

Core strategy

CDAI73 Density in the areas around Rotherhithe and East Dulwich

October 2010



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1 INTRODUCTION

1.1 Background

1.1.1 This purpose of this paper is to clarify the council's position on the designation of suburban densities in the area around Rotherhithe (the north suburban density zone) and East Dulwich/Peckham Rye (the middle suburban density zone). In particular it assesses the character of these areas against the definition of the suburban setting, outlined in paragraph 3.23 of the London Plan. It focuses on these areas because Southwark is proposing to change their density zoning from urban (in the Southwark Plan) to suburban in the core strategy.

1.1.2 This paper supports information previously submitted, namely:

- Housing background paper 3 (CDB4): Section 3 of the housing background paper 3 CDB4 describes the council's strategy for density.
- Statement of common ground, 21 September 2010 (CDAI72): This statement of common ground confirms the approach of the council and the Mayor of London to the designation of density zones and the evidence used to justify this approach.
- Southwark Density Survey 2005 (CDH18): Paragraphs 3.8-3.13 provide analysis of the character of Rotherhithe. Paragraphs 3.14-3.18 provide analysis of the character of the East Dulwich suburban density zone. Section 4 compares the four sample areas. Conclusions regarding the setting of Rotherhithe are set out in paragraph 5.3 and East Dulwich in paragraph 5.4.
- Borough-wide Tall Building Research Paper (CDD1): Section 3 provides urban design analysis, which includes analysis of the scale of development (figure 7) and building heights (figure 8).
- Canada Water Urban Design Background Paper (CDCW20): Section 4 provides a character appraisal of the core area and its immediate surroundings. This includes an appraisal of urban grain and land uses (p. 16) and building heights and massing (pp. 17-19).
- Responses to representations: The council's responses to representations are relevant. In particular, the council would draw the inspector's attention to its responses to Core Strategy representation 398 and Canada Water AAP representation 90. These describe the council's reasoning behind the suburban designation of the Quebec Industrial Estate in Rotherhithe.

1.2 London Plan density policy

1.2.1 London Plan policy 3A.3 sets out policy on density. The density matrix (Table 3A.2) sets a strategic framework for appropriate densities at different locations. It aims to ensure that density reflects character and accessibility. Paragraph 3.23 describes three urban character settings: central, urban and suburban.

1.2.2 The criteria for defining the suburban setting are described as follows:

- areas with predominantly lower density development such as detached and semi-detached houses
- predominantly residential
- small building footprints

- typically buildings of two to three storeys
- 1.2.3 In contrast, urban and central areas will incorporate a greater mix of uses, buildings with medium to larger footprints and areas within 800m of a town centre.
- 1.2.4 In 2009, the Mayor published an Interim Housing SPG on Housing. Paragraphs 3.2.1-3.2.4 provide further information on defining character setting.
- 1.3 Character area assessments
- 1.3.1 This paper summarises the key elements of the character of areas around Rotherhithe and East Dulwich/Peckham Rye, assessing their character against the criteria outlined above. In addition, a further criterion has been incorporated which relates to distance from the town centre. While this criterion is not specified in the definition of the suburban setting, it has been included because it is referred to in the definitions of urban and central settings and may therefore help distinguish the suburban from the urban setting.
- 1.3.2 The two suburban areas which are the subject of this paper are relatively large and contain variations in their character. For this reason and in the interest of practicality, each of these has been broken down into a number of smaller character areas. Even these smaller areas, however, are not uniform in character and each has its own variations. The study however seeks to identify common elements of character and distinguish prevailing characteristics.
- 1.3.3 Paragraph 3.22 of the Mayor's Interim SPG acknowledges that there is an element of subjectivity involved in defining the setting of character areas and that knowledge of the locality is required. This is emphasised in the Mayor's position as set out on p. 4 of CDA172 which states that the definitions of setting outlined in the London Plan, including the associated distances from town centres in the London Plan hierarchy, have to be interpreted at the local level in light of local circumstances. It goes on to acknowledge that the council's interpretation has, in some areas, resulted in boundaries to the proposed density zones that do not match those in the London Plan, such as that around Canada Water District Centre, which is more tightly defined. Both the council and the Mayor consider these differences to be justified.
- 1.4 Consultation
- 1.4.1 Inevitably, because of the variations within the character areas and the subjectivity acknowledged by the Mayor, there will be differences of opinion as to their settings. In this paper the council has sought to take a consistent approach which evaluates each character area against the London Plan criteria, in the light of a survey of these areas. In appendix 8 we have summarised the views of local residents and other stakeholders on the character area settings. These views have been submitted over the course of preparing the Southwark Plan 2007, the Core Strategy and the draft Dulwich SPD. In summary;

- At first deposit stage (November 2002) Rotherhithe and the area around east Dulwich and Peckham Rye were designated as urban. Approximately 37 representations received at this stage objected to this designation and stated that suburban densities would be more appropriate.
- At second deposit stage (June 2004), in the light of representations received, Rotherhithe and the area around East Dulwich and Peckham Rye were reclassified as suburban. Approximately 15 representations were received at this stage which supported the designation of suburban densities zoning in these areas.
- At this stage the GLA objected to the amendment of the boundaries of the suburban and urban density zones from the First Deposit Southwark Plan.
- At the Southwark Plan Modification consultation, following the receipt of the Inspector's Report (September 2006), approximately 44 representations were received at this stage which supported the designation of the suburban density zone. There were no representations which specifically objected to the suburban density zone.

1.5 Methodology

1.5.1 The assessments are based on local knowledge of the subject areas, as well as the use of geographic information systems (GIS). Plans have been prepared which show housing typologies, land uses, building heights, building footprints and distance from town centres. These are shown in appendices 1-7.

1.5.2 In addition, a sample of housing estates and blocks within each of the character areas has been studied in more detail. Information on density, along with aerial and street photographs is provided for each sample block. Densities have been calculated on the basis of dwellings per hectare rather than habitable rooms per hectare. Although the core strategy measures density on the basis of habitable rooms per hectare, the purpose of including density information in this report is not to provide specific policy but to help make comparisons between areas and give an overall impression of the intensity of development.

1.6 Implementation of Policy 3.11

1.6.1 The density zone policy will be one of the provisions of assessing new development. Other provisions include policies relating to design, character, appearance and Policy 3.11 which accords with national policy for the full and efficient use of land.

1.6.2 Policy 3.11 requires that all developments, among other criteria, maximise the efficient use of land, whilst also protecting the amenity of neighbouring occupiers, ensuring a satisfactory standard of accommodation and amenity, responding to the local context and design.

1.6.3 The guidance and policies set out within Area Action Plans, the Residential Design Standards SPD and the Sustainability Assessment standards will all be taken into account, alongside the density policy, when assessing development schemes.

1.6.4 In response to representations, it has been recommended to the Inspector that the text within Policy 5 of the Core Strategy DPD should be amended, to ensure that the policy is interpreted as a guideline, and other considerations will also need to be taken into account on the acceptability of a development. The recommended change is as follows:

Original text: “Density for both residential and mixed-use development will need to be within the following ranges”.

Amended text: “Residential density will be expected to comply with the following ranges, taking into account the quantity and impact of any non-residential uses.”

- 1.7 Secretary of State Letter of 22 February 2007
 - 1.7.1 The Secretary of State wrote to the council outlining that she disagrees with the Inspector in relation to the suburban north areas are predominantly suburban within the definition set out in paragraph 4.47 of the London Plan. The Secretary of State also disagreed that flexibility provided through policy 4.10 is sufficient to provide for appropriate densities in the Suburban North areas.
 - 1.7.2 The Secretary of State considered that unlike the Suburban South zone, the Suburban North zones are not predominantly detached and semi-detached housing. The housing is typically in terraces or flats, and the majority of developments are at least two storeys in height. Furthermore, the Secretary of State considered that accessibility is adequate in much of these areas to support denser development, and the lower density range (which overlaps with that of suburban) is appropriate for less accessible sites.
 - 1.7.3 The Secretary of State considered that a presumption in favour of lower densities in this area does not accord with national policy to maximise the efficient use of land, or the London Plan. It is also very likely to compromise the ability of the borough to meet its housing targets and meet housing need. A direction to modify the Southwark Plan was made.
 - 1.7.4 This paper addresses the points raised by the Secretary of State and sets out how the policy accords with the London Plan.
- 1.8 Conclusions
 - 1.8.1 This paper sets out a set of conclusions which justify the suburban density zoning for the Rotherhithe and East Dulwich/Peckham Rye areas, following an assessment of the character of these areas.
 - 1.8.2 The assessment has addressed both the London Plan and the Mayors Interim Housing SPG policy and guidance on character setting, and concluded that the prevailing character of these areas is consistent with the London Plan definition of a suburban setting.
 - 1.8.3 Conclusions: Rotherhithe
 - 1.8.3.1 Although there are some small pockets of non-residential use, for example in Rotherhithe village, residential housing is the predominant use across the Rotherhithe suburban zone.
 - 1.8.3.2 31% of the Rotherhithe suburban zone is protected open space. This is significantly higher than in surrounding areas such as Bermondsey and helps

create a character which is distinct from that of adjacent areas in the urban zone. In the latter areas, there is much less open space and the intensity of development is significantly greater (see figure 3).

- 1.8.3.3 Between them, the Russia Dock Woodland and Southwark park character areas make up 60% of the suburban area. In the main, residential blocks in these character areas comprise 2-3 storey terraced and semi-detached housing and small building footprints. Most homes have back and front gardens and car parking is largely provided off street. Not only is there a significant amount of public open space, but in addition, residential areas also feel spacious and are generously landscaped.
- 1.8.3.4 The area around Greenland and South Docks also forms 28% of the suburban area. While densities are slightly higher than in the Russia Dock Woodland character area, the well landscaped streets and docks provide a sense of openness which contributes towards the suburban character.
- 1.8.3.5 Densities are higher in the Riverside and Rotherhithe village character areas. However this is a relatively small part of the suburban zone (12%) which is limited to a thin ribbon of development along the Thames. Open spaces, such as Durrands Wharf and King Stairs help punctuate the area's built development, while the open outlook from the Thames path creates a character which is unique to the river. This is further protected through the Thames policy area designation.
- 1.8.3.6 Parts of the character areas are within 800m of the Canada Water town centre and Lower Road. However, due mainly to the fact that most of the residential areas on the peninsula were master-planned by the LDDC and did not emerge incrementally over time, there is a marked change between the character of the core area and suburban area. Public transport accessibility falls away rapidly moving east from the core area.
- 1.8.3.7 As the council noted above, the character of the Rotherhithe suburban zone is not uniform. There are blocks within the zone which meet one or more of the criteria which used to indicate an urban setting. However, this survey shows that the prevailing character of the area is consistent with the London Plan definition of a suburban setting.

1.8.4 Conclusions: East Dulwich and Peckham Rye

- 1.8.4.1 Residential housing is the predominant building use across the area. The East Dulwich and Peckham Rye character area forms 83% of the middle suburban zone and comprises a mixture of 2-3 storey terraced, semi-detached housing and small building footprints. Approximately 33% of the character area is comprised of open space and additionally, the residential gardens are generous in size. The streetscape throughout the character area also has a distinct suburban feel.
- 1.8.4.2 The Lordship Lane character area is more densely developed than the surrounding East Dulwich and Peckham Rye character area, although it is mainly comprised of 2-4 storey terrace and semi-detached residential dwellings. The street character of the area is still predominantly 2 storey frontages, with front gardens of varying sizes and partially tree-lined streets, presenting a generally suburban feel to the character area.

- 1.8.4.3 Lordship Lane has a mix of uses along its length, but the majority of surrounding development is residential. The character area has less open space within it, however it is still in close proximity to the open space in the East Dulwich and Peckham Rye character area. The majority of dwellings have attached gardens, albeit at a generally smaller size than those in the East Dulwich and Peckham Rye character area.
- 1.8.4.4 The suburban middle zone sits across three community council areas: Camberwell, Dulwich and Nunhead and Peckham Rye (refer to Appendix 7). A high proportion of the Borough's open space is located within these community council areas with a significant amount of that falling within the middle suburban density zone. The Nunhead and Peckham Rye Community Council area consists of three wards with a total Metropolitan Open Land area of 136 hectares. Of this Metropolitan Open Land, 134 hectares (98%) of it falls within the proposed middle suburban density zone. 5% (11.6 hectares) of the Dulwich community council's Metropolitan Open Land falls within the suburban middle zone. Additionally, the Camberwell community council Metropolitan Open Space covers 14.6 hectares and is wholly contained within the middle suburban density zone. In total, 160 hectares of the proposed middle suburban density zone is covered by Metropolitan Open Land, comprising 33% of the total suburban middle zone area.
- 1.8.4.5 To provide a comparison, 32% of the predominantly suburban community council area of Dulwich, (incorporating the wards of East Dulwich, Village and College) is comprised of Metropolitan Open Land. This area includes the higher density Lordship Lane character area within the suburban density middle zone. Metropolitan Open Land in the community council area of Camberwell (which sits primarily within the existing urban density zone), directly to the north, comprises only 4.5% of the total community council area. This suggests, therefore, that the character area is predominantly residential in character due to the high proportion of open space within its boundary.
- 1.8.4.6 As illustrated in figures 4 and 5, a number of sample sites have been analysed across the proposed middle zone as well as blocks immediately to the north in the urban density zone and to the south in the suburban zone. Figure 5 shows that 85% of the blocks sampled within the East Dulwich and Peckham Rye character area (blocks 1-7) fall within the same density ranges (dwellings per hectare) as the blocks sampled in the suburban zone to the south.
- 1.8.4.7 Private garden sizes also reflect the suburban character of the middle suburban zone. Area ranges (square metres) of the sampled blocks, shown in figure 6, show that the majority of gardens within the East Dulwich and Peckham Rye character area are similar ranges to those found in the suburban density zone to the south. Within the Lordship Lane character area, garden sizes compare with the lower range of suburban density zone garden sizes.
- 1.8.4.8 The East Dulwich and Peckham Rye suburban zone is not uniform in character. It contains variations in garden sizes, block set backs and building typologies and shares elements in common with both the urban and suburban character settings. However, the prevailing overall condition of the middle zone is that of a suburban area, as it shares more characteristics of the suburban zone to its south than the urban area to its north. Suburban areas close to town centres.

2 ROTHERHITHE (THE NORTH SUBURBAN DENSITY ZONE)

2.1 Character areas

2.1.1 The area in which the suburban density zone is proposed is shown on figure 1 below. It has been broken down into four areas: Russia Dock Woodland; Greenland and South Docks; Riverside and Rotherhithe village; and Southwark Park.

Figure 1: Character areas in Rotherhithe

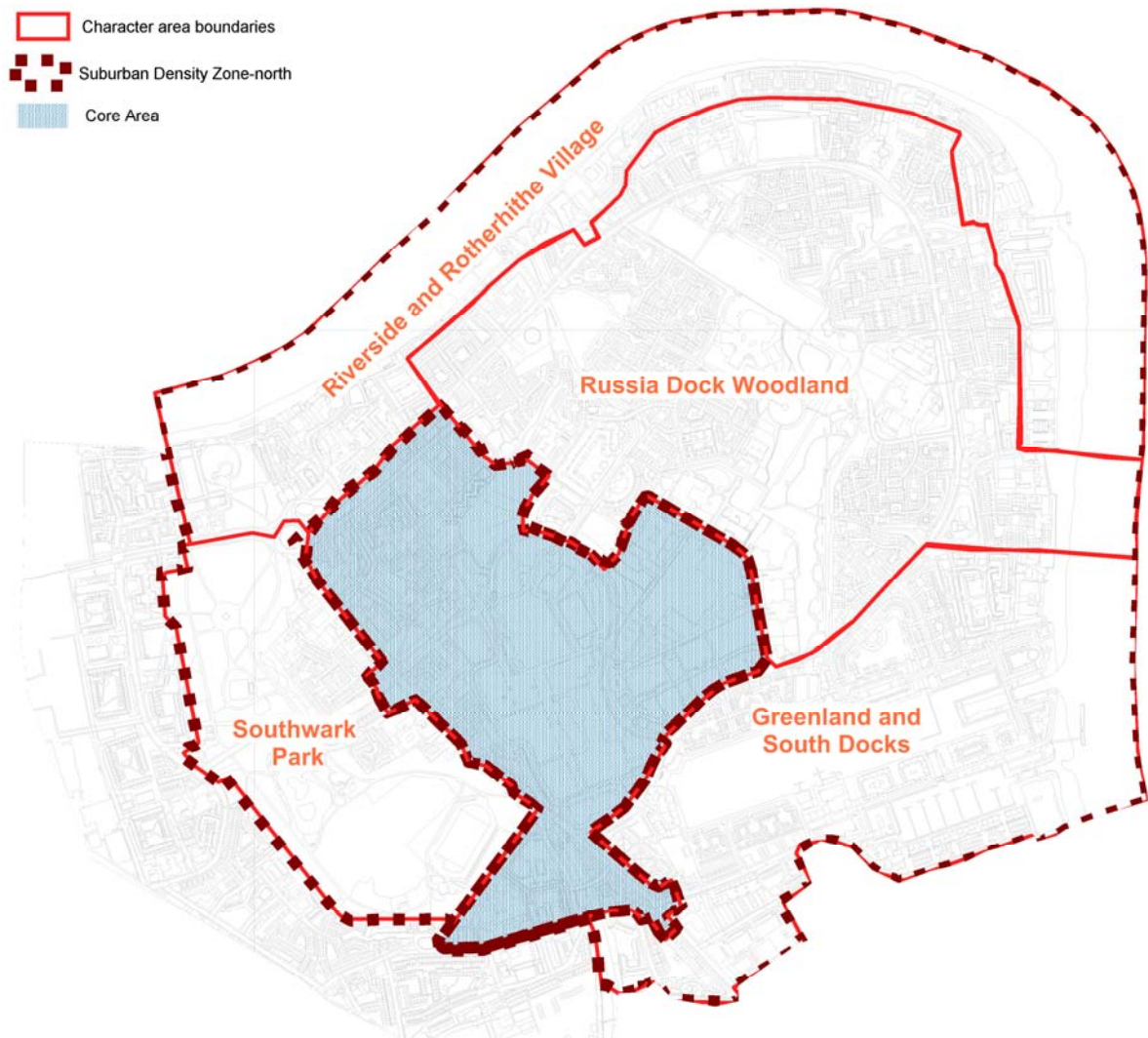
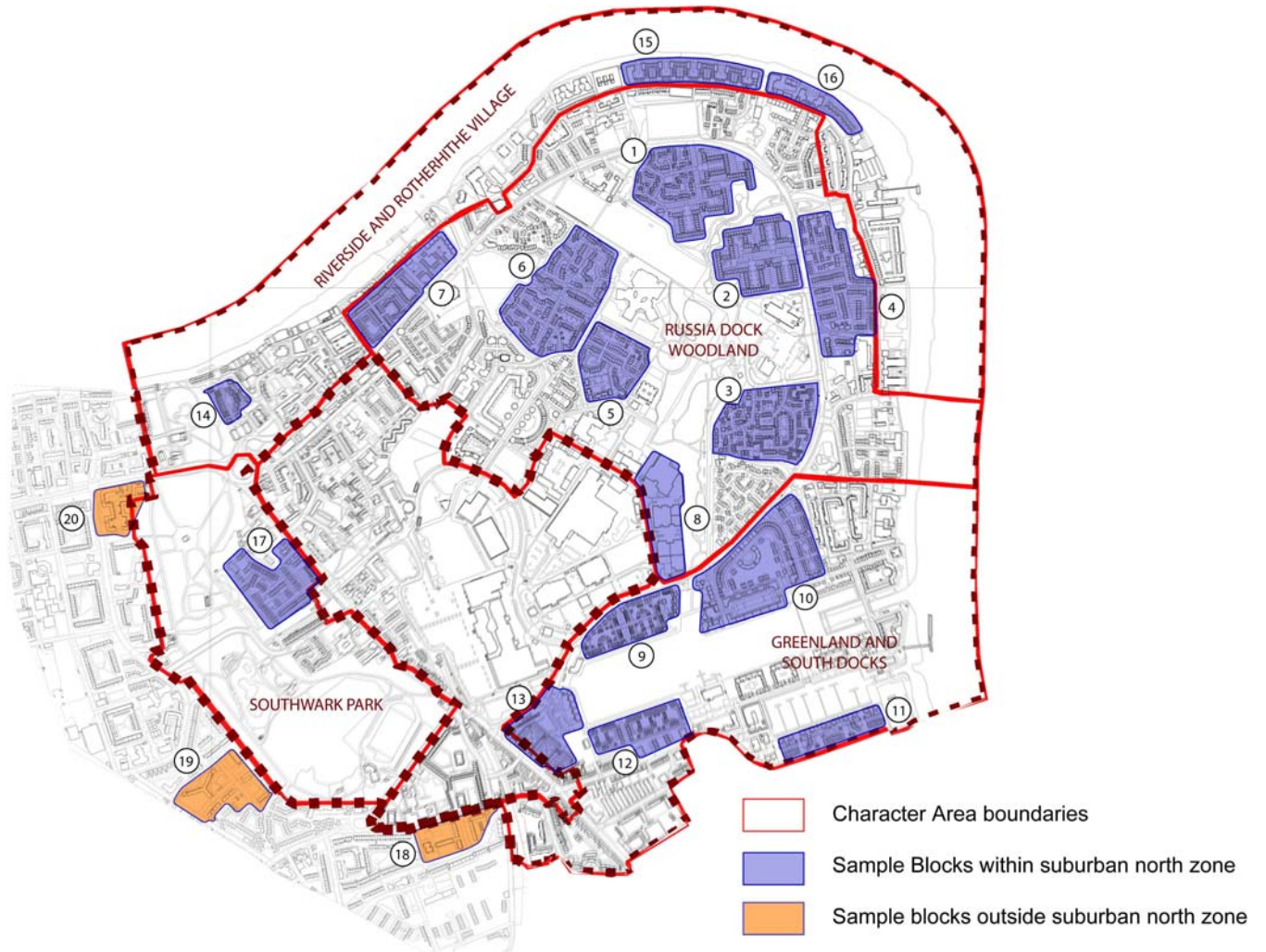


Figure 2: Sample block locations in Rotherhithe



Key to sample blocks

- | | | | |
|----|-------------------|----|-----------------------------------|
| 1 | Globe Pond Road | 11 | Plough Way |
| 2 | Russia Dock Road | 12 | Greenland Quay |
| 3 | Somerford Way | 13 | Tawney Way |
| 4 | Byfield Close | 14 | Elephant Lane |
| 5 | Fisherman's Drive | 15 | Sovereign Crescent |
| 6 | Thame Road | 16 | Pageant Crescent and Edward Court |
| 7 | Canon Beck Road | 17 | Ann Moss Way |
| 8 | Quebec Way | 18 | Tissington Court |
| 9 | Brunswick Quay | 19 | Bradley House and Abbeyfield Road |
| 10 | Plover Way | 20 | Kirby Estate |

2.2 Russia Dock Woodland

2.2.1 This is an area of 99 ha which occupies 45% of the Rotherhithe suburban density zone. Russia Dock Woodland sits at the heart of the area. 23% of the area is designated open space. In addition to the open space, the majority of residential development is comprised of discrete housing estates developed under the London Docklands Development Corporation (LDDC) in the 1980s and 1990s, in accordance with the development framework for Surrey Docks. These estates are typically arranged around cul-de-sacs which feed off Redriff and Salter Roads. They are generously landscaped, with grass verges, tree planting and front and back gardens. Car parking is generally provided off street in courtyards, garages and front drives.

2.2.2 Although much of the area is within a 10 minute walking distance of the Canada Water town centre, the difference in scale, grain and land use, between the Canada Water core area designation and the suburban area designation is very marked. Public transport accessibility falls away rapidly moving east from the core area (see CDB4, Figure 3).

Housing typology	See appendix 1. Terraced and semi-detached housing predominates in the area around Russia Dock Woodland. There are more flats around Needleman Street.
Density	The housing estates in the area are built typically at 50-65 dwellings per hectare. The area around Canon Beck Road has slightly higher densities up to 85 dwellings per hectare.
Land use	See appendix 2. Almost entirely residential. Russia Dock Woodland is located in the centre of the area. There are four schools and leisure and commercial development on Quebec Industrial estate and Surrey Docks Stadium.
Building heights	See appendix 3 and Figure 10 of CDCW20. Predominantly 2/3 storeys on the estates around Russia Dock Woodland. Predominantly 3/4 storeys around Needleman Street.
Building footprints	See appendix 2. Small building footprints with typical building depths of around 9m. Terraces of between approximately 5 and 10 homes. There are generous amounts of landscaping in the public realm and all houses have back gardens.
Distance from town centre	See appendix 2.

2.2.3 Sample blocks (refer to figure 1 for locations).



Block 1. Globe Pond Road: Predominantly two storey terraced and semi-detached homes. Approximately 52 dwellings per hectare.



Block 2. Russia Dock Road: Two storey terraced homes. Approximately 51 dwellings per hectare.



Block 3. Somford Way: Two and three storey terraced and semi-detached homes. Approximately 60 dwellings per hectare.



Block 4. Byfield Close: Two storey terraced homes. Approximately 65 dwellings per hectare.



Block 5. Fisherman's Drive: Predominantly 2-3 storeys terraced housing. Approximately 62 dwellings per hectare.



Block 6. Thame Road: Predominantly 2-3 storeys. A mix of terraced town houses and semi-detached dwellings. Approximately 61 dwellings per hectare.



Block 7. Canon Beck Road: Predominantly 2-3 storey town houses. Approximately 81 dwellings per hectare.



Block 8. Quebec Way: The site is occupied by three industrial/warehousing sheds. Quebec Way is landscaped on both sides in accordance with the LDDC's Landscape Strategy (see CDCW20, section 4.7), giving it a spacious feel. Russia Dock Woodland abounds the east of the industrial estate. Buildings are 5-10m high (see appendix 3 and CDCW20, p. 17). This is consistent with built development on both sides of Russia Dock Woodland and lower scale development provides a buffer around the woodland. Permissions on the Mulberry Business Park and Leisure Park, where proposed building heights diminish to 3 and 4 storeys, have established a gradation between the town centre and more suburban areas (see CDCW20, p. 23).

2.3 Greenland and South Docks

2.3.1 This is an area of 61 ha which occupies 27% of the north suburban density zone. The urban structure of the area is formed by the presence of Greenland and South Docks. The docks and quaysides provide a spacious setting for buildings and create a distinctive character. As in the case of the Russia Dock Woodland character area, 23% of the area is protected open space (this includes the docks). As with the central area, it was developed under the LDDC predominantly in the 1980s and 1990s and the streets are well landscaped. These elements together with its residential character help create a suburban feel.

2.3.2 A large proportion of the area is within 800m of the Canada Water town centre and also Lower Road. As in the case of Russia Dock Woodland area, there is a significant change in character around the boundary of the core area and the suburban zone. This noted in the GLA's view as set out in the statement of common ground (CDA172):

“...the marked change in setting to the southeast results in the action area and urban density zone boundary matching that of the district centre where it follows Redriff Road, rather than extending up to 800 metres walking distance beyond. This is attributable to the marked change in setting either side of Redriff Road in this location”.

2.3.3 As in the case of the Russia Dock Woodland area, public transport accessibility levels are low on the eastern side of the character area (CDB4 Figure 3).

Housing typology	See appendix 1. This area comprises a mix of town housing and flatted developments.
Density	Typically densities range between 70-80 dwellings per hectare. This is higher than in the central area due to the larger proportion of flats. Flatted developments on the Thames frontage have higher densities.
Land use	See appendix 2. Almost entirely residential.
Building heights	See appendix 3. Predominantly 10-15m (3/4 storeys). There are landmarks which are significantly taller. Notably Baltic Wharf and Tavistock Tower. Buildings on the Thames frontage on the east side of Odessa Street are up to 8 storeys.
Building footprints	See appendix 2. Perimeter block arrangements providing a mix of small terraces of town houses and longer terraces of flats and town houses. Parking and amenity areas are generally provided in courtyards.
Distance from town centre	See appendix 2. The area to the south of Redriff Road is within 800m of Canada Water town centre.

2.3.4 Sample blocks (refer to figure 1 for locations).



Block 9. Brunswick Quay: Predominately 3-4 storeys town houses and flats. Approximately 86 dwellings per hectare.



Block 10. Plover Way: Predominately 3-4 storeys town houses and flats. Approximately 75 dwellings per hectare.



Block 11. Plough Way: 2-4 storeys. Flatted blocks fronting onto South Dock with houses to south. Approximately 136 dwellings per hectare.



Block 12. Greenland Quay: Predominantly 2-4 storeys. A mix of town houses and flats. Approximately 80 dwellings per hectare.



Block 13. Tawney Way. 4/5 storey flatted development. Approximately 96 dwellings per hectare.

2.4 Riverside and Rotherhithe village

2.4.1 This area forms a narrow ribbon of development along the Thames, which widens out in Rotherhithe village. It comprises 11% of the suburban density zone. The eastern part of the area is predominantly residential. Rotherhithe village is more mixed with a pocket of business and cultural uses around St Mary's church. St Mary's church and the area around it have been designated as the St Mary's Rotherhithe conservation area. It comprises a historic village and surrounding 19th century warehousing.

2.4.2 Elsewhere in the character area, while much of the built development is relatively recent, some older warehouse buildings survive. The Thames Path extends along much of the riverside. Much of this area falls within the Thames Policy area to ensure that development provides access to the Thames and reflects historical patterns of development along the river.

2.4.3 A small part of the area is within a 10 minute walk of Canada Water town centre.

Housing typology	See appendix 1. This area comprises mainly flatted developments. There are pockets of houses around Elephant Lane, Sovereign Crescent and Pageant Crescent.
Density	Densities tend to be higher than elsewhere in the suburban density zone, ranging upwards from 80 dwellings per hectare on Elephant Lane.
Land use	See appendix 2. The eastern part of the character area is mainly residential. Important non-residential uses include the parks and Hilton Hotel. Around Rotherhithe village there is a pocket of office and light industrial uses around St Mary's church as well as a number of important cultural sites including the Mayflower pub, Sands Film studios and the Brunel museum.
Building heights	See appendix 3. Building heights vary. Development around the northern tip of the peninsula is predominantly 4/5 storeys. More recent developments on the eastern side of the peninsula rise up to 8 storeys.
Building footprints	See appendix 2. Perimeter blocks which front onto Rotherhithe Street, with permeability through the Thames Path. The residential nature of built development restricts building depths. Building footprints range between small and medium.
Distance from town centre	See appendix 2. The eastern side of the peninsula lies further than 800m from the town centre. In Rotherhithe village, because of the lack of connecting routes north from the town centre and the presence of the Rotherhithe Tunnel, only the southern part is within a 10 minute walking distance of the town centre.

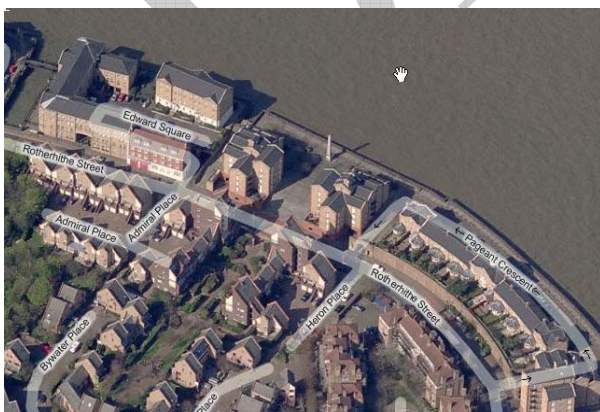
2.4.4 Sample blocks (refer to figure 1 for locations).



Block 14, Elephant Lane: Predominantly 3 storeys, with 5 storey elements at either end of the street. Approximately 87 dwellings per hectare.



Block 15: Sovereign Crescent: 3/4 storeys. A mix of flats and town houses. Approximately 84 dwellings per hectare.



Block 16: Pageant Crescent and Edward Square: 3-5 storeys. A mix of town houses and flats. Approximately 122 dwellings per hectare.

2.5 Southwark Park

2.5.1 The majority of this area comprises Southwark Park. There is a largely residential area between Lower Road and Southwark Park, around Ann Moss Way and Gomm Road.

2.5.2 The area lies within 800m of the Canada Water town centre. However, as in the case of the Greenland and South Docks area, there is a marked change of character to the west of Lower Road. The majority of built development around Gomm Road and Ann Moss Way is between 2 and 3 storeys and residential in use.

Housing typology	See appendix 1. Mainly terraced housing around Ann Moss Way and Gomm Road.
Density	The housing estates around Ann Moss Way and Gomm Road are built to a density of around 56-64 dwellings per hectare.
Land use	See appendix 2. Mainly residential, although with a mix of uses on Lower Road, including schools, churches and Leisure Centre. Southwark Park occupies much of the area.
Building heights	See appendix 3. Building heights around Ann Moss Way and Gomm Road are predominantly between 2 and 3 storeys.
Building footprints	See appendix 2. Small-medium sized building footprints.
Distance from town centre	See appendix 2. The area is within 800m of Canada Water town centre.

2.5.3 Sample blocks (refer to figure 1 for locations).



Block 17. Ann Moss Way: Predominantly 2-3 storeys. Approximately 56 dwellings per hectare.

2.6 Areas outside the suburban zone

2.6.1 The western boundary of the suburban zone is formed mainly by Southwark Park. To the west of the boundary there is a clear shift in character. Housing typologies become predominantly flatted (see appendix 1) and building heights rise to four storeys or more (see appendix 3). This is also borne out by the fact

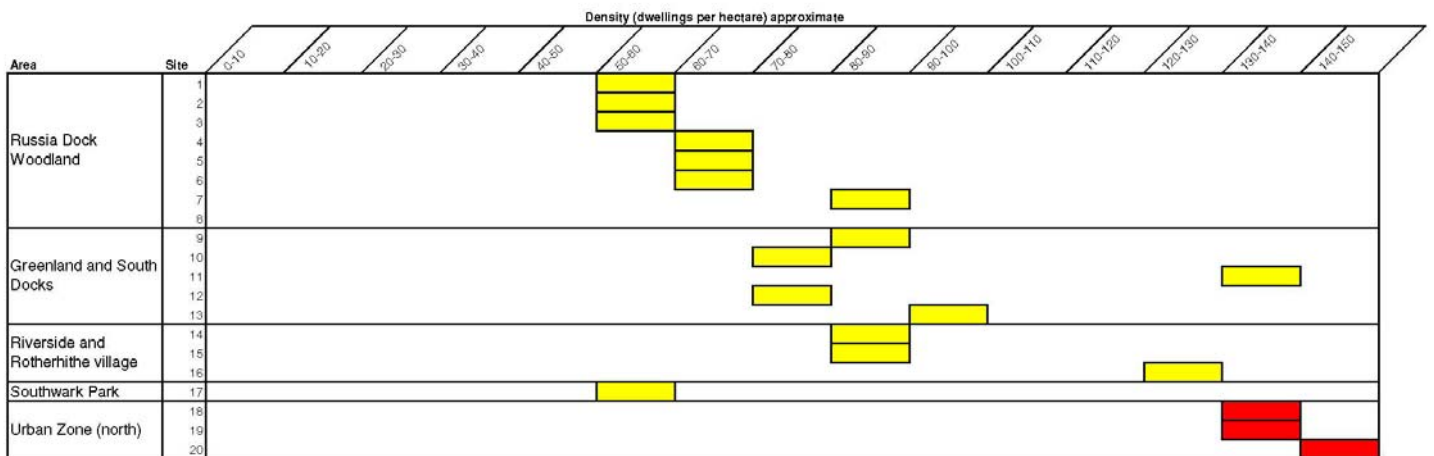
that densities on many of the blocks immediately to the west of the boundary also rise to well in excess of 100 dwellings per hectare (see figure 2 below). Moving west from the Rotherhithe suburban zone, there is much less open space, as the following figures show:

- Rotherhithe community council area: 52.1 ha of designated open space
- Bermondsey community council area: 2.7 ha of designated open space

2.6.2 The Canada Water action area core comprises the town centre and sites immediately around. Building heights on existing and proposed developments tend to be higher than in the suburban zone (see CCCW20, figure 10). Existing housing is predominantly flatted (see appendix 1). Much of the residential stock in the core area comprises 1950s deck access blocks which limits their depth and building footprint. The footprints of the commercial units are much larger.

Housing typology	See appendix 1. Residential development in the core area is mainly flatted. Likewise, moving west from the suburban area, although there are pockets of houses, for example around the Abbeyfield Estate, most dwellings are flats.
Density	Densities on many sites tend to be well in excess of 100 dwellings per hectare, both in the core area and moving west from the suburban area.
Land use	See appendix 2. Development in the core area is a mix of residential in the northern part and commercial.
Building heights	See appendix 3. Building heights in the core area are described in CDCW20, figure 8. Moving west from the suburban area, heights vary. There are many buildings between 15 and 20 metres.
Building footprints	See appendix 2. Footprints of commercial units in the core area are larger. Elsewhere in the core area and moving west from the suburban area, footprints are a mix of small and medium sizes.
Distance from town centre	See appendix 2.

Figure 3: Densities inside and outside the suburban north zone



2.6.4 Sample blocks (refer to figure 1 for locations).



Block 18. Tissington Court: Flatted development. Approximately 143 dwellings per hectare.



Block 19. Bradley House and Abbeyfield Road: Flatted development. Approximately 134 dwellings per hectare.



Block 20. Kirby Estate: Flatted development. Up to 7 storeys.
Approximately 150 dwellings per hectare.

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3 EAST DULWICH AND PECKHAM RYE (THE MIDDLE SUBURBAN DENSITY ZONE)

3.1 Character areas

3.1.1 The area in which the suburban density zone is proposed is shown on figure 4 below. It has been broken down into two areas: Lordship Lane and East Dulwich and Peckham Rye.

Figure 4: Character areas and sample block locations in Rotherhithe



Key to sample blocks

1	Harlescott Road	11	Jennings Road
2	Scutari Road	12	Keston Road
3	Underhill Road	13	Waghorn Street
4	Friern Road	14	Buchan Road
5	Gilkes Crescent	15	Carden Road
6	Winterbrook Road	16	Pickwick Road
7	Elfindale Road	17	Burbage Road
8	Derwent Grove	18	Burbage Road
9	Ulverscroft Road	19	Court Lane
10	Rodwell Road		

3.2 East Dulwich and Peckham Rye

3.2.1 This is an area of 473.2 hectares which occupies the majority of the middle suburban density zone (83.4%). The area is predominantly residential, with housing stock comprising Victorian detached, semi-detached and terraced homes of 2-4 storeys. There is around 160 ha of open space (the majority of which is Metropolitan Open Land) and the majority of houses also have private rear gardens.

Housing typology	See appendix 4. A mixture of detached, semi-detached and terraced housing. Some flatted development scattered throughout within house conversions.
Density	The housing density ranges from 25 to 80 units per hectare, with an average density of approximately 45 units per hectare.
Land use	See Appendix 5. Predominantly residential. Metropolitan Open Land accounts for approximately 1/3 of the land use across the character area.
Building heights	See Appendix 6. Predominantly 5-10m (2/3 storeys) with some 10-15m (3-4 storey) terraces. There are some taller unit blocks (40-50m).
Building footprints	See Appendix 5. Semi-detached and detached houses with approximate 9m widths. Terraces have smaller building footprints with typical building depths of between 10-13m, with building widths of 5-6m. Terrace rows tend to be comprised of around 10 houses. There are generous amounts of landscaping and almost all houses have back gardens.
Distance from town centre	See Appendix 5. The Lordship Lane and Herne Hill town centres are within 800m of some part of the character area. Both town centres are focused tightly around main roads. There is very little spill over of non-residential use into surrounding streets. These streets are residential in nature and have a very different character from the town centres.

3.2.2 Sample blocks (refer to figure 4 for locations).



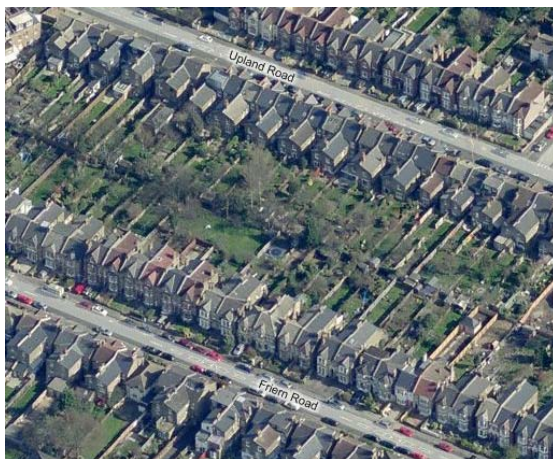
Block 1. Harlescott Road: Predominantly terrace housing
Approximately 59 dwellings per hectare



Block 2. Scutari Road: Semi-detached housing.
Approximately 38 dwellings per hectare.



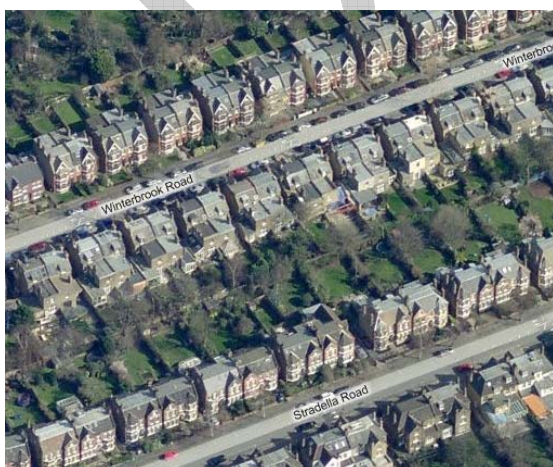
Block 3. Underhill Road: Predominantly semi-detached housing.
Approximately 35 dwellings per hectare.



Block 4. Friern Road: Semi-detached and terraced housing. Approximately 50 dwellings per hectare.



Block 5. Gilkes Crescent: Semi-detached housing. Approximately 23 dwellings per hectare.



Block 6. Winterbrook Road: Terraced and semi-detached housing. Approximately 25 dwellings per hectare.



Block 7. Elfindale Road: Terraced housing. Approximately 82 dwellings per hectare.

3.3 Lordship Lane

3.3.2 This is an area of 79 hectares which occupies 16.6 % of the middle suburban density zone. The Lordship Lane character area sits in the centre of the area and is focused around the Lordship Lane. The majority of residential development is comprised of Victorian terraces, arranged in rows roughly parallel or perpendicular to Lordship Lane. The majority of terraces have private rear gardens that back on to each other. Car parking is primarily on street, with very few premises having off street parking provision.

3.3.2 Lordship Lane town centre comprises a narrow ribbon which runs north-south through the middle of the area. It is a linear town centre and non-residential uses do not extend into surrounding side streets, creating a clear distinction between the narrow town centre and surrounding streets.

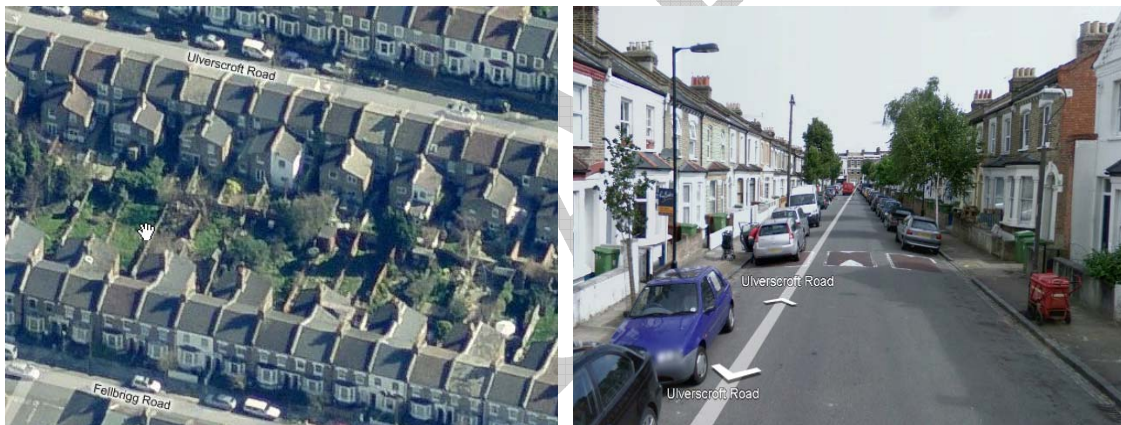
Housing typology	See Appendix 4. Predominantly terraced and semi-detached housing. Many of these have been converted into flats.
Density	The terrace housing is typically 80-95 units per hectare.
Land use	See Appendix 5. Predominantly residential. Lordship Lane has a mixture of residential, commercial and retail use.
Building heights	See Appendix 6. Predominantly 5-10m (2/3 storeys) with some 10-15m (3-4 storey) terraces.
Building footprints	See Appendix 5. Small building footprints with typical building depths of between 10-13m, with building width of 5m Terraces tend to run length of block. There are generous amounts of landscaping and most houses have back gardens.
Distance from town centre	See Appendix 5. The Lordship Lane area

is within 800m of the Lordship Lane town centre.

3.3.2 Sample blocks (refer to figure 4 for locations).



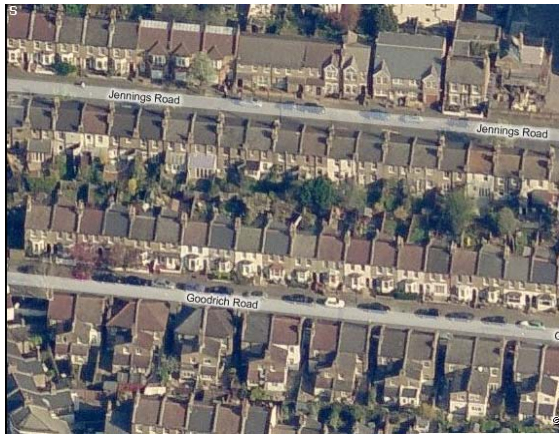
Block 8. Derwent Grove: Predominantly semi-detached housing. Approximately 81 dwellings per hectare.



Block 9. Ulverscroft Road: Predominantly terraced housing. Approximately 94 dwellings per hectare.



Block 10. Rodwell Road. Mixture of semi-detached and terrace housing. Approximately 96 dwellings per hectare.



Block 11. Jennings Road: Predominantly terrace housing.
Approximately 90 dwellings per hectare.

3.4 Areas outside the middle suburban density zone – urban zone to north

3.4.1A sample of blocks have been assessed to north of the suburban middle zone, in the existing urban density zone. These blocks are generally denser in their dwellings per hectare and have a closer proximity to the Major town Centre of Peckham. The sample block characteristics are outlined below.

Housing typology	Predominance of 2-3 storey terrace housing with some blocks semi-detached homes and larger (<10 storey) residential units (see Appendix 4).
Density	Density range 73-114 dwellings per hectare, with an average density of 94 dwellings per hectare.
Land use	Predominantly residential with more mixture of cultural and retail north and closer to Peckham town centre (see Appendix 5).
Building heights	Predominantly 5-10m (2-3 storeys) with some 4 storey terraces throughout the area (see Appendix 6).
Building footprints	Building widths vary from approximately 4-6 metres and building depth from 13-30 metres. All blocks sampled have private gardens averaging approximately 60sqm (see Appendix 5).
Distance from town centre	The urban density zone north of the suburban middle zone is in close proximity to the Peckham town Centre (see Appendix 5).

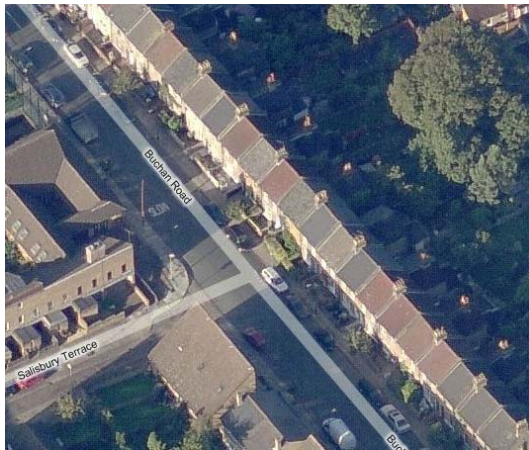
3.4.2 Sample blocks (refer to figure 4 for locations)



Block 12 Keston Road. 2 – 3 storey terrace housing. Approximately 114 dwellings per hectare. Small building setbacks (2.5 metres) with few street trees along narrow footpaths. Private gardens small (approximately 50sq.m)



Block 13 Waghorn Street. 2 – 3 storey terrace housing. Approximately 97 dwellings per hectare. Small building setbacks (1.5 metres) with few street trees along narrow footpaths. Private gardens small (approximately 60sq.m)



Block 14 Buchan Road. 2 storey terrace housing. Approximately 93 dwellings per hectare. Small building setbacks (2 metres) with few street trees along narrow footpaths. Private gardens small (approximately 40sq.m)



Block 15 Carden Road. 3 storey semi-detached housing. Approximately 73 dwellings per hectare. 3 metre building setbacks with a few street trees. Larger private gardens small (approximately 106sq.m)

3.5 Areas outside the middle suburban density zone – suburban zone to south

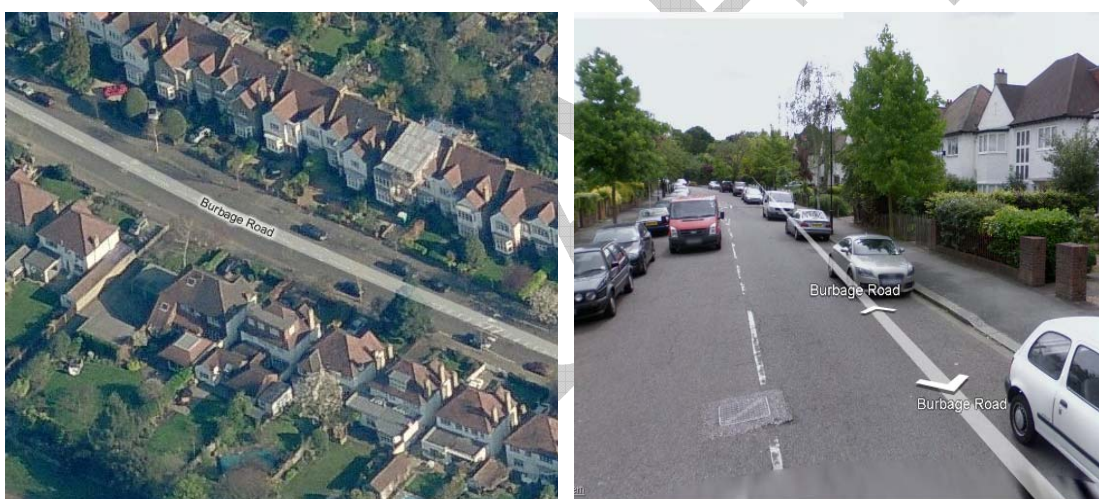
3.5.1 A sample of blocks has been assessed to south of the middle suburban density zone, in the existing suburban density zone predominantly within the Dulwich Community Council area. The sample area characteristics are outlined below in more detail.

Housing typology	Mixture of semi-detached, detached and terraces housing (See Appendix 4)
Density	Density range 10-51 dwellings per hectare, with an average density of 28 dwellings per hectare
Land use	Predominantly residential with large educational facilities. The majority of the land use is a mixture of woodland, parkland and recreational open space such as golf courses and sports fields (See appendix 5).
Building heights	Predominantly 5-10m (2-3 storeys) with some larger detached housing (See appendix 6).
Building footprints	Building footprints vary, especially with larger detached houses, which have approximately 12-18m wide building frontages and 15m depths, but situated on blocks larger than the width of the buildings. Semi-detached and terrace houses vary from 6-12m frontages and 13-20m lengths. All blocks sampled have private gardens of greatly varying sizes, from 51sqm to 1443 sqm. (See appendix 5).
Distance from town centre	The spread of the suburban zone means some blocks are within relatively close proximity the Dulwich village town centre as well as retail areas such as West Norwood in Lambeth and Crystal Palace in Bromley. To the south, the town centre of Upper Norwood, spanning several boroughs, is within 800m of the southern most dwellings in the suburban area. (See appendix 5).

3.5.2 Sample blocks (refer to figure 4 for locations)



Block 16 Pickwick Road. 2-3 storey semi-detached and terrace housing. Approximately 51 dwellings per hectare. Narrow, 2 metre building setbacks (2 metres) with some street trees. Range of private gardens (50-650sq.m)



Block 17 Burbage Road. 2-3 storey semi-detached and terrace housing. Approximately 27 dwellings per hectare. Wider, 6-7 metre building setbacks with sizeable front gardens. Some street trees. Range in size of private gardens (approximately 50-325sq.m)



Block 18 - Burbage Road. 2-3 storey semi-detached and terrace housing. Approximately 25 dwellings per hectare. Deep street frontages (11 metres) with some street trees. Range of private gardens (154-297 sq.m)



Block 19 - Court Lane. 2-4 storey semi-detached and detached housing. Approximately 10 dwellings per hectare. Deep 15 metre building setbacks with significant front gardens and some street trees. Range of rear private gardens (329-1443 sq.m)

Figure 5 – Density scatter graph for East Dulwich and Peckham Rye

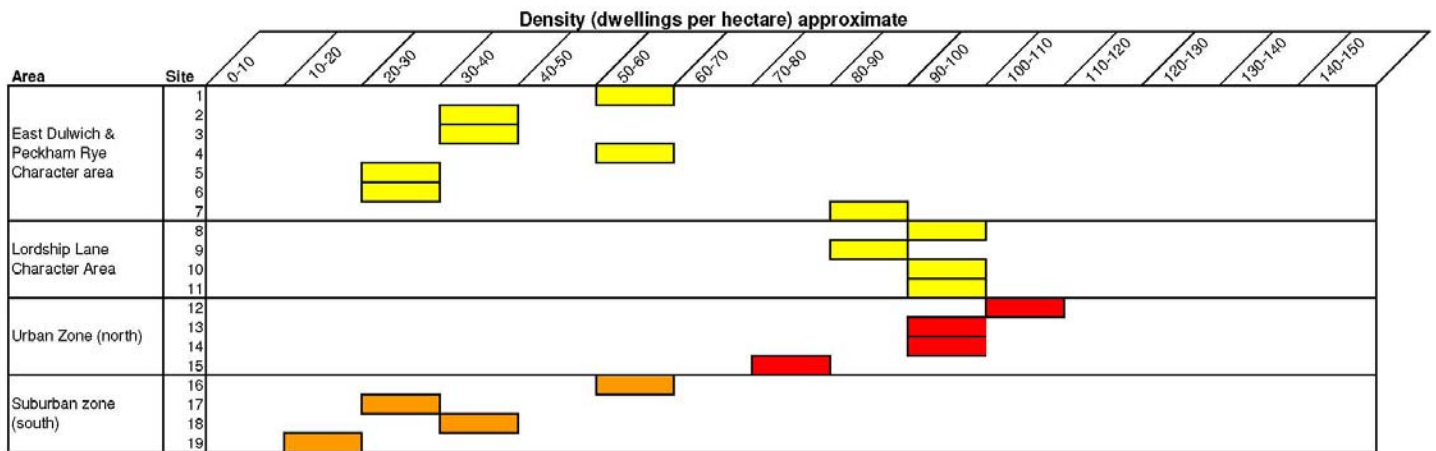
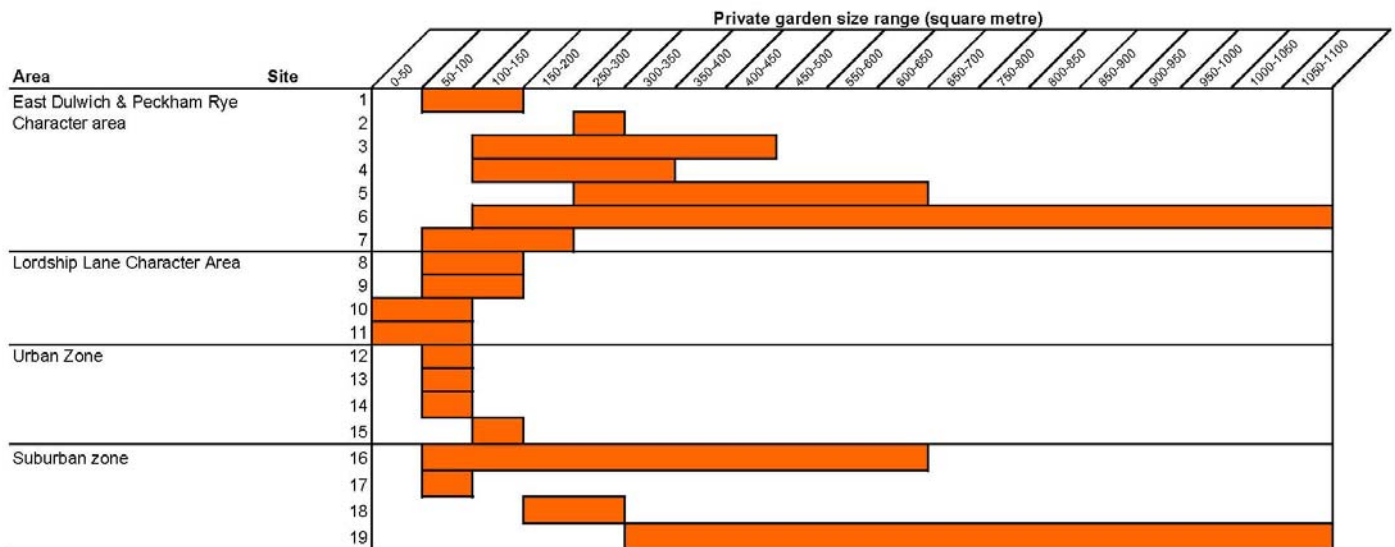


Figure 6 – Average garden size range for East Dulwich and Peckham Rye



4 APPENDICES

Appendix 1: Housing typologies in Rotherhithe



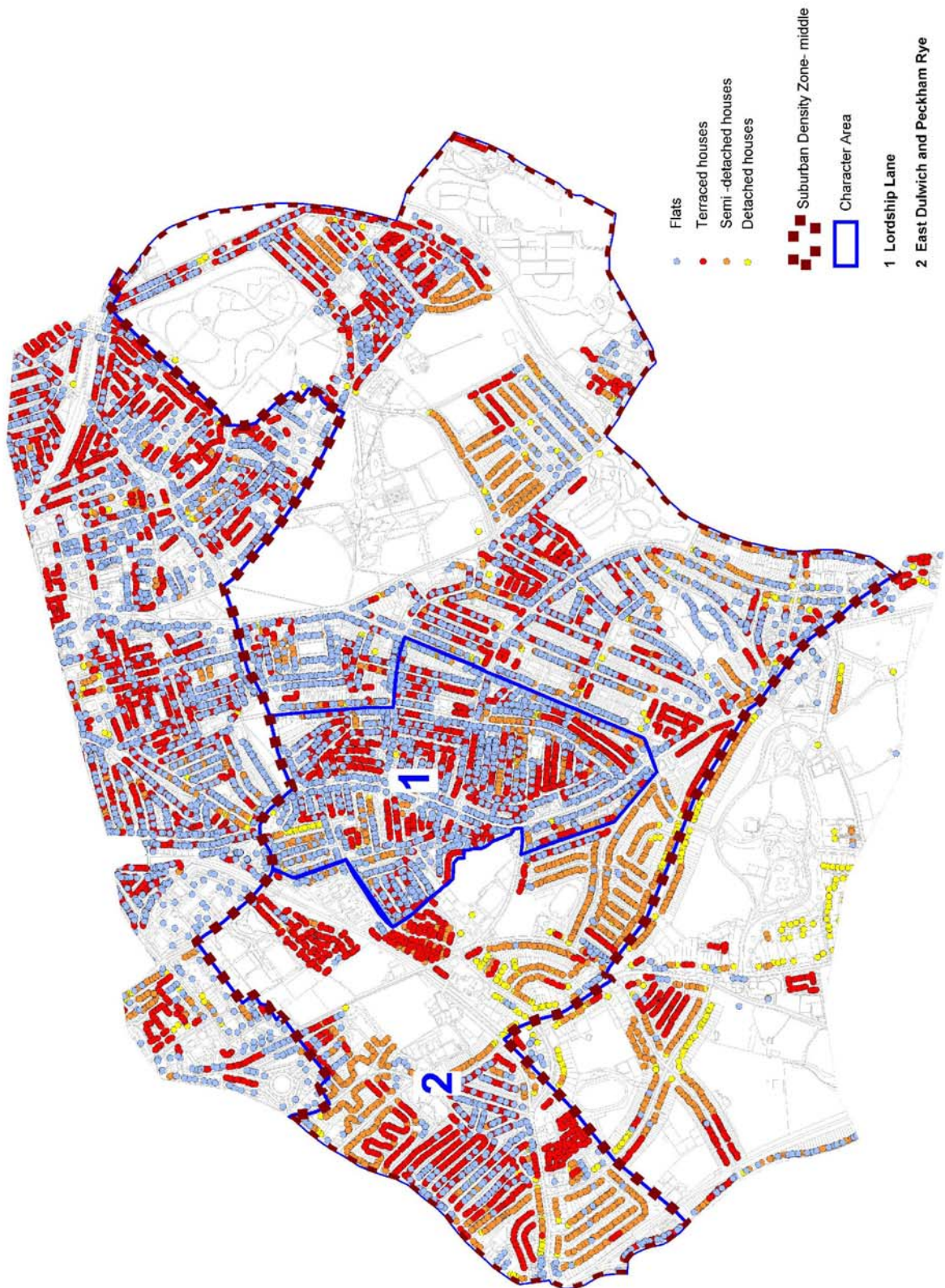
Appendix 2: Building footprints, land uses and areas within 800m of Canada Water town centre



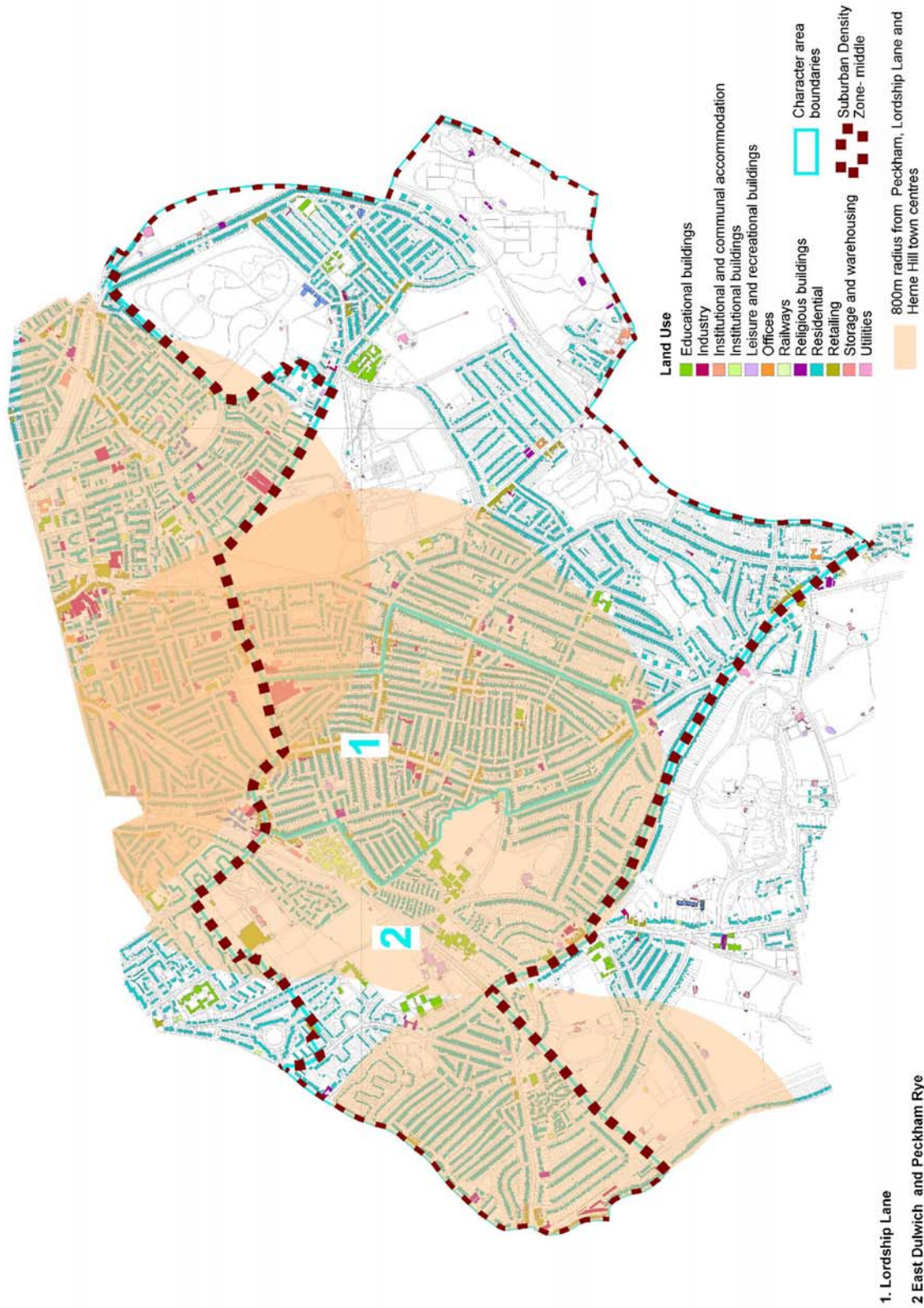
Appendix 3: Building heights in Rotherhithe



Appendix 4: Housing typologies in East Dulwich and Peckham Rye



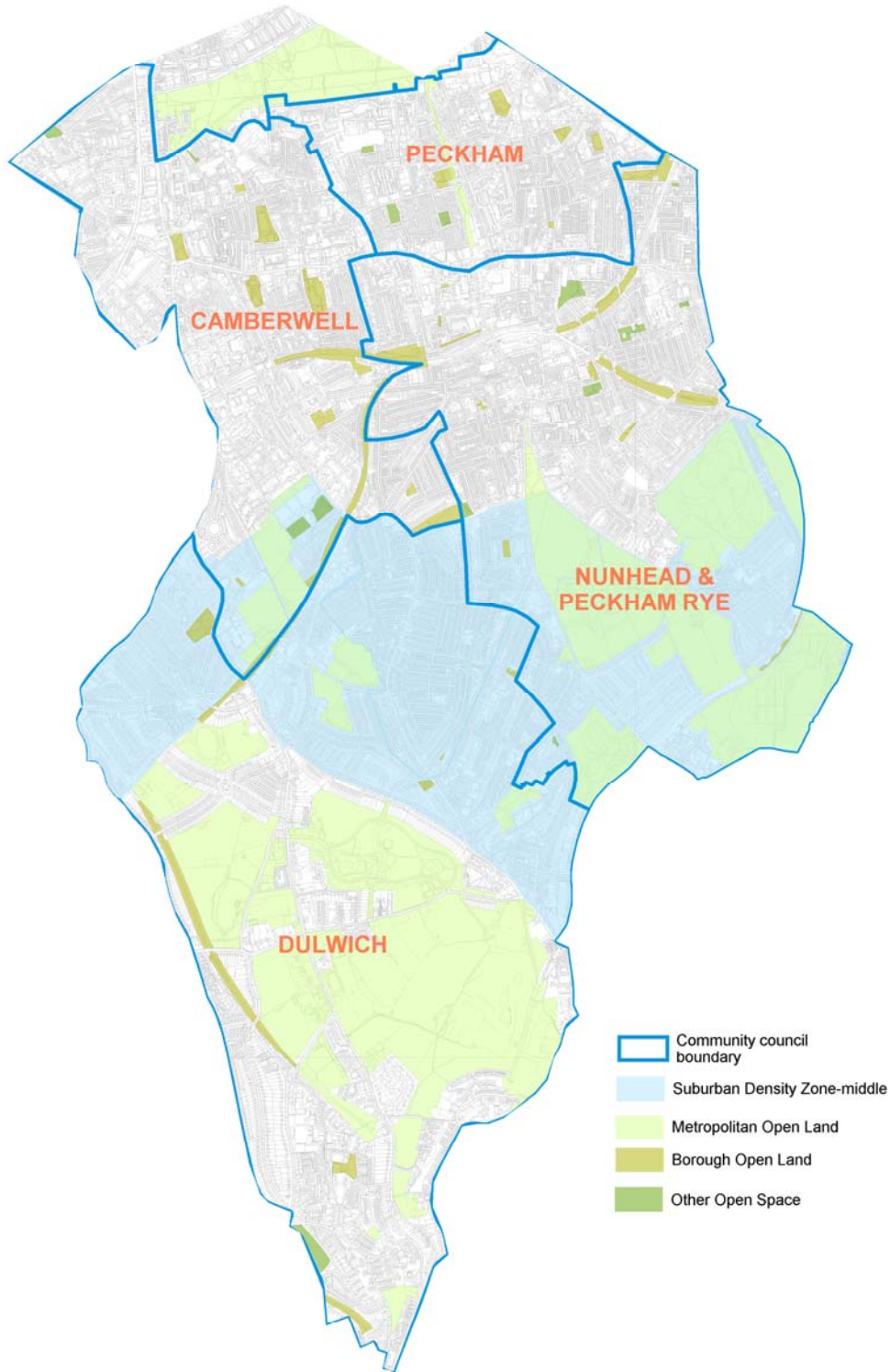
Appendix 5: Building footprints, land uses and areas within 800m of Lordship Lane and Herne Hill town centres



Appendix 6: Building heights in East Dulwich and Peckham Rye



Appendix 7: Open spaces and Community Council areas around East Dulwich and Peckham Rye



Appendix 8: Summary of responses received in response to consultation on the Southwark Plan 2007, the Core Strategy, Canada Water AAP and draft Dulwich SPD

Summary of consultation responses received on the Suburban Density Zone

1. Southwark Plan
 2. Core Strategy Development Plan Document
 3. Dulwich Supplementary Planning Document
-

Southwark Plan

Throughout the consultation stages of the Southwark Plan representations were submitted which provided support for the designation of the suburban density zone in the Rotherhithe area and the southern areas of the borough including East Dulwich, Peckham Rye and Herne Hill.

First and Second Deposit Southwark Plan

At first deposit stage (November 2002) Rotherhithe and the area around east Dulwich and Peckham Rye were designated as urban. Approximately 37 representations received at this stage objected to this designation and stated that suburban densities would be more appropriate.

Some of the comments received are set out below:

- “The Peninsular is suburban in character with the majority of other buildings are low rise and low density aside from the Riverside developments, the rest of the housing is two storeys. In conjunction with the green open spaces, the area is distinctly suburban and should therefore be recognised as different to Bermondsey, Bankside, London Bridge and Peckham. It has only medium accessibility and should therefore be designated suburban (or urban at the very least), like Dulwich.”
- “The low-rise nature of the Rotherhithe peninsula should be taken into account”
- “Maintenance of the "Low, clean and green" suburban character of Rotherhithe. Adherence to the London Plan concepts of housing densities in Rotherhithe that is suburban category 2/3.”
- “Support for the extension of the suburban zone to include the Rotherhithe Peninsula and South Nunhead.”
- “Land designations contained in the draft London Plan for the Rotherhithe Peninsula (suburban category 2/3) and the Canada Water development area be retained in the Southwark Plan. The whole of the Peninsula should retain the protection and development levels afforded by their 'suburban' nature.
- “The Rotherhithe Peninsular (land to the east of Canada Water) should be mentioned under “Urban” or “Suburban” Zone on p74/75, not Central. A distinction must be made between the above mentioned area and the Canada Water Action Area must be spelled out.”
- “Object to the designation of the Rotherhithe Peninsula as an urban area. On page 74-75 are the descriptions of the urban and suburban zone, bar the strip along the river front at either end of the Peninsula the description of the suburban zone describes the peninsula exactly.”

At second deposit stage (June 2004), in the light of representations received, Rotherhithe and the area around East Dulwich and Peckham Rye were reclassified as suburban. Approximately 15 representations were received on the Second Deposit Southwark Plan which supported the policy of the designation of suburban densities zoning in these areas.

Some of the comments received are set out below:

- “Support the extension of the suburban zone to include the Rotherhithe Peninsula and South Nunhead”.
- “Support the reclassification of Rotherhithe Peninsula as suburban. This will help maintain the garden suburb character of the area. It is also what the great majority of residents want.”
- “The whole of Rotherhithe including Canada Water should be suburban density.”
- “Question the proposal to designate large areas of North Southwark and Dulwich as urban in the London Plan and to impose this designation upon Southwark's UDP. I appreciate that population growth in London, and the need to develop sustainability along public transport routes requires that the development potential of sites should be maximised (Policy 4B.3 London Plan). However Rotherhithe and Surrey Docks have the lowest PTAL index and suffers from restricted access by road. Further development in Rotherhithe must be constrained until public transport access is significantly improved”.

One representation set out that the suburban zone of Surrey Docks is restrictive in term of the need to regenerate the area and runs counter to PPG3 and the London Plan Policy Directives to developer urban land and use land more efficiently. The Surrey Docks peninsula should be reclassified as an urban zone.

Another objected to the change in the boundary between the proposed suburban and urban zones, in comparison to the first deposit draft, by extending the proposed suburban zone designation northwards to East Dulwich Road. The representation considered that the previous boundary should be retained, but with limited amendment to include the developed land fronting the south - west side of Lordship Lane between its junction with Dulwich Common and the Borough boundary to the south - east.

At the Second Deposit Southwark Plan consultation, the GLA objected to the amendment of the boundaries of the suburban and urban density zones from the First Deposit Southwark Plan. The GLA considered that the density zones set out on the First Deposit Southwark Plan Proposals Map more accurately reflected the density descriptions within the London Plan.

Inspector's Report (May 2006)

The Inspector considered draft density Policy 4.1 and Appendix 3 and particularly whether appropriate densities are being sought at Canada Water and in other parts of the borough.

The Inspector concluded that the Southwark Plan reasonably applies the designations in the London Plan's density/parking matrix to the local circumstances of the borough. The Inspector endorsed the Council's approach to density.

In reaching this conclusion, the Inspector considered the GLA's objection to the policy and acknowledged they had put forward some good points. In particular the need to ensure that development proposals achieve the highest possible intensity of use compatible with such matters as local context, design and public transport accessibility. The Inspector noted that this approach is consistent with the London Plan Policy 4B.1 and national guidance, and that the Southwark Plan 18th July 2005 reflected it in a number of ways, including its Policy 3.11 Efficient Use of Land, which he stated he enthusiastically supported.

The Inspector noted two points to consider in relation to the GLAs objection.

2.4.31 Firstly, unless virtually every street and block is to be assessed and placed in the most appropriate zone according to such matters as prevailing density and character, the identification of those Zones is bound to be of a generalised nature. That means that, for example, some suburban zones will include parts which display more urban characteristics. That being the case, the use of zones for development control purposes will inevitably be a blunt tool even though so much work has gone into the surveys. That is no criticism because I consider that the location of a site in a particular zone can be regarded as a useful start in the consideration of a proposal for it.

2.4.32 “Secondly, as I have sought to explain, the zones will be but one of the provisions of the adopted UDP. Others include policies relating to design, character, appearance and, of course, Policy 3.10 which accords with national policy for the full and efficient use of land. Hence the fact that a site is within a Suburban Zone does not automatically preclude its development at a density suitable in principle for the Urban Zone.”

In relation to the designated areas, the Inspector considered the areas of Herne Hill, East Dulwich, Surrey Docks and South Bermondsey have some Urban Zone characteristics, however they were all correctly included in a Suburban Zone. The Inspector attached most weight to the prevailing character, which often includes open space. He noted that there might be circumstances where a proposal with an urban density might be suitable, and the development plan, read as a whole, would provide for it.

Southwark Plan Modification (September 2006)

Following the Southwark Plan public Inquiry, the council modified the plan in the light of the inspector's report and consulted on modifications. Approximately 44 representations were received at this stage which supported the designation of the suburban density zone. There were no representations which specifically objected to the suburban density zone.

Some of the comments received are set out below:

- “We support the suburban designation of North suburban one Nunhead, Herne Hill, East Dulwich and Rotherhithe. These are already suburban in character as have been for decades. Established communities would be disrupted were higher density development to be allowed. Higher structures would also be overwhelming.”
- “East Dulwich is no different to West Dulwich, both are low density in character with local facilities and infrastructure suitable for the present population, a higher density would put immense strain on the infrastructure and threaten precious pockets of biodiversity, encouraging developers to impinge on the visual amenity and amenity space of residents.”
- “In the suburban zone of East Dulwich developers are extending houses, infilling original gaps in terraces and rear gardens and replacing light industrial sites and garage mews with housing. The UDP, Appendix 3 does not define the height of suburban development but in practice up to 4 storeys is typically approved. Within this height of suburban development but in practice up to 4 storeys is typically approved. Within this height limit, intensive horizontal development is achieving site and street-block densities at the highest levels shown in the density matrix of the London Plan Table 4B.1. The Mayor of London has asked that East Dulwich is redesignated as urban. The London Plan defines development as 3-4 storeys whereas the UDP states 4-6 storeys. The heights required the London Plan for an urban zone are being achieved, and the density targets are being surpassed, under the present suburban designation. I therefore support the zoning boundaries in the UDP.”

- I was a councillor of dockyard ward from 1994 until 2002. This covered the period when the LDDC was completing its mandate and passing planning powers back to Southwark Council. The LDDC transformed a decaying and industrial area into a living residential entity, rehousing established residents and providing homes for a substantial influx of new residents with associated service infrastructure. Over development was generally avoided in the interest of providing an ambience of community. This is best sustained by adhering to a suburban standard of height and density.
- "I am supporting the suburban designation of Rotherhithe. This area is suburban in nature and low density in character with parks, trees, docks and mostly low level (up to 4 storeys) housing. Despite the proximity of Canada Water station it lacks the transport infrastructure for high density housing. It is already very difficult to get on/off the peninsula much of the time."
- "The Tenants Association supports the suburban designation of the north suburban zone, Nunhead, Henre Hill, East Dulwich and Rotherhithe. These areas are low density and local people want to keep them that way. Rotherhithe (which of course we know best) lacks the public transport accessibility to support high density development."
- "The development of Rotherhithe, following the closure of the docks has resulted in a well designed residential area of suburban character and over development has been, in the main, avoided. It lacks public transport accessibility to support high density development. In the interests of sustaining the communities and the area I support the suburban designation and its standards for height and density."

The GLA maintained its objections to the suburban designation of Rotherhithe and East Dulwich, considering it contrary to the overriding objectives of the London Plan to optimize the use of brownfield land and to promote sustainable development.

Secretary of State

A letter from the Secretary of State was received on 27 February 2007 setting out that she disagreed with the Inspector that the suburban north areas are predominantly suburban within the definition set out in paragraph 4.47 of the London Plan. In her view, the character of Rotherhithe and East Dulwich reflected the urban setting as described in the London Plan, rather than the suburban setting.

Pre-Submission Core Strategy DPD (November 2009)

In general, the majority of representations submitted on the proposed density zones set out within Policy 5 considered the density ranges and zones as being too prescriptive in nature and would not provide appropriate flexibility.

Many respondents suggested that the exact density appropriate for a site should be determined at the detailed design stage, with regard to individual site consideration and local context.

The GLA submitted a representation which made reference to the proposed suburban density zones. In summary, the GLA considers the approach is broadly consistent with the London Plan and the emerging strategic policy on this issue. At this stage, the council recommended a change to the policy, to amend the sentence "Density for both residential and mixed-use development will need to be within the following ranges", to "Residential density will be expected to comply with the following ranges, taking into account the quantity and impact of any non-residential uses."

The owner of the Quebec Industrial Estate, located within the Canada Water area submitted an objection to the Core Strategy's density policy. The respondent considers the urban density designation of the Canada Water area should be maintained and by designating the area within a suburban zone will severely limit planning flexibility, result in inefficient use of land and place Southwark Council's Core Strategy in confrontation with GLA guidelines.

Pre-Submission Canada Water AAP (January 2010)

A few respondents directly made comments on Policy 24 of the draft AAP.

The owner of the Quebec Industrial Estate submitted an objection to the AAP density designations of urban and suburban. The representation set out that they support the views of the Secretary of State, in the direction letter of 22 July 2007, relating to the restrictions on higher densities compromising Southwark's ability to bring forward housing developments that meet its housing demands and that the existing streetscape is not indicative of a suburban location. The representation set out that greater flexibility should be granted in relation to density parameters.

At Issues and Options consultation stage, the Quebec Industrial Estate was included within the urban density zone of the core area. It was removed at the Preferred Options stage. The reasons for this change are set out in Appendix 7 of the Pre-submission Consultation Report.

There were no other objections to the suburban density zone.

Another respondent welcomed the proposal to designate the core area as an Urban Zone.

The GLA submitted a representation which set out that the proposed density policy in the Core Strategy would be broadly consistent with the London Plan and the emerging strategic policy.

In relation to the draft AAP Policy 24 the GLA set out the following:

"...The AAP does not appear to take account of this envisaged change in the setting as described in the London Plan and the boundary of the core area does not reflect the associated 800 metre distance from the town centre classification as described in the supporting text for Policy 3A.3 (and Policy 3.4 in the draft replacement London Plan). It is recognised that there is scope for legitimate local variation in the application of Policy 3A.3 and that other policy requirements relevant to the area, such as protected viewing corridors, will have an impact on the densities that can be achieved in the core area. It is also recognised that the wording of the policy allows for an exception to the prescribed 'urban' density range of 200-700 where development is of an exemplary design standard. It is further noted that the proposed target for net new homes is consistent with that envisaged for the area under the London Plan Area for Intensification designation (policies 2A.6 and 5D.3). That being the case, the proposed policy is not considered to significantly harm the implementation of the London Plan and could be in general conformity, but it may nevertheless be appropriate to take this matter forward for discussion at any examination to ensure that the proposed approach to density in the core area is fully justified."

Draft Dulwich SPD (consultation period 18 March – 11 September 2009)

A total of 23 representations were received on the draft SPD.

Several respondents welcomed the references within the SPD to a suburban area where the existing character and form of buildings is maintained.

One respondent recommended extending the suburban density zone to include the East Dulwich area and another welcomed the reference in the SPD of re-classifying the northern edge of Dulwich as suburban.

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Appendix 9: Changes made to the core strategy density zones

