Item No.	Classification: Open	Date: October 14 2009	Meeting Name: Executive	
Report title:		Core strategy publication/submission version – Housing issues		
Ward(s) or groups affected:		All		
From:		Strategic Director of Regeneration and Neighbourhoods		

## RECOMMENDATIONS

That the Executive:

- 1. Agrees the housing section of the core strategy publication/submission version (appendix A) to send to the council assembly for agreement for consultation.
- 2. Agrees the proposed 'housing saved policies' for the Southwark plan as set out in Appendix B.

# BACKGROUND INFORMATION

- 3. 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.
- 4. Legislation and national guidance sets out the requirements for the preparation of a core strategy. We have complied with these requirements. Preparation of the core strategy takes place over a number of stages: -
  - The first stage involved preparing and consulting on the sustainability appraisal scoping report (July to September 2008).
  - The second stage involved consulting on issues and options (October until December 2008). These set out two different approaches that could be taken for development in Southwark.
  - The third stage involved a consultation on preferred options (April to July 2009). These established a direction for policies such as the amount of new housing, tenure, transport, open spaces, schools and health facilities.
- 5. The council is now at the fourth stage in which the version is consulted on and then submitted to the Secretary of State for independent examination.

- 6. The draft submission core strategy will then be subject to an examination in public held by a planning inspector appointed to act on behalf of the Secretary of State. The inspector will consider representations made by interested parties to test the soundness of the draft core strategy. This may involve the inspector asking further questions about issues and examining relevant evidence. He will then provide the council with a binding report with changes that the council has to make. The council will then make the changes set out in the inspector's report and finally agree the core strategy or reject the changes and make a decision about whether to return to issues and options or to take another way forward.
- 7. 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 ensure that development happens through implementation.
- 8. Based on the feedback we received on our issues and options report, we decided to take forward mainly the growth areas approach, with some ideas from the housing led approach. This prioritises development in the growth areas:
  - Central Activities Zone
  - Bankside, Borough and London Bridge opportunity area
  - Elephant and Castle opportunity area
  - Peckham and Nunhead action area
  - Canada Water action area
  - Aylesbury action area
  - West Camberwell regeneration area
  - Old Kent Road regeneration area.
- 9. 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.
- 10. The core strategy policies will replace some of the policies in the Southwark Plan. Under the planning and compulsory purchase act 2004, unless expressly replaced by a new policy, old policies (adopted Southwark plan policies) must be saved for 3 years from the date it was approved (July 2007). We need to seek the Secretary of State's agreement to save policies. We need to submit to the Government Office for London our list of proposed saved policies with reasons by January 2010 as they require them 6 months before the 3 year deadline. The government have set out the criteria that they consider should be taken into account when saving policies. Planning policy statement 12 paragraph 5.15 says that policies to be extended should comply with the following criteria:
  - Where appropriate, there is a clear central strategy;

- Policies have regard to the community strategy;
- Policies are in general conformity with the London plan;
- Policies are in conformity with the core strategy;
- There are effective policies for any parts of Southwark's area where significant change in the use or development of land or conservation of the area is envisaged;
- Policies are necessary and do not repeat national or regional policy;
- The government will have particular regard to;
- Policies that support the delivery of housing, including unimplemented site allocations, up to date affordable housing policies, policies relating to the infrastructure necessary to support housing;
- Policies on MOL;
- Policies that support economic development and regeneration, including policies for retailing and town centres;
- Policies for waste management, including unimplemented site allocations;
- Policies that promote renewable energy, reduce impact on climate change and safeguard water resources.

### CONSULTATION

- 11. The Planning and Compulsory Purchase Act 2004 (as amended by the Planning Act 2008) and the council's Statement of Community Involvement require consultation to be ongoing and informal to guide the overall approach to consultation on the Core Strategy. The council has prepared overarching consultation strategies for each of the documents. At each stage in preparing the documents, the council has prepared detailed consultation plans.
- 12. The council will consult until February 26 2010 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.
- 13. 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.
- 14. There were 100 respondents on the Preferred Options. These respondents made 189 comments on the housing policies. The key points raised are set out below with how we have addressed them:
- 15. There were 5 main issues concerning policy 5 providing new homes. These were:
  - Whether we should encourage housing development in all brownfield sites not just growth areas. We will be encouraging development on all appropriate sites, however we would expect more development in the growth areas because they generally include the large development sites in accessible areas;
  - We need to be clearer how the SHLAA sites designation impacts on individual sites. We will provide more detail;
  - Overall support of increased density in core action areas and opportunity areas;
  - Should apply density policy more flexibly. The density policy provides a guideline, the consideration of height, scale, bulk and massing is then considered in more detail in other policies so the policy will remain with the current parameters.

- 16. There were 3 main issues concerning policy 6 homes for people on different incomes. These were:
  - Tenure should be linked to viability and the level of affordable housing should be done on a site by site basis and linked to viability;
  - We have tested the viability of housing in different locations within Southwark to make sure that the different levels of tenure are viable. However the tenure required should be determined by need and creating mixed and balanced communities rather than just viability;
  - There was general support for the area based approach.
- 17. There were 3 main issues concerning policy 7 family homes. These were:
  - It is also important to provide for single and childless couples as well as family housing. We are providing 1 and 2 bed flats that should meet the needs for single and childless couples;
  - The mix of units should be carried out on an individual site basis and they want the policy to have more flexibility. We have significant levels of need that require this policy to ensure that we provide a wide range of housing types;
  - There was a lot of support for the approach of 30% family housing.
- 18. There were 3 issues concerning policy 8 student homes. These were:
  - Concern with asking for affordable housing as part of student schemes. We have an affordable housing target that we are aiming to meet through development of housing on identified sites. We will not meet this target if these sites are developed for student housing if this does not include a requirement for affordable housing. Therefore we need to require affordable housing in addition to student housing to meet our targets and provide for our housing needs;
  - We should work together with other London boroughs to provide student housing. We are a very high provider of student housing, we are unclear how working with other London boroughs would assist us with providing more student housing;
  - Should encourage student housing in the growth areas. Student housing will be welcomed throughout Southwark not just in the growth areas.
- 19. There were 2 issues concerning policy 9 Homes for Gypsies and travellers. These were:
  - The current policy is too vague. We have provided a more detailed criteria based policy;
  - We should refer to the Gypsy and Traveler Needs Assessment. We have set out a policy that will meet the requirements of the needs assessment.
- 20. Comments from planning committee on October 6 2009 will be provided as an addendum.

#### **KEY ISSUES FOR CONSIDERATION**

21. The policies that we use to implement our growth areas approach are be based on themes and objectives in the Sustainable Community Strategy 2016. The purpose of the policies is to set out a strategy to create sustainable places in Southwark. More detailed area and development management policies are provided in area action plans and development plan documents such as the one on housing.

- 22. This report deals with the housing issues. The remainder of the core strategy is being considered by the Executive on October 20 2009.
- 23. The housing issues are summarised below with any issues that require consideration:
  - **Policy 5 Providing new homes –** We want 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, Bermondsev 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 central activities zone, opportunity areas and core action areas as this is where we want to focus the majority of our new development.
  - Policy 6 Homes for people on different incomes We will provide homes that are affordable for people on a wide range of incomes including social rented, intermediate and private housing. We have differential policies requiring affordable and private housing depending on the mix of housing and the level of current completions so we require affordable housing in areas with high levels of private housing. We also are not proposing to replace 100% affordable housing, we will provide the local policy mix for each site.
  - **Policy 7 Family homes** We will provide homes with three 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 between 10% and 30% of homes for families. We are clarifying the percentages for different areas based on further evidence that we have received. Proposed changes to this policy may be presented in an addendum along with planning committee's comments. We have simplified the requirement for improving the sizes of homes by setting a minimum space standard
  - **Policy 8 Student homes** These will only be allowed in town centres and areas of high accessibility. We will require affordable housing on sites with student homes. This will ensure that we meet the need for students whilst ensuring that we have enough sites for homes including affordable homes to meet our targets.
  - **Policy 9 Homes for Gypsies and travellers** We will protect current travellers pitches. We will set out a criteria based policy for considering where to put new gypsy and traveler pitches and we will allocate new pitches if necessary in our housing development plan document.
  - **Implementation** sets out how we intend to make sure that all of the policies will work in practice. We need to set out our housing target, affordable

housing target and how we will meet these. This will be a combination of council and private developer (both RSL and developer) led schemes. We have assessed all possible development sites over 0.25ha in Southwark to set out our sites that could be developed. We have assessed the capacity and phasing along with projections for under 0.25ha. We have put these into a development schedule. We are using this to monitor and bring forward development. We are working with the HCA, applying for PFI bids and setting up agreements with developers to assist us with achieving our targets and bringing funding into Southwark for housing and affordable housing.

- **Monitoring** sets out how we will measure whether we are achieving our goals.
- 24. We are suggesting that a number of the Southwark plan policies are saved and a number are removed based on the introduction of the core strategy policies and our assessment based on the government guidance. These are set out in appendix F.

## Saving Southwark Plan policies

- 25. Members will be aware that the Southwark Plan was adopted on July 28 2007. As part of the transition to the new Local Development Framework system, Planning Policy Statement 12 (PPS12) states that "all the policies contained in local plans are saved for three years after adoption". However, if the council wishes to retain specified policies beyond that period, they will need to seek the Secretary of State's agreement to extend the life of those policies by way of a Direction under paragraph 1(3), Schedule 8 Planning and Compulsory Purchase Act 2004.
- 26. The policies in the Southwark Plan are therefore saved until July 2010, at which point they would no longer have the force of development plan policies and carry no weight at any appeals. A key consideration was whether policies were compliant with the emerging core strategy.
- 27. As part of the agreement of new policies for the core strategy we will be removing some of the Southwark plan policies. The only policies that will be saved will be those that would be development management policies which will be reviewed in our development management development plan document. We are suggesting that some of the Southwark Plan policies are saved and some are removed based on our assessment based on the government guidance. These are set out in appendix B.
- 28. These policies are provided as part of the background information alongside the consultation on the core strategy. We will then be submitting these changes to the policies to the secretary of state at the end of January 2010.
- The housing policies we are saving are; Policy 3.11 Efficient Use of Land; Policy 4.2 Quality of Residential Accommodation; Policy 4.5 Wheelchair Affordable Housing; Policy 4.6 Loss of Residential Accommodation; Policy 4.7 Non-Self-Contained Housing for Identified User Groups.
- 30. The housing policies we are part replacing are: Policy 4.3 Mix of Dwellings; Policy 4.4 Affordable Housing

#### **Community Impact Statement**

31. The purpose of the Core Strategy is to facilitate regeneration and deliver the vision of Southwark 2016 in a sustainable manner ensuring that community impacts are taken into account.

- 32. In preparing the submission version, the council has also completed Equalities Impact Assessment (available on the website). These highlight a number of key issues that need to be addressed in preparing the Core Strategy and the AAPs. 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 has been monitored and analysed to see whether any particular groups have not been engaged and whether this can be addressed at the next stage.
- 33. 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.
- 34. Sustainability appraisals have been prepared at each stage to ensure the wider impacts of development are addressed. (available on the website)

### **Resource/Financial Implications**

35. There are no specific financial implications associated with this paper. The financial implications of any particular policy or strategy should be addressed as part of any specific proposal.

## SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

#### Strategic Director of Communities, Law and Governance

- 36. Members are further advised that the main legal implications are set out in the body of the report, as the preparation and the adoption of the Core Strategy is a statute led process. This supplementary advice will therefore focus on reminding members of the processes involved.
- 37. Members are advised that Part 6 of the Town and Country Planning (Local Development) (England) Regulations 2004 ("the Regulations") there are procedural requirements that need to be prepared in the process of preparing the Core Strategy which are summarised as follows:
  - i. pre-submission consultation with particular bodies (complete);
  - ii. pre-submission public participation (to begin when Council Assembly approval has been obtained );
  - iii. submission of the Core Strategy to the Secretary of State;
  - iv. representations on the Core Strategy;
  - v. representations on the site allocation representations which have been made;
  - vi. the examination;
  - vii. adoption of the Core Strategy.
- 38. This next stage is formal consultation of the proposals for the Core Strategy. The council is required to make available for public inspection in person and on its website the proposals for the DPD, any supporting documets and details of how to

make representations. Representations can be made within a six-week period (Regulation 27(2)) and the council must consider the representations before proceeding to prepare the Core Strategy and submit it to the Secretary of State (Regulation 27(3)).

- 39. The Core Strategy will then be sent to the Secretary of State as required by section 20(1) of the Planning and Compulsory Planning Act. This will be sent along with the sustainability appraisal report, the SCI and statements setting out the main issues raised and how these have been addressed in the Core Strategy and any supporting documents (Regulation 28(1)). It will also include a submission proposals map. This will then be followed by an independent examination.
- 40. Members are finally advised that the processes followed appear to be in compliance with the legal requirements set out in the Planning and Compulsory Purchase Act 2004 and accompanying regulations and statutory guidance.
- 41. In relation to the proposals to save policies, Members attention is particularly drawn to the paragraphs in the body of the report that focus on the saved policies. Members are asked to note.
- 42. Members of the Executive are being asked to agree the recommendations set out at the beginning of this report to Council Assembly under Part 3C, paragraph 3 of the Constitution that provides that the Executive is to approve for recommendation to Council Assembly those proposals and plans contained in the council's budget and policy framework.

# The consultation plan/report

- 43. 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 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.
- 44. 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.

## The Core Strategy publication/submission

- 45. 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.
- 46. 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.
- 47. The Core Strategy must be justifiable. It must founded on a robust and credible evidence base and should be the most appropriate strategy when considered against the reasonable alternatives.

- 48. 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.
- 49. The Core Strategy must be effective. This means that it must be deliverable, flexible and able to be monitored.
- 50. 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.
- 51. 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.
- 52. 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.
- 53. these cases the Core Strategy should show what alternative strategies have been prepared to handle this uncertainty and what would trigger their use.
- 54. 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

- 55. 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.
- 56. These are the overarching principles that should be in members' minds when approving the documents before them.
- 57. On the basis of the evidence that has been reviewed there is no reason to believe that a Core Strategy based on the present publication/submission 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 publication/submission 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

- 58. 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.
- 59. 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.
- 60. 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.
- 61. The interim Sustainability Appraisal that has been provided is legally adequate to support the publication/submission. 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

- 62. 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.
- 63. 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.

64. The submitted EqIA meets the reasonable requirements for this stage of the Core Strategy.

## Human Rights Considerations

- 65. 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 erred Options, a number of rights may 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 publication/submission 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.
- 66. 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.
- 67. 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.
- 68. The approach and balance between individual and community rights set out in the publication/submission is within justifiable margins of appreciation.

# **BACKGROUND DOCUMENTS**

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

## APPENDICES

No.	Title
Appendix A	Core strategy publications/submission version - housing
Appendix B	Saved policies - housing

# AUDIT TRAIL

Lead Officer	Anne Lippitt, Strategic Director of Regeneration And Neighbourhoods					
Report Author	Julie Seymour, Head of Planning Policy					
Version	Final					
Dated	October 5 2009					
Key Decision?	Yes					
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER						
Officer Title		Comments Sought	Comments included			
Strategic Director of Communities, Law and Governance		Yes	Yes			
Departmental Finan	ce Manager	Yes	Yes			
Date final report se	October 6 2009					