



**Consultation report for the
Aylesbury Area Action Plan
May 2009**

Volume III

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

Representation Ref	Objector Ref	Stage	Document	Section	Policy	Paragraph	Details of Representation	Proposed changes	Officer Response to Representation
491	6	Publication	Publication	PV General			MPA Sites Locations within the AAP: The MPA operate a Safer Neighbourhood Team Base from the Ground floor of the Chaplin Centre on Thurlow Street, which has been designated as being suitable for redevelopment. The MPA make representation in this regard in the following paragraphs.		Noted
492	6	Publication	Publication	PV General			Planning Policy Framework: The relevant planning policy framework can be found in our letter dated 11th December 2008, in which representations were made on behalf of the MPA to the Core Strategy. Below I outline relevant local policy, extracted from the Southwark UDP (2007) and relevant SPDs, which have not previously been highlighted. At the local planning policy level UDP Policy SP9 (meeting community needs) states that 'All developments should, where appropriate, enable growth and development of education, community and welfare services in line with the community's needs'. Furthermore, Policy 2.1 (Enhancement of Community Facilities) states that "planning permission		Noted

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							will not be granted unless the applicant demonstrates that another locally accessible facility with similar or enhanced provision can meet the identified needs of the local community users". Section 1, paragraph 14, of the Council's adopted SPD on Planning Obligations states that planning obligations may be sought for police and fire services. Mindful of the planning policy framework referred to above, it is clear that the statutory development plan supports continued effective policing and therefore I present further representations regarding the emerging policies are set out below.		
493	6	Publication	Publication	PV6			At the Preferred Options stage, the MPA requested that policing facilities be recognised within this section; unfortunately, this representation has not been taken on board. PPS1 states that development plans should promote inclusive, healthy safe and crime free communities, and the London Plan, reiterates this point further at policies3A.17 and 3A.18 as outlined in our letter on 28th May 2008; accordingly the MPA believe policing should be included within this section, and therefore set out	In accordance with the policy framework outlined above, the MPA suggest that a definition of 'Social and Community Facilities' be inserted within the Glossary between 1Small and Community	As is noted in response to representation no. 494, Southwark considers that the AAP provides sufficient flexibility to be able to accommodate new police facilities should there be a need. It is not thought that the proposed change would provide additional benefit.

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							further specific representation in this regard.	Facilities' be inserted within the Glossary between `Small and Medi	
494	6	Publication	Publication	PV6	COM 1		Policy Com1: Location of Social & Community Facilities: The MPA wish to ensure the impact of large scale development upon policing is mitigated, concurrent with the statutory development plan. Should redevelopment of the Chaplin Centre be forthcoming the MPA would require a replacement facility.	Therefore, the MPA recommend that the wording of policy COM1: be expanded to read as follow (addition in bold): Recommendation : New social and community facilities will be provided at 5 main locations, (see figure 16) within the masterplan area. Replace	The existing policing facilities are located in Taplow block. Taplow is located in phase 3 of the plan, anticipated to take place from 2017. Consequently, the Safer Neighbourhood Team will continue to have a base for several years yet. Around 2017, we will be better placed to understand what police premises, if any, are needed within the new neighbourhood. Southwark considers that the AAP provides sufficient flexibility to be able to accommodate new police facilities should there be a need. Non-residential uses including A and B class uses are to be provided as part of phase 3 and could accommodate a police base.

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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 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		Noted. The Self Assessment soundness tool will be submitted to the Secretary of State alongside other documents.

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							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 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		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

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							percentages of different types of homes in the policy.		houses to be provided, which was an objective which emerged through consultation. We consider that the justification for providing a mix 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	PV7		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	PV7			Flexible: The AAP needs to be flexible to take account of changing circumstances. The redevelopment of the AAP area is		Table 1 in section 7 sets out phasing in relation to funding mechanisms. Table A7.1 in

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							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, 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.		appendix 7 of the AAP describes the general phasing approach of the plan. Phasing periods are all around 3-6 years. These timescales should 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	PV8			Able to be monitored: No specific comments, although it would be desirable for the monitoring framework to show how the policies deliver the plans objectives. The ability to monitor a policy is dependent on policy wording that allows the effectiveness of its implementation be clearly measured in the AMR. The length and wording of some policies may make this more difficult.		The monitoring framework in section 8 is organised 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	PV3	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		The justification for the affordable housing policy in the AAP is set out in full in paragraphs 2.8-2.24 of the

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							<p>'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 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.</p>		<p>Tenure Mix and Size of Homes background paper. Our 4 key objectives are to: •Maximise provision of affordable housing; •Create a mixed and balanced community and help widening 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</p>

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									Needs Assessment Update which suggests that generally the need for affordable homes in the borough outstrips supply of all kinds of homes. This 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	PV3	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,		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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							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		
460	9	Publication	Publication	PV1			(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

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									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 (appendix 4). Paragraph 1.6.3 explicitly refers to appendix 4 providing a signpost for those who wish to find out more.
461	9	Publication	Publication	PVA	A2		iii. If the AAP will replace any polices in the UDP, these should be listed in the table in Appendix 2 (section 13 (5) of the Town and Country Planning (Local Development) (England) regulation 2004)		Appendix 2 has been clarified to show which Southwark Plan policies are amended by the AAP.
462	9	Publication	Publication	PV4		4.5.6	(iv) Paragraph 4.5.6 appears to be missing text at the end of the paragraph		Missing words will be suggested to the inspector in the table of changes.
463	9	Publication	Publication	PV6			One of the tests of soundness set out in PPS 12 is that a plan should be effective. One of the way this is achieved is that a document should be deliverable. We consider the section on `Community: Enhanced social and economic opportunities' to be weak on delivery and implementation as it does not provide sufficient information as to how determined the amount of facilities required, for example in relation to heal	The Community: Enhanced social economic opportunities' section can be made more robust by providing more information on how the amount of proposed	Paragraph 7.4.4 describes the partnership arrangements that will be needed to deliver the plan. Table 1 which follows describes which organisations which will be responsible for delivering the various elements of social and community infrastructure and the funding arrangements.

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							and social care and retail, and who and how you have been working with appropriate delivery bodies to ensure delivery of these on the ground	facilities was determined. One way this could be achieved is by making cross-reference to the appropriate e	
465	9	Publication	Publication	PV7			One of the tests of soundness set out in PPS 12 is that a plan should be effective. One of the way this is achieved is that a document should be deliverable. Section 7 of the AAP cover the issues of delivery and implementation. Paragraph 7.4.2 states that a financial model for the lifetime of the project has been undertaken. This model has identified a total funding shortfall of around £299m which does not take in to account any social housing grant which might be available (A71.24). However, there is not specific reference as to how this funding gap may be reduced/reversed, which raises concerns over deliverability of the AAP's vision and objectives. We note that, at paragraph 7.4.3, you stated that you are in discussions with the Homes and communities Agency about funding the delivery of new replacement affordable	In this current economic climate we appreciate that certainty is difficult as circumstances can quickly change. However, we would expect to see more clarity in how this funding gap may be closed. You refer to discussions with the Homes and Communities A	We are proposing to update Table A7.2 to reflect the fact that the public sector funding requirement has fallen. Further details on funding are set out in the Delivery and Implementation background paper. The council is currently in discussions with the HCA and will be able to give an update at the examination.

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							<p>rented and intermediate accommodation in phase 1. However, you do not state whether any further funding is required to ensure the delivery of the phase, and if so where this may come from.</p>		

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428	10	Publication	Publication	PV7		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	PV3	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.

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486	11	Publication	Publication	PV General			The Environment Agency advises that the Publication/Submission version of the Aylesbury Area Action Plan (AAP) is sound with respect to the issues covered by the Environment Agency remit. To strengthen the document further we advise various minor amendments. We believe the key Environmental issues for Aylesbury are; •Flood Risk Management and Surface Water Flooding •Burgess Park Enhancements •Sustainable Design and Construction Options		Noted.
487	11	Publication	Publication SA	PV General			Flood Risk Management and Surface Water Flooding We are pleased to note that the Sustainability Appraisal (January 2009) identified Flood Risk as a Sustainability Issue, referencing the Southwark Strategic Flood Risk Assessment, and subsequently became a Sustainability Development Objective (SDO14), against which the Area Action Plan's Objectives were assessed. Although the assessment highlights that development will result in bringing more residents in to the flood plain, it also		Noted

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							<p>highlights opportunities to reduce surface water run-off and introduce Sustainable Drainage Systems (5.3.9). In order to mitigate for the predicted negative impacts (6.2.1) in terms of flood risk certain measures have been advised within the Sustainability Appraisal (6.2.4), including;</p> <ul style="list-style-type: none"> •The provision of Sustainable Drainage Systems (SUDS), •The requirement for a Flood Risk Assessment, •The use of early warning systems and raised floor levels. <p>The purpose of this AAP is not to duplicate other policies and it is noted that these mitigation measures are comprehensively covered by Southwark's Sustainable Design and Construction Supplementary Planning Document (19 February 2009). We look forward to working with you to ensure SUDS are integrated into the overall landscape management plan (e.g. green fingers, green roofs, permeable paving etc.).</p>		
488	11	Publication	Publication	PV4	PL8		<p>Burgess Park Enhancements It is good to see that Open Space and Biodiversity have been highlighted as Sustainable Development Objective (SDO13) within the Sustainability Appraisal and that this includes both biodiversity and public</p>	<p>Therefore, we suggest the inclusion of the following text within Paragraph 4.5.6;</p>	<p>Paragraph 4.5.6 already states that improvements will reflect a number of themes, including biodiversity. This is expanded upon in paragraph 8.2.3 of the Open Space Strategy</p>

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							access strands. We are also pleased that Policy PL8 (Burgess Park) seeks to improve the environment, biodiversity and public amenity aspects of the Park. The Lake in the park provides amenity to the local residents in terms of recreational fishing. We would encourage the introduction of fishing platforms to increase the public enjoyment of the lake. It has recently been identified that the lake's lining may be in need of reparative works but that this would firstly require an assessment of the current state of the lining. We would promote the directing of funding to assess the lining and therefore result in works, if necessary, that will help secure the lake as a valuable amenity for the local residents.	"We want to ensure the Lake is preserved and enhanced for the purposes of biodiversity and as a valuable public recreational resource".	background paper which explicitly recognises the opportunities to use the park as an environmental resource to help mitigate flood risk, provide for sustainable urban drainage systems etc. It is not considered that additional references to the lake in paragraph 4.5.6 would enhance understanding of or justification for the policy.
489	11	Publication	Publication	PV3	BH7		Sustainable Design and Construction Options The Sustainability Appraisal highlights opportunities to create dwellings that are more water efficient (5.3.9). We are pleased to see that the new homes will be built to a high standard of water efficiency, especially in terms of the required Level 4 (****) rating specified within Policy BH7. This is in line with the London Plan and our targets. The south	Therefore, we would suggest that the following text be added to Paragraph A6.8.24 on SUDS to ensure that groundwater quality is not compromised by	A further reference is not considered necessary. The council has guidance elsewhere in a Sustainable Design and Construction SPD which provide more guidance on SUDS.

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							east of the Aylesbury Area Action Plan area is underlain by the Thanet Sand/Chalk Aquifer and therefore this area is particularly vulnerable to contamination/pollution.	the use of infiltration techniques; “Where infiltration systems are used as part of SUDS, measures for the	

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431	13	Publication	Publication	PV1			The relationship of the AAP with the Core Strategy is not made clear. An AAP has to follow and conform to the Core Strategy. Since the Core Strategy is at an early stage, the AAP submission document is really a Aylesbury AAP phase 1 and an Aylesbury AAP phase 2 will be needed after adoption of the Core Strategy.		The relationship of the AAP and the Core Strategy is set out in section 1.5, figure 4 and appendix 2. This provides detailed information about how the documents relate within the context of the Local Development Framework.
432	13	Publication	Publication	PV1			There has not been compliance with Southwark's Statement of Community Involvement (SCI). Workshops, focus groups, planning by design and visioning days, virtual forums and forums on local radio stations are required under the SCI, but these have not been provided. The SCI offers the Willowbrook Centre as an independent planning resource to the community, yet the Council has cut its funding to the Willowbrook and has not provided an alternative resource. Without these methods and resources there has been no opportunity for the public to collaborate, influence and shape the Area Action Plan. The use of the Annual Monitoring Report is not an effective		Consultation has been carried out in line with the Statement of Community Involvement as set out in the consultation report. Section 2.2 and appendix 6 of the Consultation Report describe in detail the methods of consultation that have been used. These include public exhibitions at each stage of consultation, surgeries and regular stakeholder meetings. On commencing preparation of the AAP, the council assembled a Neighbourhood Team comprising local residents, and representatives from local

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							monitoring tool for this development.		businesses and other public sector and voluntary organisations. A number of workshops and planning for real exercises were held with the Neighbourhood Team. These included workshops to agree the Neighbourhood Charter which informed the AAP objectives, workshops which looked at the relationship between density, design and land value and visits to other cities to look at examples of best practice. These are summarised in section 2.2 of the Consultation Report and listed in detail in appendix 6. Many of the techniques listed in the SCI are set out as suggestions for consultation and involvement, they do not all need to be carried out. The important issue is whether effective consultation has been carried out not the techniques or groups used to carry this out. The consultation report

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									demonstrates that we have met our aims of effective consultation on the Aylesbury AAP.
433	13	Publication	Publication	PV3	BH3		<p>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 Southwark.</p>		<p>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 masterplan area would be provided by RSLs. This is because current legislation and funding mechanisms prevent</p>

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									<p>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 community infrastructure including schools, health facilities and childcare space. In the light of these benefits and</p>

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									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	PV1			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 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.		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 groups from across the borough. This includes Friends of Burgess Park as well as the market traders. Policy PL8

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									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 out the relationship between the AAP policy, the London Plan, Southwark plan and SPD. There are a number of plans in

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									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 carbon emissions.
437	13	Publication	Publication	PV7			The AAP is fundamentally unsound because it is not deliverable. The financial viability of the scheme is highly		The AAP is deliverable. The delivery and implementation section sets out how the

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							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?		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 section 3.4 of the Transport and Movement Strategy.
438	13	Publication	Publication	PV3	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

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									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 welcomes the mix provided and considers that it accords with the London Plan.
439	13	Publication	Publication	PV3	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		Policy PL4 and appendixA6.6.33 to A6.6.38 set out our approach to tall buildings. We state that

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							<p>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.</p>		<p>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 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</p>

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									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 proposed in the core area would have a beneficial impact on the visual quality of the area.
441	13	Publication	Publication	PV6	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		Policy COM6 sets out proposals for new retail space. The proposed provision in the core action area has been

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							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.		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	PV6	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 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		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 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

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							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.		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	PV6	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 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

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									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	PV6	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 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

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									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	PV4	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 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.

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446	13	Publication	Publication	PV2	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 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

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									in the case of open spaces, these assessments informed the AAP policies..

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447	14	Publication	Publication	PV6	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.

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467	15	Publication	Publication	PV1			Chapter 1 - Introduction Paragraph 1.1.2 refers to the overall improvement of the Estate including transport links, improved park, local green space all of which are to be encouraged, welcomed and supported by Natural England. Natural England acknowledges that the proposed Cross River Tram will not now be proceeding and that alternative bus routes will be considered. Any proposed public transport routes should use the existing route along Well's Way, this would ensure good use of existing infrastructure and prevent any issues of fragmentation of the park. Natural England is also pleased to see the continuing links and consideration to other emerging local Area Action Plans, for example the Elephant and Castle and Peckham Plans		Noted.
468	15	Publication	Publication	PV2	MP1		Chapter 2 – The Master plan The promotion and encouragement of walking and cycling schemes throughout the area is to be encouraged and commended. Improvements to Burgess Park, increasing usage and ecology and biodiversity		Noted

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							potential are also welcomed as are the proposed Green Fingers linking the Park and residential areas of the estate more effectively		
469	15	Publication	Publication	PV3			Chapter 3 – Better Homes The cancellation of the Cross River Tram is acknowledged and we would refer to our previous comments above, regarding improved bus services and the avoidance of fragmenting the Park.		A public transport route has been safeguarded through the AAP. Comments on the need to avoid further incursions through Burgess Park are noted.
470	15	Publication	Publication	PV4			Chapter 4 – Public Life Better and Safer Streets, Squares and Parks The encouragement of walking and cycling schemes is welcomed and supported as is the provision of Green Fingers, which will provide improved and increased access to Burgess Park. Paragraph 4.5.6 refers to improvements to Burgess Park which are aimed at increasing access, health opportunities and biodiversity of the Park are to be welcomed and supported.		Noted
471	15	Publication	Publication	PV5			Chapter 5 – Connections Improved Transport Links Natural England welcomes and supports initiatives and schemes that promotes and encourages walking and cycling initiatives, together with improved public transport links, providing that this does not lead to any		Noted

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							further fragmentation or loss of Burgess Park.		
472	15	Publication	Publication	PV6			Chapter 6 – Community No formal representation		Noted
473	15	Publication	Publication	PV7			Chapter 7 – Delivery and Implementation No formal representation		Noted
474	15	Publication	Publication	PV8			Chapter 8 – Monitoring Framework The use of the Annual Monitoring Report is acceptable to Natural England as monitoring tool for this development proposal		Noted
475	15	Publication	Publication	PVA	A2		Appendix 2: Planning Policy There are clear links and references to appropriate and relevant Policies, Programmes and Plans in the Document		Noted
476	15	Publication	Publication	PVA	A4		Appendix 4: Plan Objectives This makes references to the Sustainability Appraisal and lists the Sustainability Appraisal Objectives, this will be commented upon separately, see below.		Noted
477	15	Publication	Publication	PVA	A6		Appendix 6: Design Guidance This document should provide an indicative guide and steers for prospective developers and is to be commended.		Noted
478	15	Publication	Publication	PVA	A8		Appendix 8: Existing and Proposed Passenger Transport Accessibility Levels (PTAL's) No formal representation		Noted

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							although Natural England acknowledges that the overall schemes does provide increased overall Passenger Transport Accessibility Levels for the Area Action Plan which is to be welcomed and encouraged. Natural England would refer to its early comments in respect of avoiding fragmentation of Burgess Park.		
479	15	Publication	Publication SA	PV General			Sustainability Appraisal Non Technical Summary Paragraph 0.2.7 refers to improvements to Burgess Park and the consideration of Sustainable Urban Drainage Systems within the Area Action Plan area, which is welcomed and supported. Paragraph 0.2.13 refers to the withdrawal of the Cross River Tram, which is acknowledged by Natural England. Natural England commend and encourage the Council in their consideration of improved bus services to replace this possible element of the scheme, subject to our comments in respect of preventing fragmentation of Burgess Park, as mentioned under paragraph 0.3.7. The consideration and inclusion of Grey Water recycling within the estate redevelopment is also to be welcomed and encouraged, as per paragraph 0.3.4.		Noted

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480	15	Publication	Publication SA	PV General			Baseline Information – Section 4.2 The data and topics covered by the Scoping report includes Open Space, Biodiversity and Sustainable Transport, and therefore covers the areas and issues that Natural England would wish to see in such a document. Section 4.3 Sustainability Issues •Need to maintain and enhance Open Space; •Need to improve accessibility by public transport and minimise the need to travel by car; •Improve walking and cycling infrastructure within the action plan area. The above issues are welcomed and supported by Natural England.		Noted.
481	15	Publication	Publication SA	PV General			There are sixteen Sustainability Appraisal Objectives all of which can be broadly supported, and in particular the following; SDO 6 To reduce contributions to Climate Change SDO 13 To protect and enhance open spaces, green corridors and biodiversity SDO 16 To promote sustainable transport and minimise the need to travel by car As stated previously, the Sustainability Appraisal has covered the areas and issues that Natural England would wish to see covered by such a document.		Noted

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483	15	Publication	Publication	PV General			Appropriate Assessment The Screening Exercise to determine the requirement for stages 2 and 3 of an Appropriate Assessment has used a recognised and suitable approach and methodology which is agreeable to Natural England. However, the document does not seem to have reached a recommendation or conclusion as to the requirement or otherwise for an Appropriate Assessment.		Noted. Due to a printing error, a part of the document circulated at publication stage was missing. However, the full version of the document was issued and consulted on at preferred options stage. Section 8 of the document concluded that: "None of the preferred options of the Aylesbury Area Action Plan were found likely to have any significant discernible adverse impact on European sites therefore task 2 (appropriate assessment and ascertaining the effect on site integrity) and task 3 (mitigation and alternative solutions) of the Appropriate Assessment process are not considered necessary." A further copy of the document will be sent to English Nature.
484	15	Publication	Publication	PV7	D2		Infrastructure Tariff and Section 106 Planning Obligations Paragraph 6.3 refers to infrastructure benefits to the whole community including Green Fingers and		Noted

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							Improvements to Burgess Park, which are welcomed and supported by Natural England. The document clearly sets out the obligations and expectations of and for developers and should be of use in helping to manage expectation and delivery of the Area Action Plan		
485	15	Publication	Publication	PV General			Open Space Strategy Executive Summary Improved access to Burgess Park, increasing and diversifying use and improved links to other open spaces within the Area Action Plan area are all welcomed and supported, providing there is no fragmentation of Burgess Park. These improvements have the potential to help and facilitate an increase in the biodiversity/ecology potential for the area and Burgess Park.		Noted
501	15	Publication	Publication	PV3	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, note of which		Noted

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							<p>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 t 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 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</p>		

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							<p>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.. 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.</p>		

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490	17	Publication	Publication	PV General			English Heritage provided comments on the draft AAP in May 2008 and February 2009 and we do not wish to make a formal representation at this time. We have noted that there has been a reduction in the density of housing in the AAP area and that most building heights are now lower than originally proposed in 2008. This, and a commitment to good quality design, should ensure redevelopment of the area fits better with its surroundings and helps to reinforce the character of the surrounding conservation areas. In moving forward, our key concern is to ensure that the setting of heritage assets adjoining the Estate are carefully considered as part of the design process of any new builds, in terms of future scale, form, location, orientation, materials and detailing. Proposals to enhance Burgess Park are welcome. A key aspect of the park that deserves celebration is its history as part of the post WW2 initiative to provide new public open space. The park incorporated older gardens and play spaces as well as historic buildings such as the almshouses		Noted

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							<p>in Chumleigh Gardens and survivals of Southwark's industrial heritage. We would urge that proposals for works to improve the park need to take full account of its cultural heritage. English Heritage Landscape Architect Jane Wilson (Tel: 020 7973 3473) would be happy to offer assistance/ advice on this matter if you would find our involvement useful. This advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the Aylesbury Area Action Plan, which may have adverse effects on the historic environment.</p>		

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495	32	Publication	Publication	PV General			<p>Thank you for your letter of 6th March 2009 consulting the Mayor on the above document. Attached to this letter is the relevant report I considered on this document, along with an appendix, which represents my formal representations to the pre-submission consultation. As you will be aware, by virtue of the Planning & Compulsory Purchase Act 2004, all development plan documents must be in general conformity with the London Plan. It is my opinion that the pre-submission document is in general conformity with the London Plan. 1) On 6 March 2009, Southwark Council consulted the Mayor of London on the above document. This report sets out information for the Mayor's use in deciding what comments to make. The consultation period ends on 17th April 2009. 2) The Planning & Compulsory Purchase Act 2004 (the Act) introduced a new system of preparing development plans. This requires borough to progressively replace existing unitary development plans with a portfolio of local development documents</p>		Noted

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							<p>that will collectively form the local development framework for each of the boroughs. The LDF together with the London Plan provides the essential framework for planning at the borough level. The @development plan@ in London for the purposes of section 38(6) of the Act is: a) The London Plan (consolidated with alteration since 2004), and b) Development plans documents produced by the borough councils (and saved UDP polices in transitional period). 3) There are 2 types of local development document: development plan document; and SPDs. The document now being consulted on is a development plan document with development plan status, which will be subject to an examination to test the `soundness' of the plan. 4) PPS12 (`Creating strong, safe and prosperous communities through Local Spatial Planning') sets out that to be `sound' a development plan document should be justified, effective and consistent with national policy. Paragraph 4.50 of PPS12 sets out that an Inspector is charged with checking that the plan has complied with legislation, which will include checking the</p>		

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							at the document conforms generally to the London Plan.		
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. These programmes have helped improve the overall quality of life for residents living within the area. There have been a</p>		Noted

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							<p>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 headings: better homes; public life; connections; and community. The delivery objective deals with funding, image and</p>		

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							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/LDD01/02). 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 comments relating to energy, transport and open space.		Further work has been carried out on viability as set out in the background papers particularly the delivery and implementation background paper.
510	32	Publication	Publication	PV3	BH3		STRATEGIC ISSUES - HOUSING &		Noted

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							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.		
511	32	Publication	Publication	PVA	A6		The social housing will be build to Parker Morris plus 10% standard.		Noted
513	32	Publication	Publication	PV3	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	PV3	BH2		DENSITY & URBAN DESIGN: 19) Southwark Council was advised at the 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		Noted

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							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	PV3	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 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		Noted

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							reports, the wording is acceptable in this instance.		
516	32	Publication	Publication	PV5			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 General			LEGAL CONSIDERATIONS: 23) All local 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		Noted

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							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) 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		Noted

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							<p>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 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.</p>		

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							<p>"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 person or through further written representations. It is anticipated that the examination will take place in September 2009.</p>		

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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	PV4	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 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.		Noted. A route through the AAP area has been safeguarded for public transport.

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521	32	Publication	Publication	PV4	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	PV5	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 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		Noted. Policy TP1 states that vehicular routes should be designed in accordance with Figure 15. Figure 15 is a simplified version of the hierarchy set out in the Transport and Movement Strategy (Figure 8 in Annex 1). Part D of the same document

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							<p>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>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 Strategy (Figure 8 in Annex 1). In Figure 15 local collector streets have been merged with access streets into a single</p>

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									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	PV5	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 Walworth Road and Old Kent Road and priority measures provided wherever possible. Traffic calming measures should not hinder bus operations on these key		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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							links. Funding (through planning obligations) is likely to be required to pump prime additional public transport capacity.		
524	32	Publication	Publication	PV5	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 would support car free development close to public transport corridors. Requirements for cycle parking should be in accordance with TfL guidelines. Transport		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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							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	PV5			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 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		Policy TP1 states that vehicular routes should be designed in accordance with Figure 15. Figure 15 is a simplified version of the hierarchy set out in the Transport and Movement Strategy (Figure 8 in Annex 1). Part D of the same document

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							<p>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>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 consider servicing in preparing schemes. Further guidance on servicing is provided in the council's Transport SPD.</p>

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526	32	Publication	Publication	PV7	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 transport infrastructure required as part of the agreement. This often assists in determining the details of the scheme and delivery of infrastructure. A reference to		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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							this in the policy would be helpful.		

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430	39	Publication	Publication	PV General			Thank you for your letter dated 11th March 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		It is very important that we 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>across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from 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</p>		

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							<p>network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new 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</p>		

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							<p>transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in 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</p>		

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							<p>market operates for the connection of new developments. National Grid and Local Development Plan Documents The 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</p>		

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							<p>taken place near our routes. We therefore wish to be involved in the preparation, alteration and review of Development Plan 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</p>		

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							<p>electricity and gas is not compromised. National Grid infrastructure within Southwark Council's administrative area 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</p>		

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							<p>Council's administrative area. Contact details for Southern Gas Networks can be found on the Energy Networks website. www.energynetworks.org Specific Comments National Grid's 275kV underground cable runs along the southern boundary of the Aylesbury AAP site. Our underground cables are protected by renewable or permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our electricity transmission network. Hence we require that no permanent structures are built over or under cables or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the cable route or its joint bays and that unrestricted and safe access to any of our cable(s) must be maintained at all times</p> <p>The information supplied is given in good faith and only as a guide to the location of our underground cables. The accuracy of this information cannot be guaranteed.</p> <p>The physical presence of such cables may</p>		

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							<p>also be evident from physical protection measures such as ducts or concrete protection tiles. The person(s) responsible 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.</p>		

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							<p>Ground cover above our cables should not be reduced or increased. If a landscaping scheme is proposed as part of the works, we request that no trees and shrubs are planted either directly above or within 3 metres of the existing underground cable, as ultimately the roots may grow to cause damage to the cable. The relocation of existing underground cables is not normally feasible on grounds of cost, operation and maintenance and environmental impact and we believe that successful development can take place in their vicinity. Further Advice National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from our web site or by contacting the team below: ♣ National Grid Electricity Transmission plc, Electricity Act 1989 – Schedule 9 Statement, preservation of amenity ♣ Specification for Safe Working in the Vicinity of National Grid High Pressure</p>		

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							Gas Pipelines and Associated Installations – Requirements for Third Parties ♣ A sense of place – Design guidelines for development near high voltage overhead lines Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database;		

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497	42	Publication	Publication	PV General			RE: demolition of the Aylesbury Estate (I lived there for about 15 yrs until 18 months ago) I have understood that local residents should ALL (using scientifically valid random sampling techniques) be asked their opinions on building which would directly affect their lives. While we knew there was a legal obligation to have a ballot about a stock transfer of council housing in 2002 and that the legal obligation did not apply for demolition, I assumed that it would be necessary to consult widely before a decision was made on demolition. It was there a big shock to attend a full council meeting where all councillors had already decided to demolish the Aylesbury without having being asked our views, even though I was an active member of my local T&RA committee. Having received a one year education grant from NDC I was unable to express my objections to individuals in the NDC who were driving the project, I feel that the decision was compromised by decisions only being supported by individuals who were involved in the NDC	I would need to know that proper methods of sampling techniques were being applied in any opinion surveys.	The consultation which has been carried out in developing the AAP is described in detail in the Consultation Report.

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							<p>and who then felt loyal to individuals there. This was not an objective decision-making process and it was certainly not democratic. I was so devastated by losing my lovely home and the thought of families and community links being broken up that I applied through Homeseach for a transfer & I appreciate that I still have a council tenancy. I could not have stayed to watch the break-up of a community done in the interests of property developers and regardless of the interests of the majority of residents. It is good to see that some external work is being done on the Aylesbury estate now. The painting & decoration improvements are very good. Surely spending money on maintaining & improving the properties would make more sense now than demolishing them & not disrupting the lives of all the people living there. An estate wide survey, managed by an independent organisation with possibly university research guidance on sampling techniques before any more demolition proceeds (I see that Red Lion Close garages have been demolished).</p>		

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527	69	Publication	Publication	PV1			<p>Insufficient consultation of main stakeholders - Aylesbury residents themselves (see attached wps. appendices A and B for new evidence as to resident opinion in 2009 and for a critical analysis of Southwark's consultation procedures questioning whether they satisfy the spirit of the 1985 Housing Act). (1.3 and Appendix 1-Consultation) Appendix A - Our survey focussing on Chiltern reveals that 75% of residents are opposed to demolition. This new evidence was obtained during our Feb-April 2009 petition survey in which we added 62 new signatures to the 143 previously obtained in March - May 2008 (from assorted blocks) to total 205 signatures so far (6 of these, 3 from Chiltern, (on p23), are from May 2008, but were not previously submitted). This time we especially targeted Chiltern as a sample of opinion on the Estate, and added 41 new signatures from here. Together with 40 gathered here in 2008, this totalled 81. Background info. on conducting a door-knocking survey on the Aylesbury 2008 -</p>		The consultation process has been robust and sound. The details are set out in the Consultation Report.

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							<p>2009 On the NDC survey in 2005 20 people worked 5 hours a day over two working weeks (10 days) (20 x 5 x 10 = 1000 hours). They claim that they surveyed 1220 households, that is 1220 = 1.2 interviews per hour, or 6 interviews per 5hour day. 1000 Door knocking IS time consuming, and the Aylesbury is a huge estate. A lot of people do not answer their doors, or are out. Some residents may not speak English as their first language. On any one occasion I would estimate one in ten people answer their door. The collection of 81 signatures on Chiltern is a significant number. This is 47% of Chiltern residents, 'untreated' this number is still a sizeable proportion of people deeply troubled by the inadequacy of Southwark's consultation. That 'untreated' number would correspond with the 2005 NDC (and Marketlink) survey result for how many people were against demolition. But, we did not come close to surveying all 172 properties. I am guessing that not much more than 100 people answered their doors. 81/108 = 75% I think we could fairly say that our survey shows that 75% of residents are troubled by the inadequacy</p>		

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							<p>of the NDC/Southwark's consultation. Compared to the NDC, in this latest round of door-knocking we had 4 people who worked voluntarily 2 hours over 4 sessions. $4 \times 2 \times 4 = 32$ hours $62/32 = 2$ interviews per hour, or 10 interviews per 5 hour day Given the paid staffing resources of the NDC - why did they discontinue their survey after contacting less than half of the estate? Since 2005 they have had plenty of time to complete a thorough door-knocking survey as to opinion on the Estate and engage thoroughly with residents. This they have not done.</p> <p>Appendix B - a critical analysis of Southwark's consultation procedures</p> <p>Concerns about Consultation on the Aylesbury - is the AAP legally compliant?</p> <p>Introduction Southwark Council Officers inform me that Southwark Council is able to satisfy the letter of the law with this 'consultation' process. As an ordinary tenant, I have been unable to research whether or not this is true. The Secretary of State for Homes and Communities and the Planning Inspectors will be better able to assess this. BUT... I would like the Secretary of State for Homes and</p>		

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							<p>Communities and the Planning Inspectors to consider what must be the spirit and the purpose of guidelines on consultation, and I am confident that the 1985 Housing Act endorses the principle of Council tenants enjoying security of tenure without disruption. Whose wishes and opinions should be prioritised? (In the latest document on consultation on the Aylesbury, the tenants and residents, the 'stake holders', are but one in a list of other agencies with whom the Council is in communication.) Southwark Council is a landlord. It has responsibility to its tenants under the terms of contract of the tenancy agreement - the purpose of the existence of this kind of tenancy agreement is for ordinary people to be able to possess peace of mind that they are enabled to make use of a property as a life-long home. In a twenty-first Century Western democracy it surely would be inconceivable that a Council would proceed with a scheme against the wishes of a majority of its user-clients. Yet this is probably what is happening on the Aylesbury. Momentum has built around this scheme and its implementation is</p>		

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							<p>being pursued without consideration of the consequences for the main stakeholders - the tenants themselves - and it seems that substantive critical analysis has been systematically sidelined and excluded. Rules and regulations exist on consultation on such a big scheme as this because of the large number of lives that will be affected. Voluntary relocation is disruptive and injurious to health and well-being. Moving people against their will is even more so - and is time-consuming and potentially financially disastrous. So the Council needs to provide evidence that residents are happy for this scheme to proceed and be confident of that their quality of life will be improved, not harmed. In 2001 the Council balloted all tenants on the estate about a proposal to demolish the Aylesbury and build a new mixed tenure development, the homes for 'social renting' to be managed by a Housing Association - no new Council homes were to be built. . 76% of tenants responded, and the vote was 73% against demolition and to remain as Council Tenants. No 'consultation exercise' since has been able to rival this ballot for outreach. In</p>		

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							<p>2005 the Council reconsidered demolition and refurbishment options, on the basis of the financial viability of both of these, and concluded that demolition was the best practical and economic solution to the problems of the Estate. And tenants were not entitled to a fresh ballot. Rather, it seems, the result of the 2001 ballot was treated as a side issue - an inconvenience to be managed - rather than as a fundamental guide to opinion on the Estate to be respected and honoured... For a scheme of this scale, however, some form of consultation is legally required, therefore B.1. In 2005 the Council and the Aylesbury New Deal for Communities commissioned three surveys B.2. In 2005 the Council and the ANDC set up the Aylesbury Steering Committee, with tenants representatives elected by their T&RAs. and B.3. Since 2005, the Council and the ANDC have conducted a series of 'preferred options' exhibitions and events to which the community were invited This is a presentation of good evidence that all three of these forms of consultation are deeply flawed, distorted by the pro-demolition agenda of the</p>		

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							<p>managers of the ANDC, and Council officers, and that in fact opinion on the Estate has changed little since 2001. If the inspectors, the Secretary of State for Homes and Communities, or the Council were genuinely interested in resident opinion, social cohesion and sustaining communities, there would be a fresh ballot - and engagement with the significant number of tenants (open to debate, but certainly between 47% (Market link Survey 2005) and 75% (our Aylesbury Tenants and Leaseholders First Survey 2008 - 2009 (AT&L Survey))) who do not want to move and who do not want a Housing Association landlord. B.1. The 2005 ANDC and Marketlink surveys (B.1.a and B.1.b) The NDC and Marketlink door-knocking surveys share the same fundamental flaws which compromise the findings of either - a. there were no leaflets publicising that the survey was in progress and b. there were no post-cards informing residents that someone had called and they had missed out on participating. Publicising that surveys were taking place would a. have inclined more residents to answer their doors and participate (many</p>		

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							<p>residents have a policy of not answering the door to strangers) - and b. ensured a stricter protocol for the selection of interviewees, less vulnerable to accusations of manipulation. B.1.a. The survey with allegedly the largest outreach of 1220 households was conducted by the NDC with 20 employees working 5hours a day, flexitime, to cover daytimes and evenings, paid to go out onto the Estate and conduct doorstep interviews, over two weeks. Interviewees were questioned verbally, following a Laura written script, and the interviewer wrote down their responses. At this stage, there was no written material available for interviewees to take away and examine and question at leisure, the only way of participating was on the doorstep, there and then, and this interviewee had first hand experience of question leading. Although I had first hand experience of being interviewed, I spoke to many residents in my block and found hardly anyone aware that the survey had taken place - which is why I doubt the figure of 1220 or suspect that this was a not a random selection of residents. How were interviewers selected? There was no</p>		

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							<p>public advertisement of the survey, or that interviewers would be needed. This lack of transparency leaves this survey open to accusations of bias in the selection of interviewers, and leaves interviewers enabled to be selective about who they interviewed, and how. It would be quite understandable and probable that there would be a bias towards interviewees known, familiar and friendly with the interviewer, likely to share the same opinions. David Foreman of the NDC was responsible for organising this survey, and was disinclined to take my report of question-leading seriously. I also asked David Foreman what kind of training interviewers had, or what kind of independent checks there were on following good protocol, and was informed that interviewers reported back to the NDC managers, and that if the managers were not happy with the results employees would not get paid. This, in my opinion, did not answer the question of independent assessment of procedures, as both David Foreman and his boss Steve Pearce are known as vocal proponents of demolition. David Foreman did not seem aware at the</p>		

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							<p>time of talking to me that this 'not happy with the results' was a potentially fraught issue. This survey was supplemented by a number of meetings for residents to discuss their concerns. People on the NDC's mailing list and T&RA chairs were informed by e-mail. All other residents were informed about these meetings only by word of mouth, by survey interviewers, after most of these meetings had already taken place. There Laura Fudge wps. submission page 6 was no other written publicity. During these meetings verbal promises were made that only residents involved in the first phase of the development would have to move off the Aylesbury footprint, and that thereafter there would be enough space in each new building phase to accommodate the next set of residents whose homes were due for demolition, that is those who want to return. The AAAP now states that 50% of tenants will have to move. Aside from the issue of potential bias in interviewers, and their managers, the NDC survey- script contained misinformation which compromises the validity of this whole exercise - in fact, even without any</p>		

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							<p>interviewer bias, it can be alleged that there is an intrinsic bias within the construction of the survey-script to elicit pro-demolition responses. NDC Survey misinformation The survey script stated that the high price of private house sales could finance mixed tenure developments 'at no cost to the public purse'. This was never true. The financial incentive to the Council was that the Government would cancel the historic debt of the interest still being paid on the bank-loan made when the Estate was first built. It was a false claim then. Now we are in the situation that this whole scheme might be baled out by public money, it is even more so. The survey script also falsely stated that the demolition option involved 'knocking down existing flats and replacing them with brand new flats for everyone'. and the false statement that 'the same number of rented flats are provided in and around the area as are occupied now'. The facts now are that this AAAP as it stands will entail a net loss of social housing to rent of about 700 - and this is not being replaced by new build anywhere else in the borough in sufficient number to make an impact on</p>		

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							<p>this. And this was a predictable outcome of the model of financing social housing by depending on the sale of private homes. As to the estimated costs of refurbishment - we want an independent inquiry, please. The NDC claim that their 2005 survey reached just over 1200 people (this is 44% of the 2700 households on the Estate, or 16% of 7500 residents) They claim that there was a consistent pattern to results on each day of surveying, justifying not attempting to reach more people, and that this was a small 53% majority in favour of demolition. (53% of 44% is 23%) This figure was (magically) matched by the Marketlink survey. After this NDC survey, I found out that the person who interviewed me on behalf of the NDC also happened to be an employee of Marketlink. As well as raising doubts as to the professional standard of Marketlink interviewers, this raises worrying questions as to the interdependence between the NDC and Marketlink. Laura Fudge wps. submission page 7 B.1.b. Two surveys were conducted by Marketlink, a professional survey company. There was a quantitative survey of 338 households and a</p>		

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							<p>qualitative survey. As stated before, like the NDC survey, the Marketlink quantitative survey gave out no publicity warning residents that an important consultation survey was about to take place, or 'you were out when we knocked...' postcards. The Marketlink protocol was to conduct an interview at every eighth household. If there was no reply, the interviewer moved to the next property, if no reply there, onto the next. But as no upper limit for the number of interviews in each block was adhered to, this resulted in a systematic and significant bias towards interviews in big concrete blocks at the cost of many interviews in low-rise maisonettes overlooking the park - two blocks of about 30 residents were not surveyed at all. Also, out of the 338 households surveyed, Marketlink reported that 12%, that is 40 people, were 'active in their T&RAs'. Unfortunately, this is a grossly disproportionate number compared to the reality of active tenant involvement, and throws suspicion on the effectiveness of the survey protocol in obtaining a fair, random and representative selection of</p>		

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							<p>Aylesbury residents. Maybe these tenants are the boldest and most co-operative at answering their doors at survey time. Maybe some residents had a better idea than others that there was a survey taking place - e.g. the 20 tenants employed by the NDC for their survey, and their friends. Maybe people were embarrassed to say that they were not active in their T&RA, but I doubt this Estimating the real percentage of residents active in T&RAs In the Marketlink survey 12% of respondents were reportedly active in their T&RAs. 12% of 7,500 residents = 900 12% of 2,700 households = 324 There are four T&RAs on the estate. So, consistent with the Marketlink Survey, attendance at each of the 4 T&RA s would be $900/4=225$ or $324/4=81$ However, the average size of a committee is between 6 and 12 residents. The most generous interpretation of Tenant activity, might be attendance at an AGM. But neither is either of these figures near the reality of AGM attendance. A generous estimate is between 16 and 30, with the average now on the lower end of that range. So the most generous interpretation of T&RA</p>		

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							<p>activity, attendance at an AGM, would give a figure of 30 x 4, for attendance at the 4 AGMs. $120/2700 = 4\%$ of households $120/7500 = 1.6\%$ of residents applied to a sample of 338 this would give expected numbers of 13 or 5, not 40. The time has come for consideration of the issue of Tenants and Residents Associations (T&RAs) on the Estate - are they an effective reflection of resident opinion on the Estate? Do they effectively engage with residents? And one could ask the same of the Aylesbury New Deal for Communities - I believe that there might be a survey already commissioned to evaluate the ANDC - what are the results of this? There is evidence that there answer is 'No'. And if there is ANY DOUBT AT ALL about this question, it warrants investigation. Significantly, Marketlink reported that 43% preferred refurbishment (in answer to Q5) - i.e. were against demolition. That figure is a significant number that should inform how the Council proceeds - are the needs and wishes of these residents being sufficiently respected? Marketlink also reported (in answer to Q3) that 57% of residents were</p>		

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							<p>happy with their homes and did not want to move - there seems to be an inconsistency here with later saying that they wanted their homes demolished. Were the ANDC and the Aylesbury Steering Committee truly representative, that percentage would be reflected in the make-up of these groups. B.2. the Council and the ANDC set up the Aylesbury Steering Committee, with tenants representatives elected by their T&RAs. On first sight it seems that the Aylesbury Steering Group is, in part, a fairly elected democratic body, with tenant members drawn from the four Aylesbury Tenants and Residents' Associations (T&RAs) So - are these tenants bodies representative? (And if not, why not?) (Can we, should we, expect proportional representation with this?) 100% of these 'tenants representatives' are pro-demolition. In fact, it seems that this is a pre-condition of membership of the Aylesbury SC (and perhaps too, to a large extent, of the NDC. To join this there is a slightly intimidating multi-page document to sign, one of the clauses of which is to agree not to talk to the press unless briefed by NDC officers,</p>		

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							<p>to be consistent with NDC policies). The last director of the ANDC, Steve Pearce, was aggressively pro-demolition, and seems to have been influential in some T&RA steering group elections, expressing concerns that any pro-Council Housing/anti-demolition resident would disrupt the activity of the Steering Committee. The Aylesbury Steering Committee is, after all, essentially a Committee to help with the implementation of a pro-privatisation/demolition plan, isn't it? Tenants who defended their Secure Council Tenancies were characterised by Steve Pearce as 'trouble-makers'. It is my opinion, however, that to exclude all anti-demolition/pro-Council Housing opinion from this Steering Committee has been harmful to democracy, to social cohesion and to wise decision making. From the outset, the possibility of some kind of compromise and accommodation of pro-Council Housing opinion has been ruled out. In the AAAP, the recognition of the number of people (43-75%) who prefer Laura Fudge wps. submission page 9 Council to Housing Association was inevitable, but it came only as providing</p>		

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							<p>the option for them of moving off the Estate (where all existing Council homes will be destroyed, and none built in their place). If you want a Council home, you will be exiled from the Aylesbury footprint. And tenants who defended their Secure Council Tenancies and who have networked with the national Defend Council Housing campaign have been demonised - a prelude to not taking into their needs into account. But not allowing these people onto the important decision making committees, Southwark Councillors, Council Officers, the NDC and the so-called resident representatives can start to believe their own myth that 'No-one on the Estate is unhappy about the demolition'. And thus they have been shielded from engaging with people concerned about the fundamental, forgotten issue of Defending Council Housing and the effect of the AAAP on Housing Capacity for ordinary residents. The result - an AAAP that will mean a net loss of affordable housing to rent by 700. A substantial number of T&RA and Steering Group members are directly or indirectly financially dependent on the</p>		

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							<p>NDC or the council - they are in full or part-time employment by the NDC, or run projects whole or part-funded by the NDC. These residents themselves may assert that their independence is not compromised by this financial dependence, but it is. Do T&RAs on the Estate effectively reflect resident opinion on the Estate? Do they effectively engage with residents? There are four T&RAs on the Estate - 'the Aylesbury T&RA', chaired by Jean Bartlett (for x? years) is just one of these, which is not always clear when Jean is quoted in the press - the others are Thurlow Lodge, Wendover, and BACC 84 (Bradenham, Arklow, Chartridge and Chiltern). I can only speak from my own experience of my T&RA, Thurlow Lodge, which, provoked by the experience of question-leading in the 2005 NDC survey, I joined informally in the Summer of 2005, formally in April 2006, and since April 2008 I have been Vice-Chair. My impression is that Jean Bartlett in her role as chair on her T&RA has been consistently conscientious in consulting with her committee members. This was not true of my experience, however, of the</p>		

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							<p>Chair of Thurlow Lodge from 2005 - 2008, Ian Gardner. He was one of the tenants representatives who spoke at the September 2005 Council Meeting in favour of decisive action on the Estate - demolition - without prior discussion of this issue with his Committee. He had many closed meetings with officers from the NDC - I think he was drinking buddies with Steve Pearce - one result of which was the transfer of Thurlow Lodge Community Hall into ownership by the NDC, against the wishes of the Committee, who have since been unable to obtain the relevant paperwork concerning this issue. I have on numerous occasions attempted to join the Aylesbury Steering Committee, and it was Ian who played the major role in blocking this. Ian Gardner lost his post as Chair in 2008. He is still on the Aylesbury Steering Committee. In the sinecure position of representative of the Creation Trust he represents the Thurlow Lodge area on one of the sub-committees. Communication is sporadic. There is no mechanism whereby he can be voted out of that position. It is in the T&RAs that we find the handful of adults whose lives have</p>		

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							<p>been radically transformed by NDC employment opportunities - but in the main the activities of the NDC have not impacted on employment statistics on the Estate. A substantial obstacle to increasing employment opportunities has been the fact that NDC money is not allowed to be spent on physical improvements to the Estate. Employing residents directly to make a difference to their environment - painting, decorating, plumbing, gardening, designing, sculpting, pest-control-educating - making real, noticeable, visible improvements might have been - and still could be - the most effective measure to improve social cohesion. Instead, diverting all NDC funds away from making physical improvements to the Estate (apart from children's playgrounds - mostly built by outside contractors -a major missed community involvement and education opportunity), separating the issue of environment from employment and 'empowerment' has led to a widespread belief amongst residents that the Estate is being deliberately run-down to bully people into accepting demolition and privatisation as the only</p>		

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							<p>means to improve their lives. B.3. Since 2005, the Council and the ANDC have conducted a series of 'preferred options' exhibitions and events to which the community were invited. Then, at the event, there is the opportunity to comment on the AAAP on questionnaires. Unlike a ballot delivered to their homes, these leave out any resident who does not attend the event. The largest attendance for an event, I think, was for the July 2007 show-home exhibition, which I found Martin Smith overstating as 1000, when in fact it was just under 700 - reported in the relevant AAAP Consultation Report. Non-attendees probably do not realise that these exhibitions are a part of a continuous consultation, and that their absence could be construed as consent to the Council's plans. Our experience, talking to neighbours, is that many stay away because of alienation from the consultation process, and from democracy in general - 'We voted no - what happened?' 'What's the point, they don't listen to us anyway' 'They just do what they want' are common responses. Exhibitions are staffed by between 4 - 12</p>		

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							<p>Council or NDC employees, masking low attendance and long quiet periods. There were 445 attendees at the April/May 2008 Aylesbury Future Roadshow. 305 questionnaires were filled in. Of these, 32% were non-Aylesbury residents, that is, as a sample of opinion on the Estate the outreach was only 207. Remember, there are 2700 dwellings on the Aylesbury, and 7500 residents. At the October/November event 2008 there were only 54 visitors. 46 filled in questionnaires. Special effort has been made at times to contact 'Hard-to-reach' groups, accompanied by translators. These groups would not have access at the same time to translated Defend Council Housing literature. The net loss of affordable housing is totally masked in the exhibition presentations - it left to the viewer to work this out from calculations based on tenure mix - and in fact exhibition material is often almost mendacious - for example, in the March 09 Exhibition (closed two hours early, as have been many events, because of low attendance) the first board has the bold statement 'Reducing the density will mean that we can increase the</p>		

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							number of family houses and homes that will have access to private family space.' This gives the impression that the AAAP reduces density in comparison to what exists on the Estate, when the comparison, left to the reader to infer, is in fact with the previous AAAP. AAAP mark 1 would have increased density on the Aylesbury from 2700 to about 5000. AAAP mark 2 increases density to just 4208. It neglects to mention that actually the AAAP means that the number of family homes for Aylesbury residents for social renting on the Estate will decrease by 250. (see accompanying pdf file - Aylesbury_Revised_Preferred-Options_Breakdown_of_Homes)		
529	69	Publication	Publication	PV7		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

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									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 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		The council has considered social impacts of the proposals in both the Equalities Impact

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							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 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)		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 incoming population.
531	69	Publication	Publication	PV7		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 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

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							<p>the same time as increasing density by 50% and promoting the risky business of intermediate housing - misleadingly called 'affordable' in the AAAP 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 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 AAAP - 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</p>		<p>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 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</p>

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							<p>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>Plan.</p>

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528	90	Publication	Publication	PV General			In ignoring the 2001 ballot it dis-respects, dis-enfranchises and alienates stakeholders from participating in the political process of addressing their social inequality. The AAAP is also inconsistent with National Policy to rectify social inequalities as it currently entails a net loss of 681 homes for social renting from the 2249 that we have now, and this results in a number that fails to meet London Plan guidelines.		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 taking into account the objectives of re-providing

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									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.
537	90	Publication	Publication	PV4			1. The Walworth Rd. • We feel strongly that it is important to include the 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		Noted. An upgrade to the southern part of Walworth Road 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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							<p>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 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.</p>		

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540	90	Publication	Publication		PL1		<p>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 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</p>		<p>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 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</p>

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							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.		[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.
541	90	Publication	Publication		PL1		2. Thurlow Street. •We very much like the overall design ideas for Thurlow St and its role as a High Street and Town Centre. 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		Noted. The design guidance in appendix 6 of the AAP states that with regards to on-street 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

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							reduced.		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 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.		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 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		The council will recommend to the inspector that New Church Road is removed from the

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							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.		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 note in section 5.3.2 of the Transport Strategy (http://www.southwark.gov.uk/Uploads/FIL_E_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	We would very 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	Paragraph 5.3.2 states that the 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

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							<p>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>developments that achieve better than a 0.4 per unit car pa</p>	<p>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 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).</p>

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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 and other facilities. More the illustrations should show some cycles and cycle parking (as on page 129).		Cycle parking would be provided in accordance with the Southwark plan standards. It is not necessary to repeat those standards in the AAP.
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		Noted.

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							realm. We also very much like the use of mews and the creation of HomeZones in the residential parts of the scheme.		

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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	PV5	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 underpass?.		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 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

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									take place in this period over detailed proposals for improvements to Burgess Park.
505	101	Publication	Publication	PV4	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 rates in children and young people. Consideration should also be given for appropriate youth space.		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.
506	101	Publication	Publication	PV4	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

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									<p>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 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.</p>

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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

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448	108	Publication	Publication	PV General			<p>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 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</p>		<p>1. Consultation has been extensive throughout the preparation of the AAP. Details of the consultation carried out is set out in the Consultation 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</p>

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							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.		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. 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

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									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 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:		Consultation: Consultation has been extensive throughout the preparation of the AAP. Details 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

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							<p>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) 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</p>		<p>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. 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</p>

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							<p>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 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</p>		<p>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 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</p>

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							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 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		be 10% larger than Parker Morris standards. The existing flats on the estate were built to this standard.
450	108	Publication	Publication	PV General			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		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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							(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 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		

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							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 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	There are no specific issues to address in this representation.

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								or beyond I have never seen such a travesty of democr	

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496	110	Publication	Publication	PV General			<p>The plan is fundamentally flawed and contradicts the original declared aims of the Aylesbury plan when Tony Blair came in 1997 involving a loss of all council housing on the estate and a net loss of social housing which is detrimental to the needs of the housing waiting list. We need an increase in social and council housing which the money spent on the plan could be used for. The plan also reduces flat sizes and involves an increase in rent The consultation process and representativeness of the decision making up to this time is fundamentally flawed and breaches government guidelines. The ballot wishes of tenants and leaseholders have been ignored. Their view must be recognised and the plan stopped or at least a new ballot held to establish a democratic view.</p>	<p>The arguments for the plan so far have been one sided. I consider it necessary to redress this balance.</p>	<p>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 re-providing affordable housing, creating a mixed community, ensuring existing tenants can return and</p>

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									<p>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. The consultation process has been robust and sound. The details are set out in the Consultation Report.</p>

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500	111	Publication	Publication	PV3	BH3		<p>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 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</p>	<p>We would like the opportunity to participate at the oral examination as we have been working with 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>	Noted

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							<p>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 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</p>		

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							<p>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 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.</p>		

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498	112	Publication	Publication	PV3	BH3		<p>The AAP is not legally compliant because the decision of the ballot of the estate, not to be transferred from council ownership, has been ignored and no further ballot has been held; nor has the submission document has not been discussed at the local Community Council. The AAP is being undertaken at a time when the global financial crisis puts all large-scale building projects in doubt and when government regulations about funding public housing are in flux. The possibility of a sea-change in funding, which would allow councils to finance social housing directly and build council houses, changes the fundamental conditions of the AAP and make the plan itself unsound. The AAP is unjustified and ineffective because it reduces both the amount of social rented housing and council housing. The Aylesbury when built provided 2758 council houses, to be changed and reduced to 1600 housing association properties. It defies common sense that this should be allowed when Southwark has 15000 applicants on its housing</p>	<p>I wish to provide more detailed evidence, to comment on the Council's evidence and take part in any roundtable discussion.</p>	<p>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 existing tenants can return and</p>

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							<p>waiting list, most of whom can only afford council housing. It is also unjustifiable that the large amounts of public money and other resources expended on this project will not reduce the housing waiting list. The changes should be that public funds and resources shall be spent directly by Southwark Council to build and provide enough council homes and leasehold properties to rehouse all Aylesbury residents, as well as reduce the housing waiting list by 2100 applicants. A ballot of this plan will be put to all residents of the estate for a binding decision.</p>		<p>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. The 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 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</p>

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									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.

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499	113	Publication	Publication	PV General			1. The plan itself as far as housing provision is concerned is fundamentally flawed and contradicts the original 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. The plan is unacceptable in any terms and should be dropped. Any modified plan must be subjected to a ballot and only acted on if it gets support.	I believe I have import contributions to make regarding the Council illegal and unsound approach	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 re-providing affordable housing, creating a mixed community, ensuring existing tenants can return and

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									<p>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. Rents: In the past housing 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</p>

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									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.