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Mrs Annie Shepperd
Chief Executive
London Borough of Southwark
Chiltern House
Portland Street
London
SE17 2ES

Our Ref: PINS/A5840/429/4

Date: 23 October 2009

Dear Mrs Shepperd

Planning and Compulsory Purchase Act 2004: Town & Country Planning (Local Development) (England) Regulations 2004

Southwark London Borough Council Local Development Framework Aylesbury Area Action Plan

1. As you know, I was appointed by the Secretary of State to carry out an independent examination of the Aylesbury Area Action Plan Development Plan Document (DPD), which was submitted to the Secretary of State on 15 May 2009, pursuant to section 20 of the Planning and Compulsory Purchase Act 2004 (the 2004 Act).
2. I held a pre-examination meeting on 9 July 2009 and conducted the examination of the Area Action Plan by way of written exchanges and by a series of hearing sessions held at the Thurlow Lodge Community Centre, Thurlow Street on 2 and 3 September 2009.
3. The purpose of the independent examination is set out in section 20(5) of the 2004 Act. This falls into two parts: first, whether the submitted DPD was prepared in accordance with certain statutory requirements under s19 & s24(1) of the 2004 Act and the associated regulations (*The Town and Country Planning (Local Development) (England) Regulations 2004; SI.2004 No. 2204*); and second, whether the DPD is sound. In making an assessment of soundness, I applied guidance set out in Planning Policy Statement 12 (2008) – *Local Spatial Planning* (PPS 12).
4. With this letter is a copy of my report on the submitted Area Action Plan. This contains my recommendations and the reasons for them as required by section 20(7) of the 2004 Act. It is accompanied by an annex with three appendices which are largely based on the helpful documentation provided by the Council during the course of the examination. My overall conclusion is that, with the changes recommended in my report, the Aylesbury Area Action Plan satisfies the requirements of s20(5)(a) & (b) of the 2004 Act and the associated



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regulations and can be considered sound in accordance with the guidance in PPS12.

5. In coming to my conclusions on the soundness of the plan, I have considered all of the representations made during the 6-week period following submission, in accordance with Regulation 29 of the 2004 Regulations, together with the other written submissions made. While these have informed the identification of the matters and issues for examination, my principal task was to consider whether the document is sound. I have also taken account of the subsequent written statements and oral contributions made during the course of the examination. However, it is not a requirement of the 2004 Act that I consider or report on "objections", and consequently, my report does not list individual representations or respond to all the points made. During the course of the examination, and as a result of the discussions at the hearing session, the Council suggested some changes to the text, tables and illustrations of the submitted Area Action Plan. I have considered these changes as part of my assessment of the Plan's soundness.

6. I would like to thank all of the Council's staff who attended the hearing sessions for the professional manner in which they conducted themselves during the examination process and the courtesy with which I was treated. I am also grateful for the quality of the documentation produced, which was exemplary. A number of local residents played a significant part in the hearing sessions and I wish to record my thanks for their helpful attitude and the extent to which they had briefed themselves on the plan's complexities; this made for productive and efficient hearing sessions.

7. The facilities provided at Thurlow Lodge were excellent and I would like to thank the staff there for their help in running the various sessions smoothly. Finally, I wish to express my gratitude to the Programme Officer, Leonna Staple, without whose efficiency, boundless enthusiasm and extensive local knowledge the examination process would not have run as smoothly as it did.

8. Please pass on my thanks to the relevant staff.

Yours sincerely,

B J Juniper

Inspector

cc: Government Office for London



Report to the Council of the London Borough of Southwark

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by Barry Juniper BSc DipTP MRTPI

**an Inspector appointed by the Secretary of State
for Communities and Local Government**

12 November 2009

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO THE AYLESBURY AREA ACTION PLAN DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 15 May 2009

Examination hearings held on 2 and 3 September 2009

File Ref(s): LDF 000934

Introduction and Overall Conclusion

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
 - (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document; and
 - (b) whether it is sound.
- 1.2 This report contains my assessment of the Aylesbury Area Action Plan DPD in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act.
- 1.3 I am satisfied that the DPD meets the requirements of the Act and Regulations. My role is also to consider the soundness of the Aylesbury Area Action Plan in the terms of paragraph 4.52 of PPS12, that is whether the DPD is justified, effective and consistent with national policy. In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The changes I have specified in this binding report are made only where there is a clear need to amend the document in the light of the legal requirements and/or the tests of soundness in PPS12. None of these changes should materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.
- 1.4 My report firstly considers the legal requirements, and then deals with the relevant matters and issues considered during the examination in terms of testing justification, effectiveness and consistency with national policy. My overall conclusion is that the Plan is sound, provided it is changed in the ways specified. The principal changes which are required are, in summary:
 - a) Adjusting the proportions of private and affordable housing in Phases 1 and 4;
 - b) Amending the public sector funding requirement calculations

The report and Annex set out all the detailed changes required, including those suggested by the Council, to ensure that the plan meets the legal requirements and is sound.

Legal Requirements

Consistency with Local Development Scheme

- 2.1 The Aylesbury Area Action Plan DPD is identified in the Council's revised Local Development Scheme (LDS) which came into effect in June 2008. The submission DPD generally reflects the proposed

subject matter as set out in the LDS, although I deal in more detail with the question of the Cross River Tram under Issue (b) below.

- 2.2 Unusually, the AAP has been prepared in advance of the Core Strategy. Its strategic basis is therefore essentially dependent on the Southwark Unitary Development Plan (UDP) and the London Plan. The UDP was adopted relatively recently, in July 2007, and the AAP is broadly consistent with its policies. The Plan is also in general conformity with the London Plan. The relationship between the policies in the AAP and these documents, together with the Council's other supplementary planning documents is set out clearly in Appendix 2 to the Plan and in Table A2.1. From this I am satisfied that there is a sound strategic policy framework for the plan.
- 2.3 The housing area which it is proposed to renew shows clear signs of stress and there is evidence that the built fabric would be expensive to retain in the long term and would in any event be unlikely to achieve a satisfactory residential environment. Given the extensive renewal that needs to be undertaken and the evident availability of finance for the initial stages, I consider that it is advantageous to bring the AAP forward in advance of completion of the Borough's Core Strategy. As it focuses on a relatively small part of the Council's area, I do not consider that the Plan would unduly prejudice future overall policy for the Borough as a whole or for the adjoining communities.
- 2.4 Preparation of the Core Strategy is proceeding broadly as envisaged in the LDS and consultation on the preferred options took place in June and July 2009. As a result a number of changes to the AAP are proposed to ensure consistency with the published 'Core Strategy Preferred Options'. These are set out in the Annex and are the changes prefixed 'CS'.
- 2.5 I am satisfied that the preparation of the DPD has been generally in accordance with the LDS.

Compliance with Statement of Community Involvement (SCI) and Associated Regulations

- 2.6 The Council's Statement of Community Involvement (SCI) was found sound by the Secretary of State and was formally adopted by the Council in January 2008. The Council's Regulation 30 (1) (d) and (e) Statements show that all of the requirements of the adopted SCI have been met.
- 2.7 Criticisms of the adequacy of the Sustainability Appraisal (SA) in relation to particular policies of the DPD are more appropriately dealt with in considering the justification, effectiveness and consistency tests. However, I deal here with some general criticisms and expand on the matters of sustainability and deliverability in section 3 below.

- 2.8 The consultation exercises on the AAP were conducted against a background of previous public participation focussed on the public housing. In particular, there was concern expressed in the representations and at the hearings that the AAP runs contrary to a ballot of tenants carried out in 2001 in which a large proportion of tenants indicated that they wished to remain in their present, Council-rented accommodation whereas the Plan proposes an overall reduction in the number of such homes. However, there is a need to distinguish between the specific housing and tenancy issues which formed the focus of the earlier participation exercises and the much wider remit of the AAP consultation, undertaken to inform the preparation of a spatial plan. I do not consider that there is any fundamental conflict between the outcomes of the consultation exercises carried out by the Council in recent years.
- 2.9 I accept that the SCI indicates a wide variety of consultation exercise types and that the Council did not use all of them in preparing the AAP. I am confident, however, that the methods used in preparing the AAP were sufficient to ensure a reasonable opportunity for residents of the AAP area and surrounding communities to make their views known. Whilst the exercise focussed largely on the Master Plan Area, now known as the Action Area Core (AAC) I consider this to have been an appropriate strategy given the intensive change proposed in this zone. Given that the effect of the proposals in the AAP on Burgess Park itself would be relatively modest, I am not convinced that the residents of the areas outside the AAP boundary but adjoining the Park were unduly disadvantaged by the less intensive publicity strategy in these areas. The recent changes in the Council's internal arrangements for managing the Park do not seem to me to imply that the Council would not in future consult in accordance with the SCI on the more detailed measures referred to at para 4.5.5 of the Plan. This would provide an opportunity for meaningful public participation in any significant proposals which would affect the Park itself.
- 2.10 I am satisfied that the DPD was prepared in compliance with the SCI after it had been approved in draft by the Council, and before that in compliance with the minimum requirements set out in the 2004 Regulations.

Other Legal Requirements

- 2.11 At the hearing the Council confirmed that the statutory requirements for the preparation of the DPD had all been met.
- 2.12 I am satisfied that the DPD has regard to national policy.
- 2.13 The Greater London Authority has indicated that the Plan is in general conformity with the London Plan and I am satisfied that this is so.
- 2.14 I am satisfied that the DPD has had regard to the sustainable community strategy for the area.

- 2.15 I am satisfied that the DPD complies with the specific requirements of the 2004 Regulations (as amended) including the requirements in relation to publication of the prescribed documents; availability of them for Inspection and local advertisement; notification of DPD bodies and provision of a list of superseded saved policies.
- 2.16 Accordingly, I am satisfied that the legal requirements have all been met.

3 Justified; Effective and Consistent with National Policy

- 3.1 The plan focuses on proposals to replace an area of housing built by the local authority in the 1960s and 1970s in what was previously known as the 'Masterplan Area'. I have no doubt that dealing with the clearly evident shortcomings of this housing is the principal challenge which the Council has faced in the AAP area. I consider that the main issues are:
- (a) whether the proposed tenure mix is appropriate;
 - (b) whether the Plan's policies are the most appropriate in terms of minimising energy needs and achieving sustainable development;
 - (c) whether the proposed improvements to public transport facilities are appropriate and achievable; and
 - (d) whether the Plan provides satisfactorily for delivery of development and monitoring its effectiveness.
- 3.2 I note that, to achieve consistency with the emerging Core Strategy, the Council now wishes to replace the title 'Masterplan Area' with 'Action Area Core' (AAC). This is one of the changes I recommend in Section 4.

Issue (a) – Tenure Mix

- 3.3 The tenure mix proposed in Policy BH3 would, in the AAC, result in an overall reduction in the number of social rented homes from the present total of about 2,250. Whilst the number of dwellings would increase significantly to about 4,200, only 50% of these would comprise affordable housing and of those, 25% would be intermediate homes (i.e. part rented and part mortgaged). As a result the number of dwellings available to rent would fall by about 30% to 1,575. This would also reduce the number of dwellings available to rent in the Borough as a whole. However, the Council provided evidence which establishes to my satisfaction that it would not be financially possible to raise the proportion of affordable housing in the area above 50% and this was not seriously challenged. Thus, whilst a range of tenure mix options was evaluated in the SA (summarised at paragraph 5.2.1 of Volume I), it seems to me that the chosen mix is the only one that is reasonably practicable.

- 3.4 I am in no doubt that some existing tenants value the generous space standards that some of the existing flats provide and that the extensive glazing which is a feature of most of the flats provides a light and airy living space. However, there are fundamental shortcomings in the urban form which is characterised by monolithic blocks of flats of up to 14 storeys accessed largely by elevated walkways. The internal stairways and dark corridors appear to offer opportunities for crime and this was a view expressed in consultation on the Plan. Evidence obtained for the Sustainability Appraisal showed that some areas near the Walworth Road were in the 10% most affected in terms of crime in England. At street level the buildings present a forbidding and unkempt appearance and pedestrian routes are constrained by the layout of what in many cases are particularly large buildings. Whilst it is possible that some of the maintenance shortcomings of the buildings could be addressed, I agree with the Council that refurbishment would be unlikely to achieve satisfactory living conditions in the longer term.
- 3.5 The AAP includes detailed design guidance in Appendix 6 which sets out space standards equivalent to the present council rented flats for the new social rented housing (Parker Morris + 10%) and this would be expressly required by Policy BH5. I consider that the new development built in accordance with this guidance would, notwithstanding the significant increase in the number of dwellings in the area, provide much improved living conditions and I find no evidence to suggest that the overall reduction in the provision of social rented housing would in itself be harmful.
- 3.6 Development of Phase 1a has already begun and, following discussions with the Homes and Communities Agency, the Council has established that it would not be possible to achieve the 50/50 split between private and affordable homes in the prevailing economic climate. It therefore proposes to adjust the overall balance in Phase 1 in favour of additional affordable homes, so that the split is 59% affordable to 41% private. To balance this, Phase 4 would be adjusted to 58% private to 42% affordable (the slight difference in percentage terms arising from the higher overall housing numbers in Phase 4). I agree that this is rational and it seems to me that it would have the added advantage of increasing the number of rented houses available through the early part of the plan period which would help in the process of decanting tenants from dwellings which are to be demolished.
- 3.7 **In order to make the Action Area Plan sound, the following changes should be made:**
- C1 Delete Policy BH3 and replace it with the text set out in the Annex;**
 - C2 Delete Paragraph 3.3.8 and replace it with the text set out in the Annex;**
 - C3 Delete Table A7.1 and replace it with the version in the Annex.**

Issue (b) - Energy needs and sustainable development

- 3.8 The new dwellings in the AAC must, under Policy BH6, be designed to connect to a district heating scheme, one of the key measures by which the Council propose to achieve development which would result in zero carbon growth. This is an ambitious aim, on the face of it, and evidence was given at the hearings about another scheme in south east London where the benefits of such a scheme failed to materialise.
- 3.9 However, there is already a district heating installation on the Aylesbury estate with its associated infrastructure and a boiler house. Further, a combined heat and power (CHP) scheme is being developed in conjunction with a major redevelopment at Elephant and Castle, just to the north of the Plan area. Such schemes have the potential for efficient energy supply given that space heating is provided from the waste heat and I am satisfied that there is a reasonable prospect that a linkage to the Aylesbury area is practicable. I am also satisfied that, even if the consortium undertaking the Elephant and Castle scheme, Dalkia, is not subsequently able to extend that scheme to the Aylesbury area, it would be possible to establish a separate Multi Utility Service Company for the AAC.
- 3.10 I am conscious that the reduction in potential CO₂ emissions arising simply from a gas-fired district heating system, even as part of a CHP scheme, is necessarily limited. I have also taken into account the relatively restricted scope for the use of waste heat from electricity production during the summer months, given that only limited information was available at the hearing about the use of that heat in connection with cooling plant for buildings at the Elephant and Castle. However, I have no reason to dispute the Council's evidence that, in the longer term, the CHP plant could be fuelled by biomass, including a proportion generated from sources within the Borough itself. On the Council's own evidence, this would have the greatest potential to reduce the CO₂ emissions arising from the proposal but I also give only limited weight to the evidence of lack of success of the South East London Combined Heat and Power scheme which was not, I was advised, designed with use of waste heat in nearby dwellings in mind.
- 3.11 Government guidance on local requirements for decentralised energy supply to new development is set out in the '*Planning and Climate Change*' supplement to Planning Policy Statement 1: *Delivering Sustainable Development*. I am content that the energy supply requirements in part (I) of Policy BH6 have been drawn up with proper regard to this guidance against a sound evidence base.
- 3.12 The Council accepted at the hearing that the overall calculation of the carbon neutrality of the proposals in the AAP had not taken account of the emissions likely to arise from demolition and construction activities associated with the proposal. However, no

evidence was available on this point and, whilst I accept that the CO₂ emissions from this aspect of the scheme are likely to be material, I have to set them against the long term benefits of improved energy efficiency of the resultant buildings. I am not convinced that the Council's calculations were so skewed on this matter as to render them unreliable. By the same token, I acknowledge that the location of taller buildings on the southern edge of the AAC would reduce the potential for solar gain in the zone immediately to the north, but this effect would be limited. In any event I have found that the plan would result in far reaching improvements to the urban form of the area, a factor to which I ascribe considerable weight.

- 3.13 Policy BH7 requires that all homes in the AAC must achieve Code for Sustainable Homes (CfSH) Level 4 in terms of energy efficiency and I had some reservations about the impact of this comparatively high standard on the cost of constructing dwellings to this standard. However, given that the Council will control the land on which they will be built, there is scope to achieve this aim which in any event is in line with the Council's corporate objectives. Further, since the government has indicated that it aims to require the more stringent CfSH Level 6 for all new homes in 2016, for the bulk of the plan period an even higher standard is likely to be required.
- 3.14 Overall I conclude that the plan would be likely to meet the targets it sets itself in terms of zero carbon growth development and would result in an appropriately sustainable form of development. No changes are required to ensure that this aspect of the Plan is sound.

Issue (c) – Public transport

- 3.15 For most of the plan preparation period Transport for London (TfL) were promoting a proposal for the Cross River Tram scheme, which would have significantly improved accessibility to the AAC, and this was the basis of the options considered in the SA. Shortly before the Submission document was finalised the scheme was dropped. Policy TP2 was, therefore, necessarily framed to focus on improvements to bus services, although it continues to identify a high capacity public transport route on the proposals map. I judge this sufficient to allow for subsequent provision of extra bus stops and turning/waiting spaces if these prove to be required. It would also allow for the tram proposal to be reconsidered subsequently. I am satisfied that this constraint on the options open to the Council has not materially affected the soundness of this aspect of the AAP.
- 3.16 I agree that there is scope for flexibility in the provision of improved public transport because much of the new residential development will be on redeveloped sites so the absolute number of people the network will have to serve will not increase significantly until Phase 4, beyond 2020. At this stage it is envisaged that developer contributions could be achieved and there appears to me to be

sufficient evidence to have confidence that these could be sought without unduly harming the overall viability of Phase 4.

- 3.17 I am concerned, however, that the wording of the plan is vague on this point, particularly in the light of the evidence given at the hearing that an increase in the frequency of services on the principal existing route running along Thurlow Street through the centre of the AAC, service No. 343 is likely to be most effective. This seems rational, given that high public transport accessibility levels (PTALs) are already achieved to the east and west of the plan area. I recommend below that paragraph 5.3.3 is adapted accordingly.

- 3.18 **In order to make the Action Area Plan sound, the following change should be made:**

C4 Delete the last sentence of paragraph 5.3.3 and replace it with the following text: *However, it will be necessary to raise PTALs further and improvements to the frequency of the existing bus services which run through the Core Action Area as well as new routes to Peckham and Elephant and Castle will be sought in Phase 4 in co-operation with TfL and with developer funding.*

Issue (d) – Delivery and monitoring

Funding the Housing Component

- 3.19 So far as Phase 1 of the regeneration is concerned, social housing grant (SHG) has been obtained for the first part (Phase 1a) which is already effectively under way. The Council is working with the Homes and Communities Agency to secure SHG for the remainder of Phase 1 and I am satisfied that the mechanisms proposed are the most appropriate and thus most likely to be successful.
- 3.20 Much of the funding for Phases 2 and 3 will be dependent on successful bids under the government's Private Finance Initiative (PFI). Since this is in essence a bidding process, there is no guarantee that the Council will be successful. However, so far as Phase 2 is concerned, the Council has been successful in its initial application in the Round 6 PFI process and has been invited to progress to the next stage. A 'soft market testing exercise' is being conducted to hone the subsequent bid process, in accordance with current guidance on PFI submissions. At the hearing the Council indicated that the exercise was proceeding satisfactorily and that the input from the housebuilding industry, which is a crucial part of the technique, had not led to concerns over the future viability of the overall scheme. Whilst the whole exercise will take a further three years, I recognise that the extent of the involvement of the Homes and Communities Agency thus far gives a clear indication that the bid is soundly based.

- 3.21 I am conscious that the PFI system cannot provide certainty for the funding of Phases 2 and 3, and I am also aware that its efficacy has been questioned in some quarters including recent comments by the National Audit Office. Nevertheless, it remains a cornerstone of government policy in terms of delivering major public sector led enterprises. Even if PFI subsequently ceases to be part of national policy, it is likely that some other form of funding structure would replace it and I do not consider that the Council can be faulted for formulating its strategy on the basis of current national guidance. A significant element of stability is assured since the Council controls the necessary land.
- 3.22 There are likely to be some additional development costs arising in the later stages. In particular, meeting CfSH level 6 will increase construction costs, but as this will apply to all new housing, it would not affect viability of the AAP proposals compared to schemes elsewhere. There is also likely to be a need for contributions to enhanced public transport in Phase 4, but this would be spread over a large number and proportion of private homes, reducing the impact on the cost of individual units. No change is required to the Plan in this respect.
- 3.23 However, changes to the national economic position mean that the public sector funding requirement has changed significantly since the Submission document was published in January 2009 and the Council has recalibrated its calculation of the requirement. **In order to make the Action Area Plan sound, the following changes should be made:**
- C5 Change the capital programme and funding shortfall figures in paragraphs 7.4.2 to £1.2bn and £169m respectively;**
 - C6 Change the capital programme and funding shortfall figures in paragraphs A7.1.24 to £1.2bn and £169m respectively and remove the last sentence referring to social housing grant;**
 - C7 Delete table A7.2 and replace it with the version in the Annex.**

Burgess Park

- 3.24 I am aware from discussions at the hearings that residents outside the plan area have concerns about the future uses to which Burgess Park might be put as the Council comes to deliver the objectives of Policy PL8. This is referred to at para 2.7 above. Whilst I acknowledge that there have been a number of proposals for built development in the Park which have been resisted in the past, the AAP does not include any schemes which in themselves would introduce a significant element of new buildings within the area, which is in any event designated as Metropolitan Open Land. Nevertheless, it seems to me that Policy PL8 could be clearer on this point and without a change to the wording the Plan would be unsound.

3.25 In order to make the Action Area Plan sound, the following change should be made:

C8 Policy PL8: second sentence after 'designed to' insert '....facilitate open space activities which will....'

Monitoring

3.26 For the most part the output indicators in Section 8 of the AAP are straightforward and they reflect where possible those already used by the Council in its Annual Monitoring Report and Corporate Plan. Some are necessarily less easy to quantify but a measure of the Plan's progress may need to be assessed by opinion surveys. One of the indicators for Policy PL2, however, required that a percentage of approvals meeting the Plan's design requirements should be recorded. The Council subsequently decided that this was too vague to be measurable and I agree with this assessment. Other indicators already in the Plan will be sufficient.

3.27 In order to make the Action Area Plan sound, the following changes should be made:

C9 Delete the indicator for Policy PL2 in Section 2.3 which refers to the percentage of approvals meeting design requirements.

4 Minor Changes

4.1 The Council wishes to make a number of minor changes to the submitted DPD in order to clarify, correct and update various parts of the text. Although these changes do not address key aspects of soundness, I endorse them on a general basis in the interests of clarity and accuracy. These changes are shown in the Annex with the prefix 'E' in the first column.

5 Overall Conclusions

5.1 I conclude that, with the amendments I recommend, the Aylesbury Area Action Plan DPD can be considered sound, that it satisfies the requirements of s20(5) of the 2004 Act and that it accords with the advice in PPS12.

B J Juniper

INSPECTOR

ANNEX

Examination into the Aylesbury Area Action Plan DPD

SCHEDULE OF SUGGESTED CHANGES

ISSUE 1 – October 2009

The changes below are expressed with strikethrough for deletions and underlining for additions of text

The first column distinguishes the three types of change. 'CS' relates to changes intended to achieve consistency with the Core Strategy Preferred Options document, 'C1 to C10' are those specifically set out in the Report and 'E' denotes alterations for editing and clarification purposes, largely as suggested by the Council.

The page and paragraph numbering refer to the submission DPD, and do not take account of the addition or deletion of text.

Type of Change	Page	Paragraph/ policy/ figure	Proposed change	LBS Comments
CS	Through- out document		Rename "masterplan area" as "core action area", throughout the document	Core Strategy publication draft/submission document refers to this as "Action Area Core".
E	12	1.2.1	The Aylesbury Estate was constructed between 1966 and 1977 (the location of the Aylesbury AAP area is shown in Figure 2).	✓
CS	27	BH2	The masterplan area is designated as a Public Transport Accessibility Zone (PTAZ) as shown on the Proposals Map (see Figure 7). <u>The footprint of the Aylesbury estate is designated as a core</u>	Core Strategy publication draft/submission document refers to this as "Action Area Core".

CS	28	3.2.4	<p>action area on the Proposals Map (see Figure 7).</p> <p>As regards public transport accessibility, the proposed average density will be in compliance with the London Plan density matrix (GLA 2008, Table 3A.2) for an urban setting with existing and future improved Public Transport Accessibility Levels (PTALs) ranging from 2-6. Increasing the number of homes and investing in schools, employment space, shops and community facilities will help to support future improvements in bus services (see policy TP2). The Watworth Road Public Transport Accessibility Zone (PTAZ), which is designated in the Southwark Plan, has therefore been extended to cover the AAP area. In view of this context, higher densities are appropriate in the core action area. Such an approach is supported by the London Plan (GLA, 2008, para 3.21).</p>	Core Strategy publication draft/submission document refers to this as "Action Area Core".
CS	28	3.2.5	<p>Developments in the PTAZ core action area which exceed 700 habitable rooms per hectare will be expected to provide an exemplary standard of design with an excellent standard of living accommodation, in line with policy 4.1.1 of the Southwark Plan the Core Strategy Preferred Options.</p>	Core Strategy publication draft/submission document refers to this as "Action Area Core".
CS	29	Figure 7	Proposed masterplan core action area	Core Strategy publication draft/submission document refers to this as "Action Area Core".
CS	29	Figure 7	Existing PTAZ - delete from Figure	✓
CS	29	Figure 7	Proposed PTAZ extension - delete from Figure	✓
CS	29	Figure 7	Amend the boundary of the AAP area as set out in the attached plan (Table of Changes Appendix A).	✓
C1	31	Policy BH3	<p>BH3 Tenure mix</p> <p>50% of new homes in the core action area will be affordable and 50% will be private.</p> <p>We will require the following mix of tenures on each proposals site: all proposals sites within the core action masterplan area:</p>	Core Strategy publication draft/submission document refers to this as "Action Area Core".

C2	32	3.3.8	<p><u>Proposals site AAP1 (Phase 1)</u></p> <ul style="list-style-type: none"> • <u>41% Private</u> • <u>59% Affordable</u> <p><u>Proposals sites AAP2 and AAP3 (Phases 2 and 3)</u></p> <ul style="list-style-type: none"> • <u>50% Private</u> • <u>50% Affordable</u> <p><u>Proposals site AAP4 (Phase 4)</u></p> <ul style="list-style-type: none"> • <u>58% Private</u> • <u>42% Affordable</u> <p><u>Of the affordable housing provided, 75% should be social rented and 25% should be intermediate</u></p> <ul style="list-style-type: none"> • <u>50% private</u> • <u>50% affordable, of which 75% should be social rented and 25% should be intermediate</u> <p>The testing we carried out on the masterplan demonstrated that a 50/50 the splits between affordable and private housing set out in policy BH3 will be physically possible in all development blocks. Therefore, all developments blocks should seek to provide the tenure mix which is appropriate for the proposals site in which the block is located, as set out in policy BH3, unless it can be demonstrated that this is not possible through an openbook financial appraisal. A greater proportion of affordable units will be provided in the first phase in order to improve the deliverability of the scheme. This will be balanced by the provision of fewer affordable units in phase 4 to deliver the aim of achieving 50/50 split between affordable and private homes across the core action area. However, in order to provide some flexibility, the policy seeks to ensure that the correct mix is provided across each phase as a whole,</p>	Core Strategy publication draft/submission document refers to this as "Action Area Core".
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E	43	4.3.1	rather than per development block. We will monitor developments to ensure that the correct proportions are provided within each phase (see section 8). Add title "Reasons" above paragraph 4.3.1	✓	
E	43	4.3.1	Policies PL2 and PL3 are designed to create an easy to understand, lively and interesting neighbourhood with safer, well overlooked streets and open spaces and a variety of buildings and blocks types to give more interest and character.	✓	
C8	52	Policy PL8	We will transform Burgess Park so that it becomes a more attractive and better-used open space serving local people and south-east London. Improvements will encourage and celebrate sporting activities, healthy living, education, biodiversity and cultural diversity and will be designed to facilitate open space activities which will support and enhance the regeneration of the Aylesbury area. We will seek the provision of flexible outdoor spaces, particularly in Burgess Park, so that stage events and festivals can be held.	✓	
E	52	4.5.6	We will also make it easier to move around the park by reducing the barriers to movement caused by Albany Road, Wells Way, Trafalgar Avenue, St. George's Way and other roads. These will become calmed routes, with high quality and wide pedestrian and cycling crossings.	✓	
C4	53	5.3.3	Existing public transport accessibility levels (PTALs) are higher in the AAP areas closer to Walworth Road and Old Kent Road and are lower in the centre of the area. Simply redesigning the block layout in the masterplan area Core Action Area will raise PTALs as the masterplan layout brings homes closer to bus stops (existing and estimated masterplan Core Action Area PTALs are set out in Appendix 8). However, it will be necessary to raise PTALs further and improvements to the frequency of the existing bus services which run through the Core Action Area as well as new routes to Peckham and	Change is on Page 58, not page 53. Core Strategy publication draft/submission document refers to this as "Action Area Core".	

				<u>Elephant and Castle will be sought in Phase 4 in co-operation with TfL and with developer funding.</u>	
E	57 and 111	Figures 15 and A6.2		Delete new Church Road as an access street.	✓
E	70	7.2.1		The first phase of development, Phase 1a, started on site in April 2009, starts on site shortly.	✓
C5	73	7.4.2		Fourth sentence: Delete £1.8 billion and £299m; Insert £1.2 billion and £169m.	✓
E	73	7.4.3		We are in discussions with the Homes and Communities Agency (HCA) (formerly Housing Corporation and English Partnerships) about the funding for the delivery of new replacement affordable rented and intermediate accommodation in phase 1.	✓
E	73	7.4.3		In addition, we have submitted a bid to the secured £2m from the GLA under the Priority Parks scheme for £2m to support improvements to Burgess Park. We have a commitment of £4m NDC match funding.	✓
E	74	Table 1 – Aylesbury Resource Centre		Add "Southwark Council" in column 3 and "Capital programme" in column 4.	✓
C9	78	Table 3 – PL2		Development should conform with the design guidance in Appendix 6.	✓
E	78	Table 4 – TP3		Parking provision should not exceed 0.4 spaces per home averaged over the core action area as a whole.	Core Strategy publication draft/submission document refers to this as "Action Area Core".
E	86	A2.1.1		PPS1: Delivering Sustainable Development	✓
E	86	A2.1.6		On issues in areas in which the AAP has no policies, for example on the use of metropolitan open land and the need to incorporate green roofs and sustainable urban drainage	✓

				systems, policies which are in the London Plan and Southwark Plan on these issues will apply.																																						
E	88	Appendix 2		See revised appendix 2 (Table of Changes Appendix B).		✓																																				
E	92	A3.1.2		All of the background work described in Part 1 of this document has been taken into account in preparing the AAP. Together with the extensive consultation a series of objectives have been developed. These are outlined in the following section appendix 4 as place-making, delivery and sustainable development objectives.		✓																																				
E	97	A4.1.4		The appraisal checks the preferred options for developing the AAP area against the set of sustainable development objectives set out above below.		✓																																				
E	99	Appendix 5		See amended appendix 5 (Table of Changes appendix C).		✓																																				
E	110	A6.5.2		Design streets so that pedestrians and cyclists feel safe.		✓																																				
E	134	A6.6.11		Section A6.5.4		✓																																				
E	142	A6.6.30		The location of balconies must however be balanced with the need to provide daylight to lower levels flats and to the street.		✓																																				
C3	159	Table A7.1				✓																																				
				<table><tr><th>Phase</th><th>Phase 1</th><th>Phase 2</th><th>Phase 3</th><th>Phase 4</th><th>Total</th></tr><tr><td>Site reference</td><td>1a, 1b, 1ci, 1cii, 7, 10</td><td>4a, 4b, 5</td><td>6, 8, 9</td><td>2a, 2b, 3a, 3b, 11, 12, 13, 14</td><td></td></tr><tr><td>No. private units</td><td>722</td><td>322</td><td>224</td><td>846</td><td>2,114</td></tr><tr><td>No. social for rent units</td><td>582</td><td>241</td><td>169</td><td>986</td><td>1,568</td></tr><tr><td></td><td>522</td><td></td><td></td><td>635</td><td></td></tr><tr><td></td><td>592</td><td></td><td></td><td>565</td><td></td></tr></table>	Phase	Phase 1	Phase 2	Phase 3	Phase 4	Total	Site reference	1a, 1b, 1ci, 1cii, 7, 10	4a, 4b, 5	6, 8, 9	2a, 2b, 3a, 3b, 11, 12, 13, 14		No. private units	722	322	224	846	2,114	No. social for rent units	582	241	169	986	1,568		522			635			592			565			
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		Funding Gap		82.63	
Table A7.2: Total funding shortfall Public Sector Funding Requirement					
E	162	7.1.31	The council has submitted a bid to secured £2m from the GLA under the Priority Parks scheme for £2m to support improvements to Burgess Park. We have a commitment of £4m NDC match funding.	✓	
E	166	A.8.1.1	The following plans show indicative public transport accessibility levels across the Aylesbury AAP area both as they are now (Figure A8.1) and as they might be following the redevelopment of the estate (Figure A.1a). The increases in PTALs shown in Figure A8.1a are due to the fact that following redevelopment, blocks in the core action area will be smaller and routes to bus stops will be more direct.	✓	
E	166	A.8.1.2	It should be noted, however, that the plan showing the proposed PTAL is indicative only. Improvements to bus services will bring further improvements to PTALs. PTALs in the core action area taking into account both the masterplan layout and bus service improvements are shown in Figure A8.2. (Nb. The plan is based on the improvement of service frequencies for existing transport routes through the area and does not consider the introduction of new routes or the modification of existing routes.) This plan demonstrates that improvements to bus services will result in higher levels of public transport accessibility. This accessibility will be further increased with the introduction of new routes as proposed within the AAP.		Core Strategy publication draft/submission document refers to this as "Action Area Core".
E	167	New figure (The new	Insert new figure as follows: A8.1a Indicative proposed public transport accessibility, taking into account the masterplan	✓	

Core Strategy publication draft/submission document refers to this as "Action Area Core".

		figure can be seen in the Transport and Movement Strategy Figure 3).	layout	
E	167	Figure A8.2	Figure A8.2: Indicative proposed public transport accessibility, taking into account the masterplan layout and bus service improvements	✓
E	170	Glossary	Annual Monitoring Report This is produced every year as part of the local development framework. It sets out how well our planning policies are performing based on a range of different indicators.	✓
E	171	Glossary	Community Infrastructure Levy The Community Infrastructure Levy (CIL) is a government proposal which will enable local authorities to make a charge for most types of new development in their area. CIL charges will be calculated using a formula and will be based on the size of a development. Funds raised by the CIL can be spent on infrastructure, such as public transport improvements, schools, parks etc. needed to support the development of the area	✓
E	174	Glossary	Public Transport Accessibility Zone (PTAZ) Areas within urban or suburban zones, which have better public transport, significant potential for new development and investment, and a mixed use character including significant retail development (Southwark Plan 2007, Appendix 18)	✓
E	174	Glossary	Planning brief	✓

			<p>Planning briefs are prepared by a local authority as a guide for developers interested in buying and developing a site. They may contain more detailed information about the number of homes which can fit on a site, the design of homes, levels of car parking etc. They are not used to help assess planning applications, unless they are adopted as supplementary planning documents.</p>	
E	175	Glossary	<p><u>S106 Planning Obligation</u> These are also called <u>planning gain</u> or <u>section 106 contributions</u>. Applicants for major developments are usually required to provide payments to offset the <u>Impact</u> of their scheme and make it <u>acceptable</u>. This may include <u>improved transport, environment, employment, housing or recreation facilities</u>. They could also be built as <u>part of a development</u> rather than provided as a <u>payment</u>.</p>	✓

APPENDIX A PROPOSED CHANGES TO THE AYLESBURY AAP SUBMISSION

Background

1. The AAP has been examined by an independent inspector and the council has received a binding report. His overall conclusion is that the AAP is sound and therefore there are no significant issues that need to be addressed.
2. Prior to the examination in public the council provided the inspector with a list of proposed changes to the AAP to provide updates due to changes during the consultation period. The most significant of these were that we alter the proportions of private and affordable housing in phases 1 and 4 to reflect funding proposals agreed with the HCA and also to amend the public sector funding requirement calculations. These proposals were agreed by IDM in May 2009. The inspector agreed with the council that these changes would improve the document and has confirmed that they should be incorporated into the final AAP.
3. We proposed these changes as they enabled us to keep the mix of affordable and private housing the same for the entire area. We increased the affordable housing in phase 1 to gain HCA funding to unlock development to make it viable. The reduction in private housing has been increased by the same amount in phase 4.
4. In addition to those changes proposed by the council, the inspector has recommended a very small number of additional changes. These are very minor in character.
5. The schedule of suggested changes with our response to the fact check is set out below.
6. This is followed by a set of appendices with the detail of the proposed changes and updates described above.

Inspector report and fact check of the examination into the Aylesbury Area Action Plan DPD Schedule of suggested changes.

The changes below are expressed with strikethrough for deletions and underlining for additions of text

The first column distinguishes the three types of change. 'CS' relates to changes intended to achieve consistency with the Core Strategy Preferred Options document, 'C1 to C10' are those specifically set out in the Report and 'E' denotes alterations for editing and clarification purposes, largely as suggested by the Council.

The page and paragraph numbering refer to the submission DPD, and do not take account of the addition or deletion of text.

Type of Change	Page	Paragraph/ policy/ figure	Proposed change	All changes made to meet suggested changes by the council unless set out below
CS	Through- out document		Rename "masterplan area" as "action area core", throughout the document	
E	12	1.2.1	The Aylesbury Estate was constructed between 1966 and 1977 (the location of the Aylesbury AAP area is shown in Figure 2).	
CS	27	BH2	The masterplan area is designated as a Public Transport Accessibility Zone (PTAZ) as shown on the Proposals Map (see Figure 7). <u>The footprint of the Aylesbury estate is designated as action area core on the Proposals Map (see Figure 7).</u>	
CS	28	3.2.4	<u>As regards public transport accessibility, the proposed average density will be in compliance with the London Plan density matrix (GLA 2008, Table 3A.2) for an urban setting with existing and future improved Public Transport Accessibility</u>	

A				Levels (PTALs) ranging from 2-6. Increasing the number of homes and investing in schools, employment space, shops and community facilities will help to support future improvements in bus services (see policy TP2). The Walworth Road Public Transport Accessibility Zone (PTAZ), which is designated in the Southwark Plan, has therefore been extended to cover the AAP area. In view of this context, higher densities are appropriate in the action area core. Such an approach is supported by the London Plan (GLA, 2008, para 3.21).	
CS	28	3.2.5		Developments in the <u>PTAZ action area core</u> which exceed 700 habitable rooms per hectare will be expected to provide an exemplary standard of design with an excellent standard of living accommodation, in line with policy 4.1 of the Southwark Plan - the Core Strategy Preferred Options.	
CS	29	Figure 7		Proposed <u>masterplan action area core</u>	
CS	29	Figure 7		Existing PTAZ - delete from Figure	
CS	29	Figure 7		Proposed PTAZ extension - delete from Figure	
CS	29	Figure 7		Amend the boundary of the AAP area as set out in the attached plan (Table of Changes Appendix A).	
C1	31	Policy BH3		BH3 Tenure mix 50% of new homes in the <u>action area core</u> will be <u>affordable</u> and 50% will be <u>private</u> . We will require the following mix of tenures on <u>each proposals site</u> , <u>all proposals sites</u> within the <u>action area core masterplan area</u> : <u>Proposals site AAP1 (Phase 1)</u> <ul style="list-style-type: none">• 41% Private• 59% Affordable <u>Proposals sites AAP2 and AAP3 (Phases 2 and 3)</u> <ul style="list-style-type: none">• 50% Private	

			<ul style="list-style-type: none"> • <u>50% Affordable</u> <p>Proposals site AAP4 (Phase 4)</p> <ul style="list-style-type: none"> • 58% Private • 42% Affordable <p><u>Of the affordable housing provided, 75% should be social rented and 25% should be intermediate</u></p> <ul style="list-style-type: none"> • 50% private • 50% affordable, of which 75% should be social rented and 25% should be intermediate 		
C2	32	3.3.8	<p>The testing we carried out on the masterplan demonstrated that a 50/50 <u>the splits between affordable and private housing set out in policy BH3 will be physically possible in all development blocks. Therefore, all</u> developments blocks should seek to provide the tenure mix <u>which is appropriate for the proposals site in which the block is located, as set out in policy BH3, unless it can be demonstrated that this is not possible through an openbook financial appraisal. A greater proportion of affordable units will be provided in the first phase in order to improve the deliverability of the scheme. This will be balanced by the provision of fewer affordable units in phase 4 to deliver the aim of achieving 50/50 split between affordable and private homes across the action area core. However, in order to provide some flexibility, the policy seeks to ensure that the correct mix is provided across each phase as a whole, rather than per development block. We will monitor developments to ensure that the correct proportions are provided within each phase (see section 8).</u></p> <p>Add title "Reasons" above paragraph 4.3.1</p>		
E	43	4.3.1			
E	43	4.3.1			Policies PL2 and PL3 are designed to create an easy to

C8	52	Policy PL8	understand, lively and interesting neighbourhood with safer, well overlooked streets and open spaces and a variety of buildings and blocks types to give more interest and character. We will transform Burgess Park so that it becomes a more attractive and better-used open space serving local people and south-east London. Improvements will encourage and celebrate sporting activities, healthy living, education, biodiversity and cultural diversity and will be designed to facilitate open space activities which will support and enhance the regeneration of the Aylesbury area. We will seek the provision of flexible outdoor spaces, particularly in Burgess Park, so that stage events and festivals can be held.	We should accept this change as a point of clarity.
E	52	4.5.6	We will also make it easier to move around the park by reducing the barriers to movement caused by Albany Road, Wells Way, Trafalgar Avenue, St. George's Way and other roads. These will become calmed routes, with high quality and wide pedestrian and cycling crossings.	
C4	53	5.3.3	Existing public transport accessibility levels (PTALs) are higher in the AAP areas closer to Walworth Road and Old Kent Road and are lower in the centre of the area. Simply redesigning the block layout in the masterplan area Action area core will raise PTALs as the masterplan layout brings homes closer to bus stops (existing and estimated masterplan Action area core PTALs are set out in Appendix 8). However, it will be necessary to raise PTALs further and improvements to the frequency of the existing bus services which run through the Action area core as well as new routes to Peckham and Elephant and Castle will be sought in Phase 4 in co-operation with TfL and with developer funding. Delete new Church Road as an access street.	We should accept this change as a point of clarity.
E	57 and 111	Figures 15 and A6.2		
E	70	7.2.1	The first phase of development, Phase 1a, started on site in April 2009, starts on-site shortly.	

C5	73	7.4.2	Fourth sentence: Delete £1.8 billion and £299m; Insert £1.2 billion and £169m.	
E	73	7.4.3	We are in discussions with the Homes and Communities Agency (HCA) (formerly Housing Corporation and English Partnerships) about the funding for the delivery of new replacement affordable rented and intermediate accommodation in phase 1.	
E	73	7.4.3	In addition, we have submitted a bid to the secured £2m from the GLA under the Priority Parks scheme for £2m to support improvements to Burgess Park. We have a commitment of £4m NDC match funding.	
E	74	Table 1 – Aylesbury Resource Centre	Add "Southwark Council" in column 3 and "Capital programme" in column 4.	
C9	78	Table 3 – PL2	Development should conform with the design guidance in Appendix 6.	
E	78	Table 4 – TP3	Parking provision should not exceed 0.4 spaces per home averaged over the action area core as a whole.	
E	86	A2.1.1	PPS1: Delivering Sustainable Development	
E	86	A2.1.6	On issues in areas in which the AAP has no policies, for example on the use of metropolitan open land and the need to incorporate green roofs and sustainable urban drainage systems, policies which are in the London Plan and Southwark Plan on these issues will apply.	
E	88	Appendix 2	See revised appendix 2 (Table of Changes Appendix B).	
E	92	A3.1.2	All of the background work described in Part 1 of this document has been taken into account in preparing the AAP. Together with the extensive consultation a series of objectives have been developed. These are outlined in the following section appendix	

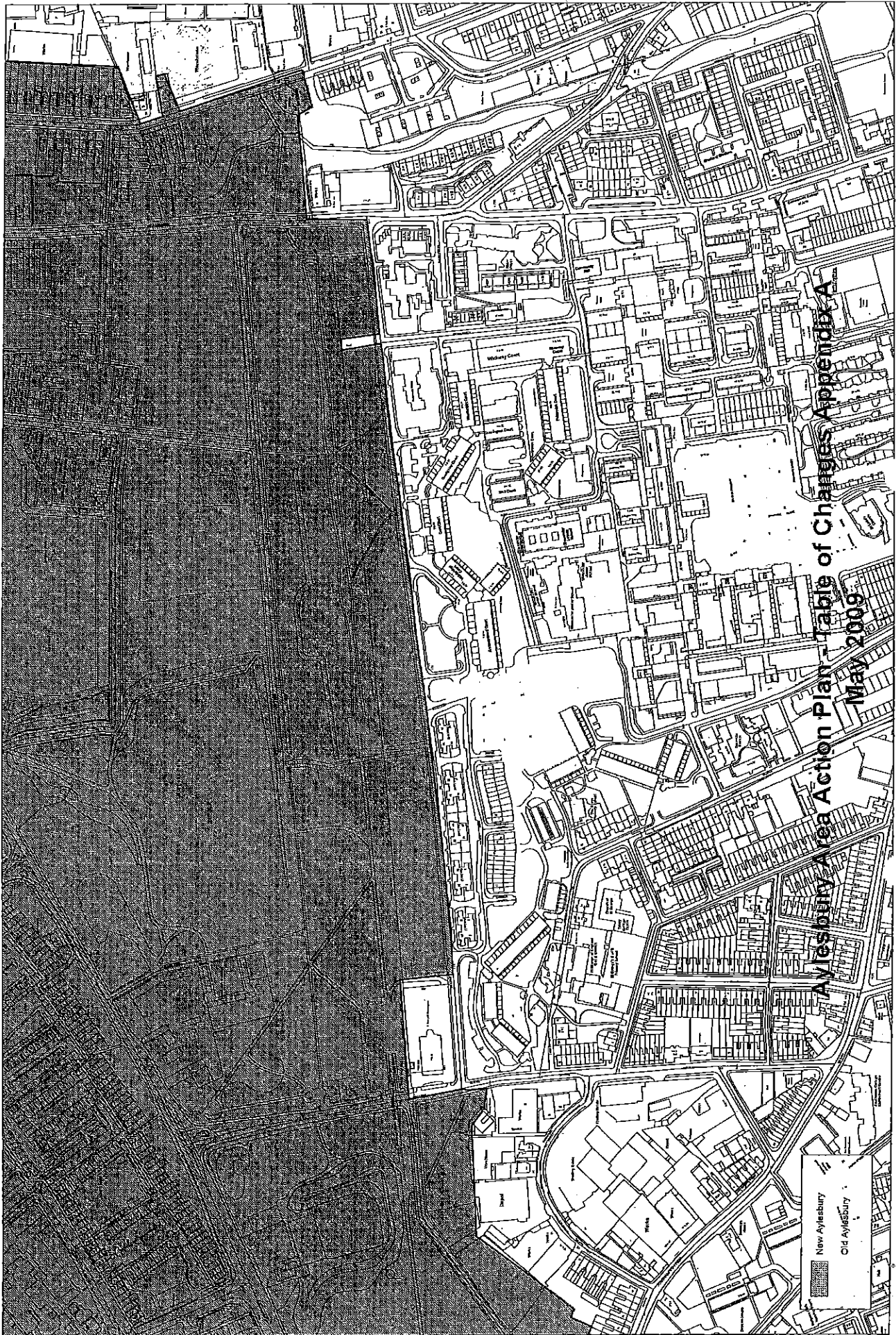
			4 as place-making, delivery and sustainable development objectives.																																											
E	97	A4.1.4	The appraisal checks the preferred options for developing the AAP area against the set of sustainable development objectives set out above below.																																											
E	99	Appendix 5	See amended appendix 5 (Table of Changes appendix C).																																											
E	110	A6.5.2	Design streets so that pedestrians and cyclists feel safe.																																											
E	134	A6.6.11	Section A6.5.4																																											
E	142	A6.6.30	The location of balconies must however be balanced with the need to provide daylight to lower levels flats and to the street.																																											
C3	159	Table A7.1	<table><tr><th>Phase</th><th>Phase 1</th><th>Phase 2</th><th>Phase 3</th><th>Phase 4</th><th>Total</th></tr><tr><td>Site reference</td><td>1a, 1b, 1ci, 1cii, 7, 10</td><td>4a, 4b, 5</td><td>6, 8, 9</td><td>2a, 2b, 3a, 3b, 11, 12, 13, 14</td><td></td></tr><tr><td>No. private units</td><td>722 582</td><td>322</td><td>224</td><td>846 986</td><td>2,114</td></tr><tr><td>No. social for rent units</td><td>522 592</td><td>241</td><td>169</td><td>635 565</td><td>1,568</td></tr><tr><td>No. of intermediate units</td><td>175 245</td><td>81</td><td>57</td><td>214 144</td><td>527</td></tr><tr><td>Total units</td><td>1,419 34%</td><td>645 15%</td><td>450 11%</td><td>1,695 40%</td><td>4,209 100%</td></tr><tr><td>Redevelopment Phase</td><td>2011-2016</td><td>2013-2016</td><td>2017-2020</td><td>2020-2027</td><td></td></tr></table>	Phase	Phase 1	Phase 2	Phase 3	Phase 4	Total	Site reference	1a, 1b, 1ci, 1cii, 7, 10	4a, 4b, 5	6, 8, 9	2a, 2b, 3a, 3b, 11, 12, 13, 14		No. private units	722 582	322	224	846 986	2,114	No. social for rent units	522 592	241	169	635 565	1,568	No. of intermediate units	175 245	81	57	214 144	527	Total units	1,419 34%	645 15%	450 11%	1,695 40%	4,209 100%	Redevelopment Phase	2011-2016	2013-2016	2017-2020	2020-2027		
Phase	Phase 1	Phase 2	Phase 3	Phase 4	Total																																									
Site reference	1a, 1b, 1ci, 1cii, 7, 10	4a, 4b, 5	6, 8, 9	2a, 2b, 3a, 3b, 11, 12, 13, 14																																										
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Redevelopment Phase	2011-2016	2013-2016	2017-2020	2020-2027																																										

C6	161	A7.1.24	The model calculates the full lifetime cost of the capital programme at around £1.8 1.2 billion and has identified a total funding shortfall of around £299m £169m (see table 7A.2 for details). This does not take into account any social housing grant which might be available.																							
C7	162	Table A7.2	<table><tr><th>Public sector funding requirement</th><th>Total funding shortfall £m</th></tr><tr><td>Land value deficit</td><td>76.185 62.98</td></tr><tr><td>Infrastructure costs (shortfall after developer contributions)</td><td>20.737 3.44</td></tr><tr><td>Leasehold acquisitions</td><td>130.42265.73</td></tr><tr><td>CPO enquiry costs</td><td>1.500 1.50</td></tr><tr><td>Re-housing tenants, estate management and community safety</td><td>21.853 15.39</td></tr><tr><td>Demolition</td><td>39.075 11.28</td></tr><tr><td>Land disposal and programme management</td><td>9.893 9.00</td></tr><tr><td>Total</td><td>299.665169.3</td></tr><tr><td>Funding Income</td><td>86.69</td></tr><tr><td>Funding Gap</td><td>82.63</td></tr></table> <p>Table A7.2: Total funding shortfall Public Sector Funding Requirement</p> <p>The council has submitted a bid to secure £2m from the GLA under the Priority Parks scheme for £2m to support improvements to Burgess Park. We have a commitment of £4m NDC match funding.</p>	Public sector funding requirement	Total funding shortfall £m	Land value deficit	76.185 62.98	Infrastructure costs (shortfall after developer contributions)	20.737 3.44	Leasehold acquisitions	130.42265.73	CPO enquiry costs	1.500 1.50	Re-housing tenants, estate management and community safety	21.853 15.39	Demolition	39.075 11.28	Land disposal and programme management	9.893 9.00	Total	299.665169.3	Funding Income	86.69	Funding Gap	82.63	
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E	162	7.1.31																								

E	166	A.8.1.1.1	<p>The following plans show <u>indicative public transport accessibility levels</u> across the Aylesbury AAP area both as they are now (Figure A8.1) and as they might be following the redevelopment of the estate (Figure A.1a). The increases in PTALs shown in Figure A8.1a are due to the fact that following redevelopment, <u>blocks in the action area core will be smaller and routes to bus stops will be more direct.</u></p>	
E	166	A.8.1.2	<p>It should be noted, however, that the plan showing the proposed PTAL is indicative only. Improvements to bus services will bring further improvements to PTALs. PTALs in the action area core taking into account both the masterplan layout and bus service improvements are shown in Figure A8.2. (Nb. The plan is based on the improvement of service frequencies for existing transport routes through the area and does not consider the introduction of new routes or the modification of existing routes.) This plan demonstrates that improvements to bus services will result in higher levels of public transport accessibility. This accessibility will be further increased with the introduction of new routes as proposed within the AAP.</p>	
E	167	<p>New figure (The new figure can be seen in the Transport and Movement Strategy Figure 3).</p>	<p>Insert new figure as follows: <u>A8.1a Indicative proposed public transport accessibility, taking into account the masterplan layout</u></p>	

E	167	Figure A8.2	Figure A8.2: Indicative proposed public transport accessibility, taking into account the masterplan layout and bus service improvements	
E	170	Glossary	Annual Monitoring Report This is produced every year as part of the local development framework. It sets out how well our planning policies are performing based on a range of different indicators.	
E	171	Glossary	Community Infrastructure Levy The Community Infrastructure Levy (CIL) is a government proposal which will enable local authorities to make a charge for most types of new development in their area. CIL charges will be calculated using a formula and will be based on the size of a development. Funds raised by the CIL can be spent on infrastructure, such as public transport improvements, schools, parks etc. needed to support the development of the area	
E	174	Glossary	Public Transport Accessibility Zone (PTAZ)-Areas within urban or suburban zones, which have better public transport, significant potential for new development and investment, and a mixed-use character including significant retail development (Southwark Plan 2007, Appendix 18)	
E	174	Glossary	Planning brief Planning briefs are prepared by a local authority as a guide for developers interested in buying and developing a site. They may contain more detailed information about the number of homes which can fit on a site, the design of homes, levels of car parking etc. They are not used to help assess planning applications, unless they are adopted as supplementary planning documents.	

E	175	Glossary	<p><u>S106 Planning Obligation</u> These are also called <u>planning gain</u> or <u>section 106 contributions</u>. Applicants for major developments are usually required to provide payments to offset the impact of their scheme and make it acceptable. This may include improved transport, environment, employment, housing or recreation facilities. They could also be built as part of a development rather than provided as a payment.</p>	
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Aylesbury Area Action Plan Table of Changes Appendix B

Appendix 2: Planning policy

- A2.1.1 The AAP is consistent with national planning policies set out in Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs). National policies such as PPS1: Delivering Sustainable development, PPS3: Housing are considered particularly relevant for the AAP and it is consistent with these and other government policies.
- A2.1.2 The AAP is in general conformity with the London Plan (Table A2.1) and will contribute towards achieving the Mayor's six objectives for the future of London (GLA, 2008 pg 6-11). It particularly contributes to achieving the London Plan's housing policies by creating a high quality neighbourhood that will include a mix of tenures, housing types and size. The AAP has had regard to all the relevant London Plan policies including Policy 3D.11 Open Space Provision in DPDs, Policy 3C.19 Local Transport and Public Realm Enhancements, Policy 3C.20 Improving conditions for buses and Policy 3C.21: Improving conditions for walking.
- A2.1.3 The Aylesbury AAP is one of a number of LDF documents Southwark is preparing. Other documents include the Core Strategy and AAPs for Peckham and Nunhead, and Canada Water. The Core Strategy will be used for deciding what sort of development should take place within Southwark, when, where and how it will happen. We have consulted on the issues and options and the preferred option. ~~We will be consulting on the preferred option between May and July 09.~~ This AAP is being prepared before the Core Strategy because we need a planning framework to facilitate redevelopment of the estate. This will also allow us to maintain the momentum from starting work in the south-west corner of the estate (phase 1a). The AAP accords with the vision and objectives of the Core Strategy. ~~The Core Strategy Issues and Options Publications/submission sets out two broad options for the future of the borough. The first is focused on development in growth areas and the second is housing-led growth throughout the borough. Both of these options support the regeneration of the Aylesbury Estate focuses development in growth areas, which includes the Aylesbury Action Area and our intention to produce an Area Action Plan for Aylesbury is clearly set out in the report.~~
- A2.1.4 The preparation of Southwark's LDF over the next few years will take into account the transition between the previous system of unitary development plans and the new system. Southwark adopted a new unitary development plan in July 2007 - The Southwark Plan - which has been "saved" until 2010. In 2010, we may apply to extend some of the policies in the Southwark Plan for a further period.
- A2.1.5 The AAP is broadly consistent with policies in the Southwark Plan and the Core Strategy Publications/submission (Table A2.1). Because the AAP is specific to the estate and surrounding area, it provides an area specific interpretation of policies in the Southwark Plan and the Core Strategy Publications/submission. Where there is a difference between policies in the Southwark Plan and the AAP, because the AAP has been adopted more recently, it takes precedence over the Southwark Plan.

- A2.1.6 The AAP only contains policies which are specific to the AAP area and does not repeat policies in existing documents such as the London Plan and the Southwark Plan. On issues in areas in which the AAP has no policies, for example on the use of metropolitan open land and the need to incorporate green roofs and sustainable urban drainage systems, policies which are in the London Plan and, Southwark Plan and the Core Strategy on these issues will apply.
- A2.1.7 The AAP also takes into account Southwark 2016, our Sustainable Community Strategy, other council strategies including the Housing Strategy and plans for nearby areas including the Elephant and Castle and Peckham.
- A2.1.8 We also have a number of supplementary planning documents (SPDs) which provide further guidance on policies in the Southwark Plan and this AAP. These SPDs include Residential Design, Sustainable Design and Construction and s106 Planning Obligations. Because the AAP is area specific and comprises a development plan, where there is a conflict between the guidance contained in SPDs and AAP policy, for example on minimum floor areas, the AAP will take precedence.
- A2.1.9 Table A2.1 below sets out the relationship between policies in the AAP, the London Plan, the Southwark Plan, the Core Strategy Publications/submission and Southwark's SPDs.

			Southwark Core Strategy Publications/submit site	Southwark Supplementary Planning Documents
MP1: The Masterplan	2A.7 Areas for Regeneration	SP1-SP20: All the strategic policies apply Section 7: Local Policy Areas. <u>The AAP introduces a vision for Aylesbury, there was no vision in the Southwark Plan.</u>	<u>Section 4 sets out the vision for Aylesbury.</u>	
MP2: Proposals sites		SP20: Development sites uses, Southwark Plan Proposals Map. <u>The AAP adds further proposals sites to those in the Southwark Plan</u>	<u>The Core Strategy Publications /submission proposals map includes the sites allocated in the AAP.</u>	
BH1: Number of homes	3A.1 Increasing London's supply of housing, 3A.2 Borough Housing Targets, 3A.3 Maximising the potential of sites	SP14: Sustainable buildings, SP17: Housing.	<u>Strategic Policy 5: Providing new homes.</u>	
BH2: Density and distribution of homes	Policy 3A.3: Maximising the potential of sites	SP14: Sustainable buildings, Policy 4.1: Density of residential development. <u>The core action area is designated an area in which densities in excess of 700 hr/ha may be permitted. This is consistent with the Core Strategy.</u>	<u>Strategic Policy 5: Providing new homes.</u>	Sustainability Assessment SPD, Residential Design Standards SPD
BH3: Tenure mix	3A.4 Efficient use of stock	SP17: Housing, Policy 4.4: Affordable housing. <u>The AAP amends policy 4.4 to require more affordable housing for the AAP area and to require more social rented housing within the affordable housing.</u>	<u>Strategic Policy 6: Homes for people on different incomes. The tenure split for the AAP area is set out in the Core Strategy.</u>	Sustainability Assessment SPD, Affordable Housing SPD

			Southwark Core Strategy Policy 4.3: Family housing SPD	Southwark Supplementary Planning Documents
BH4: Size of homes	3A.5 Housing stock, 3A.6 Quality of new housing provision	SP17: Housing, Policy 4.3: Mix of dwellings. <u>The AAP amends policy 4.3 to require more family housing and fewer studios.</u>	<u>Strategic Policy 7: Family housing.</u>	Sustainability Assessment SPD
BH5: Type of homes	3A.17 Addressing the needs of London's diverse population, 3A.9 Affordable Housing targets, 3A.15 Loss of housing and affordable housing, 3A.7 Large Residential Sites	SP17: Housing Policy 4.3: Mix of dwellings. <u>The AAP amends policy 4.3 to set out the different types of housing.</u>	<u>Strategic Policy 7: Family housing</u>	Sustainability Assessment SPD, Residential Design Standards SPD
BH6: Sustainable design and construction	4A.3 Sustainable design and construction	SP10: Development Impacts, SP12: Pollution Policy 3.4: Energy efficiency. Policy 3.5: Renewable energy. <u>The AAP amends policy 3.5 to require 20% renewable energy for the AAP area.</u>	<u>Strategic Policy 13: High environmental standards</u>	Sustainability Assessment SPD, Draft Sustainable Design and Construction SPD
BH7: Energy	4A.4 Energy assessment, 4A.6 Decentralised Energy: Heating, Cooling and Power, 4A.7 Renewable Energy	SP10: Development impacts, SP12: Pollution, Policy 3.4: Energy efficiency, Policy 3.5: Renewable Energy. <u>The AAP amends policy 3.4 to require Code for Sustainable Homes level 4.</u>	<u>Strategic Policy 13: High environmental standards</u>	Sustainability Assessment SPD, Draft Sustainable Design and Construction SPD
PL1: Street layout	Policy 3C.18 Allocation of street space, 3C.19 Local transport and public realm enhancements	SP13: Design and heritage, Policy 3.13: Urban design. <u>The AAP provides more detail on design principles and layout.</u>	<u>Strategic Policy 12: Design and conservation</u>	Sustainability Assessment SPD, Design and Access Statements SPD
PL2: Building block layout and types	3B.2 Mixed Use development	SP13: Design and heritage, Policy 3.12: Quality in design, Policy 3.13: Urban	<u>Strategic Policy 12: Design and conservation</u>	Sustainability Assessment SPD, Design and Access Statements SPD, Residential

			Southwark Core Strategy Publications/submit	Southwark Supplementary Planning Documents
		design, Policy 3.14: Designing out crime. <u>The AAP provides more detail on design principles and layout.</u>		Design Standards SPD
PL3: Building heights	4B.9 Tall buildings - location, 4B.10 Large-scale buildings - design and impact, 4B.12 Heritage conservation	SP13: Design and Heritage, Policy 3.15: Conservation and historic environment, Policy 3.18: Setting of listed buildings, conservation areas and world heritage sites, Policy 3.20: Tall buildings, Policy 3.22: Important local views. <u>The AAP amends policy 3.20 by allowing tall buildings outside the Central Activities Zone.</u>	<u>Strategic Policy 12: Design and conservation.</u>	Sustainability Assessment SPD, Design and Access Statements SPD
PL4: Open space	3D.8 Realising the value of open space and green infrastructure, 3D.11 Open space provision in DPDs, 3D.12 Open space strategies, 3D.14 Biodiversity and nature conservation, 3D.13 Children and young people's play and informal recreation strategies	SP15: Open space and biodiversity, Policy 3.25 Metropolitan open land, Policy 3.26 Borough open land, Policy 3.27 Other open spaces, Policy 3.28 Biodiversity	<u>Strategic Policy 11: Open spaces and wildlife</u>	Sustainability Assessment SPD
PL5: Burgess Park	3D.8 Realising the value of open space and green infrastructure, 3S.10 Metropolitan Open Land	SP15: Open space and biodiversity, Policy 3.25: Metropolitan Open Land	<u>Strategic Policy 11: Open spaces and wildlife</u>	
TP1: Designing streets for all road users/Designing streets as attractive	Policy 3C.18 Allocation of street space, 4B.3 Enhancing the quality of the public realm	SP18: Sustainable transport, Policy 5.3: Walking and cycling. <u>The AAP provides further detail to the Southwark Plan policies.</u>	<u>Strategic Policy 2: Sustainable transport</u>	Sustainability Assessment SPD, Sustainable Transport SPD

			Southwark Core Strategy Publications/Submission	Southwark Supplementary Planning Documents
public spaces				
TP2: Public transport	3C.1 Integrating transport and development, 3C.3 Sustainable transport in London, 3C.9 Increasing the capacity, quality and integration of public transport to meet London's needs	SP18: Sustainable transport, Policy 5.4: Public transport improvements. <u>The AAP amends the proposals map through the route for high capacity public transport.</u>	<u>Strategic Policy 2: Sustainable Transport. The route for high capacity public transport is shown on the proposals map.</u>	Sustainability Assessment SPD, Sustainable Transport SPD
TP3: Parking standards	3C.19 Parking Strategy	SP18: Sustainable transport, SP19: Minimising the need to travel, Policy 5.6: Car parking, Policy 5.7 Parking standards for disabled people or the mobility impaired. <u>The AAP amends appendix 15 of the Southwark Plan by requiring different parking standards.</u>	<u>Strategic Policy 2: Sustainable transport.</u>	Sustainability Assessment SPD, Sustainable Transport SPD
COM1: Location of social and community facilities	3A.18 Protection and enhancement of social infrastructure and community facilities	SP6: Accessible services, SP9: Meeting community needs, SP10: Development impacts, Policy 2.2: Provision of new community facilities. <u>The AAP provides more detail than in the Southwark Plan.</u>	<u>Strategic Policy 4: Places to learn and enjoy</u>	
COM2: Opportunities for new business	3B.1 Developing London's economy, 3B.5 Supporting innovation, 3B.5 Creative Industries	SP4: Removing barriers to employment, SP5: Regenerating and creating employment	<u>Strategic Policy 10: Jobs and businesses</u>	Sustainability Assessment SPD
COM3: Health and social care	3A.20 Health objectives	SP6: Accessible services, SP9: Meeting community needs, Policy 2.2:	<u>Strategic Policy 4: Places to learn and enjoy</u>	Sustainability Assessment SPD

			Southwark Core Strategy Sub-Regions/submissions	Southwark Supplementary Planning Documents
		Provision of new community facilities. <u>The AAP provides more detail to the Southwark Plan policies.</u>		
COM4: Education and learning	3A.24 Education facilities	SP9: Meeting community needs, Policy 2.3: Enhancement of educational establishments. <u>The AAP provides more detail to the Southwark Plan policies.</u>	<u>Strategic Policy 4: Places to learn and enjoy</u>	Sustainability Assessment SPD
COM5: Community space and arts and culture	3D.5 Development and promotion of arts and culture	SP7: Arts, culture and tourism, SP9: Meeting community needs, SP10: Development impacts, Policy 2.2: Provision of new community facilities	<u>Strategic Policy 4: Places to learn and enjoy</u>	Sustainability Assessment SPD
COM6: Shopping/Retail	3D.3 Maintaining and improving retail facilities,	Policy 1.8: Location of developments for retail and other town centre uses. <u>The AAP provides further detail to policy 1.8.</u>	<u>Strategic Policy 3: Shopping, leisure and entertainment</u>	Sustainability Assessment SPD
D1: Phasing	Policy 6A.8 Phasing of development and transport provision	SP20: Development sites uses		
D2: Infrastructure funding	Policy 6A.4 Priorities in Planning obligations, Policy 6A.5 Planning obligations	Policy 2.5: Planning Obligations	<u>Strategic Policy 14: Implementation and delivery</u>	S016 Planning obligations SPD

Aylesbury Area Action Plan Table of Changes Appendix C

Table A5.1: Schedule of proposals sites

Proposal	Development number and block address	Proposed uses (all figures are approximate)	Sizes of homes (all figures are approximate)							Types of homes (all figures are approximate)				Anticipated phasing
			Studio	1 bed	2 bed	3 bed	4 bed	5 bed	Total	Flats	Maisonettes	Houses		
AAAP P1		+1,417 homes (C3 Use Class) +1,050sqm retail uses (A Use Classes) +1,980sqm community space (D1 Use Class) +2,500sqm health and social care spaces (D1 Use Class) +400sqm of pre-school facilities	36	465	608	225	61	22	1,417	67%	23%	10%	Deleted: + Deleted: 9 Deleted: 37 Deleted: 466 Deleted: 9 Deleted: 308 Deleted: -	
	Indicative development block sub-totals													
	1a: (1-12 Red Lion Close; 1-41 Brademant; and the Aylesbury Day Centre)	+260 homes (C3 Use Class) +400sqm retail uses (A Use Class) +1,480sqm community space (D1 Use Class) (Aylesbury Resource centre)	-	99	135	19	7	-	260	100%	0%	0%	Deleted: - Deleted: 9 Deleted: 26	
	1b: (1-35 Charridge; 42-256 Brademant; 69-76 Charridge; 77-105 Charridge; Ellison House; 1-28 Arklow House)	+408 homes (C3 Use Class) +250sqm retail uses (A Use Classes)	13	132	170	69	18	6	409	67%	27%	6%	Deleted: 9 Deleted: 93 Deleted: 9 Deleted: 1 Deleted: 107 Deleted: 1 Deleted: 6 Deleted: 62 Deleted: 6 Deleted: 3 Deleted: 20 Deleted: 3	
	1c: (36-68 Charridge; 106-119 Charridge; 120-149 Charridge; and 1-172 Chiltern)	+472 homes (C3 Use Class)	15	153	196	80	20	8	472	67%	27%	6%		
	7: (1-27 Wolverton; and 28-59 Wolverton)	+165 homes (C3 Use Class)	4	39	61	41	13	7	165	49%	19%	32%		
	10: (Youth Club Amersham; and 300-313 Missenden)	+112 homes (C3 Use Class) +2,500 health facilities (D1 Use Class) +500 community space (D1 Use Class)	4	42	46	16	3	1	112	81%	19%	0%		

AAAP P2	645 homes (C3 Use Class)	18	172	253	139	43	20	645	55%	24%	21%	Phase (2013- 2018)	Deleted: 202
	Indicative development block sub-totals												
	4a (391-471 Wendover; 1-30 Foxcote; 140 Albany Road; 24-36 Ravenstone; and 67-81 Ravenstone)	7	68	92	34	9	2	212	67%	33%	0%		Deleted: 45
	4b (241-390 Wendover; 1-30 Winslow; 1-25 Padbury; 1-23 Ravenstone; and 37-56 Ravenstone)	4	38	69	61	21	13	203	36%	13%	49%		Deleted: 7
	5 (37-62 Wendover; 117-156 Wendover; 201-240 Wendover; 126-151 Wolverton; 152-175 Wolverton; and 176-192 Wolverton)	7	66	92	44	13	5	227	50%	27%	13%		Deleted: 95
													Deleted: 7
													Deleted: 6
													Deleted: 62
													Deleted: 6
AAAP P3	449 homes (C3 Use Class) 300sqm retail/café space (A Use Class) 2,500sqm employment space (B1a Use Class) (Unspecified location) 400sqm of pre-school facilities (D1 Use Class)	9	82	160	123	44	26	449	38%	19%	43%	Phase (2017- 2020)	Deleted: 50
													Deleted: 9
													Deleted: 200
													Deleted: 50
	Indicative development block sub-totals												
	6 (1-36 Wendover; 73-116 Wendover; 157-200 Wendover; 80-84 Wolverton; 1-14 Brookley House; 105-125 Wolverton; and 85-104 Wolverton)	3	33	58	48	16	10	168	41%	13%	46%		Deleted: 169
													Deleted: 74
													Deleted: 9
	8 (218 A-F East Street)	2	16	25	13	4	2	62	53%	29%	18%		Deleted: 9

	9 (1-215 Taplow; 184 A-F East Street; 1-20 Northchurch; 21-40 Northchurch; 41-56 Northchurch; Aylesbury Day Nursery; 57-76 Northchurch; Tykes Corner; and Aylesbury Access Centre)	219 homes (C3 Use Class) 300sqm retail/café space (A Use Class) 2,500sqm employment space (B1a Use Class)	3	33	77	68	24	14	219	31%	21%	48%	Deleted: 106
ARAP P4		1,692 homes (C3 Use Class) 400sqm retail/café space (A Use Class) 1,000sqm energy centre (Unspecified location) 300sqm of pre-school facilities (D1 Use Class)	43	416	624	408	130	68	1,692	52%	18%	18%	Phase Deleted: 696 (2020-2027) Deleted: 2 Deleted: 7 Deleted: 8 Deleted: 607
	Indicative development block sub-totals												
	2a (1-35 Gayhurst; 62-79 Gayhurst; 145-182 Gayhurst; and 80-120 Gayhurst)	196 homes (C3 Use Class)	6	54	75	42	13	6	196	57%	21%	22%	Deleted: 5 Deleted: 61
	2b (36-61 Gayhurst; 1-20 Hambledon; 1-18 Gaiskell House; 121-144 Gayhurst; 1-24 Calverton; and 19-31 Gaiskell)	312 homes (C3 Use Class)	10	102	124	56	14	6	312	67%	20%	13%	Deleted: 76
	3a (32-61 Latimer; 114-141 Latimer; 7-35 Emberton; and 195-202A Albany Road)	298 homes (C3 Use Class)	9	88	115	61	17	8	298	61%	20%	20%	Deleted: 9 Deleted: 86 Deleted: 9 Deleted: 2 Deleted: 104 Deleted: 2 Deleted: 3 Deleted: 68 Deleted: 3
	3b (1-31 Latimer; 86-113 Latimer; 1-6 Emberton; 1-31 Danesfield; 25-31 Calverton; 32-42 Gaiskell House; 43-66 Gaiskell House; and 62-85 Latimer)	321 homes (C3 Use Class)	9	96	122	71	22	11	321	55%	20%	25%	
	11 (Amersham Community Centre; 284-299 Missenden; 77-105 Michael Faraday House; and 57-76 Michael Faraday House)	174 homes (C3 Use Class) 400sqm retail/café space (A Use Class) 1,000sqm energy centre	4	40	62	45	15	8	174	47%	16%	37%	

12 (59-75 Missenden; 256-283 Missenden; 166-235 Missenden; 1-36 Michael Faraday House; 37-56 Michael Faraday House)	172 homes (C3 Use Class)	2	19	56	60	22	13	172	23%	15%	62%	Deleted: 3
13 (1-30 Soane House; 31-35 Soane House; 1-12 Lees House; 77-105 Darvell House; 51-67 odd Inville Road; 1-8 Chadwell House; and 47/47a Villa Street)	101 homes (C3 Use Class)	4	4	28	41	16	10	100	9%	6%	85%	Deleted: 95
14 (44-58 Missenden; 78-165 Missenden; and 1-43 Missenden)	119 homes (C3 Use Class)	2	23	45	32	11	6	119	40%	26%	34%	Deleted: 3
												Deleted: 0
												Deleted: 68
												Deleted: 1
												Deleted: 20
												Deleted: 49
												Deleted: 20

THE EXAMINATION OF THE AYLESBURY AREA ACTION PLAN DEVELOPMENT PLAN DOCUMENT

FEEDBACK FROM HEARING PARTICIPANTS

At the close of the Hearing sessions there was an opportunity for participants to make informal comments on how the process had seemed to them and I undertook to summarise these views at the conclusion of the examination.

Observation	Inspector's Comment
Ms Seymour for the Council's team explained that it was the first AAP that they had had to tackle and that they had found it considerably easier to deal with than the previous UDP system	
Mr Lee thought that the overall time allowed for the sessions had been a bit short considering the significance of the development that was under consideration. Whilst he appreciated the need for the Inspector to narrow the range of issues to be discussed at the hearings, it was a rare opportunity for third parties to be heard. This was one reason why the discussion had gone off at a tangent from time to time.	<i>On reflection I agree that it would have been better to spread the hearing sessions out over 3 days, reducing the individual settings to a more manageable length. However, I do not consider that any party was disadvantaged by the timetable.</i>
Mr Lee also commented on the good relationship he and other representors had had with the Council's planners and noted that the Policy Team were always helpful. There had been occasional difficulty in accessing the examination library. It was accepted that this had been due to an enforced move of premises but participants should be able to rely on accessing the library	<i>I have no doubt that the Council will give the location of the library due consideration in future examinations.</i>
Mr Lee wondered whether it would be possible to arrange an introduction or training sessions for representors and suggested that this might help to reduce sitting times. Mr Corbyn agreed that some people would be put off by the idea of appearing before an Inspector	<i>The sessions were arranged on an informal basis as possible, consistent with the need to meet specified timetables. The Inspectorate's published guidance on participation is a helpful starting point for all participants.</i>

Mr Flynn thought that it had been difficult to keep track of the progress of the consultations and had been surprised that more people had not attended the sessions. He suggested that an evening session might have been helpful	<i>No request for evening sessions was made at the pre-hearing meeting and, given that the hearing period was comparatively short, such sessions would have been difficult to arrange. They should not, however, be ruled out for subsequent DPD hearings.</i>
Ms Fudge expressed some concern about the way in which the proposals had been publicised at the exhibitions and thought it had been hard for residents to hear viewpoints other than those of the Council	<i>All such exercises involve an element of compromise but in this case I was satisfied that the Council had achieved a good balance.</i>
Ms Dada considered that the Council's Delivery Team found the process helpful as it forced them to think about implementation. The Council recognised that it will need to manage a cross-departmental approach to implementation	
Mr Smith for the Council was of the view that it was useful that the AAP effectively merged a business planning process with a land use plan. He considered that the AAP would be vital to the PFI process	

B J Juniper

INSPECTOR