p> <p>Will it improve the range of job opportunities? Will it help to diversify the economy? Will it encourage the retention and /or growth of local employment? Will it close the gaps between equalities target groups compared with the National average? Will it encourage business start-ups and support the growth of businesses?</p>	1.1 1.2 1.3 1.4 1.5	Employment land available Change in VAT registered businesses Numbers and % jobs in Southwark by sector Southwark compared to London (broken down by micro, small and medium sized businesses) Numbers of unemployed/ receiving benefit (by sector)
Education	<p>SDO2: To improve the education and skill of the population</p> <p>Will it provide opportunities to improve the skills and qualifications of the population, particularly for young people and adults? Will it help improve employee education/training programmes? Will it help reduce skills shortages? Will it help to reduce the disparity in educational achievement between different ethnic groups?</p>	2.1 2.2 2.3 2.4	Indices of multiple deprivation; Education deprivation % of the population with higher education qualifications % of population with no qualifications Proportion of resident pupils attending Southwark schools achieving 5+ A-Cs including English and Maths split by equality group

Sustainability Issue	Sustainability Objective and Questions	Sustainability Indicators	
Health	<p>SDO3: To improve the health of the population</p> <p>Will it promote and facilitate healthy living and active lifestyles? Will it reduce health inequalities? Will it promote non-polluting forms of transport? Will it improve access to health and social care/treatment?</p>	<p>3.1 3.2 3.3 3.4 3.5 3.6 3.7</p>	<p>Health life expectancy at age 65 by equality group Indices of multiple deprivation: Health deprivation 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</p>
Crime and Community Safety	<p>SDO4: To reduce the incidence of crime and the fear of crime</p> <p>Will it improve safety and security? Will it incorporate measures to reduce crime and the fear of crime, including anti-social behaviour?</p>	<p>4.1 4.2 4.3 4.4</p>	<p>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</p>
Social Inclusion and Community Cohesion	<p>SDO5: To promote social inclusion, equality, diversity and community cohesion</p> <p>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?</p>	<p>5.1 5.2 5.3</p>	<p>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</p>
Mitigation of and adaption to climate change	<p>SDO6: To mitigate and adapt to the impacts of climate change</p> <p>Will it reduce consumption of energy? Will it result in a reduction of carbon emissions? Will it use renewable sources of energy? Will it help local people cope with hotter drier summers and warmer wetter winters? Will it mitigate against the urban heat island effect?</p>	<p>6.1 6.2 6.3 6.4</p>	<p>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</p>

Sustainability Issue	Sustainability Objective and Questions	Sustainability Indicators	
Air Quality	<p>SDO7: To improve the air quality in Southwark</p> <p>Will it help to reduce emissions of PM10, NO2? Will it encourage a reduction in amount and length of journeys made by car?</p>	7.1 7.2 7.3	<p>Number of days of high pollution</p> <p>Annual average concentrations and number of hourly exceedences of nitrogen dioxide in air</p> <p>Annual average concentrations and number of daily exceedences of PM10 in air</p>
Noise	<p>SDO8: To minimise the ambient noise environment</p> <p>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?</p>	8.1 8.2	<p>Number of Priority Areas in the borough</p> <p>The number of persons affected by a noise level above 55 dB(A) Lden</p>
Waste Management	<p>SDO9: To reduce waste and maximise use of waste arising as a resource</p> <p>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?</p>	9.1 9.2 9.3	<p>Municipal waste land-filled (tonnes)</p> <p>Residual household waste per household (tonnes)</p> <p>Percentage of municipal waste sent for reuse, recycling and composting</p>
Water Resources	<p>SDO10: To encourage sustainable use of water resources</p> <p>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?</p>	10.1 10.2	<p>Average domestic and commercial potable water consumption (l/head/day)</p> <p>Water quality measures (by no./type)</p>
Soil and Land Quality	<p>SDO11: To maintain and enhance the quality of land and soils</p> <p>Will it encourage the remediation of land identified as potentially contaminated? Will it prevent further contamination of soils?</p>	11.1 11.2	<p>Number of contaminated sites</p> <p>Number of contaminated sites not remediated</p>

Sustainability Issue	Sustainability Objective and Questions	Sustainability Indicators	
Quality in Design	<p>SDO12: To protect and enhance the quality of landscape and townscape</p> <p>Will it have a negative impact on important strategic/local views? Will it improve the quality of public spaces and street? Will it improve the relationship between different buildings, streets, squares, parks and waterways and other spaces that make up the public domain?</p>	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 the Historic Environment	<p>SDO13: To conserve and enhance the historic environment and cultural assets</p> <p>Will it involve the loss or damage to historic buildings and remains and their setting? Will it improve the historic value of places? Will it promote the historic environment and also contribute to better understanding of the historic environment?</p>	13.1 13.2 13.3 13.4 13.5 13.6	Amount of Southwark covered by Conservation Area or APZ Numbers of heritage assets in the borough on the English Heritage at Risk Register Changes in numbers of listed buildings Number of scheduled ancient monuments at risk Number of conservation areas at risk Number of conservation areas with up-to-date appraisal/ management plans
Open Space and Biodiversity	<p>SDO14: To protect and improve open spaces, green corridors and biodiversity</p> <p>Will it encourage development on previously developed land? Will it improve the quality and range of open spaces? Will it improve access to open space and nature? Will it improve the quality and range of habitat for wildlife? Will it avoid harm to protected and priority species?</p>	14.1 14.2 14.3 14.4 14.5 14.6 14.7 14.8	Change in quantity of open space (ha) Resident satisfaction with open space Change in SINCS and LNRs Change in quality of open space (ha) Open space deficiency Deficiency in access to nature Number/types of habitats Number of green roofs/ facades approved

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

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.

Compatibility Matrix of the SA Objectives

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

Key

✓	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:

<p>Getting the right amount of affordable housing</p>	<ul style="list-style-type: none"> • 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. • 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. • An alternative would be to not have a threshold for student housing, but this would be inconsistent with the approach to conventional housing.
<p>Getting the right mix of housing</p>	<ul style="list-style-type: none"> • 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. • 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.
<p>The quality and design of affordable housing</p>	<ul style="list-style-type: none"> • 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. • 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.
<p>Where should the affordable housing be provided</p>	<ul style="list-style-type: none"> • 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. • 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.
<p>Affordable housing in specific types of development</p>	<ul style="list-style-type: none"> • 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. • An alternative would be to accept live-work units as affordable housing, however our needs analysis shows they do not meet affordable housing need. • 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.
<p>Sheltered, supported and extra care housing</p>	<ul style="list-style-type: none"> • 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. • An alternative would be to require affordable housing as part of specialist housing schemes, however this would affect the ability of

	this housing to be provided at a cost affordable to its intended occupants.
Financing and securing affordable housing	<ul style="list-style-type: none"> 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?

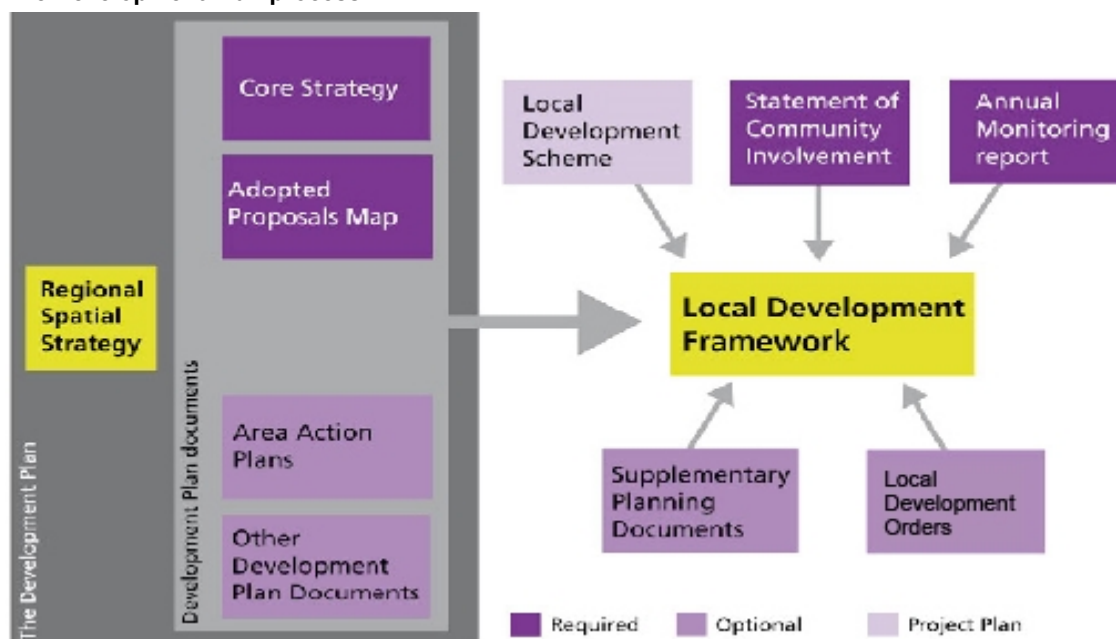
- 9.2.1 The SPD will assist members and council officers in implementing the Core Strategy policies effectively. It will be used to inform the community of the issues associated with affordable housing and how we maximise provision of affordable housing, and will provide detailed guidance to developers, 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.

APPENDICES

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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 Spatial 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

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

	<p>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).</p>	<p>Sections 2, 3 and 9</p>
	<p>Consultation:</p> <ul style="list-style-type: none"> • authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4). • authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2). • other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7). 	<p>Section 2 Appendix 2</p>
	<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8) Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> • the plan or programme as adopted; • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9 and 10) 	<p>Section 9</p>
	<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	<p>Section 9</p>
	<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA checklist Directive (Art. 12).</p>	<p>The Quality Assurance Checklist has been followed</p>

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.

	<p>Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of 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:</p> <ul style="list-style-type: none"> • No person should live more than 300 metres from their nearest area of natural green-space; • There should be at least one accessible 20 hectare site within 2 kilometres; • There should be one accessible 100 hectares site within 5 kilometres; • There should be one accessible 500 hectares site within 10 kilometres 	<p>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.</p>
	<p>Sustainability Issues – this section lists eighteen issues which can be broadly supported, and in particular the following;</p> <p>Protection of landscape features and designated sites and need to address contaminated land issues;</p> <p>Protecting and enhancing biodiversity</p>	<p>Support noted.</p>
	<p>Sustainability Objectives – there are seventeen objectives listed under this section which again can be broadly supported, and in particular;</p> <p><u>SDO6</u> To reduce contributions to Climate Change</p> <p><u>SDO 11 and 12</u> To protect and enhance and conserve the quality of landscape and townscape</p> <p>The Council may wish to consider combining these two objectives</p>	<p>Support noted. We maintain the two objectives to ensure a detailed and thorough sustainability appraisal.</p>
	<p>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.</p>	<p>Support noted.</p>

<p>Highways Agency</p>		<p>No comment</p>	
<p>English Heritage</p>		<p>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.</p>	<p>Noted.</p>
		<p>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:</p> <ul style="list-style-type: none"> · Review the objectives of other relevant policies, plans and programmes, and provide information on synergies or inconsistencies; · Establish the historic environment baseline including trends and gaps in data with notes on sources and any problems encountered; 2 · Identify issues and opportunities for the historic environment; · Set out the sustainability appraisal framework, SEA/SA objectives, indicators and targets where proposed, for the historic environment; · Provide sufficient information on the proposed methodology for the appraisal to assess whether effects upon the historic environment will be properly addressed; and · Consider cross-boundary issues. 	<p>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.</p> <p>Section 5 of the draft SPD sets out more general design guidance for affordable housing.</p>

		<p>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.</p>	
		<p>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 http://www.helm.org.uk/server/show/nav.7709. We would also endorse use of the English Heritage/CABE Tall Buildings Guidance 2007 to help inform policy formulation (available at http://www.helm.org.uk/upload/pdf/tall_buildings07.pdf).</p>	<p>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.</p>
		<p>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.</p> <p>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.</p>	<p>Noted.</p>

	<p>Page 19, para 4.2.8</p>	<p>We welcome inclusion of consideration of historic buildings and conservation 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 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.</p> <p>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.</p> <p>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.</p>	<p>The baseline used for the Affordable Housing SPD takes into account a wider definition to include designated and non-designated assets.</p> <p>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.</p>
	<p>Page 24, para 5.1</p>	<p>Sustainability Issues and Objectives</p> <p>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:</p> <p>‘conserve and enhance all cultural and heritage assets and the wider historic environment and increase enjoyment of the historic environment public realm’</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> · Number of assets removed from the ‘At Risk’ Register · Number of locally listed buildings · Number of archaeological priority zones maintained 	<p>We have amended the wording in the SA.</p>

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.

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 of 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)

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 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)

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)
Souder 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

Commentary of results

Compatibility Matrix		Affordable Housing SPD Objectives		
Sustainability Objectives	AH1	AH2	AH3	
SDO 1 To tackle poverty and encourage wealth creation	✓	✓	✓	AH1 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;
SDO 2 To improve the education and skill of the population	0	0	0	
SDO 3 To improve the health of the population	✓	✓	✓	
SDO 4 To reduce the incidence of crime and the fear of crime	0	?	0	AH2 To provide guidance to make sure that affordable housing is provided throughout the borough in the most appropriate way;
SDO 5 To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	
SDO 6 To reduce contributions to climate change	0	?	0	AH3 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.
SDO 7 To improve the air quality in Southwark	0	?	0	
SDO 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	0	?	0	
SDO 9 To encourage sustainable use of water resources	0	?	0	
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	Key ✓ compatible X incompatible 0 no significant link ? dependent on implementation
SDO 12 To conserve and enhance the historic environment and cultural assets	0	?	0	
SDO 13 To protect and enhance open spaces, green corridors and biodiversity	0	0	0	
SDO 14 To reduce vulnerability to flooding	0	0	0	
SDO 15 To provide everyone with the opportunity to live in a decent home	✓	✓	✓	
SDO 16 To promote sustainable transport and minimise the need to travel by car	0	0	0	
SDO 17 To provide the necessary infrastructure to support existing and future development	0	0	0	

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	1	Core Strategy Policy (No SPD)
SDO 1: To tackle poverty and encourage wealth creation	✓✓	✓✓	2	Affordable Housing SPD
SDO 2: To improve the education and skill of the population	-	-		
SDO 3: To improve the health of the population	✓✓	✓✓		
SDO 4: To reduce the incidence of crime and the fear of crime	✓✓	✓✓		
SDO 5: To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓		
SDO 6: To reduce contributions to climate change	-	-		
SDO 7: To improve the air quality in Southwark	-	-		
SDO 8 : To 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	?	✓		
SDO 13: To conserve and enhance the historic environment and cultural assets	?	✓		
			Key	✓✓ major positive

SDO 14: To protect & improve open spaces, green corridors & biodiversity	-	-		✓	minor positive
SDO 15: To reduce vulnerability to flooding	-	-		XX	major negative
SDO 16: To provide everyone with the opportunity to live in a decent home	✓✓	✓✓		X	minor negative
SDO 17: To promote sustainable transport and minimise the need to travel by car	✓	✓		?	uncertain
SDO 18: To provide the necessary infrastructure to support existing and future development	?	?		-	no significant impact

Detailed Results

Sustainability Objectives	Timescale				Option 1: Core Strategy (no SPD)
	1	S	M	L	Commentary on Results
SDO 1 : To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	<p>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.</p> <p>Requiring student homes to have an affordable element will help ensure more people in the borough have access to suitable accommodation that is affordable.</p>
SDO 2 : To improve the education and skill of the population	-	-	-	-	No significant impact
SDO 3 : To improve the health of the population	✓✓	✓	✓✓	✓✓	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	✓✓	✓	✓✓	✓✓	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	✓✓	✓	✓✓	✓✓	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

Sustainability Objectives	Timescale				Option 1: Core Strategy (no SPD)
	1	S	M	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.
SDO 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	✓✓	✓	✓✓	✓✓	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	M	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	M	L	Commentary on Results
SDO 1 : To tackle poverty and encourage wealth creation	✓✓	✓✓	✓✓	✓✓	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	✓✓	✓✓	✓✓	✓✓	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	✓✓	✓✓	✓✓	✓✓	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

Sustainability Objectives	Timescale				Option 2 : Affordable Housing SPD
	2	S	M	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 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 13 : To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	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	✓✓	✓✓	✓✓	✓✓	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	✓	-	✓	✓	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
	C	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	✓✓	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	✓✓	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	✓✓	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	✓	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 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	✓✓	The policy will increase the number of new affordable homes.
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	?	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	SA	Sustainability Appraisal
CABE	Commission for Architecture and the Built Environment	SINC	Sites of Importance for Nature Conservation
DCLG	Department for Communities and Local Government	SCI	Statement of Community Involvement
DETR	Department for Environment, Transport, and the Regions	SDO	Sustainable Development Objective
DfT	Department for Transport	SEA	Strategic Environmental Assessment
DPD	Development Plan Document	SOA	Super Output Areas
GLA	Greater London Authority	SPD	Supplementary Planning Document
IMD	Index of Multiple Deprivation	SPG	Supplementary Planning Guidance
LDD	Local Development Documents	UDP	Unitary Development Plan
LDF	Local Development Framework		
LDS	Local Development Scheme		
ODPM	Office of the Deputy Prime Minister		
PPG	Planning Policy Guidance		
PPS	Planning Policy Statement		

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

- 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 Consultation (December 2006)
- CDN44. 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
- CDN57. Communities Plan – Sustainable Communities: Building for the Future (2003)
- CDN58. UK Climate Change Regulations (2009)
- CDN59. UK Sustainable Procurement Action Plan (2007)
- CDN60. English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)
- 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 Contaminated Land- Environment Agency (2004)

- CDN65. Environment Agency: Adapting to Climate Change Strategy
- CDN66. Environment Agency Strategies, Plans and Reports
- CDN67. 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. Zero 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 (Mayor of London, May 2006)
- CDR28. London: Cultural Capital – Realising the potential of a 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. Mayor's Municipal Waste Management Strategy (2003)
- CDR32. Mayor's draft replacement Municipal Waste Management Strategy (2010)
- CDR33. GLA Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (March 2009)
- CDR34. Experian Goad Category Report (July 2007)
- CDR35. North East and South East London Industrial Baseline (2007)
- CDR36. Industrial and Warehousing Demand in London (2004)
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- CDB6. Employment
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- CDB8. Strategic Flood Risk Sequential Test
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- CDB10. Infrastructure
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