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TABLE OF REPRESENTATIONS ON THE PUBLICATION DRAFT AYLESBURY AREA ACTION PLAN (REGULATION 28 RESPONSES) AND RESPONSES FROM THE COUNCIL

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428	10	Publication	Publication	PVP7		7.3.1	<p>Paragraphs 7.3.1 to 7.3.7 relate to infrastructure funding. Within Paragraph 5.1 of PPS12 it is stated that the requirements of utilities/infrastructure providers should be taken into account when considering which DPDs other than the Core Strategy should be produced. The plan proposes to provide homes for 4200 households and it is unclear from the document what the impact will be in terms of the net increase in the demand on the water and wastewater infrastructure. There is no reference within the document to the provision of water or wastewater infrastructure, however, infrastructure upgrades may be required to serve development and it is vital that any such upgrades are in place ahead of the occupation of the development if problems such as sewer flooding and low/no water pressure are to be avoided. It is important not to under estimate the time required to deliver necessary infrastructure, for example local network upgrades take around 18 months; Sewage Treatment & Water Treatment Works upgrades can</p>	<p>Within our response to the consultation on the Core Strategy issues and options we put forward proposed policies for the provision of water and sewerage infrastructure in order to ensure that problems such as those outlined above are avoided. It is consid</p>	<p>Noted. AAP policy BH7 requires new residential development to meet Code for Sustainable Homes level 4. This implies capping water consumption at 105 litres, per person, per day and this target has been used to inform water modelling described in detail in the Sustainable Design and Construction background paper. The council's engineering consultants Ramboll Whitby Bird (RWB) provided an overview of existing water infrastructure and concluded that the site benefits from an extensive water supply network (para 2.1.3.1.1 Sustainable Design and Construction background paper). Likewise RWB also provided an overview of existing sewerage capacity (2.1.3.2 Sustainable Design and Construction background</p>

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							take 3-5 years. It is Thames Waters understanding that developers can not be requisitioned into S106 agreement to secure water industry infrastructure. It is therefore vital that where infrastructure is required suitably worded planning conditions are attached to planning approvals if internal/external flooding is to be avoided.		paper), existing foul water flows (2.1.3.3 Sustainable Design and Construction background paper) and existing storm water flows (2.1.3.4 Sustainable Design and Construction background paper). In section 4.3.1 RWB describe the foul water management strategy, in the context of the need to reduce water consumption to 105l per person per day. Section 4.3.2 describes the surface-water drainage strategy designed to attenuate existing run-off rates by 20%. Table 4.2.2 shows the existing and proposed combined water flow rates, suggesting that the development will result in a 17% reduction in flows. The redevelopment will be drained by suitable dedicated foul water system designed in accordance with the following documents; •Building Regulations: Approved document H •BS EN 752: Part 4: Drain and Sewer

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									<p>Systems outside buildings: hydraulic design and environmental considerations</p> <ul style="list-style-type: none"> •BS EN 6700: Design, installation, testing and maintenance of services supplying water for domestic use within buildings and their curtilages •BS 8000-14: Workmanship On Building Sites: Code Of Practice For Below Ground Drainage •BS EN 12056: Parts 1-5: Gravity Drainage Systems Inside Buildings Dedicated surface water systems will be designed in accordance with the following documents; •Building Regulations: Approved Document H •BS EN 12056: Parts 3: Roof Drainage •BS EN 752: Part 4: Drain and Sewer Systems outside buildings: hydraulic design and environmental considerations •Sustainable urban drainage systems - design manual for England and Wales (CIRIA

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									C697) •Planning Policy Statement (PPS) 25.0 Development and Flood Risk, DCLG (2006) Benchmark costs associated with upgrades have been assumed in financial modelling undertaken in preparing the AAP. It is envisaged that individual developments will be responsible for meeting their own water infrastructure needs, although this will be kept under review.
429	10	Publication	Publication	PVP3	BH7		Within Policy BH7 it is required that all homes must achieve at Code for Sustainable Homes Level 4 rating. It is our understanding that the Code for Sustainable Homes allows for low scores in one area to be offset by high scores in other areas. As such the level of water usage within a property could vary depending on the scores obtained in other areas within the Code for Sustainable Homes and this could result in high water consumption levels.	All new dwellings should meet the water usage targets set out in code for sustainable homes code 3 rating as a minimum in order to limit water usage as a result of new development.	Policy BH7 says that all homes within the master plan area must achieve at least code for sustainable homes level 4 or the equivalent. It is a requirement of CfSH level 4 that water consumption should not be greater than 105 litres per person per day. There is no opportunity to offset.
430	39	Publication	Publication	PV			Thank you for your letter dated 11th March		It is very important that we

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				General			2009 regarding the above. Having reviewed the document we would like to reiterate the comments made to the previous Preferred Options consultation, and also take this opportunity to emphasise the role of National Grid and to highlight areas and issues where we feel consultation with National Grid would be appropriate in future Development Plan Documents (DPDs). Overview – National Grid National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below. Electricity Transmission National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity. National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from		provide all of the infrastructure required for the new developments. We will continue to involve national grid consulting them on planning application and, planning documents. In preparing the AAP, the council has taken into account the capacity of existing infrastructure (see Sustainable Design and Construction background paper, paragraph 2.1.2.2).

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							<p>generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses. Please see the enclosed leaflet for more information on who to contact regarding electricity distribution issues in your area. To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new</p>		

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							<p>electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply. Gas Transmission National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances. New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in</p>		

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							<p>demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments. Gas Distribution National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London – almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments. National Grid and Local Development Plan Documents The</p>		

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							<p>Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for;</p> <ul style="list-style-type: none"> ♣ An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations). ♣ New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites). <p>Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes. We therefore wish to be involved in the preparation, alteration and review of Development Plan</p>		

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							<p>Documents (DPDs) which may affect our assets including policies and plans relating to the following issues; ♣ Any policies relating to overhead transmission lines, underground cables or gas pipeline installations ♣ Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines ♣ Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations ♣ Any policies relating to the diverting or undergrounding of overhead transmission lines ♣ Other policies relating to infrastructure or utility provision ♣ Policies relating to development in the countryside ♣ Landscape policies ♣ Waste and mineral plans In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised. National Grid infrastructure within Southwark Council's administrative area</p>		

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							<p>Electricity Transmission National Grid's high voltage electricity overhead transmission lines / underground cables within Southwark Council's administrative area that form an essential part of the electricity transmission network in England and Wales include the following: ♣ 275kV underground cable from New cross substation in Southwark to Wimbledon substation in Wandsworth. The following substations are also located within the administrative area of Southwark Council's: ♣ New cross Substation – 275kV National Grid has provided information in relation to electricity transmission assets via the following internet link: http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW Gas Transmission National Grid has no gas transmission assets located within the administrative area of Southwark Council. Gas Distribution Southern Gas Networks owns and operates the local gas distribution network in Southwark Council's administrative area. Contact details for Southern Gas Networks can be found on the Energy Networks website.</p>		

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							<p>for planning, supervising and carrying out work in proximity to our cable(s) shall be liable to us, as cable(s) owner, as well as to any third party who may be affected in any way by any loss or damage resulting from their failure to locate and avoid any damage to such a cable(s). The relevant guidance in relation to working safely near to existing underground cables is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance HS(G)47 "Avoiding Danger From Underground Services" and all relevant site staff should make sure that they are both aware of and understand this guidance. Our cables are normally buried to a depth of 1.1 metres or more below ground and cable profile drawings showing further details along the route of the particular cable can be obtained via the Asset Protection Team. Cables installed in cable tunnels, deeper underground, whilst less likely to be affected by surface or shallow works may be affected by activities such as piling. Ground cover above our cables should not be reduced or increased. If a landscaping scheme is proposed as part of the works,</p>		

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									effective consultation has been carried out not the techniques or groups used to carry this out. The consultation report demonstrates that we have met our aims of effective consultation on the Aylesbury AAP.
433	13	Publication	Publication	PVP3	BH3		Policy BH1 and BH3 In the AAP there seems to be a bias against council housing, borne out of stigmatisation. National and regional policy require the replacement of housing that is lost through development and this housing should not be counted as part of new housing provision. The 2,200 social rented homes on the Aylesbury are being reduced to 1,568, a loss of about 700 social rented homes. Of the 1450 extra homes to be built on the estate, none will be social rented or affordable, completely contravening London Plan policy on 50% of new housing being affordable housing. There is already an oversupply of market housing in Southwark, the necessity is to focus on social rented housing which the Housing Needs Surveys show is desperately needed by the people of		Paragraphs 2.7.-2.11 in the Tenure Mix and Size of Homes background paper set out the AAP strategy for affordable housing. Affordable housing is defined in the glossary to the AAP and reflects the definition in the Southwark Plan and emerging Core Strategy. In accordance with Appendix B of Planning Policy Statement 3 Housing, the AAP definition of affordable housing does not specify which body should provide affordable housing i.e. it could be provided either by a registered social landlord (RSL) or by the council. In practice, it is currently envisaged that the new affordable homes in the

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							Southwark.		<p>masterplan area would be provided by RSLs. This is because current legislation and funding mechanisms prevent local authorities from building new council homes. However, the AAP is flexible. If current funding mechanisms change, the AAP would not preclude the council from building new council homes. The justification for the proportion of homes which will be affordable is set out in detail in paragraphs 2.8-2.28 of the Tenure Mix and Size of Homes background paper While the AAP would result in a small loss of affordable housing, it would bring many other benefits. These include a much improved and high quality physical environment, a transformational change in the quality of public open spaces in the area, homes which are far more energy and water efficient and new social and new</p>

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									community infrastructure including schools, health facilities and childcare space. In the light of these benefits and taking into account the objectives of re-providing affordable housing, creating a mixed community, ensuring existing tenants can return and creating a deliverable scheme, Southwark consider the AAP approach to tenure to be the most appropriate in the circumstances. It is in line with options set out in the emerging Core Strategy and the Mayor has confirmed that it is consistent with the London Plan.
434	13	Publication	Publication	PVP1			There has been little or no consultation with those outside of the Aylesbury estate. Burgess Park is a much valued resource by the whole community of Southwark but there has been no wider involvement of residents and stakeholders. It was consulted upon in the same way as the rest of the AAP, with the only outreach work done on the Aylesbury estate. This is		The council has consulted widely on the AAP. Although it has focused on the estate itself which will experience the major part of the change in the area. Using letters, the council's website, exhibitions and newsletters, we have involved residents and voluntary sector

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							despite requests being made for exhibitions in local libraries and on Burgess Park itself. The same applies to East Street market and other local traders.		groups from across the borough. This includes Friends of Burgess Park as well as the market traders. Policy PL8 provides a framework for change in the park but does not prescribe particular designs. All major changes to the park will be subject to future consultation.
435	13	Publication	Publication	PV General			A general weakness is the lack of integration with the surrounding neighbourhoods. For example, linkage with the green routes projects in East Walworth and Borough and Bankside (Policy PL1). The MUSCO must not be socially divisive. Leaving existing social rented housing, on say East Street, out of the combined heat and power system is creating segregated communities. (Policy BH6). Gated communities are being proposed and should be resisted. (Policy PL7) The whole AAP area should be considered in its wider context.		The Southwark Plan and emerging core strategy set out the strategy for spatial planning and regeneration in Southwark. They set the Aylesbury within context of the borough. They are linked regeneration schemes at the Elephant and Castle and Peckham and other growth areas within Southwark as a strategy for regeneration particularly to provide more homes, jobs and places that people aspire to be in. Figure 2 sets out the context for Aylesbury within the surrounding neighbourhoods. Appendix 2 and table A2.1 set

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									<p>out the relationship between the AAP policy, the London Plan, Southwark plan and SPD. There are a number of plans in the AAP which show the core action area in the context of surrounding neighbourhoods. These include for example Figure 13-15 which show how the new area will link into surrounding development. Policy PL3 sets out requirement for block types. Although perimeter blocks are envisaged for much of the area, there is no suggestion that these will be gated. Private communal and courtyard gardens will be provided for residents living in the new blocks. However, mews streets cut through most of the blocks, providing greater permeability. There is no suggestion that the CHP infrastructure to be provided will be socially divisive. It simply forms part of an energy strategy aimed at minimising</p>

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									carbon emissions.
436	103	Publication	Publication	PV General			Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.		Noted
437	13	Publication	Publication	PVP7			The AAP is fundamentally unsound because it is not deliverable. The financial viability of the scheme is highly questionable. It is all very well to say this is a 20 year plan, spanning several economic cycles. Events since September 2008 are of a different order to a normal boom and bust economic cycle and no evidence or audit is provided to show that the new economic circumstances and their impact on the shape and scale of the AAP have been thought through. The development potential of the Cross River Tram has been lost and a few extra buses will not deliver the same PTAL rating and stimulate the intensive development envisaged along Thurlow Street (Policy TP2). The model of private sector cross subsidy of affordable housing has broken down and can probably never play the role that it did pre-2008. The HCA has already had to intervene to save the housing phase 1a of the AAP, but will more HCA funds be forthcoming for future phases?		The AAP is deliverable. The delivery and implementation section sets out how the phasing, infrastructure funding and land assembly, disposal, funding and partnership strategy will be achieved. The delivery and implementation background paper is being updated to set out the most up to date information on how we will be able to deliver the programme in the short and long term. The council is currently in discussions with the HCA and will be able to give an update at the examination. A route for public transport has been safeguarded in the AAP. The council will continue to discuss public transport improvements with TfL. The benefits to PTALs of increasing bus services are discussed in

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									section 3.4 of the Transport and Movement Strategy.
438	13	Publication	Publication	PVP3	BH4		The Mayor's targets for family housing are not followed, and the Southwark Housing Needs Survey provides no justification for departure. 42% of homes should be 3 bed +.		The Mayor's position is set out in policy 3A.5: Housing choice, of the London Plan. It sets out that DPD policies should seek to ensure that new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups. There is further guidance in section 11 of the Mayor's Housing SPG. This explicitly states that the proportions set out in the GLA Housing Requirement Study apply to London as a whole and it is not expected that they will be applied to individual development sites which must also take account of character and local circumstances. The Mayor has also announced intention to replace the SPG. The Mayor's confirmed in his representation that he

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									welcomes the mix provided and considers that it accords with the London Plan.
439	13	Publication	Publication	PVP3	PL4		There is an assumption that tall buildings per se improve the character of an area, signal that money has been spent etc. CABE guidance on tall buildings does not seem to have been understood. There will be a uniform urban landscape between Borough and Burgess Park, characterless and dominated by tall buildings and with implications for the view management framework which do not seem to have been considered.		Policy PL4 and appendix A6.6.33 to A6.6.38 set out our approach to tall buildings. We state that developments must contain variations in height and make use of the full range of building heights. Most of the development should have a general height of between 2 and 4 storeys. Height and scale should respect conservation areas and the general height in Thurlow street and Albany Road will be greater mostly between 7 to 10 storeys. Buildings that are taller than the general height should be situated in important locations and guidance is given as to what these may be. We set out that design of taller buildings should have careful consideration and should demonstrate that possible

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									harmful effects should be minimised. This demonstrates a robust strategy to building heights and tall buildings with a varied sky line taking into account creating an liveable local environment. The Visual Impact Assessment background paper describes the impact of tall buildings on the surrounding townscape. Figure 4 in the Visual Impact Assessment shows that the AAP area is not affected by the London Plan View Management Framework (LVMF). The council has assessed the impact of development on sensitive views. This has been undertaken in accordance with the IMEA Guidelines for Landscape and Visual Impact Assessment. The analysis and findings are set out in section 4.4 of the document. These indicate that the scale, mass and heights of the development

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									proposed in the core area would have a beneficial impact on the visual quality of the area.
441	13	Publication	Publication	PVP6	COM 6		There is little or no consideration of how retail development will impact on the East Street market and on local shops on East Street and the surrounding area. The AAP should have a strong connection with the recent review of the needs and development potential of East Street market and with recent reports on the future of London's street markets including that by the London Assembly.		Policy COM6 sets out proposals for new retail space. The proposed provision in the core action area has been informed by Southwark's 2009 Retail Study. The increased population living in the area will generate capacity to provide more retail space which should not harm East Street and Westmoreland Road. Further details on retail capacity are provided in sections 3.2 and 3.5 of the Economic Development background paper.
442	13	Publication	Publication	PVP6	COM 2		It is difficult to see how the existing community will benefit from the development of Aylesbury as a growth area. Business incubator space is mentioned, but will these units be affordable and what business support, training and mentoring schemes will be available. Nothing is mentioned. Development will inevitably lead to the rise in rents for small businesses, which will		In accordance with usual practice and policy 1.1 in the Southwark Plan, the council will seek to target job and training opportunities which arise out of development towards locally disadvantaged people. Through the s106 Planning obligations SPD, the council has developed a standard charge

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							threaten the livelihood and survival of the essential small community shops in particular. A community development financial institution would be helpful, so would a partnership approach to employment and training. The absence of a local employment and training strategy is worrying, as it suggests that few of the jobs created will be for local people. There is no information on the number of jobs that will be created, what kind of jobs and at what level, how many will be in construction and how many in other occupations. I would like to see a proportion of the jobs ring fenced for local people, as at Kings Cross where the target is 30%. There should also be an employment skills training centre and apprenticeship schemes.		for negotiating these benefits. Further details on the way in which this works are set out in section 2.9 of the Economic Development background paper. Section 2.5 of the Economic Development background paper describes the way in which business and employment support will be provided for in the area. COM 2 explicitly that new business space provided on the estate should be flexible and capable of serving the needs of small and medium sized businesses. Further details on type of space to be provided is set out in sections 2.13 and 2.14 of the Economic Development background paper.
443	13	Publication	Publication	PVP6	COM 1		There is no buy-in for the community stakeholder. There should be an open master-planning process and there should be support for community assets and social and community enterprises.		Consultation has helped shape the masterplan. In particular a series of planning for real events took place with the Neighbourhood Team which influenced the eventual form of the plan. Further details on

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									these events are set out in the consultation report. Section 6 sets out the provision for the community. There will be new community and social facilities at five main locations as set out in COM 1. These will be grouped together in easy reachable places. There will be other art spaces, schools, learning and health centres to provide for the diverse communities living in the area. These are all located within the master plan as part of the AAP consultation process.
444	13	Publication	Publication	PVP6	COM 3		There has been no health impact assessment and without this there is no robust evidence to show that the proposed new health facilities are appropriate.		The health impact assessment issues have been considered in the equalities impact assessment and the sustainability appraisal. The section on housing management in the EqIA (p.7) in particular draws attention to the way in which health can be affected by housing management. In the SA, health issues have been flagged

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									throughout the process as a key sustainability issue facing the area (see SA report, Table 5). New health provision will be provided as set out in policy COM3. Other issues which affect health such as provision of open space, access to job opportunities and education and skills have also been extensively considered in the plan with policies put in place to provide necessary supporting infrastructure.
445	13	Publication	Publication	PVP4	PL5		Local food production is one emerging London Plan policy which has not been recognised. For example, there should be space for allotments. There has been no health impact assessment and without this there is no robust evidence to show that the proposed new health facilities are appropriate.		AAP policy PL5 aims to provide a network of open spaces in the area which have a variety of functions. This could include food production. Policy PL8 regarding Burgess Park explicitly states that improvements will encourage healthy living and education. We have expanded on these themes in section 8.2 of the Open Space Strategy background paper. The themes on eco-park and leaning park

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									both mention local food production. PL8 provides a framework for the transformation of Burgess Park. It is not prescriptive however and changes will be subject to consultation.
446	13	Publication	Publication	PVP2	MP1		There seems to be a considerable loss of mature trees, and there should be an arboriculture statement to quantify this. Similarly, there should be an audit of the total amount of green space and community buildings on the Aylesbury.		Section 3 of the Open Space Strategy background paper sets out baseline information on open space. It summarises and updates Southwark's 2003 open spaces audit. Section 3.9 of the same document summarises the total quantum of space in the AAP area. This has been taken into account in preparing the AAP. Similarly, the council has also assessed existing provision of community facilities in the AAP area. This includes: Pre-school facilities - see appendix 1, section 2 of the Social and Community Infrastructure background paper Community facilities - see section 4 of the Social and Community Infrastructure

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									background paper Health - see section 3 of the Social and Community Infrastructure background paper and also section 9.3.9 of the Baseline Report Education - see section 8.3.5 of the Baseline Report As in the case of open spaces, these assessments informed the AAP policies..
447	14	Publication	Publication	PVP6	COM 5		We are pleased to see that a community space is being considered although concerned at the statement that such a space will only be provided if there is a 'clear requirement'. Presumably the Council has consulted the Aylesbury Tenants' Association on this matter as they would be the 'consumers' and in a strong position to advise whether a community space was required and that they would be able to operate it on a viable basis should one be provided.		It is very important that a community space will only be provided if there is a clear requirement at the time of building. This is essential to ensure a tenant for the building so that it is not empty when built. We are envisaging that this will be the case however we can not provide a definite requirement until the planning application stage is reached as groups situations may change.
448	108	Publication	Publication	PV General			There are 3 basic reasons why AAP is not legally compliant and is unsound: 1) The consultation process was corrupted and contravenes Southwark's statement of community involvement & rules on tenants		1. Consultation has been extensive throughout the preparation of the AAP. Details of the consultation carried out is set out in the Consultation

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							<p>representation against conflicts of interest and govt guidelines on such; further the adoption of the 'privatisation-demolition strategy' in Sept 2005 was improperly done and relied on fundamentally false assumptions (see separate document Aylesbury & Leaseholders First Campaign Objections to AAP 26 Feb 2008; those objections still stand). 2) It is a social cleansing scheme. It reduces social housing and - especially when alongside the destruction of Heygate estate also in Walworth - destroys the estate and area community and destroys Walworth as a community and is contrary to the London Plan recommendations, contrary to the local Govt Act 2000 and contrary to national govt policies to support social cohesion as in the sustainable Communities Plan 2008. 3. It is undeliverable - having being intended for an era of an expanding bullish economy which has now passed. The housing market is not there to support the scheme and the tram on which the scheme was largely based has been shelved.</p>		<p>Statement. 2. The justification for the proportion of homes which will be affordable is set out in detail in paragraphs 2.8-2.28 of the Tenure Mix and Size of Homes background paper. While the AAP would result in a small loss of affordable housing, it would bring many other benefits. These include a much improved and high quality physical environment, a transformational change in the quality of public open spaces in the area, homes which are far more energy and water efficient and new social and new community infrastructure including schools, health facilities and childcare space. In the light of these benefits and taking into account the objectives of reprovding affordable housing, creating a mixed community, ensuring existing tenants can return and creating a deliverable scheme,</p>

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									Southwark consider the AAP approach to tenure to be the most appropriate in the circumstances. It is in line with options set out in the emerging Core Strategy and the Mayor has confirmed that it is consistent with the London Plan. 3.The AAP is deliverable. The delivery and implementation section sets out how the phasing, infrastructure funding and land assembly, disposal, funding and partnership strategy will be achieved. Although the scheme is sound for deliverability based on the evidence provided at submission. The delivery and implementation background paper is being updated to set out the most up to date information on how we will be able to deliver the programme in the short and long term.
449	108	Publication	Publication	PV General			1. The plan itself as far as housing provision is concerned is fundamentally flawed and contradicts the original		Consultation: Consultation has been extensive throughout the preparation of the AAP. Details

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							<p>declared aims of the Aylesbury plan when Tony Blair came in 1997 which was to better the lot of the tenants and needy people in the area. a) It involves a loss of all council housing on the estate and a net loss of social housing and is detrimental to the needs of the housing waiting list. b) It reduces flat sizes while tenants and leaseholders want to maintain their large size flats without any reductions c) it involves an increase in rent. It is insane to spend all these £millions on REDUCING the available socially rented housing when the Govt has declared the UK needs MORE social housing (let alone Council housing!) The plan must be stopped and the money spent on building NEW Council housing. 2. The consultation process and representativeness of the decision making for the AAP was fundamentally flawed and breaches govt guidelines. In more detail: a) The NDC structure is corrupted and dominated by representatives who have a conflict of interests - being in receipt of council/NDC funds directly or indirectly (see note below) with those whom they purport to represent. In the ballot of Dec 2001, 73% of tenants (and leaseholders)</p>		<p>of the consultation carried out is set out in the Consultation Statement. Affordable homes: The justification for the proportion of homes which will be affordable is set out in detail in paragraphs 2.8-2.28 of the Tenure Mix and Size of Homes background paper. While the AAP would result in a small loss of affordable housing, it would bring many other benefits. These include a much improved and high quality physical environment, a transformational change in the quality of public open spaces in the area, homes which are far more energy and water efficient and new social and new community infrastructure including schools, health facilities and childcare space. In the light of these benefits and taking into account the objectives of reprovinding affordable housing, creating a mixed community, ensuring</p>

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							<p>voted to keep the whole estate as Council housing and given the abstentions that was about 5 times those who voted for the privatisation demolition plan. The poll was about 75% of possible participants. More people on the Aylesbury estate voted to keep their estate as Council housing than have ever voted for any politicians there. The ballot showed that these 'representatives' on the NDC do not represent tenants views and they - the same ones continued - still do not. b) Since the ballot I have witnessed ongoing Council/NDC action to trash the ballot result and manipulate and intimidate the representatives and interest of tenants (see note below) c) The post ballot surveys on the Aylesbury estate were of strained integrity (see Laura Fudge's representation) d) The nearby estate tenants representatives were physically excluded from the consultation process and I was removed from one such meeting by police on the grounds that I was 'not from the estate' even though being elected to represent the whole area including the Aylesbury estate. Others representing business /churches and also not from the</p>		<p>existing tenants can return and creating a deliverable scheme, Southwark consider the AAP approach to tenure to be the most appropriate in the circumstances. It is in line with options set out in the emerging Core Strategy and the Mayor has confirmed that it is consistent with the London Plan. Deliverability: The AAP is deliverable. The delivery and implementation section sets out how the phasing, infrastructure funding and land assembly, disposal, funding and partnership strategy will be achieved. Although the scheme is sound for deliverability based on the evidence provided at submission. The delivery and implementation background paper is being updated to set out the most up to date information on how we will be able to deliver the programme in the short and long term. Rents: In the past housing</p>

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							<p>estate but in receipt of NDC funds were not excluded. Tenants representatives who disagreed with the privatisation-demolition scheme and/or who are not from the estate were generally harassed intimidated or ignored. Indeed only in March I attended by invitation a 'late' Consultation event in Thurlow Lodge Hall and was told 'you don't live on the estate' even though having been invited by leaflet delivered to my flat to contribute at this end of game consultation. Such consultation is a joke to tick boxes. 3. The plan does not meet legal requirements and is not sound or sustainable because:</p> <p>a) The reduction of social housing - particularly when the destruction of Heygate estate also in Walworth is noted - contravenes the LONDON PLAN RECOMMENDATIONS b) The ballot of Dec 2001 was ignored so there is not robust evidence of support for the plan. (73% majority against any transfer of the Aylesbury estate or land out of Council ownership). c) The plan is not deliverable because it was intended for a strong economy but the housing market has now crashed and the tram scheme which was</p>		<p>association rents in Southwark have tended to be slightly higher than the council's rents, and have varied from one association to another. However in 2002, the government introduced legislation to ensure that the rents set by the council and by different housing associations will be similar by 2010, for similar properties. Rents will be set within both the government and Southwark Council's guidelines for affordability and will be well below market rent values. Sizes of homes: the design guide in Appendix 6 of the AAP specifies space standards. All social rented homes to be provided should be 10% larger than Parker Morris standards. The existing flats on the estate were built to this standard.</p>

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							a centre piece to maintain house values has been dropped. d) the destruction of the community - and the destruction of Heygate estate means that Walworth as we know it would be destroyed by the plan. This destruction contravenes national govt policy to support social cohesion as required on - the local Govt Act 2000 and - The Sustainable Communities plan 2003		
450	108	Publication	Publication	PV General			<p>NOTES ON A) Conflicts of interests on the NDC B) harassment intimidation, bullying & pressuring of anti-privatisation tenants reprehensive A) Conflicts of interests on the NDC (Some examples) The majority of Tenants representatives on the NDC board appear to have a conflict of interests with whom they purport to represent. Three of note (past or present) for which allegations could be made are: Tony Taitt ('Drum' music operation); Ian Gardiner (the NDC gave money to Southwark Pensioners group which gave it back to him to run some sort of Over 50s employment advice group. Jean Bartlett (Tykes corner playgroup on the estate which stands to gain from the development) At the recent delegation to</p>		Issues around the management of the NDC are not relevant for consideration of the Aylesbury AAP. Consultation processes are set out in the Consultation Report.

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							<p>the Council Assembly all 6 of the 'representatives' supporting privatisation had or had had a conflict of interest between the NDC/Council and the tenants whom they purport to represent. B) harassment intimidation, bullying & pressuring of anti-privatisation Aylesbury estate tenants reprehensive (Some examples) Norma Hibbert, a very able black woman, was elected onto the NDC, asked questions about conflicts of interest and was then expelled and her funding cut. Eva in a local TA had asked difficult questions about the accounts of one TA on the estate, was given a laptop by the NDC and dropped her line of questioning. Alex had been a keen anti-privatiser was given a grant by the NDC etc to produce a guide for certain disadvantaged groups and dropped out of campaigning. Margot Lindsay was a consistent campaigner against privatisation but often would not put her name onto letters because she had received a grant from the NDC for educational matters and felt unable to sign letters. Victoria Briden was bullied in her TA and the rules were interpreted to prevent her getting on the committee for</p>		

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							some time. Amano, an able young Asian man, was ignored and intimidated in his Tenants Association. Rob Mitchell got elected onto the NDC board and was then 'gagged' from talking to the press and forced to resign.		
451	108	Publication	Publication	PV General			The AAP is unacceptable in any terms at its core it is not legally compliant or sound and cannot be made such retrospectively.	The AAP is unacceptable in any terms because at its core it is not legally compliant or sound and cannot be made such retrospectively. In all my years of involvement in housing campaigns around London or beyond I have never seen such a travesty of democr	There are no specific issues to address in this representation.
452	9	Publication	Publication	PV General			1) Thank you for your letter of 6 March 2009 enclosing the above documents, which are on public consultation from 6		Noted. The Self Assessment soundness tool will be submitted to the Secretary of

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							<p>march 17th April 2009. 2) The Secretary of State's consideration of the Plan is based on the Soundness test set out in PP12 para 4.2). Please notes that this letter and attached response from constitutes our forma publication stage response. These can be considered by written representation, unless the Inspector considers there to be merit in the Government Office participating at the oral examination. 3) As you are aware, we made a number of comments throughout the consultation stages of this AAP - from issues and options (old Regulation 24 stage) in November 2007 to preferred options and revised preferred options in May & December 2008 respectively. 4) At this stage, our comments are primarily confined to matters affecting the soundness of AAP, the key issues of which are set out in the attached representation form. More general comments are set out in the annex at the end of this letter. We note that section 4 of your representation forms asks those responding to consider whether the plan is legally compliant and sound. The independent examination of a</p>		State alongside other documents.

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							development plan document and soundness. A decision on whether a plan is "sound" is subsequently made by the Inspector in the form of Binding Report. In view of this we will not be commenting on these issues within the enclosed representation form.		
453	9	Publication	Publication	PV General			Robust & credible evidence base: It is essential that LDF documents are based on are based on a robust and credible evidence base. PP12 par 4.37 states that "evidence gathered should be appropriate to the job being undertaken by the plan, relevant to the place in question and as up-to-date as practical having regard to what may have changed since the evidence was collected". The plan generally makes reference to the justification for policies, but some policies have weaker justification than others. For example, Policy BH3 Type of Homes, could be improved by making reference to the evidence that supports the percentages of different types of homes in the policy.		The evidence base and background papers have been prepared to support the AAAP. The evidence has been updated at each stage to ensure that it is as contemporary as possible. The only specific comment on justification is BH3. The proportions set out in policy BH3 have been arrived at through testing options which balanced the need to provide enough dwellings to ensure that the scheme is deliverable and maximising the numbers of houses to be provided, which was an objective which emerged through consultation. We consider that the justification for providing a mix

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									is described sufficiently in the policy and supporting text.
454	9	Publication	Publication	PV General			Most appropriate strategy when considered against the reasonable alternatives - No comment.		Noted
455	9	Publication	Publication	PVP7		7.4.3	Deliverable: Paragraph 7.4.3 states that you are in discussions with the Homes & Communities Agency about funding the delivery of new replacement affordable rented and intermediate accommodation; you have submitted an expression of interest for Housing Revenue Account Private Finance Initiative Funding; and you have also submitted a bid to the GLA under the Priority Parks scheme for improvements to Burgess Park. Will you be in a position to provide any further updates on these initiatives upon submission of the plan, or if called upon to do so at examination?		Noted we will propose changes to paragraph 7.4.3 to confirm that the priority parks bid has been successful. The council is currently in discussions with the HCA and will be able to give an update at the examination.
456	9	Publication	Publication	PVP7			Flexible: The AAP needs to be flexible to take account of changing circumstances. The redevelopment of the AAP area is proposed to take place over a 20 year period, being broken up in to 4 main phases of development. Detailed implementation proposals will be brought forward on a phase by phase basis,		Table 1 in section 7 sets out phasing in relation to funding mechanisms. Table A7.1 in appendix 7 of the AAP describes the general phasing approach of the plan. Phasing periods are all around 3-6 years. These timescales should

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							including whether the phases may be broken down to meet market demands - Table 1 in section 7 sets out phasing of the AAP in relation to funding mechanisms. This table could be expanded to show proposed flexibility within each phase, as stated paragraph A7.12.7, both for the housing and social infrastructure elements of the scheme.		allow some flexibility. The progress of the AAP will be monitored (see AAP section 8.2) and reported through the council's AMR. This seems to be a more practical approach than anticipating alternative phasing scenarios.
457	9	Publication	Publication	PVP8			Able to be monitored: No specific comments, although it would be desirable for the monitoring framework to show how the polices deliver the plans objectives. The ability to monitor a policy is dependent on policy wording th allows the effectiveness of its implementation be clearly mesured in the AMR. The length and wording of some polices may make this more difficult.		The monitoring framework is section 8 is organtised around policies which are listed under the various objectives. In this way Southwark is confident that the framework will monitor both the objectives and the policies which will be used to implement the objectives.
458	9	Publication	Publication	PVP3	BH3		Affordable Housing: The AAP proposes to re-provide 2,100 affordable housing units - there are currently 2,250 social rented homes within the Master plan area. PPS3 `Housing' says that "Local planning authorities should aim to ensure that provision of affordable housing meets the needs of both current and future occupiers". It is noted that paragraph 3.3.2		The justification for the affordable housing policy in the AAP is set out in full in paragraphs 2.8-2.24 of the Tenure Mix and Size of Homes background paper. Our 4 key objectives are to: <ul style="list-style-type: none"> •Maximise provision of affordable housing; •Create a mixed and balanced

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							states that enough social-rented homes will be provided during the planned development period in the rest of borough to meet the needs of the residents in the Aylesbury Estate and those in housing need. Is this realistic and achievable given the current economic climate as there is no indication within the justification to show how this will occur? To make this statement more robust you may want to set out how this need will be met throughout the rest of the Southwark - perhaps by cross referencing to evidence based document where appropriate.		community and help widen housing choice by introducing private housing as well as an element of intermediate housing; •Ensure that tenants who wish to can return to the area following redevelopment; and •Provide a sufficient number of private homes to ensure that the redevelopment is deliverable. The background paper describes in detail how the AAP policy responds to these objectives. . New affordable homes in the core action area will contribute to meeting Southwark's general housing needs. Further detail on general housing need is set out in paragraphs 13.6.11-13.6.22 of the Baseline Report. These paragraphs summarise the findings of the 2006 Housing Needs Assessment Update which suggests that generally the need for affordable homes in the borough outstrips supply of all kinds of homes. This

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									issue however needs to be balanced against the other objectives set out above. Paragraphs 2.17-2.22 of the Tenure Mix and Size of Homes background paper describe the implications of the AAP policy on Southwark's housing targets. Section 7 and appendix 7 of the AAP set out how the changes in financing position and other broader factors will be taken into account.
459	9	Publication	Publication	PVP3	BH3		Viability: You should be satisfied that the AAP meets the criteria set out in paragraph 29 of PPS3, in particular the need to demonstrate economic viability of affordable housing targets. This requirement has been highlighted in the judgement of the Court of Appeal in Blythe Valley BC v Persimmon Homes. It is not clear, either within the policy or the reasoned justification that accompanies it, that such an assessment has taken place. To increase certainty in the policy, if an assessment has been carried out, you should make reference to this within section 3.3		In preparing the AAP, the council has prepared a financial model which has been used to test all the assumptions in the plan. Further details on the financial testing which has been carried out are set out in appendix 7 (paragraphs A7.1.24-A7.1.33).

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460	9	Publication	Publication	PVP1			(i) To provide a greater overall context to why this plan is being produced, the AAP would benefit from the key issues facing the area for the next 15 -20 years being expanded upon within the background section 1.2 This could include details on who your Council is working to overcome these issues and how this would be achieved. (ii) The plan's objectives are set out in Appendix 4. To provide further context to the overall vision of the document you may want to set out the high level objectives at the end of section 1.6, cross referencing these to the more detailed objectives in appendix 4. PPS12 paragraph 4.3 states that "the strategic objectives form the link between the high level vision and the detailed strategy".		In order to make the AAP as readable as possible, particularly for local people who are only too aware of the issues, Southwark aimed to keep the introductory sections reasonably brief. Additional information is provided in appendices and background papers for those who are interested. The key issues in section 1.2 are further elaborated upon in the SWOT analysis contained in Appendix 3. Southwark consider that the key information is set out in section 1.2 and do not think that expanding this section would benefit the AAP. With regards to the objectives, again Southwark felt that including a lengthy list of objectives in section 1.6 served to break up the flow of the plan. The decision was taken to highlight the vision in section 1.6 and place the more detailed objectives into an appendix

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									rents, and have varied from one association to another. However in 2002, the government introduced legislation to ensure that the rents set by the council and by different housing associations will be similar by 2010, for similar properties. Rents will be set within both the government and Southwark Council's guidelines for affordability and will be well below market rent values. Sizes of homes: the design guide in Appendix 6 of the AAP specifies space standards. All social rented homes to be provided should be 10% larger than Parker Morris standards. The existing flats on the estate were built to this standard.
500	111	Publication	Publication	PVP3	BH3		The Aylesbury New Deal for Communities (NDC) has spent the last nine years working closely with the residents on the estate to support them in their hopes and aspirations for the regeneration of the estate. Following many failed regeneration	We would like the opportunity to participate at the oral examination as we have been working with	Noted

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							<p>proposals culminating in the failure of the initiative to refurbish the estate in early 2005, the NDC carried out an estate wide consultation the results of which confirmed that was a majority of residents in favour of demolition. A survey carried out by the Council achieved a similar result. Since then the NDC has worked closely with the Council to assist them through a 'visioning' process followed by the procurement of consultants to deliver the Area Action Plan (AAP) in which residents played a very active role. We believe that the AAP is legally sound and compliant because: 1. The very extensive consultation carried out during the preparation of the AAP achieved not only high levels of participation from local residents, many of whom had clear objectives about what they wanted to achieve from the redevelopment of the estate, but very high levels of approval for the proposals which is well documented. 2. Residents feel that they have been listened to because when there were proposals that concerned them such as the original density proposal this was relayed back to the council who took the decision to reduce the number of</p>	<p>Aylesbury residents delivering many different projects and programmes including the AAP from our office on the estate since 2001, we are therefore better pla</p>	

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							<p>homes from 5000 to 4,200 which reduced the density and the number of flats and enabled the provision of more family houses. 3. The AAP covers all aspects of residents needs in the area and all the elements that they want in an area that they would choose to live in including well designed and sustainable new homes, schools, health facilities, community facilities, improved transport connections, good play areas and open spaces in a safer environment and long overdue improvements to Burgess Park. 4. The residents are also supportive of the tenure mix more so since the number of affordable homes has been increased from 45% to 50%. The Aylesbury New Deal for Communities (NDC) has spent the last nine years working closely with the residents on the estate to support them in their hopes and aspirations for the regeneration of the estate. Following many failed regeneration proposals culminating in the failure of the initiative to refurbish the estate in early 2005, the NDC carried out an estate wide consultation the results of which confirmed that was a majority of residents in favour of demolition. A survey</p>		

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							carried out by the Council achieved a similar result. Since then the NDC has worked closely with the Council to assist them through a 'visioning' process followed by the procurement of consultants to deliver the Area Action Plan (AAP) in which residents played a very active role.		
501	15	Publication	Publication	PVP3	BH3		I strongly support the Aylesbury AAP and believe it represents the best way forward for Aylesbury area. Something has needed to be done about Aylesbury Estate for many years. While the community spirit in the area is strong, the physical environment is far from satisfactory. For the last 10 years residents have been presented with a range of unsuccessful redevelopment proposals, none of which have come to fruition. This time the plans are widely supported by residents. We have been actively involved in creating the AAP and developing a new neighbourhood that meets our needs. We want to see the AAP adopted as soon as possible so we can begin to see physical change in the area at long last. We believe the Aylesbury AAP is a legally compliant and sound scheme for the following		Noted

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							<p>reasons: 1. The AAP reflects the needs of existing residents. We want to live in an area that we are proud of - where people aspire to live. The AAP outlines that the new area will have all the elements that make a great neighbourhood - well-designed new homes, community facilities, good schools, better transport links and great open spaces including a new and improved Burgess Park. 2. Residents both on the estate and in the AAP area were consulted with extensively to develop the AAP. Their views have shaped the plans for the area. A specialist neighbourhood team was also formed with community representatives from the AAP area to empower and educate them and allow them to feed into the planning process. 3. The regeneration sub-group, which I chair, has been actively involved in the creation of the AAP. Residents have worked cooperatively with officers to ensure that their aspirations are reflected in the new community. 4. The plans have received strong support from the majority of the public at all the exhibitions. 5. Resident concerns have been listened to - the revised preferred options reflect this..</p>		

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							Residents said they were concerned about density and too many flats being built. Following this the number of homes outlined in the plan was decreased from 5,000 to 4,200. This will create a more spacious environment where more family houses will be built, something residents have asked for. I am also pleased with the tenure mix and the fact that the number of affordable homes will increase from 45% to 50%. This will ensure that all residents who want to will have the option to return to the new community. I recognise that there is a small loss in the number of affordable homes but looking at the scheme overall i.e. the creation of a better environment and more family houses I feel that this is beneficial to the area overall.		
503	101	Publication	Publication	PVA	A6	A.6.5.7.	Green Finger Routes: The illustration shows an excess of tree planting which will negate good surveillance through the public and private space and could assist criminal activity/and social behaviour.		The figure mentioned is an illustrative only. Detailed plans and landscaping schemes will be subject to consultation.
504	101	Publication	Publication	PVP5	TP1		Page 56 Figure - 14 Designated Cycle routes. Are there plans to a) provide b) enhance lighting on existing cycle routes? Will local cycle network running East/West still run under Wells Way via existing		It is not envisaged that existing underpass would be closed or replaced by an alternative grade crossing. Poor lighting in Burgess park is recognised as

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							underpass?.		a key concern (see paragraph 3.3.11 of the Open Space Strategy background paper). The council has secured £6m of funding to improve Burgess Park through the GLA's Priority Parks scheme and Aylesbury NDC match funding (refer to paragraph A7.1.31). Additional funding will be generated through the proposed infrastructure tariff (Policy D2). It is expected that the GLA/NDC funding will be spent during the first phase of development. Consultation will take place in this period over detailed proposals for improvements to Burgess Park.
505	101	Publication	Publication	PVP4	PL6		This map show the location of proposed play spaces without designated equipment. I hope the proposals contain play equipment that allows female and male teenagers to integrate freely and share common play space. Such equipment should encourage robust and safe physical activity which should help reduce anticipated future high obesity		Policy PL6 sets out requirements for children's play space. Further guidance on how this should be incorporated into proposals is set out in AP6.5.10. A range of equipment and spaces will be provided to meet the needs of existing and future residents.

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							rates in children and young people. Consideration should also be given for appropriate youth space.		
506	101	Publication	Publication	PVP4	PL8		How still stewardship be maintained of open green spaces? Will there be increased Police/Community Wardens, Park Rangers? Has an identified use for the lake been made as a possible income generator and a form of community engagement?		It is currently envisaged that open spaces in the AAP area would be maintained and managed by the council. While park wardens and community wardens will have a presence in the area, as they do at the current time, the AAP emphasises the importance of creating spaces that are safe and secure through good design. A key part of the plan is that new public and open spaces will be overlooked and will benefit from natural surveillance to help users feel safer. This is recognised in policy 3.13 of the Southwark Plan which will apply to the Aylesbury area as well as AAP policy PL3. The importance of this is reiterated in paragraph 4.3.1. The design guidance in appendix 6 also emphasises the need to use design to

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									create safe and secure spaces. In particular A.6.15 to A.6.17 reiterate the need to provide active frontages onto the public realm.
508	32	Publication	Publication	PV General			<p>THE MAYOR'S ROLE: 5) It is a statutory requirement for local planning authorities to request the Mayor's opinion on general conformity at the same time as it publishes a document prior to submitting it to the Secretary of State. Regulation 27 requires consultation at the pre-submission stage. The Mayor issues his opinion on DPD general conformity in accordance with Section 24(5) of the Act. 6) The Mayor of London's comments will be made available on the GLA website www.london.gov.uk. BACKGROUND: 7) The Aylesbury Estate was constructed between 1966 & 1977 and is now the home of 7,500 people and includes several schools, offices, community buildings and some shops. It lies immediately to the north of Burgess Park and south of the Elephant & Castle. 8) Over recent years Southwark Council and the Aylesbury NDC have managed various social programmes for estate residents.</p>		Noted

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							<p>These programmes have helped improve the overall quality of life for residents living within the area. There have been a number of previous attempts to regenerate the estate that did not come to fruition for a number of reasons. 9) In September 2005 it was agreed that the whole of the estate would be redeveloped. This decision was informed by a large amount of research work including a report on the structural robustness of existing housing blocks, and the costs of total refurbishment compared to total redevelopment. 10) Whilst the estate is the main focus of the AAP and the area of greatest change, the plan covers an area that stretches from Burgess Park to the South, East Street to the north, Walworth Road to the west and OKR to the east. 11) To take the vision for the Aylesbury forward, a number of objectives have been developed for the AAP grouped under place making, delivery and sustainability. The place making objective has at its heart the aspiration to create successful places where people are attracted to live, work, visit and invest and the document deals with these aspirations under 4</p>		

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							headings: better homes; public life; connections; and community. The delivery objective deals with funding, image and speed of bringing forward the development. The sustainability objective sets out 16 sustainable development objectives for the AAP.		
509	32	Publication	Publication	PV General			12) PREVIOUS REPS: a) The issues and options stage was considered by the head of Planning Decisions Unit, under delegation from the previous Mayor, in November 2007. b) The preferred options stage was considered by the Deputy Mayor, Government Relations in June 2008 (PDU/LDF28/LDD01/01. c) a revised preferred options stage was considered by the Deputy Mayor, Policy and Planning in December 2008 (PDU/LDF28/LDDO1/02). 13) In December 2008 response, the Deputy Mayor concluded that the principle of the development of the Aylesbury AAP was supported from a strategic planning perspective. The design concept; level of affordable housing; housing mix; family focus and increased number of homes were all welcomed. Further work needed to be carried out on the viability of plans and there were number of other detailed		Further work has been carried out on viability as set out in the background papers particularly the delivery and implementation background paper.

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							comments relating to energy, transport and open space.		
510	32	Publication	Publication	PVP3	BH3		STRATEGIC ISSUES - HOUSING & AFFORDABLE HOUSING: 14) The existing & proposed accommodation would be as follows: table 15) At the revised preferred options stage, it was agreed that although there would be an overall loss of about 150 affordable units, this was acceptable given that the proposal would include increased family size accommodation and the shortfall of affordable accommodation when calculated in habitable rooms would be 2%. 16) The overall estate provision is intended to be: a) 50% private b) 50% affordable of which 75% would be social rented and 25% intermediate accommodation.		Noted
511	32	Publication	Publication	PVA	A6		The social housing will be build to Parker Morris plus 10% standard.		Noted
513	32	Publication	Publication	PVP3	BH4		Southwark council has been advised previously that the level of family housing (at 30%) and the number of houses proposed (23%) are welcomed.		Noted
514	32	Publication	Publication	PVP3	BH2		DENSITY & URBAN DESIGN: 19) Southwark Council was advised at the		Noted

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							revised preferred options stage that the density at 500 habitable rooms per hectare and approach to building heights was a well thought out spatial plan, with an appropriate level of detail, that provides clear design guidance and a sense of what kind of place would be created, whilst allowing for flexibility in terms of detailed implementation. A range of building types and height are proposed which relate to the context of the surrounding conservation areas and the park. This approach is supported in strategic policy terms. 20) the density figure has been increased to around 563 habitable rooms per hectare due to the inclusion of some non residential floorspace. However, the density remains acceptable given that it will broadly remain within the London Plan guidance and given the context of the overall development.		
515	32	Publication	Publication	PVP3	BH6		ENERGY: 21) The AAP sets out that the energy supply for the masterplan will be generated by combined heat and power (CHP) plant will be appropriately sized to accommodate plant required to deliver services to the development. All		Noted

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							developments within the masterplan area must connect to the CHP system. Whilst the text does not meet all the GLA requirements as set out in previous reports, the wording is acceptable in this instance.		
516	32	Publication	Publication	PVP5			TfL comments: 22) Although the submission document is accompanied by a transport strategy, the introduction recognises that the assessment was carried out before decisions were taken about the Cross River Tram. Further dialogue will be required with TfL London Buses to agree how the bus network can be adapted to serve the redevelopment and the supporting infrastructure that will be required including segregation, priority measure at junctions, bus stops and stands. The AAP will also need to be sufficiently flexible to take account of work resulting from the study in to alternatives to Cross River Tram and sub-regional modelling being carried out by TfL. TfL has updated detailed comments made at the preferred options stage to reflect changes to the proposals and these are attached as an appendix.		Noted. Land has been safeguarded for a public transport route. This incorporates flexibility to provide the public transport corridor either around the current estate (along Albany Road), or through (along Beaconsfield Road). The council will continue to discuss public transport improvements with TfL.
517	32	Publication	Publication	PV			LEGAL CONSIDERATIONS: 23) All local		Noted

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				General			development plan documents must be in general conformity with the London Plan. This key test of the soundness of plans. The Mayor's representations made at this stage will go forward to the examination in public. The test of general conformity is set out in Circular 1/2008 and states that LDDs should not be adopted unless they properly reflect the policies in the Spatial Development Strategy. The Circular states "the test is of general conformity and not conformity. In practice, this means that it is only where an inconsistency or omission in a development plan document would cause significant harm to the implementation of the spatial development strategy, that it should be considered to not be in general conformity".		
518	32	Publication	Publication	PV General			24) The Mayor's General Conformity Guidance Note (July 2006) confirms that the principle of general conformity applies to all policy areas of the London Plan and can apply to a single policy issue. The guidance Note also confirms that the mayor will make other comments on development plan documents. However, where these are made they must relate to one of the other test of soundness. 25)		Noted

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							<p>The fact that a development plan is inconsistent with one or more policies in the spatial development strategy, either directly or through the omission of a policy or proposal, does not, by itself, mean that the document is not in general conformity. Rather, the test is now significant the inconsistency is from the point of view of delivery of the spatial development strategy. 26) any expression of opinion from the Mayor that the development plan document is not in general conformity will be treated as a representation to be dealt with by the Inspector at the examination. The Planning Inspectorate has stated that the view of the Mayor's opinion "will be given considerable weight" and that a lack of general conformity with the London Plan will need to be fully justified on the basis of local circumstances, based on relevant evidence. 27) GOL Circular 1/2008 (Strategic Planning in London) confirms that the Mayor's opinion on general conformity will be the starting point for consideration of a DPD by an Inspector to ensure the Mayor's policies are fully considered when draft DPDs are examined. Paragraph 4.5 states "The</p>		

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							<p>Inspector will be expected to recommend changes to the DPD in accordance with the Mayor's opinion unless there are sound planning reasons for not doing so. "Under the new development plan system the Inspector's recommendations are binding on the local planning authority, and there is no subsequent modifications stage. Accordingly, the Mayor should set out which policies are not in general conformity with the spatial development strategy. 28) The Mayor must also state why the policy is not in general conformity and his reasoning behind the opinion. The Inspector will determine whether he/she supports the opinion and recommend accordingly. The Mayor should provide the Inspector conducting the examination with any necessary additional information as appropriate, either through a representative or in writing according to the requirement of the Inspector. 29) Based on experience elsewhere in the country, it is likely that where an opinion that a plan is not in general conformity is made, the Mayor will be expected to be represented in person at the examination. Other representations may be dealt with in</p>		

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							person or through further written representations. It is anticipated that the examination will take place in September 2009.		
519	32	Publication	Publication	PV General			CONCLUSION: 30) There are no outstanding issues. The Aylesbury AAP is in general conformity with the London Plan.		Noted
520	32	Publication	Publication	PVP4	BH2		Although the submission document is accompanied by a transport strategy, the introduction recognises that the assessment was carried out before decisions were taken about Cross River Tram. TfL notes the subsequent reduction in residential units which should lead to the assessment presenting a worst case scenario. However, it is important that aspirations to achieve a high modal share for public transport, walking and cycling and measures to minimise the impact on the road network are realised. Further dialogue will be required with TfL London Buses to agree how the bus network can be adapted to serve the redevelopment and the supporting infrastructure that will be required including segregation, priority measures at junctions, bus stops and stands. The AAP will also need to be		Noted. A route through the AAP area has been safeguarded for public transport.

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							sufficiently flexible to take account of work resulting from the study in to alternatives to cross River Tram and sub-regional modelling being carried out by TfL.		
521	32	Publication	Publication	PVP4	PL1		TfL considers there is a need to ensure the provision of sufficient land for the development of an expanded transport system. The safeguarding of a route for public transport through the development is welcomed but there will be a need for supporting infrastructure including locations for stops, stands as well as temporary facilities during the construction phase. As a minimum there will be a requirement for two bus stands and drivers' facilities within the master plan area. Providing for improved freight movement and deliveries can also involve a land requirement. The AAP should acknowledge the need to safeguard land for transport functions, in line with the 'Land for Transport' (March 2007) document with a SPG to the London Plan.		The AAP has safeguarded all land requested by TfL and considered appropriate by the council. There are no areas suggested by TfL have not been safeguarded by Southwark Council. Furthermore the emerging core strategy process supports this safeguarding approach.
522	32	Publication	Publication	PVP5	TP1		Reference should be made in this policy and the accompanying design guidance in appendix 6 to the need for street design to facilitate bus movements through the AAP area. TfL supports the priority accorded to		Noted. Policy TP1 states that vehicular routes should be designed in accordance with Figure 15. Figure 15 is a simplified version of the

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							<p>pedestrians and cyclists, and recognises that these modes can provide important access to public transport, e.g.. Rail and underground at Elephant & Castle, but this should not be at the expenses of public transport operations. In particular traffic calming measures including speed tables and road narrowing must comply with TfL technical note `Traffic Calming Measures for bus routes' to include a minimum carriageway width of 4 metres along the full length. Pedestrian crossing facilities should also take account of the impact on bus journey times and reliability. Zebra crossings and raised tables can cause particular concerns. Thurlow Street, Albany Road and East Street are important routes for buses. In general traffic calming measures should be restricted to local access roads that are not intended for use by buses. In this context the designation of East Street as an access street may not be appropriate. If shared foot/cycle ways are intended for the community spine or other key links they should be at least 3 metres in width and appropriately segregated to minimise conflicts.</p>		<p>hierarchy set out in the Transport and Movement Strategy (Figure 8 in Annex 1). Part D of the same document describes the highway strategy for the area. The hierarchy should ensure that streets are designed in accordance with both their movement status and their place status. The council has taken the needs of bus routing and priority into account in preparing the AAP (refer to the Transport and Movement Strategy sections 6.4 and 8.2). Some raised tables are proposed for Albany Road, Thurlow Street and Portland Street (see Transport and Movement Strategy paragraphs 6.3.16-6.3.19). These will be designed in accordance with TfL guidance on Traffic Calming Measures for Bus Routes. As is noted above, Figure 15 is a simplified version of the hierarchy set out in the Transport and Movement</p>

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									Strategy (Figure 8 in Annex 1). In Figure 15 local collector streets have been merged with access streets into a single category. The more detailed hierarchy in the Transport and Movement Strategy shows that East street is a local collector street and junctions would be designed accordingly. All shared foot/cycle ways will be in excess of 3m in width.
523	32	Publication	Publication	PVP5	TP2		TfL shares the aspiration to provide significant improvements in bus services operating in the masterplan area following redevelopment and welcomes the identification and safeguarding of a route for high capacity public transport. This routes should be designed with sufficient flexibility to take in to account the outcome of the study in to alternatives to Cross River Tram and sub-regional modelling work. In any scenario there are likely to be benefits from achieving a high level of priority or segregation for public transport vehicles. Reference should also be made to the importance of east-west links for bus services to provide connections to		Noted. The street hierarchy (see Figure 15 of the AAP) should ensure that streets are designed in accordance with their traffic function and sense of place. The council has taken the needs of bus routing and priority into account in preparing the AAP (refer to the Transport and Movement Strategy sections 6.4 and 8.2).

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							Walworth Road and Old Kent Road and priority measures provided wherever possible. Traffic calming measures should not hinder bus operations on these key links. Funding (through planning obligations) is likely to be required to pump prime additional public transport capacity.		
524	32	Publication	Publication	PVP5	TP3		TfL strongly supports the preferred AAP approach of providing for a maximum car parking standard across the master plan area of 4 spaces per 10 households, varying according to PTAL levels. This standard is in line with Annex 4 of the London Plan. Concerns about overspill parking should not be used as a justification for higher level of on site parking. Instead, a consistent Controlled Parking Zone should be applied across the master plan area. Parking management will be an important consideration in drawing up an area-wide Travel Plan. Parking controls should be supported by a car club facility for residents that need access to a motor vehicle for certain trips. Preferential access to parking for a car club members should be considered as an incentive. TfL		Noted. With regards to non-residential parking, transport assessments, green travel plans and motor cycle parking, the council would apply standards in the Southwark Plan, emerging core strategy, Transport SPD and the London Plan. There is no need to repeat such policies in the AAP.

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							would support car free development close to public transport corridors. Requirements for cycle parking should be in accordance with TfL guidelines. Transport Assessments and Travel Plans should also follow TfL best practice guidance with particular consideration given to the impacts on the wider transport networks including junctions with Walworth Road and OKR and links to Elephant & Castle. An area wide approach to preparing a residential travel plan will be particularly useful in providing a framework for individual phases and plots. Consideration should be given to setting targets for modal share as apart of the monitoring. The AAP does not appear to mention car parking standards for non-residential developments or the parking needs of disabled motorist or motorcyclists. TfL suggest that the AAP should refer specifically to the maximum standards set out in the London Plan as well as any standards adopted by the borough.		
525	32	Publication	Publication	PVP5			The document does not appear to mention freight and servicing. TfL suggests that freight and servicing issues are covered in the AAP, based on 3C.25 of the London		Policy TP1 states that vehicular routes should be designed in accordance with Figure 15. Figure 15 is a simplified version

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							<p>Plan (and PPG13), taking in to account the sustainability aspects of freight and the need to provide Delivery and Servicing Plans. Issues to consider include the potential for collection points and concierge services to cater for homes deliveries. Furthermore, the Council should have considerable leverage (due to the large proportion of planned social housing) to employ best practice in the application of Construction Logistics Plans for construction of social housing stock and these would contribute to the overall sustainability of housing provision. Outlined details are provided in the London freight Plan, viewable at http://www/tfl.gov.uk/freight. Further information can also be provided by the TfL freight Unit on request.</p>		<p>of the hierarchy set out in the Transport and Movement Strategy (Figure 8 in Annex 1). Part D of the same document describes the highway strategy for the area. The hierarchy should ensure that streets are designed in accordance with both their movement status and their place status. The needs of freight vehicles would be taken into account in the design of streets, particularly in the higher order streets which run through the area, including district (Albany Road) and local distributors (Thurlow Street/Flint Street, Wells Way). In lower order streets, such as access streets, HGV movements will be limited to delivery and servicing of premises only (paragraph 6.2.13 of the Transport and Movement Strategy). Southwark Plan policy 5.2 which would apply to the AAP area requires developers to</p>

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									consider servicing in preparing schemes. Further guidance on servicing is provided in the council's Transport SPD.
526	32	Publication	Publication	PVP7	D2	6A.4 6A.5	TfL supports the principle of securing infrastructure funding through a tariff scheme, alongside planning obligations. However, it is important that the list of infrastructure projects is agreed with delivery partners including TfL and reflects the full cost of provision. TfL is pleased to see the list of items to be funded through a tariff includes highways and public transport improvements and cycling and walking facilities. Planning obligations would need to include mitigation for any identified impacts on public transport or the operation of the road network including nearby sections of TfL Road Networks (TLRN). It is appropriate to seek contributions which contribute to borough wide transport improvements as well as site specific improvements. In this context, TfL welcomes the reference to strategic transport improvements in paragraph 7.3.6. TfL periodically enters in to S106 agreements, as co-signatory with boroughs, if TfL is required to provide the		Noted 7.3 states that the council will prepare an SPD which provides more detail on s106/tariff arrangements. We will provide details about partnership working on securing and spending the monies in this document.

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									has confirmed that it is consistent with the London Plan.
529	69	Publication	Publication	PVP7		7.1.22	Insufficient consideration of rehousing policy (7.1.22 & 7. 1.23 contain vague paragraphs that gloss over the significant problem of Housing Capacity currently encountered by the Heygate development)		The justification for the proportion of homes which will be affordable is set out in detail in paragraphs 2.8-2.28 of the Tenure Mix and Size of Homes background paper. While the AAP would result in a small loss of affordable housing, it would bring many other benefits. These include a much improved and high quality physical environment, a transformational change in the quality of public open spaces in the area, homes which are far more energy and water efficient and new social and new community infrastructure including schools, health facilities and childcare space. In the light of these benefits and taking into account the objectives of reproviding affordable housing, creating a mixed community, ensuring

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									existing tenants can return and creating a deliverable scheme, Southwark consider the AAP approach to tenure to be the most appropriate in the circumstances. It is in line with options set out in the emerging Core Strategy and the Mayor has confirmed that it is consistent with the London Plan.
530	69	Publication	Publication	PV General			No consideration of continuity of community and social cohesion and of educational continuity - all disrupted by having to rehouse 50% of residents off-site to accommodate demolition (Appendix 7.1.9), and by consultation failures. This plan is therefore inconsistent with National Government Policies and Guidelines to support social cohesion - Sustainable Communities Plan 2003 and Local Government Act 2000. In the AAAP, in recognition of the number of people (43-75%) who prefer Council to Housing Association, they are provided with the option of moving off the Estate with no return (where all existing Council homes will be destroyed, and none built in their		The council has considered social impacts of the proposals in both the Equalities Impact Assessment (see Part 3 of the Stage 1 Scoping) and the Sustainability Appraisal. Southwark is investing in local schools to ensure that they will have the capacity to serve the neighbourhood. Social infrastructure including new health facilities, the Aylesbury Resource Centre, new employment space, flexible community space and retail space will be provided to support both the existing and

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							place). i.e. if you want a Council home you will be exiled from the Aylesbury footprint. (There is no monitoring framework for either issue 3 or 4 - 8.6. & 8.7)		incoming population.
531	69	Publication	Publication	PVP7		7.1.24	There is insufficient evidence to back the soundness of the basic economic model for the whole scheme whereby private sales finance social housing - this has failed on the Heygate. In fact the current economic crisis has arguably been caused by overextending credit to potential homeowners starved of affordable accommodation - this scheme reduces the net number of homes for social renting, at the same time as increasing density by 50% and promoting the risky business of intermediate housing - misleadingly called 'affordable' in the AAP and associated consultation documents. National Housing Policy is under review, and Council tenants on the Aylesbury are well placed to appreciate the benefits of their spacious, light and genuinely affordable homes and advise National policy makers of the economic dangers of over-promoting private home ownership and neglecting investment in not just maintaining existing Council Housing		The consultation process is robust and sound. The details are set out in the Consultation Report. The justification for the proportion of homes which will be affordable is set out in detail in paragraphs 2.8-2.28 of the Tenure Mix and Size of Homes background paper. While the AAP would result in a small loss of affordable housing, it would bring many other benefits. These include a much improved and high quality physical environment, a transformational change in the quality of public open spaces in the area, homes which are far more energy and water efficient and new social and new community infrastructure including schools, health facilities and childcare space. In the light of these benefits and

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							<p>stock well but building more. The result of the 2001 ballot might have been treated as a fundamental guide to opinion on the Estate to be respected and honoured rather than as a side issue to the business of the AAP - an inconvenience to be managed. If the Aylesbury's existence is the indicator of greater than average deprivation, the financial ability, or not, of Southwark to honour it Tenants wishes, empowered, or not, by the Government, is an Equalities and Human Rights issue. The issue of demolition and regeneration came about in the context of the Government rules on Housing Finance - which, it seems, are currently under review. There seems to have been the attitude that poor Aylesbury Tenants wishes cannot be honoured - stupid people - lets educate them about the realities of Housing Finance - rather than letting these tenants sound a warning bell that there has been something radically wrong with Housing Policy and provision of social housing over decades. But its not too late.</p>		<p>taking into account the objectives of reprovding affordable housing, creating a mixed community, ensuring existing tenants can return and creating a deliverable scheme, Southwark consider the AAP approach to tenure to be the most appropriate in the circumstances. It is in line with options set out in the emerging Core Strategy and the Mayor has confirmed that it is consistent with the London Plan.</p>
537	90	Publication	Publication	PVP4			<p>1. The Walworth Rd. • We feel strongly that it is important to include the</p>		<p>Noted. An upgrade to the southern part of Walworth Road</p>

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							southernmost section of the Walworth Rd in the Aylesbury AAP. When the plans were developed for the redevelopment of the Walworth Rd, it was very much envisaged that the southern most section (and the most northerly section of the Camberwell Rd) would become a "Green Boulevard" uniting Burgess Park with the rest of the scheme north of Merrow St and Fielding St. • We feel that for those living in the newly created sections 1a, 1b and 1c, it is inappropriate that they will be accessing their public transport connection across a four lane wide relatively fast Walworth Rd and that this represents a barrier to the likely take-up of public transport by residents. At present the missing section is an anomaly as vehicles that proceed south through the main section of the Walworth Rd are encouraged to speed up through this short four lane stretch. • We feel that by including this part of the Walworth Rd in the AAP, it will be possible to gain funding for the improvements that are needed and were planned. These include significant pavement widening and carriageway capacity reduction. These improvements		might be desirable. However, it is not essential to making the Aylesbury development work and would be likely to be costly. Costs associated with improving Walworth Road would be an additional burden on the project and therefore have not been considered as part of the AAP..

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							could even allow for the creation of a linear/pocket park when combined with the existing space outside the Gateway Estate. • Most importantly these improvements would allow the economic benefits that have accrued to the more northerly parts of the Walworth Rd to continue further south and to ensure that those who live in the regenerated Aylesbury also have a high quality public realm when they are accessing their own local High Street in the form of the Walworth Rd.		
540	90	Publication	Publication		PL1		3. Albany Rd. •Albany Rd has a real significance as its redesign offers the opportunity to create the links between the Aylesbury and its “playground” and “garden” that plainly are absent from the road at present. •The initial designs again look excellent. We would again emphasise the need to calm the road to an effective maximum speed of 20mph throughout its length from Camberwell Rd to the Old Kent Rd. •We would also suggest that the carriageway of Albany Rd still appears too wide. In the drawings there is room for both cycles and motor vehicles. This will lead to a road that is far easier to speed		Noted. A 20mph zone would apply to all district distributors (Albany Road), local distributors and access streets (Transport and Movement Strategy paragraph 6.3.20). Plans for Albany Road are set out in section 8.2 of the Transport and Movement Strategy (with 3 plans shown in Annex 1). The design proposals suggest that Albany Road is narrowed to the minimum necessary (paragraph 8.2.3). The carriageway would be

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							<p>along. We feel that if the carriageway is to remain this wide in total, then protected cycle lanes should be used. It is vital that you do not create a road that vehicles feel is easy and quick to use. •We would also recommend the removal of the right turn into Albany Rd from Camberwell Rd (except for buses and cycles). This would have two significant benefits. Firstly it would reduce use of the road significantly especially as a through route. Secondly it would improve journey times into Central London significantly for public transport users heading north from Camberwell. The right turning lane of traffic is the cause of significant delays to bus journeys north owing to the lack of road capacity where the bus lane ends at the Albany Rd junction. •We would see such a change as offering a major benefit from this project to residents in other areas.</p>		<p>designed with one lane in each direction and a width of 8m. This option has been fully tested to ensure it works. Albany Road functions as a key east-west district distributor, and provides an important link between Walworth Road and Old Kent Road. It is considered more suitable to carry this traffic than other nearby streets; diverted traffic would in this case turn right at Bowyer Place [New Church Rd], and later turn right at Wells Way onto Albany Rd - the latter junction is already under pressure and causing bus delays (343 route); consultants have reported possible benefits at Camberwell Rd / Albany Rd junction from optimization of signal times, this would need to be monitored over time and further measures taken as appropriate.</p>
541	90	Publication	Publication		PL1		<p>2. Thurlow Street. •We very much like the overall design ideas for Thurlow St and its role as a High Street and Town Centre.</p>		<p>Noted. The design guidance in appendix 6 of the AAP states that with regards to on-street</p>

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							We feel that it is important: - to state the street should be designed so that vehicles proceed through this space at no more than 20mph. This is especially important if it is not intended that cyclists will be provided with their own protected lanes. - that vehicle parking will not occur the whole length of the road and that there will be frequent build-outs (that are wider than simply containing a small street tree). Such build-outs will mean that vehicle parking is broken up and that crossing distances for pedestrians will frequently be reduced.		parking, there should be a maximum of 5 parked cars before there is a break, that parking spaces should be in marked bays and that landscaping should be used to soften the impact of parking (A6.8.36). This is illustrated in respect to Thurlow Street in section A6.5.4). A 20mph zone would apply to all district distributors, local distributors and access streets (Transport and Movement Strategy paragraph 6.3.20).
542	90	Publication	Publication		PL1		Other Issues in the Streets & Spaces. We would like to see consideration also given to the following: •The proposed community spine should continue east to Old Kent Road. •The green fingers should extend further north and, to the south, should link with paths within Burgess Park. There is a clear opportunity to integrate the proposed green fingers into the East Walworth Green Links scheme which is gaining considerable interest from local residents and local groups. •The green fingers could also follow through to the south to access		Community spine: The community spine continues east in terms of public realm, but not with the full restrictions on vehicular traffic. No advantages would be gained from this change, the street is residential and not a through route (it is blocked off from Old Kent Rd at the eastern end) and has restricted access. Green fingers: Figure 11 in the AAP shows how the green

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							streets such as Addington Square. These green fingers through the park are not currently shown. •The LCN should be shown on the map on page 111.		fingers link to existing open spaces. Improvements to the park, including the extension of green fingers south though the park would be subject to future consultation. LCN: Figure A6.2 sets out the typologies of street according to their function and character. The LCN is shown on Figure 14 - Cycle Network.
543	90	Publication	Publication		A6.2		On the map (page 111) the Portland Street access street is shown as a continuous street rather than being closed at various points to block through traffic. We feel that an access street that supports through traffic isn't an access street. It is important that, to become a safe cycling route, access to vehicles and vehicle speeds are reduced. Breaking this street up in this way will go a long way to achieving these goals. • New Church Road is shown as an access street whereas currently it is closed to everything except pedestrians and cycles. It is really important that this road is finally removed and the space is integrated into Burgess Park itself.		The council will recommend to the inspector that New Church Road is removed from the street hierarchy plans. With regard to Portland Street, the council is not proposing to change the existing traffic management scheme outside the footprint of the Aylesbury Estate.
544	90	Publication	Publication		TP3		Car Parking Restrictions In The Scheme	We would very	Paragraph 5.3.2 states that the

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							<p>•We note in section 5.3.2 of the Transport Strategy (http://www.southwark.gov.uk/Uploads/FILE_41086.pdf) that the overall proposed maximum for car parking is 0.4 parking spaces per unit to be provided. •We note also that “there will be variations within the area below this level depending on the public transport accessibility levels, size of homes and tenure mix” and that some of the early phase sites (1a, 1b and 1c (with a PTAL of 5 to 6)) will have a per unit ratio of between 0.0 and 0.2. •We remain concerned that these early achievements of low levels of car usage will be reversed by the overall goal of 0.4 car parking spaces per unit. •The overall effect of this would be to encourage car ownership levels to increase over existing levels. As one of the principal aims of this scheme has always been to try to maintain/reduce car trips, rather than make it easier to drive a car, this overall goal of 0.4 appears erroneous.</p>	<p>much recommend that the 0.4 maximum car parking is applied to each individual phase of the development and that steps are taken not to lose any gains that may be achieved from those developments that achieve better than a 0.4 per unit car pa</p>	<p>maximum will be averaged across the AAP area. The change proposed, ie. seek a maximum of 0.4 in each development block, rather than across the core action area as a whole, has been tested and would work physically. It would probably result in a slightly lower level of car parking provision, as any "spare capacity" gained from provision at a level which is significantly below the maximum in initial phases, could not be carried forward to later phases. It would also be easier to implement as each development block could be considered individually. However, a strong part of the vision for the AAP is to create an area which is attractive for families who are more likely to need cars. The current wording of the policy would result in a slightly higher level of car parking provision, some of</p>

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									which would be available for families. This would help achieve our objective of creating an attractive area for families. Although it would be harder to implement, Southwark would monitor car parking provision across development blocks and phases to ensure the site-wide maximum is not exceeded (see Table 4 in section 8.4 of the AAP).
545	90	Publication	Publication		TP3		Car Sharing. •We are unable to locate defined car sharing minimum expectations. We would very much like to see these included in order that these will become hard wired into each development and so that strategies will be create to ensure the development of a car sharing culture.		Travel Plans are required by Southwark Plan policy 5.1 and in Southwark's Transport SPD. It is not necessary to repeat those policies in this document. Section 9.3 of the Transport and Movement Strategy shows how car clubs might would in relation to the AAP area.
546	90	Publication	Publication		TP3		Cycle Parking. • This needs more emphasis than the brief reference in section 5.4.2 on page 59. It should specify residents' cycle parking within homes and plenty of on-street parking for visitors to homes and for the customers of shops		Cycle parking would be provided in accordance with the Southwark plan standards. It is not necessary to repeat those standards in the AAP.

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							and other facilities. More the illustrations should show some cycles and cycle parking (as on page 129).		
548	90	Publication	Publication	PV General			We would like to say overall that Southwark Living Streets is strongly in favour of the approach taken by the Southwark Council in relation to the redevelopment of the public realm of the Aylesbury area in this plan. We strongly support the commitment to designing individual and characterful neighbourhoods and putting pedestrians and cyclists at the heart of the public realm. We also very much like the use of mews and the creation of HomeZones in the residential parts of the scheme.		Noted.

TABLE OF REPRESENTATIONS ON THE ISSUES AND OPTIONS REPORT, PREFERRED OPTIONS REPORT AND REVISED PREFERRED OPTIONS REPORT (REGULATION 25 RESPONSES) AND RESPONSES FROM THE COUNCIL

Representation Ref	Objector Ref	Document	Part	Section	Option	Details of Representation	Officer Response to Representation
1	1	Issues and Options	Checklist of options			Respondee has ticked preferred boxes on questionnaire form.	
2	2	Issues and Options				Respondee has ticked preferred boxes on questionnaire form.	
3	3	Issues and Options	IO Part 2	IO 2.3	Size of Homes Opt 1	Respondee has ticked preferred boxes on questionnaire form.	
4	20	Issues and Options	IO General			Respondee has ticked preferred boxes on questionnaire form.	
5	6	Issues and Options	IO Part 2			Respondee has ticked preferred boxes on questionnaire form.	
6	7	Issues and Options	IO Part 2	IO 2.5	Surrey Sq Opt 2	<p>We would like to protest, in strongest terms, against being excluded from the consultation process during the first two stages of the Aylesbury Area Action Plan preparations, particularly the issues and options stage.</p> <p>Residents of our estate are going to be directly affected by the physical changes in our part of the Aylesbury Area, outside of the Aylesbury Estate itself. We are really concerned about our interests not being represented in the decision-making process, as the Aylesbury Area Action Plan Issues and Options report</p>	<p>Noted. While letters were sent out to the tenants and residents associations, the council acknowledges that residents around Surrey Square could have been better involved in the consultation process. Two meetings have taken place with residents and representatives from the T&RAs around Surrey Square and the council will endeavour to ensure that residents around Surrey Square are included in all future consultation about the area action plan.</p>

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						<p>states that the “responses to this document will be very important in determining the preferred options to take forward”, while the Issues and Options Consultation Plan mentions that the results of a large consultation on the phasing options (carried out in July) “will inform the next stage in the preparation of the AAP, which is the selection of the preferred options.”</p> <p>The Consultation Plan and the introduction to the Issues and Options report (published in September) refer to the “extensive consultation already undertaken”, the “ongoing and informal” process taking place and to the formal consultation set to commence on 5th October 2007.</p> <p>Alas, this does not tally with our experience – we first learned about having a stake in the plan and our estate being part of the Aylesbury area, in the last week but one of the issues and options stage of the AAP, when our Secretary came across a copy of the Consultation Questionnaire at a Walworth Community Council meeting on the 7th November, which he attended on, what we thought at the time, was an unrelated business. Even then, he only picked it up out of interest in what was going on in the neighbouring area, without realising that we are supposed to be among the consultees.</p> <p>In fact, according to the minutes of Walworth Community Council meetings for 2007, at no point were the Members of the</p>	

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						<p>Community Council actually provided with the Aylesbury Area Action Plan Issues and Options document in its entirety. Officers from the Regeneration Department presented updates on selected issues and options and on the consultation process, but not even the East Walworth Councillors were informed of the proposed changes to the physical environment in our ward.</p> <p>The response deadline for the questionnaire is Friday, 16th November 2007. As it came to our attention only last week, we do not have enough time to respond. The plan involves complex, interlinked issues, which need thorough analysis for us to understand the full implications for the residents of Kinglake. We need to inspect other documents which form the context of AAP, as they may have some bearing on the issues relating to our concerns, such as the Local Development Framework papers, and the Sustainable Community Strategy. In addition, we cannot convene an open TRA meeting within the time frame to obtain an approval to represent the interest of Kinglake residents formally.</p> <p>Despite Southwark Council's "ambition to go beyond the statutory requirements, to engage more continuously and intensively and enable those people with a stake in the area to be able to participate and influence the preparation of the AAP," expressed in the Consultation Plan, we have not been included</p>	

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						<p>in any form of consultation whatsoever, nor, to our best knowledge, have any other residents, nor their representative bodies in the part of the Aylesbury Area surrounding the Aylesbury Estate. This is in breach of our statutory rights set out in the 2004 Planning and Compulsory Purchase Act and may undermine the development plan document status of the Aylesbury AAP.</p> <p>Part of the problem seems to be whether or not Kinglake belongs to Aylesbury. Last re-organisation of housing management separated us from Aylesbury Estate in terms of housing services. Various officers, attending our meetings at the time, stressed the administrative difference and we were told that we are not included in the Aylesbury New Deal for Communities. Previous Aylesbury plans followed this and the AAP is the first plan in which we are explicitly included. We expected any developments in and around Kinglake to be announced separately and, as an association recognised by the council, we certainly expected to be informed.</p> <p>We are the residents of the Aylesbury Area, but not of the Aylesbury Estate and the element of confusion between the two – evident in even in the Issues and Options documentation, which in many places uses the terms interchangeably – makes us believe that the authors of the plan did not seriously consider us. We seem to be included within the boundaries of the plan,</p>	

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						<p>but not included in the decision making process.</p> <p>A number of issues in the document have direct impact on us, such as transport and the street layout, but one of them stands out. All of the residents, and other interested parties, in our part of the area we managed to contact in the short space of time, seem to feel strongly about it. It is the Surrey Square issue in the Public Life: Better and Safer Streets, Squares and Parks section of the Issues and Options report, putting forward a strong possibility of building blocks of flats on Surrey Square Park.</p> <p>It is clear from reading the Issues and Options report and the supporting documents, that the Council planners favour Surrey Square Option 2. Option 1, even in its minimalist form, offers many merits (some of them outlined in the general discussion of the Surrey Square issue earlier in the document). Yet almost nothing is presented in this option, whereas Option 2 goes into a lot more detail, 'flagging up' such benefits as "improved internal layout and habitat provision." It is difficult to envisage how building on top of a half of the present space helps to achieve these merits, unless mechanical symmetry and reducing the amount of 'untidy' greenery mean 'improved layout' and the habitats are the ones for humans!</p> <p>Surrey Square Park is a valuable amenity for many people in</p>	

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						<p>the vicinity. Children in particular have few places to play, especially on the Kinglake Estate. A recent survey carried out by Groundwork Southwark in partnership with KTRA, identified a need for kids to have somewhere 'local' to play. Parents are unwilling to let their children out, unsupervised, unless they are nearby. Thus, although Burgess Park has recreational facilities to offer, it is too far away to meet the need of a local play area, and provision of green-finger routes will not compensate for this.</p> <p>KTRA understands that the recreational facilities on Surrey Square Park are in great need of improvement, and has been active in raising money to address this. Hard work of our committee over the last 2 years secured CGS grants to improve the play area outside Hadlow / Leysdown Houses, and the west-most ball cage in the park complex.</p> <p>We are unable to present our arguments in any detail, even just on this one issue, as one week is just not enough time for a consultation of an estate.</p>	
7	8	Issues and Options	IO Part 2	IO 2.5	Surrey Sq Opt 2	<p>Opposed Option 2 for Surrey Square on grounds of the reduction of biodiversity, the</p> <p>loss of amenity for the many people who use the park for informal play,</p>	<p>Noted. Building on part of Surrey Square was examined as an early re-housing site. Further work has shown that the benefits of building on Surrey Square are not of a high enough significance to justify building and losing open space much valued by the local community. As a result this option will not be taken forward to the next</p>

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						picnicking and ball sports, the lack of congruence of this proposal with the need for action to reduce obesity and improve exercise.	stage.
8	9	Issues and Options	IO General			<p>1. The document is well set out, easy to read and makes good use of diagrams and photographs, in particular the inclusion of a key diagram at Figure 1.</p> <p>2. We welcome the use of "Fact Boxes" along side certain phrases/options as a helpful aid to those that are not too familiar with planning terms/jargon.</p> <p>3. Paragraph 1.3.8 – As you are bringing forward this Area Action Plan before your Core Strategy, it might have been helpful to say here that the document will also be consistent with your Unitary Development Plan which was adopted earlier this year. However, you do refer to taking into account your Council's Sustainable Community Strategy and other plans for nearby areas.</p>	Noted. The relationship between the AAP and the UDP and Core Strategy will be clarified in the Preferred Options Report.

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						<p>4. The inclusion of a “SWOT Analysis” (1.3.19) up front in the document is considered to be a useful scene setter which helps put issues into context, and hopefully from this enable the reader to gain a more thorough understanding of the issues facing the Aylesbury estate and its regeneration.</p> <p>5. The document provides an overall strategic vision for the area, which encompasses the Aylesbury Estate and its surroundings. This can be seen in the place making objectives which are grouped under the 4 headings of better homes, public life, connections and community. This is followed up through the reference to delivery and sustainable development objectives - with linkages to the Sustainability Appraisal. This overall approach is welcomed as it appears to embrace the principles of the new planning system.</p> <p>6. Section 2.1 details how to use the report in terms of commenting on it. We consider that the use of the ratings box is helpful, and hopefully as a result of this you will receive more meaningful responses, as it looks at how the options are performing against the key objectives of the document. Is this information backed up by what is in the Sustainability</p>	

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						<p>Appraisal? A minor point is that readers have to keep referring back to the key diagram and explanation throughout the document which could lead to some confusion.</p> <p>7. The options are rather detailed/specific in their nature. Given this, do you think that the provision of such detail at this stage may curtail the responses received/discourage readers from providing alternative options? It will also be interesting to see how you formulate your Preferred Options given the detail shown at this early stage of the DPDs production.</p>	
9	10	Issues and Options	IO Part 2			<p>As far as the Draft Supplementary Planning Document is concerned, the provision of utility infrastructure, including pipes and cables, has not been considered in the document. Thames Water recommend that this issue is included in accordance with paragraphs B3-B8 in Policy Planning Statement 12.</p> <p>Thames Water need to plan in advance the need for infrastructure as we have been advised that we are unable to seek upgrades via the Section 106 route (Town & Country Planning Act).</p>	Noted. The AAP will be supported by detailed technical studies on infrastructure requirements.

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						<p>As a consequence Thames Water has very limited powers under the water industry act to prevent connection to our network where insufficient capacity exists and where needed, we would rely on the Local Authority to include a Grampian style condition.</p> <p>It is essential that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and Thames Water (or any successor) have no planned improvements, the Local Council will require the developer to fund appropriate improvements that must be completed prior to occupation of the development. Network upgrades can take up to 18 months and where additional funding from our regulator is required up to 5 years lead in times may be necessary.</p>	
10	11	Issues and Options	IO Part 2			Respondee has ticked preferred boxes on questionnaire form.	

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11	12	Issues and Options	IO Part 2			Respondee has ticked preferred boxes on questionnaire form.	
12	13	Issues and Options	IO Part 2	IO 2.3		<p>Tenure</p> <p>None of the housing options conform with the primary requirement in local and regional plans that 50% of new housing shall be affordable . (Replacement housing cannot be counted towards the 50% figure). All the new housing on the Aylesbury will be market housing whichever option is chosen. Other planning requirements such as creating mixed communities should be secondary. I would like to know what consideration is being given to new Government policy on housing, to PPS 3 and to the Mayor's Housing Strategy all of which give greater priority than previously to affordable housing and particularly social rented housing. There is already an over-supply of market housing, the necessity is to focus on social rented housing which is needed desperately by the people of Southwark.</p>	<p>The policy of both the London Plan (and the Southwark Plan) is that estate renewal schemes should not result in any loss of affordable housing housing. The Mayor's Housing SPG suggests that where the need to create mixed communities is particularly important or in order to help make such schemes viable, replacing some social rented homes with intermediate homes may be an option. All the tenure mix options in the Issues and Options Report met these requirements. The council is undertaking financial modelling to assess these options. Whichever option is chosen, it will be critical that the AAP can be delivered.</p>
13	4	Issues and Options	IO Part 2			Respondee has ticked preferred boxes on questionnaire form.	
15	14	Issues and Options	IO Part 2	IO 2.9	Arts and Culture Opt 2	1. A modest well designed multi-purpose community centre with a performance area, film screen and activity rooms would provide participation opportunities for groups excluded from, or less able to access, mainstream services, such as younger or	1. Noted.

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						<p>older people.</p> <p>2. Cultural activities can drive regeneration and make people proud of their communities and of themselves. Widening cultural opportunities can improve community safety - for example by diverting attention away from acts of crime. Local activities can promote social inclusion, bringing together the new community, where good quality, accessible local cultural facilities are key to creating communities where people will want to live and work.</p>	2. Noted.
16	15	Issues and Options				Respondee has ticked preferred boxes on questionnaire form.	
17	16	Issues and Options	IO Part 2	IO 2.9		<p>Shopping Option 1&2</p> <p>The existing and projected growth in population in the AAP and spending growth in both convenience and comparison goods, relative to the existing retail provision does require the AAP to consider the need to improve the quantity, quality and accessibility of local shopping provision. Indeed such consideration should be reviewed holistically or borough-wide through the LDF process.</p>	Noted. The AAP will support improvements to existing facilities. However, Shopping Option 1 will be developed as the preferred Option. It is important that any new retail does not impact adversely on existing retail centres such as the Walworth Road and East Street Market. Local retail capacity and supply and demand will therefore be considered in detail at a later stage to ensure any new retail in the Aylesbury area complements provision in these existing centres.

