

Item No. 10	Classification: Open	Date: May 19 2009	Meeting Name: Executive
Report title:		Core Strategy Preferred Options	
Ward(s) or groups affected:		All	
From:		Strategic Director of Regeneration and Neighbourhoods	

RECOMMENDATIONS

1. That members agree the Core Strategy Preferred Options (appendix A) with any changes (set out in table 1 and 2) for consultation.
2. That members comment on the consultation plan and report (appendix B and C).
3. That members comment on the draft Sustainability Appraisal (appendix D).
4. That members comment on the Equalities Impact Assessment (appendix E).

BACKGROUND INFORMATION

5. The Core Strategy will provide the overarching planning framework for the borough. It will be a spatial plan which delivers the vision and objectives for Southwark set out in Southwark 2016. Looking forward to 2026, it will set out the kind of place we want Southwark to be, showing the areas in which growth will be expected to occur, those areas Southwark wishes to protect, such as open spaces, locations for employment uses, and Southwark's approach to maintaining a stable and balanced community through the delivery of schools, affordable housing and leisure facilities. Like all development plans, the Core Strategy must be consistent with national planning guidance and in general conformity with the London Plan. It must show how Southwark will deliver its regional housing target, as well as targets set for the opportunity areas (Elephant and Castle and London Bridge/Bankside) and areas for intensification (Canada Water). It will also need to focus on implementation and show when development in strategic areas will be delivered. It will also need to address how the transport and social infrastructure such as schools, which are needed to support growth, will be provided.
6. The programme for preparing development plans (the Local Development Scheme) has been agreed by the Secretary of State. We are currently at the second stage of preparing the plans. The first stage involved consulting on an issues and options report, we are now deciding the approach for the Core Strategy by consulting on a preferred option.
7. The process for preparing the Core Strategy is slightly different from preparing a unitary development plan. Under the new planning system, the council must consult on options prior to consulting on the draft plans themselves. Following consultation on the draft plans, they are submitted to the Secretary of State who will appoint a planning inspector to hold a public examination of the Core Strategy and AAPs.
8. At preferred options stage, the council must consult on our approach for the Core Strategy. These options must establish our distinct and viable approach for future growth and development. It is important that at this stage the council recognises that it is not starting from scratch. In a number of respects, Southwark's strategy has already been tied down. The Elephant and Castle regeneration is already

underway, as is the regeneration of Bermondsey Spa. The preferred options are not turning back the clock and must focus on those alternatives which are genuinely still open. The preferred option is accompanied by interim sustainability appraisals (the full appraisals are prepared at the preferred options stage), equalities impact assessments and consultation plans. These documents are available to view on the internet.

9. The publication/submission version will be brought back to members in November for adoption for consultation and submission to the Secretary of State.

CONSULTATION

10. The Planning and Compulsory Purchase Act 2004 (as amended by the Planning Act 2008) and the council's Statement of Community Involvement require consultation at preferred options stage to be ongoing and informal. To guide the overall approach to consultation on the Core Strategy and the AAPs, the council has prepared overarching consultation strategies for each of the documents. At each stage in preparing the documents, the council will also prepare detailed consultation plans.
11. The council will consult over a period of 12 weeks (until July 10 2009), in line with the requirements of the SCI, the second half of this period will comprise a period of formal consultation. All documents will be available on the internet, in council offices, libraries and area housing offices. Adverts will also be placed in the press.
12. It is important to recognise that a considerable amount of consultation has taken place over the last few years. The council aims to build on this process and demonstrate that previous comments have been taken into account to try and avoid consultation fatigue.

KEY ISSUES FOR CONSIDERATION

13. We are faced with many challenges in making sure the Core Strategy meets the needs of our diverse population and environment. These include:
 - How we can achieve sustainable development by balancing environmental, social and economic needs to ensure a good quality of life for now and in the long term.
 - How we can build more housing and how it can meet the needs of such a diverse population. This includes how we can provide family housing, housing for first time buyers, social rented housing and different types of housing such as flats and houses.
 - How we can balance the need for more housing with other demands on the land such as for community facilities, open spaces, new offices and leisure centres
 - How we can continue to develop our economy and link local people to jobs.
 - How we can make sure we provide space for new small businesses and creative industries
 - How we can continue to improve the accessibility of Southwark including safeguarding land for possible new public and river transport and improving walking and cycling routes.
14. Based on the feedback we received on our issues and options report, we have decided to take forward mainly the growth areas approach, with some ideas from the housing led approach, as our preferred option.

15. We will prioritise development in the growth areas:
 - Central Activities Zone
 - Elephant and Castle opportunity area
 - Peckham and Nunhead action area
 - Canada Water action area
 - Bankside, Borough and London Bridge opportunity area
 - Aylesbury action area
 - West Camberwell housing regeneration area
 - Old Kent Road regeneration area.
16. Most new development will happen in the growth areas. We are aiming to balance providing as many homes as possible with growth of other activities that create successful places such as places to work, leisure, arts and culture, sports, health centres and tourist activities. We will encourage developments to focus on the strengths of places that make the different areas of the borough distinctive.
17. The policies that we use to implement our growth areas approach will be based on themes and objectives in the Sustainable Community Strategy 2016. These are:
 - Sustainable development to make sure that all developments balance up the benefits and drawbacks of development. We want to make sure that all new development is sustainable with the best development for each place based on an assessment of social, economic and environmental needs. We will retain requirements for sustainability assessment to measure this.
 - Sustainable transport to make Southwark very accessible so that people can get around the borough and to destinations outside the borough very easily. In particular, we want to make Southwark accessible by sustainable types of transport, such as walking, cycling and public transport where possible, rather than the car. This approach will reduce congestion and pollution and make places easier to get to and around. We also want to improve our town centres so that people do not need to travel far to get to shops, libraries, open spaces, health and leisure centres. We will retain requirements for transport assessments to measure this.
 - Shopping, leisure and entertainment to make sure we have a network of successful town centres which have a wide range of shops and services and things for people to do. Our centres will be well used because they are vibrant, easy to get to, friendly and safe. We will retain requirements for larger and busier developments to go into the town centres.
 - Places to learn and enjoy, to make sure we have enough community facilities, such as schools, libraries, health centres and faith premises to help meet people's needs. These facilities can improve people's lifestyles, make places unique and help create areas which are friendly and safe. We want to ensure that larger facilities are located in town centres and places which are easy to travel to. Smaller facilities that only serve the local community can be located anywhere. To do this we need a more joined up approach to how we will use our existing community buildings, schools and facilities. Along with building new schools and improving existing schools (Southwark Schools for the Future) to provide education for children in Southwark, we will continue to ask for payments for community facilities and schools that new people living in an area will use.

- Provide new homes to help meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive environments, particularly in our growth areas. We will encourage new housing, as long as the local character, the environment, open spaces and Southwark's heritage are not harmed. We will do this by developing housing on sites we own, including sites in Elephant and Castle, Bermondsey Spa, Canada Water and Peckham, through our regeneration programmes. Ensuring that development is of the right size and character (density) for the area so that we can build as many homes as possible while creating attractive places which fit well with their surroundings. We have changed some of these areas from the designations in the Southwark Plan. We have put more of the borough within the suburban zone to make sure that we build homes and developments that are a similar size to those already there, in places where there will be little development. We will no longer allow higher density in areas just because they have high levels of public transport accessibility. Instead we will only allow high densities in the opportunity areas and core action areas as this is where we want to focus the majority of our new development.
- We have set out the sites that could be available for the development of housing. This is to consult on sites that could help meet our housing targets. This does not mean that we consider housing to be appropriate on all of these sites. This is an early consultation stage. We will be setting out more detail about the type of development and how much development could go on each site at the next stage of consultation.
- Homes for people on different incomes by providing homes that are affordable for people on a wide range of incomes including social rented, intermediate and private housing.
- Family homes with 3 or more bedrooms for people on all incomes to help make Southwark a borough which is attractive for families. We will ask for developments of 10 or more units to have at least 65% of homes with 2 or more bedrooms, 25% to have 3, 4 or 5 bedrooms and a maximum of 35% of homes to have 1 bedroom. A minimum of 50% of homes with 2 or more bedrooms must have two double bedrooms and a maximum of 5% of homes will be allowed to be studios and then only for private housing. The only exception is the Elephant and Castle opportunity area where 10% of homes in a development must have 3 bedrooms or more.
- Student homes which meet the needs of local communities whilst ensuring that they enhance areas and that we have enough sites on which to build other types of homes including affordable homes.
- Gypsies and travelers site provision which endeavors to meet the Mayor's targets.
- Increase the numbers of jobs in Southwark and reduce the barriers that prevent local people from finding people work. To achieve this we need to maintain and encourage a wide range of businesses within an environment so that they can thrive. The main places for this will be the Central Activities Zone, town centres, the core action areas and strategic cultural centres. We will protect and encourage small business units, tourist facilities, culture and creative industries and preferred industrial locations. We are proposing also to protect the Parkhouse Street industrial area for a tram or alternative depot and to remove protection of industrial uses as the Tower Industrial Estate to allow a wider range of uses. We will also target new jobs and

training to local people through planning obligations. Hotels may be becoming dominant in particular areas so we are considering restricting them in these places and encouraging them where they would enhance areas.

- Protection and improvement of open space to make places attractive and popular and provide sport and leisure opportunities. We will protect metropolitan open land, borough open land and other open space. We will protect nature reserves, woodlands, wildlife and trees. We will protect allotments and sports grounds. We will ask for new open spaces with developments, create and improve outdoor sports facilities., review open spaces to find out if more need protection and protect some spaces as part of the green chain walk. We will also ask for payments for improving open spaces, access to open spaces, sports facilities, trees and nature conservation from developments so that we can try to create more and improve open spaces especially in dense areas where there is lots of development.
- High standards of design to create distinctive places which are attractive and fit well with their surroundings, which are safe, easy to get around and feel comfortable to live, work, study and relax in. We are also trying to make sure that Southwark's places of historic value, including its conservation areas, listed buildings, archaeological priority zones and monuments, are protected or improved.
- High environmental standards to achieve positive designs to improve the quality of places, provide higher living and working standards, improve the environment and reduce the impacts on climate change. To achieve this will introduce a policy for the highest possible standards for all development and we will set code for sustainable homes and BREEAM levels as standards. We will also allocate a site to process our waste.
- A number of changes to the planning committee version have been suggested. These are set out in tables 1 and 2 and a track changes version of the preferred options is available as appendix . This are attached at the back of this report.

Community Impact Statement

18. The purpose of the Core Strategy and the AAPs is to facilitate regeneration and deliver the vision of Southwark 2016 in a sustainable manner ensuring that community impacts are taken into account.
19. In preparing the preferred options report, the council has also completed Equalities Impact Assessment (EqIA) scoping reports (available on the website). These highlight a number of key issues that need to be addressed in preparing the Core Strategy and the AAP. The first of these is the need to ensure that the methods used to consult and engage people in the preparation of the Core Strategy and AAPs are open and accessible to all members of the community. To help address this issue the council has prepared consultation strategies which set out the principles of how it will consult and the importance of reducing barriers to consultation. These emphasise that particular needs such as access, transport, childcare and translation need to be considered, as well as a strategy to broaden the appeal of taking part in consultation and make it attractive to a diverse range of people and groups. At each stage, participation will be monitored and analysed to see whether any particular groups have not been engaged and whether this can be addressed at the next stage.

20. Other issues which the EqlAs highlight include access to housing for all groups. There are particular groups, such as BME communities, who are affected by the size of housing available and have a need for more family sized units. We also need to consider the benefits of regeneration of areas versus improvements to tenants homes to ensure that we consider the needs of current residents in addition to how areas can be improved. It will also be important to ensure that homes are adaptable and meet lifetime homes needs, and that homes which can be easily adapted to wheelchair use are provided. The latter are important considerations for the elderly and people with disabilities. The council has a statutory duty to provide for Gypsies and travelers, and this needs to be taken into account in allocating sites in the plan. It will also be important that the plans help reduce barriers to work which are experienced by those with low skills, single parent families, and people with disabilities in particular. This will have implications for a number of the council's equalities target groups, including the young and older people, people with disabilities and people in BME communities whose first language is not English.
21. Other important issues include access to facilities, to shops, jobs, schools etc. It will be important to ensure that provision is located in areas which are accessible. This can be particularly important for groups who are less likely to have access to cars, including the young and elderly. While it will be important to improve access to public transport and reduce parking requirements, it should be borne in mind that some groups rely on cars, particularly families and the elderly.
22. Draft sustainability appraisals have been prepared to ensure the wider impacts of development are addressed. Both the sustainability appraisals and the EqlAs will be taken forward and revised at publication/submission version stage.

Resource/Financial Implications

23. None at this stage, however, the team will work closely with colleagues in FMS over the coming months to identify and evaluate any financial impact arising from the development of the Core Strategy.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Strategic Director of Legal and Democratic Services

24. The Core Strategy is a development plan document (Regulation 7 of the Town and Country Planning (Local Development) (England) Regulations 2004 ("the Regulations")) and a draft Core Strategy will be subject to independent examination once the Preferred Options has been developed, post consultation, into a submission draft Strategy.
25. The Core Strategy Preferred Options, the accompanying consultation plan, the consultation report, the interim Sustainability Appraisal and the Equalities Impact Assessment, together with comments of members of Planning Committee, are presented to the Executive for approval of the Preferred Options for consultation prior to the preparation of a submission draft document.
26. The Core Strategy Preferred Options sets out which of the options from the Core Strategy Issues and Options Report (October 2008) are being pursued.

The Consultation Plan/Consultation Report

27. The production of the Core Strategy is required to follow principles for community engagement in planning. In particular Regulations 24 and 25 of the Town and Country Planning (Local Development) (England) Regulations 2004 (the

Regulations') require the council to consult with the community and stakeholders during the preparation of the preferred options and publish an initial sustainability report. Regulation 26 and Section 19(3) of the Planning and Compulsory Act 2004 ("the Act") specifically require local planning authorities to comply with their adopted SCI.

28. Where the SCI exceeds the consultation requirements of the Regulations, it must be complied with. The involvement of the public and stakeholders across different sectors in preparing the Core Strategy must follow the approach set out in the council's SCI. This means that the Council is required to undertake timely and effective consultation. The approach outlined in the attached consultation documents is legally compliant and appropriate.
29. We will use a questionnaire to gather responses on the Core Strategy Preferred Options report. A draft of the questionnaire is included within the document in appendix A, and we have inserted consultation questions throughout the document. These questions and the questionnaire will be set out more clearly in the final version of the Core Strategy, before it goes out for formal consultation.

The Core Strategy Preferred Options

30. In devising its Core Strategy the council is required to be consistent with national policy and in general conformity with the London Plan. This means that the choices made regarding, for example where growth should take place should follow national and regional policy.
31. The Core Strategy is key to delivering corporate and community aspirations. Therefore the key spatial planning objectives for the Southwark area should be in alignment with priorities identified in the SCS.
32. The Core Strategy must be justifiable. It must be founded on a robust and credible evidence base and should be the most appropriate strategy when considered against the reasonable alternatives.
33. The ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the council to seek out and evaluate *reasonable* alternatives promoted by themselves and others.
34. The Core Strategy must be effective. This means that it must be deliverable, flexible and able to be monitored.
35. Deliverability is demonstrated by showing how the vision, objectives and strategy for the area will be delivered, by whom and when. This includes making it clear how infrastructure which is needed to support the strategy will be provided and ensuring that what is in the plan is consistent with other relevant plans (such as other DPDs) and strategies relating to adjoining areas.
36. Flexibility is demonstrated by showing that the Core Strategy can deal with changing circumstances. Core strategies should look over a long time frame – 15 years usually but more if necessary.
37. It is important to note that it is not always possible to have certainty about the deliverability of the strategy. In with a strategic approach to community involvement.
38. In these cases the Core Strategy should show what alternative strategies have been prepared to handle this uncertainty and what would trigger their use.

39. A Core Strategy must have clear arrangements for monitoring and reporting results. Monitoring is essential for an effective strategy and will provide the basis on which the contingency plans within the strategy would be triggered. The delivery strategy should contain clear targets or measurable outcomes to assist this process.

Soundness of the Core Strategy

40. Under the Planning and Compulsory Purchase Act 2004 S 20(5)(a) when the Core Strategy is finalised and submitted to the Secretary of State, an Inspector will be charged with firstly checking that the plan has complied with legislation and is otherwise sound. Section 20(5)(b) of the Act requires the Inspector to determine whether the plan is 'sound'. The 'soundness test' includes in particular ensuring that the plan:

- a) has been prepared in accordance with the Local Development Scheme
- b) is in compliance with the Statement of Community Involvement and the Regulations;
- c) has been subject to Sustainability Appraisal;
- d) has regard to and is consistent with national policy;
- e) conforms generally to the Spatial Development Strategy, namely the London Plan;
- f) has regard to other relevant plans, policies and strategies such as other DPDs which have been adopted or are being produced by the Council;
- g) has regard to any sustainable community strategy for its area; and
- h) has policies, strategies and objectives which are coherent, justified, consistent and effective.

41. These are the overarching principles that should be in members' minds when approving the documents before them.

42. On the basis of the evidence that has been reviewed there is no reason to believe that a Core Strategy based on the present Preferred Options will not be sound. However, prior to the finalisation of the submission draft further issues will need to be considered and developed further. These include:

- a) the relationship between the Core Strategy and the policies of adjacent Boroughs where there are cross boundary implications;
- b) how the Core Strategy addresses the three Area Action Plans (AAPs) that are emerging;
- c) how the Core Strategy will be flexible enough to accommodate changes in policy within the London Plan;
- d) as indicated in the Preferred Options document, how the proposals will be implemented and, in particular, the infrastructure implications. A clear strategy for delivering (and paying for) the required infrastructure will need to be developed;
- e) the mechanisms that will be used to monitor the implementation of the CS and what approaches will be taken to address changes in circumstances.

Sustainability Appraisal

43. The Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) to be prepared for all emerging development plan documents and therefore this applies to the Core Strategy. A strategic environmental assessment (SEA) is required by the Environmental Assessment of Plans and Programmes Regulations 2004 and this normally forms part of the Sustainability Appraisal.

44. The Sustainability Appraisal required by section 19(5) of the Planning and Compulsory Purchase Act 2004 should be an appraisal of the economic, social and environmental sustainability of the plan.
45. The Sustainability Appraisal should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process. Sustainability assessment should also inform the evaluation of alternatives. It will also provide a means of proving to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives.
46. The interim Sustainability Appraisal that has been provided is legally adequate to support the Preferred Options. When consultation responses have been received and the submission draft of the Core Strategy is prepared further work will be carried out to ensure that it addresses alternative options, delivery issues and the implications of other elements of the development plan that are already being progressed. It will also make clear those elements of the document that are intended to meet the requirements for Strategic Environmental Assessment.

Equality Impact Assessment

47. The council published its Equality Scheme 2008-2011 in May 2008. This sets out the council's overall policy for addressing equality, diversity and social cohesion in the borough. This policy recognises that people may face discrimination, or experience adverse impact on their lives as a result of age, disability, ethnicity, faith, gender or sexuality.
48. The carrying out of an EqIA in relation to policy documents such as the Core Strategy improves the work of Southwark by making sure it does not discriminate and that, where possible, it promotes equality. The EqIA ensures and records that individuals and teams have thought carefully about the likely impact of their work on the residents of Southwark and take action to improve the policies, practices or services being delivered. The EqIA in respect of the Core Strategy needs to consider the impact of the proposed strategies on groups who may be at risk of discriminatory treatment and has regard to the need to promote equality among the borough's communities.
49. The submitted EqIA meets the reasonable requirements for this stage of the Core Strategy.

Human Rights Considerations

50. The policy making process potentially engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant. In the case of the Core Strategy Preferred Options, a number of rights may be relevant:
 - **The right to a fair trial (Article 6)** – giving rise to the need to ensure proper consultation and effective engagement of the public in the process;
 - **The right to respect for private and family life (Article 8)** – for instance the selection of preferred options from a number of alternatives could impact on housing provision, re-provision or potential loss of others. Other considerations may include significant impacts on amenities or the quality of life of individuals;
 - **Article 1, Protocol 1 (Protection of Property)** – this right prohibits interference with individuals' right to peaceful enjoyment of existing and future homes. It could be engaged, for instance, if the delivery of any plan necessitates CPOs;

- **Part II Protocol 1 Article 2 Right to Education** – this is an absolute right enshrining the rights of parents’ to ensure that their children are not denied suitable education. This will be a relevant consideration in terms of strategies in the plan which impact on education provision.

51. It is important to note that few rights are absolute in the sense that they cannot be interfered with under any circumstances. ‘Qualified’ rights, including the Article 6, Article 8 and Protocol 1 rights, can be interfered with or limited in certain circumstances. The extent of legitimate interference is subject to the principle of proportionality whereby a balance must be struck between the legitimate aims to be achieved by a local planning authority in the policy making process against potential interference with individual human rights. Public bodies have a wide margin of appreciation in striking a fair balance between competing rights in making these decisions.
52. This approach has been endorsed by *Lough v First Secretary of State* [2004] 1 WLR 2557. The emphasised that human rights considerations are also material considerations in the planning arena which must be given proper consideration and weight. However, it is acceptable to strike a balance between the legitimate aims of making development plans for the benefit of the community as a whole against potential interference with some individual rights.
53. The approach and balance between individual and community rights set out in the Preferred Options is within justifiable margins of appreciation.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
London Plan	Planning Policy Team Chiltern House	Tim Cutts 020 7525 5380
Southwark Statement of Community Involvement	Planning Policy Team Chiltern House	Tim Cutts 020 7525 5380
Southwark Local Development Scheme	Planning Policy Team Chiltern House	Tim Cutts 020 7525 5380
Southwark Plan 2007	Planning Policy Team Chiltern House	Tim Cutts 020 7525 5380

APPENDICES

No.	Title
Appendix A	Core strategy Preferred Options (available with report)
Appendix B	Core strategy preferred option consultation plan <i>(available on the internet)</i>
Appendix C	Core strategy preferred option consultation report <i>(available on the internet)</i>
Appendix D	Core strategy preferred option interim Sustainability Appraisal (available on the internet)
Appendix E	Core Strategy preferred option Equalities Impact Assessment (available on the internet)
Appendix F	Core strategy Preferred Options with tracked changes <i>(available on internet)</i>
Internet link for appendices	http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/planningpolicy/localdevelopmentframework/corestrategy.html

AUDIT TRAIL

Lead Officer	Anne Lippit, Strategic Director of Regeneration And Neighbourhoods	
Report Author	Julie Seymour, Head of Planning Policy	
Version	Final	
Dated	May 8 2009	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Legal and Democratic Services	Yes	Yes
Executive Member	Yes	No
Date final report sent to Constitutional Support Services	May 11 2009	

TABLE 1 RECOMMEND THAT EXECUTIVE CONSIDER AND DO NOT MAKE THE FOLLOWING CHANGES

This table sets out issues that we do not consider need changing. We would like Executive to take a decision on whether they would like these suggestions for changes to be made. These changes are all shown in appendix F as a track changes version of the core strategy which is available on the internet and on request.

WHOSE COMMENT	CHANGE SUGGESTED BY PLANNING COMMITTEE, MEMBERS OR OFFICERS	WHY NO CHANGE SHOULD BE MADE	EXECUTIVE YES OR NO TO CHANGE
Planning Committee	Section 3.1 Policy 2 – Sustainable transport. Do we want to say we will protect the tram route further than the TfL route into Peckham. Do we want the tram route on the proposals map at all when there is no money to build the scheme?	We think that the tram route should be included as set out by TfL as this is the only scheme that could be implemented. We should continue negotiating with TfL until the publication/submission version as it may need to be removed if a supported, funded scheme can not be identified.	
Planning Committee	Section 3.1 Old Kent Road and policy 3 Concerns re Old Kent Road and whether we want to continue to leave it outside the retail hierarchy.	We do not consider Old Kent Road to meet the criteria for a town centre. Therefore it should not be protected.	
Planning Committee	Lordship Lane – put some more information in about community centres and facilities.	Community facilities policy 4 provides this information. There is no need to repeat this in the area section as there are no special Lordship Lane features that single this out for a mention.	
Planning Committee	Section 3.1 Objectives Insert a reference to reducing demand for carbon-based energy and maximising the proportion of energy needs met from renewable sources	This would repeat information already set out in policy 13	
Planning Committee	Policy 7 Look at rewording the sentence on minimum of 50% of homes with 2 bedrooms or more. This should either remove the requirement for larger homes because they are not needed or change the emphasis to require larger homes in another way.	We consider the policy necessary to provide a balanced approach to providing homes of different sizes to meet different needs.	

WHOSE COMMENT	CHANGE SUGGESTED BY PLANNING COMMITTEE, MEMBERS OR OFFICERS	WHY NO CHANGE SHOULD BE MADE	EXECUTIVE YES OR NO TO CHANGE
Planning Committee	Policy 10 Suggestion that we should protect more employment sites than just within the CAZ, town centres, core action areas, strategic cultural areas and preferred industrial locations. Suggestion that could add in that could add in a sentence to say “Other areas identified in the local development framework” to protect more areas. Executive to consider whether they want to protect more business space than currently in policy 10.	We consider the policy to protect employment sites in the growth areas to be the most effective strategy. This means that employment sites are protected in main areas of activity with good transport links. They are not protected in predominantly residential areas. We do not consider there to be a need to protect all employment sites in the borough wherever they are located. There is no demonstrated need for all of these sites and their locations can make them inaccessible. This could also reduce our ability to meet out housing targets as there will be fewer sites for housing development.	
Planning Committee	Live-work units. Add in to say that we will not favour live work developments	This is too specific for the core strategy. We will consider this in the development management planning document.	

TABLE 2 RECOMMEND THAT EXECUTIVE CONSIDER AND MAKE THE FOLLOWING CHANGES

This table sets out the changes we think should be made to the document based on Planning Committee, Members and officer comments. We would like Executive to make a decision on whether they think these suggested changes should be made. These changes are all shown in appendix F as a track changes version of the core strategy which is available on the internet and on request.

WHOSE COMMENT	CHANGE SUGGESTED	CHANGE MADE	EXECUTIVE YES OR NO TO CHANGE
Planning Committee	Section 1.1.What is the Core Strategy? Fourth bullet point. Add faith centres and community centres to our important issues.	Changed as suggested	
Planning Committee	Section 2.1. Southwark today Reword the last sentence about population changes and diverse populations.	Amended text to say “The borough is very diverse and the population is growing”.	
Planning Committee	Section 2.1 Southwark today Fourth bullet point. Clarify whether we are the 19 th largest economy in England.	Changed to text to read “...being one of the largest in England”	

WHOSE COMMENT	CHANGE SUGGESTED	CHANGE MADE	EXECUTIVE YES OR NO TO CHANGE
Government Office for London	Section 2.1 Southwark today. This section could be expanded to show any cross boundary issues/relationships with areas in neighbouring boroughs; Suggest expand the bullet points detailing key issues being faced by the borough – possibly drawing information from Appendix E.	Changes have been made to the map to show the links. The bullets have been expanded to detail more issues from the community strategy and cross boundary relationships	
Government office for London	Section 2.2 What has already been agreed You refer to your UDP being adopted after 7 years of consultation. During this time there may have been changes to national and regional policy; also change in local circumstances. Are you confident that none of the issues that have been agreed need updating? Do you have up to date evidence to confirm this stance?	Changes have been made to remove the reference to not changing relevant policies as this was incorrect.	
Government office for London	Section 2.3 Southwark in the future Overall strategy for the borough – where you want Southwark to be by 2026 – does not come through here. What are the linkages between the areas classed as growth areas and are there any areas within the borough that you want to preserve/see little change?	The vision has been reworded to say how Southwark should be in 2026. A reference has been put in to provide a link to the area details.	
Planning Committee	Reference to students throughout the whole document should not say that we are going to direct them away from busy areas. It should say that we are going to limit them if they are having negative impacts.	Changes made throughout the document.	
Planning Committee	Section 3.1 Vision Needs some refinement. e.g. London is an important place, we are part of it etc. Plus make it clear that it is the vision.	Amended vision and made it more clear in the document that it is our vision for the whole of Southwark.	

WHOSE COMMENT	CHANGE SUGGESTED	CHANGE MADE	EXECUTIVE YES OR NO TO CHANGE
Officers	Section 3.1 Input the other areas in London covered by the Central Activities Zone.	Added in the other 9 boroughs	
Planning Committee	Section 3.1 River Thames Add in that Chambers Wharf has potential for development and is underway now.	Changed the text to read: "There is little potential for development in the riverside sites from Shad Thames along to Rotherhithe, except for Chambers Wharf which is being developed at the moment"	
Planning Committee	Section 3.1 Objectives Reword all the objectives to be more consistent	We have reworded some of the objectives to make them consistent.	
Planning Committee	Section 3.1 Elephant and Castle Add in South Bank University when we refer to the university	Changed the text to read "We will support London South Bank University"...	
Officers	Section 3.1 Elephant and Castle. Explain how our SPD and SPG link to the Core Strategy	Added text to say "There is an mentaPlanning Guidance for the central part of the Elephant and Castle and an Supplementary Planning Document for the enterprise zone. We will need to review these once the core strategy has been prepared to find out if there is any guidance that needs updating. As the Elephant and Castle is an Opportunity Area in the London plan, we will need to work with the Mayor to make sure that we have a framework for development and meeting targets in this area."	
Planning Committee	Section 3.1 Peckham and Nunhead Add in that Peckham will be a centre for creativity and commercial activity.	Changed the text to readas a centre "for creativity and commercial activity"...	
Planning Committee	Section 3.1 Peckham and Nunhead. Add in that we will work with landlords to bring accommodations above shops back into use.	Added in text to say "including bringing accommodation above shops into use".	
Planning Committee	Section 3.1 Peckham and Nunhead. Reword about Bermondsey Street to be clear that conservation areas do not prevent regeneration.	Amended text to read 'This could has positive impacts like the interesting, modern new buildings on Bermondsey	

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		Street, which shows how conservation areas can be used to stimulate regeneration.'	
Executive Member for Regeneration	Section 3.1 Borough and Bankside Produce an A4 map to show just this area as there is so much happening in this area.	Inserted a map to show the Borough and Bankside area in more detail	
Executive Member for Regeneration	Section 3.1 Borough and Bankside and the Blue. Need more information on improving the quality of retail	More information added for both on doing this. 'Borough market provides a popular, unique shopping experience. Borough High street has some great cafes and local shops and is used by residents, office workers and some tourists. However many of the shops are not providing local services so we are preparing a strategy to improve the quality of shopping.'	
Planning Committee	Section 3.1 The Blue Add in some further information on this.	Added in further text to say The Blue has a market place and the potential for a busy local shopping area along Southwark Park road. There are high vacancies and a lack of local shops for residents. We will be preparing a strategy to improve the quality of the shops and services for local people to encourage them to use the Blue. We need to find niche shops that will build up momentum for rejuvenating the area and that will encourage other more mainstream local shops and services to start up. We will be improving the quality of the environment and links into and around the area to encourage people to walk through and use the area. We will be increasing the numbers of homes in the Spa and other areas around the Blue which will increase	

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		the number of potential shoppers.	
Planning Committee	Section 3.1 Camberwell Add in that need to improve traffic and transport and that we are working with TfL to do this.	Added in text. We will work with Transport for London to improve the traffic congestion, safety and accessibility to and within Camberwell by bike, foot and public transport.	
Executive Member for Regeneration	Section 3.1 Camberwell. Widen out Camberwell town centre to include the Green and shops in the surrounding area.	The boundary has been changed on the map and guidance included for the Green and leisure centre. 'We will continue to improve Camberwell Green as an important open space within the town centre. We will work to improve the leisure centre to provide local services.'	Do this please
Executive Member for Regeneration	Section 3.1 Old Kent Road Add in information about the new businesses that could locate along the Old Kent Road and widen out job opportunities for residents.	Added in 'We want to exploit the expected significant growth in innovative industries in this area. Particularly new sectors in green manufacturing, bio-sciences and the knowledge economy. These could provide a range of jobs for Southwark residents from highly skilled research to call centres'.	
Government Office for London	Section 3 : Vision and objectives Vision is not locally distinctive though it is noted that you provide information on all of the areas within the borough - it would be helpful to the reader if you explained the linkages between the two; Only some of the areas consider the type and quantum of development being proposed. Suggest that where possible, you provide this detail for all areas. For example in relation to Peckham, you could explain that this is currently out to consultation and then set out in broad terms the proposed growth scenarios. However, you	The vision has been reworded to be more locally distinctive. The linkages have been explained. The number of homes and jobs has been provided where we have targets for areas. The key diagram shows where the areas are within the borough. The key diagram and proposals map are now 2 maps, the suggestions have been included.	

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	<p>should ensure that the Core Strategy is not being led by the AAPs, as the Core Strategy should set the framework for the AAPs;</p> <ul style="list-style-type: none"> • Suggest you insert a diagram to show where the areas mentioned are within the borough; • Key diagram/proposals map – this needs to be separated into 2 maps. In relation to the key diagram, suggest you include Southwark’s relationship with neighbouring boroughs/key centres; broad locations for growth; key infrastructure/transport routes; strategic sites. 		
Officers	Add in need to attract teachers into objective 1B	Added in.	
Government Office for London	<p>Section 4: the preferred options</p> <ul style="list-style-type: none"> • It would be helpful to briefly set out the justification for each preferred option – for example what came out of your issues and options consultation and SA; you could also explain the linkages to the documents referred to; • Within the policy options section you have taken the approach of only putting forward one preferred option within each policy area. With this approach you will need to show through your evidence base that there is only one realistic option for each policy remaining at this stage and that you have not closed off other possible options which would have benefited from further consultation; 	We have included this information in the background papers and evidence base.	

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Planning Committee	Figure 1. Key diagram/proposals map Remove the blue urban zone where it is not needed.	Key diagram and proposals map amended and made more clear	
Planning Committee	Policy 2 Mention possible tube extensions as something that we may need to safeguard	Amended text to add in a bullet point on tube extensions.	
Planning Committee	Policy 3 or within fact box on town centres need to add toilets as one of the uses.	Added toilets to fact box on town centres	
Executive Member for Regeneration	Fact box: Town and local centre hierarchy Add in figures for how much retail, leisure etc is suitable for each of the three types of centres in the hierarchy. Provide more definitions on what is meant by each level.	Added in descriptions of each of the three types of centres. Added in the figure of 50,000 sqm of retail space for major town centres (as from the London Plan and PPS6). The other centres have no defined figures.	
Executive Member for Regeneration	Policy 4 Add in about how if community facilities are going to be successful they need to be able to be afforded by local groups. Also local groups need to be ready to use them or they will be built and then stay empty.	It is important that new community facilities have identified users that can afford to pay the revenue costs to upkeep and rent the centre. If community groups can not be found to use centres, they can become empty buildings that nobody uses.	
Members	Policy 4 Change wording about the PCT.	We have provided clarity about the role of the PCT.	
Planning Committee	Policy 5 Reword 4 th bullet point on short term lets to be more clear.	Removed this sentence	
Executive Member for Regeneration	Policy 5 Put the London Plan housing target into the first section of “ we are trying to”	Amended first section of “we are trying to” to say “Meet our targets set out in the London Plan, which is a target of building 31,000 new homes between 1997 and 2017”	
Officers	Policy 5	Added in text to say “We have set out the	

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	Refer to possible sites for future housing development.	sites that could be available for the development of housing in appendix B. This is to consult on the boundaries of strategic sites that we may put on the proposals map at the publications/submissions stage. This could help meet out housing targets. This does not mean that we consider housing to be appropriate on all of these sites. This is an early consultation stage, we will be setting out more detail about the type of development and how much development could go on each site at the next stage of consultation”	
Planning Committee	Fact box: Density Make it clear that density zones link to parking standards	Added in sentence to explain that the density zones link to parking standards and the detail will be in a later planning document.	
Officers	Fact box Density Change the urban density range to remove the distinction between medium and lower density and to have the whole of the urban zone within the range 200-700 habitable rooms per hectare.	Changed as suggested	
Planning Committee	Fact box Affordable housing Reword point 1 of affordable housing to have a better definition	Amended definitions of affordable housing within the fact box to make it more clear.	
Planning Committee	Figure 2 Affordable housing map. Make it clear of what the percentages as different tenure types relate to. Input information on what is required in the Aylesbury action area.	Amended the affordable housing map (figure 1) to show this. Inserted percentages for Aylesbury action area	
Officers	Figure 2 Affordable housing map Elephant and Castle affordable housing area have policies for affordable housing and private housing/	Shown on figure 2 on affordable housing.	

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Officers	Figure 3 Affordable housing map Add the Lane ward and all of the Old Kent Road regeneration area to the areas where we will require a minimum of 35% of major developments to be private housing.	Affordable housing map has been amended to reflect this.	
Planning Committee	Policy 7 Insert fact box on bedroom room sizes	Amended fact box on habitable rooms to also include minimum double bedroom size (12sqm) and single bedrooms (7sqm). Also explained that the number of habitable rooms are used to measure density, affordable housing and family housing.	
Executive Member for Regeneration	Policy 7 Change to the requirement for 3 bedroom plus housing from 25% to 30% Change the requirement for 2 bedroom housing to 60%	Have changed the text accordingly. This may have viability issues so will need careful consideration in the publication/submission version.	
Officers	Policy 7 Add to text that we want 50% of 3 bedrooms plus dwellings as private.	Amended text to read “50% of 3, 4 or 5 bedroom units to be private housing”	
Executive Member for Regeneration	Policy 10 Further information needed on green manufacturing.	Added in that we are enabling growth in new sectors such as green manufacturing. Explained reasons why. ‘Protecting industrial and warehousing and enabling growth in new sectors such as green manufacturing and technology in the following strategic and local preferred industrial locations:’ ‘As part of a world city, we will continue to be an attractive location for innovative industries. We will use that dynamism to improve employment and business opportunities for local people.’ ‘London’s economy is changing fast.	

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		Although traditional manufacturing has declined, new sectors are emerging in green manufacturing, biosciences and the knowledge economy. Clusters of industrial and warehousing activities should be protected to meet existing needs and to enable Southwark's economy to diversify into emerging sectors. These sectors provide a range of job opportunities from highly skilled research jobs, to call centre jobs. Diversifying the range of job opportunities in the preferred industrial locations, into new sectors would benefit local people.'	
Executive Member for Regeneration	Fact box: Archaeological Priority Zones Need to change names to make it clearer where they are and number the APZs.	Names changed and APZs numbered to make it more clear	
Executive Member for Regeneration	Add in part of Cross Bones Graveyard to be protected open space.	Added to the proposals map as new open space.	
Planning Committee	Policy 12 Need to show clearly on a map where the tall building area is. Need to check whether we allow tall buildings in Aylesbury	We have included a Tall Buildings area on the proposals map. Added a link to the proposals and Bankside maps.	
Planning Committee	Fact box Tall buildings Describe height of tall buildings in number of storeys as well as metres.	Add in text to say "30 metres is the height of approximately a 10 storey residential development or a 7-10 storey commercial development"	
Planning Committee	Policy 13 Add in that we also encourage the use of carbon reduction and renewable energy technologies for existing buildings.	Added into policy under we will do this by to state: "Encouraging the use of carbon reduction and renewable energy technologies for existing buildings"	

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Executive Member for Regeneration	Policy 13 Add in Code for Sustainable Homes level 3 or 4, depending on how feasible it is.	Added in “Residential development should exceed Code for Sustainable Homes Level 3. We will investigate how feasible it is to ask for all major residential development to achieve Code Level 4. This would provide very high reductions in carbon dioxide emissions but would be technically and financially harder to achieve than Code Level 3”	
Officer	Policy 13 Waste – add in reference to waste management once new sites are occupied. Suggest adding that a waste strategy is required to show how waste is to be managed once the site is occupied.	Added into text apportionment target, recycling targets and information about Joint Waste Technical Paper and explained that we have a site allocated.	
Government Office for London	Policy 13 Waste Need to add in apportionment target, safeguarding of sites and a information about the Joint Waste Technical paper.	Added into text apportionment target, recycling targets and information about Joint Waste Technical Paper and explained that we have a site allocated.	
Planning Committee	Figure 3 Need to add in some text to explain the purpose of the map.	Text added to document to explain purpose of all maps	
Government Office for London	Section 9: Delivery and implementation <ul style="list-style-type: none"> Given that this is a further regulation 25 consultation we would expect to see much more detail here – including who you are working with, how and when you aim to deliver your vision and objectives, including any issues arising from this. The Planning Inspectorate’s ‘Local Development Frameworks: Lessons Learnt Examining Development Plan Documents’ says that “DPDs should be 	Our delivery section sets out the context for the detail that will be included at the publication/submission version. All of our preferred options have been tested to ensure they are deliverable. We have set out targets with each policy and sections with each policy saying what we are trying to achieve and how we intend to go about achieving it. We will provide a detailed plan once we have the final policies that we will be implementing.	

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	<p><i>firmly focused on delivery. Thus the implementation and monitoring section of a DPD is of equal importance as the policies in the DPD."</i></p>		
Government Office for London	<p>Section 10: Reviewing progress</p> <ul style="list-style-type: none"> This section states that you will set targets for the Core Strategy and regularly monitor whether the plan is working through your AMR. The Plan Making Manual says <i>"It is not sufficient to defer the issue of monitoring within the core strategy by simply saying that it will be dealt with in the annual monitoring report. The core strategy itself requires a framework for the annual monitoring report by identifying key targets and indicators against which the council can measure the effectiveness of the strategy, policies and proposals. Implementation and delivery targets must be clearly set out and relate to policy considerations. For example, affordable housing targets need to have a parent affordable housing policy and need to be firmly rooted in a proper understanding of the likelihood of funding for affordable housing. The targets should be properly explained and supported by evidence and it should be clear in their relationship to the strategy"</i>. 	<p>We have added 'These will be based on national, London and local indicators using figures already being measured through local area agreements and best value along with new local indicators.'</p> <p>We have set out our key targets with each policy. Our annual monitoring report sets out a framework of national, London and local indicators to measure how we are meeting our targets. We are doing the activities requested in our annual monitoring report along with other measuring mechanisms as added above. This is linked to our evidence base and will be further detailed in our implementation section.</p>	
Government Office for London Proposals map	<p>Strategic Sites in the Core Strategy The Core Strategy should be a strategic document that <i>"makes clear spatial choices</i></p>	<p>We are consulting on the boundaries of all strategic sites set out in the SHLAA map. We will then put the details suggested</p>	

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	<p><i>about where development should go in broad terms</i>" (PPS12 para 4.5). Strategic sites may be allocated in the Core Strategy, but the expectation is that there will not a a large number of these sites.</p> <p>PPS12 para 4.7 indicates that <i>strategic sites</i> should be those sites that <i>"are central to the achievement of the strategy and where investment requires a long lead-in."</i> The expectation is that where sites have been allocated in the Core Strategy, they will not need a further DPD to bring them forward. Therefore, pre-publication consultation on the boundaries of the sites is essential. However, as you are preparing several AAPs for the main areas of change in the borough, will the AAPs effectively allocate your strategic sites, or will there be a need to identify other sites outside the AAP areas?</p> <p>For any strategic sites that are not covered by the AAPs, we advise that you include a policy in the Core Strategy for each strategic site. Set out below are the sort of matters that it would be advisable to cover for each strategic site:</p> <ul style="list-style-type: none"> • A clear statement of what is expected to be achieved on the site, and why it is central to the delivery of the Core Strategy • Site constraints, and where applicable, how it is intended to mitigate or overcome the constraints • The type and scale of land uses to be 	<p>and policies for the large strategic sites in the core strategy publication/submission version. We will ensure that all of the information set out in the bullets is provided in the publication/submission version for each strategic site.</p>	

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	<p>delivered on the site</p> <ul style="list-style-type: none"> • The infrastructure required to support the development, with the expected phasing and details of who is expected to fund and deliver it. Any infrastructure that is a pre-requisite for development should be identified • Whether an SPD will be prepared to provide further details • Expected timescale for delivery, for example an indication of the dates for submission of a planning application, commencement, phasing of development, together with a risk assessment if the expected delivery is not achieved • The boundaries of the site should be identified on an OS-based Proposals Map. 		
<p>Government Office for London Proposals map</p>	<p>Level of detail in the Core Strategy Some of the type of sites that you referred to are designations rather than allocations, and could be linked to policies in the Development Management DPD. If the Core Strategy sets out the high level policies, this coupled with the saved UDP policies, and London Plan policies, will provide the development plan basis for development management until the subsequent Development Management DPD is adopted. Whether these sites are critical to the delivery of the Core Strategy is a matter for you to determine.</p>	<p>The strategic sites have been allocated on the proposals map. We are consulting on the boundaries of all sites set out in the SHLAA map. We will then put the details suggested and policies for the large strategic sites in the core strategy publication/submission version.</p>	

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	<p>PPS3 para 53 refers to LDDs containing "policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption." There is no specific requirement to identify all sites in the Core Strategy, and PPS3 should be read in conjunction with PPS12, which is quite clear on the Core Strategy being the strategic planning policy document that should be accompanied by a key diagram or, where essential for delivery of the strategy, strategic sites that are shown on an OS-based Proposals Map.</p> <p>The identification of a large number of non-strategic sites in the Core Strategy may detract from the overall focus of the document. Your SHLAA will be part of the evidence base for the Core Strategy. One possibility may be to consider the inclusion of a policy for housing sites outside the AAP areas in the Development Management DPD, if you consider that a Sites DPD is not required for the Borough. You should also consider the requirements for Sustainability Appraisal.</p> <p>The priority should be to progress with the Core Strategy, to provide you with a framework for development management and future growth and investment in the borough. We would therefore suggest that only strategic sites are included in the Core Strategy and that any potential strategic sites are rigorously assessed to ensure that only those essential for the delivery of the Core</p>		

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	Strategy are included in the plan.		