Integrated Impact Assessment
New Southwark Plan Preferred Option

Draft

October 2015

NON-TECHNICAL SUMMARY

The Integrated Impact Assessment (IIA) fulfils the requirement for a Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Analysis (EIA) and Health Impact Assessment (HIA). This integrated approach avoids the need to undertake and report on separate assessments, seeks to reduce any duplication of assessment work and benefits from a shared understanding of the policies.

The IIA considered policies contained within the New Southwark Plan, Preferred Option (NSPPO) and references work completed for the New Southwark Plan, Integrated Impact Assessment: Scoping Report (NSPIIASR) which was published in February 2015. The NSPIIASR considered relevant baseline information regarding key environmental, social and economic matters within the borough which are likely to be impacted by emerging NSP policies included in the NSPPO. The NSPIIASR also established the framework for undertaking the IIA by setting out sustainability, health and equalities objectives, decision making criteria and indicators used to measure the impacts of emerging policies.

The IIA considered NSPPO policies, reasoned justifications and supporting text within the context of the seven topic areas set out below. The topics are based on strategic policy areas identified in the NSPPO.

- Quality affordable homes
- Revitalised neighbourhoods
- Best start in life
- Strong local economy
- Healthy, active lives
- Cleaner, greener, safer
- Implementation

Having undertaken a detailed IIA it is considered that overall the seven topic areas have a positive impact on the IIA framework of 17 objectives. Key positive impacts are identified in terms of social, economic and environmental sustainability. Some risks have been identified been these are generally mitigated by other policies in the plan.

The IIA was carried out 'in-house' in September 2015 concurrent with the preparation of the NSPPO. Consultation on the IIA will take place alongside the NSPPO from 26 October 2015 to 12 February 2016.

Contents

Appendices

Glossary

AAP	Area Action Plan
AMR	Authority Monitoring Report
EIA	Equalities Impact Assessment
HIA	Health Impact Assessment
IIA	Integrated Impact Assessment
LDS	Local Development Scheme
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NSPIIAR	New Southwark Plan, Integrated Impact Assessment Scoping Report
NSP	New Southwark Plan
NSPPO	New Southwark Plan, Preferred Options
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SCI	Statement of Community Involvement
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance

2. Relevant Plans in Southwark

Southwark's Local Plan

The "Local Plan" refers to all relevant documents that are prepared by a local planning authority in planning for the future and in assessing and making decisions on planning applications. There are several layers and sub-sets to a Local Plan. Numbers 1-7 together, below, make up Southwark's current Local Plan:

1) The National Planning Policy Framework (NPPF) – The NPPF was introduced by the government in 2012 and condensed thousands of pages of national planning policy into 52 pages. To aid understanding and interpretation of the NPPF, the government also produced topic-based National Planning Practice Guidance (NPPG). However, the guidance does not constitute formal policy and so does not hold significant weight in the determination of planning applications. The NPPF seeks to establish planning policies applicable to the UK as a whole. Unless otherwise justifiable, all regional and local planning policy must be in general conformity with the NPPF.

2) The London Plan 2015 (consolidated with alterations since 2011) – The London Plan contains the regional planning policy for Greater London as a whole. The London Plan considers long-term, large scale, strategic issues as well as more detailed policy suited specifically to London, for example prescribing acceptable levels of density in a London context. The Mayor of London also produces more detailed Supplementary Planning Guidance (SPG) to aid understanding and interpretation of the planning policies in the London Plan. Unless otherwise justifiable, all London borough local planning policy must be in general conformity with the London Plan.

3) The 'saved' Southwark Plan policies (adopted in 2007) - The saved Southwark Plan policies contain detailed development management policies which are used in assessing planning applications.

4) The Core Strategy (adopted in 2011) – The Core Strategy is the overarching spatial plan for the borough. This was produced in response to a new system of local plans introduced by national government. The Core Strategy takes a longer-term, more broad and strategic overview than the 2007 Southwark Plan.

5) Area Action Plans (AAP's) – AAP's have been adopted for Aylesbury, Peckham and Nunhead and Canada Water. At the time of writing an additional AAP was being prepared for the Old Kent Road. These documents contain area-specific planning policy fine-tuned for specific areas.

6) Other area and topic based Supplementary Planning Documents (SPD's) - These do not constitute planning policy and their purpose is to aid understanding and provide a more detailed interpretation of and guidance to local Southwark planning policies.

7) Neighbourhood Forums – Southwark has several Neighbourhood Forums either established or currently in the process of being established with the objective of designating a Neighbourhood Area, for which a group of people can come together and write their own development plan. Again, this must be in general conformity with the local, regional and national planning policy. So far no neighbourhood plans have been produced or adopted in Southwark.

8) Local Development Scheme (LDS) – This sets out the timetable for the preparation and adoption of Southwark's various planning policy documents (such as those listed above). This schedule takes into account the different stages of plan preparation including evidence base preparation, background studies, various consultation phases and where relevant any

public hearings that the Council will need to satisfy before adopting policies. This is updated annually.

The New Southwark Plan

When adopted The New Southwark Plan (NSP) will replace the 'saved' policies of the Southwark Plan and the Core Strategy, incorporating strategic and detailed policies in one document. The planning policies as proposed in the NSP will have significant implications for the social, economic and environmental well-being and resilience of the borough and its residents.

The NSP will emerge through a series of iterations which will each undergo consultation to meet the requirements of the Town and Country Planning (Local planning) (England) Regulations 2012 (The regulations) as well as the guidance set out in Southwark's Statement of Community Involvement (SCI).

An informal first stage of the preparation of the NSP, the Issues and Options paper went out to public consultation in October 2014 until March 2015. This document set out an emerging strategy for regeneration in Southwark as well as the proposed approach to planning to deliver the Council's Fairer Future promises. It updated the strategy and area visions in the Core Strategy (2011).

The New Southwark Plan, Preferred Option (NSPPO) sets out how the Council will deliver further regeneration and wider improvements across the borough. Southwark Council utilises planning and regeneration to improve and protect neighbourhoods across the borough. Planning decisions must generally be made in accordance with the development plan which will include the New Southwark Plan, The London Plan, Area Action Plans and Neighbourhood Plans.

The NSPPO contains strategic policies setting out the Council's strategy for planning and regeneration along with detailed development management policies. At the time of writing it was expected that consultation on the NSPPO would take place between October 2015 and February 2016. It is envisaged that the submission version will be consulted on in the autumn of 2016.

The New Southwark Plan, Integrated Impact Assessment: Scoping Report

The New Southwark Plan, Integrated Impact Assessment: Scoping Report (NSPIIASR) was published in February 2015. The NSPIIASR considered relevant baseline information regarding key environmental, social and economic matters within the borough which are likely to be impacted by emerging NSP policies within the NSPPO. The NSPIIASR also established the framework for undertaking the IIA by setting out sustainability, health and equalities objectives, decision making criteria and indicators used to measure the impacts of the emerging policies.

Identifying Other Relevant Plans, Strategies and Programmes

To establish a clear and concise scope for the IIA it is necessary to identify and review the relevant policies, plans and programmes that may influence the content of the NSPPO. This process enables potential relationships to be identified that will allow any synergies to be exploited and any inconsistencies and/or constraints to be addressed. Additional objectives and indicators which would assist in analysing and comparing economic, environmental and social impacts are also identified.

It is important to identify this policy framework at an early stage. This is because a wide range of guidance and initiatives influence the United Kingdom's planning system and the development of planning policy in Southwark.

The policy framework is constantly evolving: at a national level, the NPPF and NPPG are now in place (replacing and simplifying a suite of former national policy and guidance documents); at a regional level, The London Plan 2015 and associated SPG's are subject to on-going review.

At a local level, planning decisions in Southwark are influenced by a number of statutory plan-making authorities and policy is developed with regard to corporate Council-wide strategies. In addition the evidence base continues to evolve as the NSP and associated framework documents are prepared.

Appendix 3 provides an overview of the key international, national, regional and local policies, plans and programmes that will inform the NSP and accompanying IIA.

3. Requirement for IIA

Under the Planning and Compulsory Purchase Act 2004 regulations, a Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA), prepared in accordance with the Strategic Environmental Assessment Directive EC/2001/42 is required for all Development Plan Documents.

Paragraph 165 of the NPPF states:

"*A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors*".

Southwark Borough Council has a statutory duty to consider the equality impacts of its decisions. The public sector Equalities Duty (section 149 of the Equality Act 2010) came into force on the 5th April 2011 which extended the previous duties to cover the following protected characteristics:

"Age, disability, gender reassignment, pregnancy and maternity, race – including ethnic or national origins, colour or nationality, religion or belief – including lack of belief, sex and sexual orientation".

While there is no statutory requirement to undertake a Health Impact Assessment (HIA), the government has clearly expressed a commitment to promoting HIA's at a policy level in a variety of policy documents and they are increasingly being seen as best practice.

The IIA considers proposed policies within the NSPPO and was carried out 'in-house' in September 2015 concurrent with the preparation of the NSPPO. Consultation on the IIA will take place alongside the NSPPO from 26 October 2015 to 12 February 2016.

4. Appraisal Methodology

IIA Topics

The sustainability, equalities and health impacts of policies contained within the NSPPO have been assessed with reference to the following 'topics' within which NSPPO policies have been grouped and assessed. Each topic references Strategic Policies outlined in the NSPPO. This approach ensures a consistent approach is used by the IIA, SA and other impact assessments prepared for the NSPPO.

Topic areas identified for use by the IIA include:

1. Quality affordable homes
2. Revitalised neighbourhoods
3. Best start in life
4. Strong local economy
5. Healthy active lives
6. Cleaner, greener, safer

As well as the topics outlined above, an additional topic, 'implementation', has been employed to group NSPPO policies related to the same.

IIA Assessment Framework

The establishment of appropriate objectives and indicative guide questions / sub-criteria is central to the assessment process and provides a way in which the performance of NSPPO polices can be assessed.

The IIA framework is based on 17 sustainability objectives outlined in the NSPIIASR. These objectives were developed by researching specific issues affecting Southwark, through a detailed desk top analysis and internal discussions. The objectives reflect the current social, economic and environmental issues affecting the borough and are linked with the aims of the Southwark 2016 Community Strategy.

The 17 objectives set out in Table 4.1 are reflective of a move toward the integration of impact assessments for the NSP. Objectives and associated criteria questions can be linked to the Sustainability Appraisal, Health Impact Assessment and Equalities Analysis.

Each of the objectives have been linked to the monitoring framework set out for the Core Strategy which established a comprehensive set of indicators to be examined through the Authority Monitoring Report (AMR). Making use of the same indicators for the NSPPO IIA allows for a consistency across the Local Plan process and ensures that objectives established below can be assessed.

As the NSP is progressed the IIA will appraise preferred policies against the framework of objectives as set out in Table 4.1. Table 4.2 sets out those groups affected by the HIA element and Table 4.3 sets out 'protected characteristics' considered by the EIA element.

Table 4.1: Integrated Impact Assessment Framework of Objectives

IIA Objective	SA/HIA/EIA Sub-criteria for assessment
IIA01	
To tackle poverty and encourage wealth creation	> Will it improve the range of job opportunities for all people? > Will it help to diversify the economy? > Will it increase the number of higher paid jobs in the borough? > Will it help reduce overall unemployment, particularly long-term unemployment? > Will it encourage the retention and / or growth of local employment and training opportunities in the most deprived areas? > Will it assist in providing land and buildings of a type required by businesses, for a range of employment uses? > Will it reduce poverty in those areas and communities / equalities groups most affected? > Will it improve access to low-cost transport and other facilities? > Will it provide for successful neighbourhoods for all? > Will it promote and enable tourism opportunities to be exploited, and employment created? > Will it result in a loss of employment land?
IIA02	
To improve the education and skill of the population	> Will it provide opportunities to improve the skills and qualifications of the population, particularly for young people and adults? > Will it help improve employee education / training programmes? > Will it help reduce skills shortages? > Will it help to reduce the disparity in educational achievement between different ethnic groups?
IIA03	
To improve the health of the population	> Will it promote and facilitate healthy living and active lifestyles amongst different groups? > Will it improve access to health and social care / treatment for all sectors of the community? > Will it maintain, enhance and create green infrastructure assets (e.g. green space, woodlands, recreation and sports facilities and allotments) for recreation, exercise and access to locally produced food? > Will it improve the quality of housing for all? > Will it improve access to jobs for all and otherwise reduce poverty?

	> Will it encourage a range and mix of land uses that underpin local health; for example avoiding over concentration of hot food takeaways in one location? > Will it help facilitate the supply and availability of locally produced food? > Will it help improve mental and emotional health, reducing social exclusion? > Will it promote non-polluting forms of transport? > Will it reduce exposure to poor air quality across all groups?
IIA04	
To reduce the incidence of crime and the fear of crime	> Will it improve safety and security? > Will it incorporate measures to reduce crime and the fear of crime, including anti-social behaviour? > Will it provide for a well maintained and inclusive public realm and other public facilities? > Will it encourage an active and connected, strong and cohesive community?
IIA05	
To promote social inclusion, equality, diversity and community cohesion	> Will it help support the voluntary and community sectors? > Will it support active community engagement? > Will it support a diversity of lifestyles and communities? > Will it promote accessibility for those people who are elderly or disabled? > Will it improve access to low-cost transport and other facilities? > Will it help sustain the provision of community facilities and open space that meets local needs? > Will it facilitate the connection of existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction? > How will different groups of people be affected by the option or policy - including black and minority ethnic communities, women, disabled people, lesbians, gay men, bisexual and transgender people, children and faith groups? Will it benefit the groups listed above?
IIA06	
To reduce contributions to climate change	> Will it reduce C02 and other greenhouse gas emissions? > Will it reduce consumption of energy? > Will it use renewable sources of energy? > Will it help local people cope with hotter/drier summers and warmer wetter winters? > Will it mitigate against the urban heat island effect? > Will it encourage the re-use of resources? > Will it encourage water efficiency and drought resilience?

	> Will it encourage the reuse or improvement of buildings and land that are vacant, under-utilised or in disrepair?
	> Will it maintain or enhance biodiversity?
IIA07	
To improve the air quality of Southwark	> Will it improve air quality?
	> Will it help to reduce emissions of PM10, N02?
	> Will it minimise construction impacts such as dust, noise, vibration and odours?
	> Will it encourage a reduction in amount and length of journeys made by car?
IIA08	
To avoid waste and maximise, reuse or recycle waste arising as a resource	> Will it promote the reduction of waste during construction / operation?
	> Will it minimise the production of household and commercial waste?
	> Will it promote sustainable processing of waste?
IIA09	
To encourage sustainable use of water resources	> Will it result in a net increase in the demand for water and foul sewage disposal?
	> Will it encourage reuse of water?
	> Will it maximise use of rainwater or other local water supplies?
	> Will it reduce discharges to surface and groundwater?
IIA10	
To maintain and enhance the quality of land and soils	> Will it result in the loss of open or previously undeveloped land?
	> Will it promote re-use of previously developed land and buildings?
	> Will it use land effectively and efficiently, including mixed use and higher density development?
	> Will it encourage the remediation of land identified as potentially contaminated?
	> Will it prevent further contamination of soils?
	> Will it improve soil quality?
IIA11	
To protect and enhance quality of landscape and townscape	> Will it conserve and enhance local landscape and townscape character and visual amenity?
	> Will it improve the relationship between different buildings, streets, parks and waterways and other spaces that make up the townscape character?
	> Will it have a negative impact on important strategic/local views?
	> Will it incorporate sustainable design and construction techniques?
IIA12	
To conserve and enhance	> Will it protect, maintain and enhance the condition and setting of features and areas of cultural, historical and archaeological heritage in the environment?

the historic environment and cultural assets	> Will it promote the historic environment and also contribute to better understanding of the historic environment?
	> Will it promote high quality design and sustainable construction?
	> Will it respect visual amenity and the spatial diversity of communities?
	> Will it maintain or increase access to leisure, sporting, cultural and arts destinations and facilities?
	> Will it improve leisure, sporting, cultural and arts provision?

IIA13	
To protect and enhance open spaces, green corridors and biodiversity	> Will it encourage development on previously developed land?
	> Will it improve the quality and access to open spaces in areas of deficiency?
	> Will it provide a range of play spaces for children and young people?
	> Will it maintain, enhance and create green infrastructure assets and networks (e.g. green space, woodlands, public rights of way, open recreation and sports recreation and sports facilities) across the area?
	> Will it help protect and improve biodiversity in the area overall and in particular avoid harm to species and habitats protected by International and UK law?
	> Will it protect and enhance natural habitats and protect priority species?
	> Will it encourage the creation of new habitats, including through the provision of additional open space and green roofs?
	> Will it help achieve the Biodiversity Action Plan (BAP) targets?
	> Will it protect and provide opportunities for creating / enhancing / improving sites designated for their nature conservation value / geo-diversity level (local and national levels?)

IIA14	
To reduce vulnerability to flooding	> Will the development be an area at risk of flooding?
	> Will it minimise the risk of and from flooding to people and property?
	> Will it protect and improve flood defences and allow them to be maintained?
	> Will it promote the use of sustainable urban drainage systems?

IIA15	
To provide everyone with the opportunity to live in a decent home	> Will it improve the supply of housing?
	> Will it contribute towards increasing the range of housing mix, sizes, tenures and affordability to meet the identified current and future needs of all social groups and local residents, including older households?
	> Will it deliver 'healthy homes'? (e.g. in relation to warmth, overcrowding, noise and mental health?)
	> Will it improve overall design quality, including flexibility of stock to enable it to evolve to meet changing needs?

IIA16	
To promote sustainable transport and minimise the need to travel by car	**>** Will it encourage development at locations that enable walking, cycling and / or the use of public transport and connected to local services and facilities? **>** Will it reduce car use? **>** Will it reduce the number and length of journeys undertaken by car? **>** Will it reduce road traffic accidents? **>** Will it improve public transport? **>** Will it promote walking and cycling? **>** Will it allow people with mobility problems or a disability to access buildings and places? **>** Will it improve connections across the area to local services, facilities, places of employment and green infrastructure?
IIA17	
To provide the necessary infrastructure to support existing and future development	**>** Will it provide enough social infrastructure and meet local needs? **>** Does the proposal explore opportunities for shared community use and co-location of services? **>** Will it provide enough physical infrastructure? **>** Will it provide enough green infrastructure?

For the HIA element of the IIA the impacts on the population groups listed below will be considered:

Table 4.2: Groups Affected by the Health Impact Assessment Element

Population groups - HIA	
Children 0-16	Unemployed
Young Adults 16-25	Low Income
Adults 25-65	Homeless / Street Community
Older Adults 65+	Refugees and asylum seekers
People with alcohol and drug problems	Ethnic groups
People with long term illness	Learning difficulties
People with mental health	Physical disabilities
Residents	Carers
Visitors	People who experience domestic violence

For the EQIA element of the IIA the impacts on the protected characteristics listed below will be considered. The Equality Act was introduced in October 2010. It replaces and extends all previous equality legislation into one overarching act. The Equality Act 2010 outlines a number of 'protected characteristics', which are the groups of people or communities where the government feels that discrimination or unfair treatment could arise. The IIA will consider if there are any unintended consequences for some groups and if the policies will be fully effective for all target groups.

Table 4.3: Protected Characteristics for Equalities Impact Assessment

EQIA consider the following protected characteristics:
There are six protected characteristics as set out in the Equality Act 2010. These are: Age; Disability; Gender reassignment; Pregnancy and maternity; Race - this includes ethnic of national origins; colour or nationality; Religion or belief - this includes lack of belief; Sex; Sexual orientation (including gender reassignment).

Appendix 2 contains the detailed appraisals of the NSPPO covering the nine topical areas using the above IIA framework.

5. Relevant Plans, Programmes and Baseline Information

The SEA Directive requires the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the borough and providing a basis for predicting and monitoring effects of the NSPPO. To make judgements about how the emerging content of the NSP will progress or hinder sustainable development, it is essential to understand the economic, environmental and social circumstances in the borough today and their likely evolution in the future.

SA / SEA Guidance provides a practical approach to data collection, recognising that information may not yet be available and that information gaps for further improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the IIA process guides plan making and as new information becomes available.

The IIA of the NSPPO follows on from the NSPIIASR and has therefore utilised the baseline prepared for this previous document.

Appendix 3 lists key plans, strategies and programmes relevant to the NSPPO.

6. Appraisal Summary for IIA Topics

The IIA appraisal tables in Appendix 2 set out the details of the impacts for each of the seven topics in terms of the 17 objectives in the IIA framework. Each appraisal is referenced by Strategic Policy and Development Management Policy contained in the NSPPO. In addition, for each strategic policy / topic area, seven overview tables have been prepared which appraise all of the Development Management policies contained within the strategic policy area.

Summary of the IIA Appraisals

1. Quality Affordable Homes

Overall Summary: <u>Positive</u>

Strategic Policy 1: "Quality affordable homes" and the development management policies that sit under it as a topic area have been assessed as having an overall positive future effect on the economic, social and environmental sustainability of the borough and the health and equality of residents, workers and visitors. Notably this includes:

-       An overall increase in affordable homes, family sized homes, private rented sector homes and housing for the elderly and other people with specialist needs. Our policies seeking to deliver these new homes, combined with optimizing the delivery of new homes through appropriate densities, means more housing of all types will be built and should relieve pressure on existing housing stock, reducing overcrowding and increasing affordability and security. However, it is noted there is a risk that the demand for housing could have a knock on effect on the delivery of jobs and employment space and our other proposed policies in the plan must be considered along side SP1 and those that sit under it, including Strategic policies 2, 3 4 and 5 and the corresponding the development management policies.

-       Reducing overcrowding and providing more homes to meet our current unmet need and the predicted future demand will contribute significantly to an increased chance of good physical and mental health. Poor housing conditions can cause stress and sleep deprivation which can also impact on children's school life. Providing homes for the families, the elderly, disabled people, private renters and people in between conventional accommodation arrangements (i.e. HMOs and hostels) will help all these diverse sections of society live their lives uninhibited by housing issues, enabling greater community cohesion.

-       SP1 and the concurrent development management policies may incur risks. Southwark already has poor air quality and providing more housing to accommodate a larger number of people will increase exposure to poor air quality. A growth in housing may worsen air quality through increased emissions from building plant and increased transport demand, particularly with the provision for family homes, where cars are rightly seen as a convenient mode of transport. There is a likelihood that the demand for energy and water will increase with an increased population. Looked at in isolation (see SP6 summary and policy assessments), an increase in housing will likely increase overall carbon emissions from the current baseline. However even with 'no plan' there would likely be a significant increase in housing and associated effects given the housing targets established in the London Plan.

-       Optimising the delivery of new homes through appropriate densities will promote walkable neighbourhoods at higher densities. This will have several benefits, some addressing the potential risks identified above. These benefits include a more lively street life with services and facilities becoming more viable due to the increase in demand from the increased number of residents. This will have the secondary benefit of reducing the opportunity for crime and the fear of crime through an increase in street life and natural surveillance. More

facilities and services due to increased demand will help form walkable neighborhoods in which everything a resident needs is within easy walking distance. This will then have knock-on impacts on the transport network, reducing the demand for private car use and encouraging walking, cycling and public transport. This in turn will reduce emissions and pollution per capita.

- Other risks identified from SP1 include a potential loss of unprotected amenity land on housing estates to help deliver new affordable council homes, increased construction impacts from the increase in overall housing delivery and that the majority of locations for housing will likely be in an area at risk of some form of flooding. These issues will be addressed through the other policies in the New Southwark Plan.

2. Revitalised Neighbourhoods

Overall Summary: <u>Positive</u>

Strategic Policy 2: "Revitalised Neighbourhoods" and the development management policies that sit under it as a topic area have been assessed as having an overall positive future effect on the economic, social and environmental sustainability of the borough and the health and equality of residents, workers and visitors. Notably this includes:

- With reference to revitalising neighbourhoods with the aim of making them places where everyone can be proud to live and work, Southwark Council have one of the most ambitious regeneration programmes in the country. It is leveraging the borough's unique position in central London to benefit local residents and encourage innovative development of spaces to provide new council and other affordable homes, jobs, schools, shops and places to work.

- SP2 outlines that homes are being built rapidly with most of the change taking place in the north and centre of the borough. Development management policies aim to ensure development is sensitive to local townscapes and existing communities, enhancing what already exists. Southwark's built heritage is recognised as a community asset and is strongly protected.

- The importance of urban greening and green infrastructure is recognised by development management policies. It is encouraged with reference to delivering multiple amenity and environmental benefits. Development that provides communal amenity space providing multiple benefits such as food growing is also encouraged.

- Development management policies recognise good quality housing can help to improve the health, safety, amenity and quality of life of current and future residents.

- Development which provides for accessible and inclusive design for all ages and especially for people with disabilities is supported ensuring future development is in compliance with the Equalities Act 2010, relevant London Plan policies and Part M of the building regulations.

- Development management policies support development which ensures high standards of design with commensurate consideration given to visual appearance, composition, aesthetics and detailing. This includes recognising the importance of significant Borough views and panoramas which provide a positive contribution to experiencing Southwark's position in London. Development that does not enhance such views is to be avoided.

- Risks identified by assessing SP2 policies include the recognition that tall buildings can look out of place in their surroundings with a risk of causing unpleasant environmental effects, especially to a given locations micro-climate. Risks are also recognised in relation to maintaining the strategic importance and unique character of the River Thames; this is

due to the areas environmental sensitivity and intense development pressure. These issues will be addressed through the other policies in the New Southwark Plan.

3. Best Start in Life

Overall Summary: <u>Positive</u>

Strategic Policy 3: "Best Start in Life" and the development management policies that sit under it as a topic area have been assessed as having an overall positive future effect on the economic, social and environmental sustainability of the borough and the health and equality of residents, workers and visitors. Notably this includes:

- SP3 aims to support all young people to have the best start in life by ensuring a safe, stable and healthy environment where they have the opportunity to develop, make choices and feel in control of their lives and future. The Council believes wholeheartedly in giving young people the best start in life and aims to do so by establishing a new childcare commission bringing together experts, parents, providers and employers to find new ways to guarantee care and early education. The Council also aims to make sure there are enough primary and secondary places for all.

- Development management policies recognise that education facilities can significantly enhance the economy and contribute to regeneration by complementing existing uses.

- In addition to supporting younger children development management policies seek to ensure appropriate student housing is delivered. This plan recognises that providing too much student accommodation can restrict the Council's ability to deliver more family and affordable housing. By requiring an element of affordable housing or contribution towards affordable housing from student housing development the Council can work towards meeting the strategic need for student accommodation and the local need for affordable homes.

4. Strong Local Economy

Overall Summary: <u>Positive</u>

Strategic Policy 4: "Strong Local Economy" and the development management policies that sit under it as a topic area have been assessed as having an overall positive future effect on the economic, social and environmental sustainability of the borough and the health and equality of residents, workers and visitors. Notably this includes:

- SP4 outlines that Southwark Council will work to ensure that the Borough has a strong local economy where all residents benefit. The Council intends to create more opportunities for people in Southwark to find work, get into training and achieve their aspirations.

- Development management policies encourage the diversification of the local economy and support the retention of existing small and medium enterprises by encouraging the development of affordable workspace and of railway arches. Activities supported include business uses (B Use Classes), retail (A Use Classes) and community facilities (D use classes) in railway arches.

- Tourism is promoted by a range of development management policies including those which support proposals for new hotels, protect heritage assets and recognise the contribution of pubs to the historic character of a given arealt is recognised that Southwark's historic assets can promote and enable tourism opportunities.

- Development management policies aim to help and improve employee education and training programmes. The Council's Economic Wellbeing Strategy objective of overcoming barriers to employment is supported by policies which promote a targeted approach to improve employment participation within Southwark and promote an entrepreneurial approach to business, especially amongst young people.

- Recognition and support is given to town and local centres. These places provide important services and facilities for the borough's residents and should be the main focus for new developments for town centre uses. The Council's aim is to increase the amount of shopping space in centres and improve the choice of goods and services while also encouraging the diversification of economic activity within these areas. This should improve access to jobs for all and otherwise contribute to a reduction in poverty.

- Infrastructure, particularly transport infrastructure which provides access to services and jobs for all people is supported by SP4 and associated development management policies. It is outlined that new mixed-use neighbourhoods will require significant investment and enhancement to pedestrian and cycle networks. The potential for other infrastructure enhancements, such as the proposed extension to the Bakerloo line, to drive growth and regeneration within the Borough is also supported.

5. Healthy, Active Lives

Overall Summary: <u>Positive</u>

Strategic Policy 5: "Healthy active lives" and the development management policies that sit under it as a topic area have been assessed as having an overall positive effect on the economic, social and environmental sustainability of the borough and the health and equality of residents, workers and visitors. Notably this includes:

- The delivery and increase in the range of jobs by supporting arts, culture, leisure and sports and health facilities, which can also positively effect wellbeing and mental health and provide opportunities for exercise, workshops, training classes and lessons. This will encourage social interaction and potentially employment prospects. These types of facilities, as well as community facilities can provide essential spaces for human interaction and discovery, reducing the chance of social exclusion. This is especially true for both the elderly, due to a lack of active friends or support networks, and children and younger people, where a lack of such facilities may have negative effects on their growth and their outlook on life.

- Arts, culture and leisure can extend our evening economies, adding life and vitality to places for a longer time each day, making people feel safer. Flexible, shared community facilities were assessed as a positive policy development due to the increased opportunities for social interaction across groups, and more people using spaces and buildings at different times of day, helping to create street life and enhancing natural surveillance. It will also be an efficient use of land in a borough where land is in extremely short supply.

- Promoting walking, cycling and public transport over private car use will similarly have multiple positive impacts. Well designed and easy-to-navigate routes will increase and improve access to services, facilities and jobs for residents and visitors and improve safety by reducing car accidents through integrating appropriate well designed infrastructure. Walking and cycling are the healthiest ways to move around and encouraging this will help make people and places healthier, more active and have improved air quality and reduce emissions. Opening up low line walking routes along and through the borough's railway viaducts will re-connect historically severed areas and provide space for and further improve access to a variety of businesses, services and facilities and encourage walking.

- Investment in public transport infrastructure and discouraging use of private motor vehicles will reduce negative environmental impacts, including CO2 emissions and air quality impacts. Car parking provision will be more restrictive than previous policy limits and the current London Plan, potentially impacting families more so than other groups where cars are seen as the most convenient mode of transport. However, we are increasing accessibility through the promotion of walking with good walking routes that make it easy for people with mobility issues to move around, as well as requiring cycle parking spaces for accessible bicycles and tricycles. Street level car parking will also be restricted.

6. Cleaner, Greener, Safer

Overall Summary: <u>Positive</u>

Strategic Policy 6: "Cleaner, greener, safer" and the development management policies that sit under it as a topic area (DM50-63) have been assessed as having an overall positive impact on the economic, social and environmental sustainability of the borough and the health and equalities of residents, workers and visitors. Notably this includes:

- The continued protection of currently protected green space and the creation of new green and open spaces will have multiple benefits, including providing new and improving existing habitats which will enhance the borough's biodiversity. Access to nature and greenery is known to have positive effects on mental wellbeing. Open and green spaces will also provide the opportunity for people to engage in leisure, sports and recreational activities which are often a good form of exercise. This will improve the health of the population in Southwark.

- Improving Southwark' s existing poor air quality has the potential to significantly improve physical health, particularly for vulnerable groups such as children and the elderly, who suffer the effects of poor air quality more so than other groups. Plants absorb CO_2 and release oxygen, meaning the more greenery Southwark has, through green walls and roofs, brown roofs, green open space, community food growing facilities and green open spaces such as parks and gardens the better the opportunity for improvement. It has been acknowledged that the air quality neutral policy has the potential to worsen air quality depending on the context of a site (for example, if the site has been empty for a number of years and the proposal is for an active use). The air quality neutral policy has been judged as a best-fit compromise between the need to improve air quality and also deliver homes and employment space.

- The integrated impact assessment acknowledged two risks regarding the impact of trees on air quality which depend on the detailed implementation of the policies. First is the type and context of trees used in the urban environment. While lots of types of trees can actively improve air quality, some types of trees can cause new harmful pollutants to form which would not otherwise have formed. Another risk is the immediate urban context in which trees are planted needs to be carefully considered. For example, the canopy cover that trees provide can trap pollutants at ground level and prevent them from escaping, making air quality worse for users of the street.

- Trees and other types of urban greening such as green walls and brown roofs will have positive impacts for other reasons, such as providing shade and minimising the solar gain of buildings, helping reduce overheating in buildings and the urban heat island effect. This will result in less need to artificially cool buildings, saving on energy consumption and CO_2 emissions.

- Ensuring new buildings and existing buildings are built or retrofitted to high environmental standards will also save energy and reduce greenhouse gas emissions. This will reduce utility bills, having a particularly positive effect in Southwark's deprived communities where fuel poverty is a higher risk for people. Retrofitting existing buildings and creating

sustainable new buildings will contribute to future proofing our built environment, helping it to be 'fot for purpose' for longer and resulting in a more efficient use of resources such as materials and energy. Other policies that will help to achieve an efficient use of resources include our energy policy, where combined heat and power will re-capture wasted heat energy to supply back to buildings; requirements for re-use of rain water; and requirements for construction phases to demonstrate sustainable waste management.

- Public safety will be positively impacted through improving green spaces for pedestrians and cyclists so that they can avoid main roads where traffic accidents and poor air quality is worse. New development and public realm will be required to "design out" opportunities for crime and reduce flood risk through design and mitigation measures. The appropriate management of waste will also help to positively impact health and safety of the public realm, minimising vermin and offensive odours and visual harm to amenity.

7. Implementation

Overall Summary: <u>Positive</u>

The implementation policies proposed in the New Southwark Plan have been assessed as having an overall positive impact. Ensuring existing infrastructure is adequate and building new infrastructure will help enable an increase in development, as the capacity of the borough (for services and utilities such as water, power, waste management and transport) is increased.

The assessment identified several positive impacts following from this, for example the opportunity to increase the supply of housing, or provide more jobs; jobs could be in the construction, expansion or upgrading of infrastructure, the construction of subsequent development made possible by the infrastructure or in the built-out development itself. Analysis of DM64 also recognised that identifying and implementing shared servicing programmes for developments in concentrated areas has the potential to improve air quality and road safety by minimising vehicle trips. The main risk noted is that an expansion or upgrade of water infrastructure, required because of the pressure new development will place on existing capacity, will result in a net increase in demand for water and foul sewage disposal.

Planning obligations such as Section 106 agreements and the community infrastructure levy will have a largely positive impact. The aim of DM65 is to offset the negative impacts of a development through financial contributions made by the developer to the council. For example, providing affordable housing or business space would help address a rise in housing or business premises costs; transport and public realm investment would help address increased pressure on transport; and building health and community facilities will help expand the capacity of the borough's social infrastructure. Requiring developments to include training, work placements and employment contributions for local people will improve employment opportunities. In effect, DM65 seeks to address all of the impact objectives listed as part of the integrated impact assessment through investment enabled by development.

The impact of DM66 Enforcement was assessed as largely being dependent on the individual cases and the impact of the policy cannot be assessed accurately in isolation. However, it is considered that the impacts of enforcement action are highly likely to be positive. Action would be taken against unlawful development that breaches planning policy. Our policies are there to protect amenity of people and ensure appropriate development is implemented. Enforcement action against persons means their development is in breach of our policies, for example accommodation standards may be very poor. In this instance, the action taken will mean that the standard of accommodation provided would be improved.

It was considered that compulsory purchase orders and monitoring will not directly impact any of the objectives set out in the integrated impact assessment when assessed in isolation. These policies form extremely useful tools from which more can be achieved in regeneration. For example, the impacts of a compulsory purchase of land by the council will depend on what that

land will be used for in the future. This will be influenced by other policies in the New Southwark Plan. Monitoring will not directly impact the built environment but will enable us to analyse what has been granted permission and what has been built in the borough. This will form a large evidence base to be built up that will help us refine and inform our policies in the future.

7. Conclusion

The overall impact of the seven identified topics in terms of the 17 objectives in the IIA framework has been assessed as being positive. This reflects the positive appraisal of each of the seven topics. Some risks have been identified been these are generally mitigated by other policies in the plan.

Appendix 1 – Integrated Impact Assessment Framework & Monitoring Indicators

Includes:

Table A1.1: Integrated Impact Assessment Framework & Monitoring Indicators

The IIA incorporates: Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA) and Equality Impact Assessment (EIA).

Table A.1: Integrated Impact Assessment Framework & Monitoring Indicators

IIA Objective	SA//HIA/EIA Sub-Criteria for assessment	Monitoring Indicators
IIAO1: **To tackle poverty and encourage wealth creation**	> Will it improve the range of job opportunities for all local people? > Will it help to diversify the economy? > Will it increase the numbers of higher paid jobs in the borough? > Will it help reduce overall unemployment, particularly long-term unemployment? > Will it encourage the retention and /or growth of local employment and training opportunities in the most deprived areas? > Will it assist in providing land and buildings of a type required by businesses, for a range of employment uses? > Will it reduce poverty in those areas and communities / equalities groups most affected? > Will it improve access to low-cost transport and other facilities? > Will it provide for successful neighbourhoods for all? > Will it promote and enable tourism opportunities to be exploited, and employment created? > Will it result in a loss of employment land?	Employment land available and take up rates New business formation and Survival a) Rate of Business Formation per 10,000 b) 3 year business survival rate Numbers and % jobs in Southwark by sector Southwark compared to London (broken down by micro, small and medium sized businesses) Vacancy Levels and non-retail uses in primary frontages in town centres Numbers of unemployed/ numbers receiving benefit (by sector) Indices of deprivation 2015: Local Authority summary Indices of deprivation 2015: Employment domain Indices of deprivation 2015: Income domain Children in poverty (under 16s)
IIAO2: **To improve the education and skill of the population**	> Will it provide opportunities to improve the skills and qualifications of the population, particularly for young people and adults? > Will it help improve employee education/training programmes? > Will it help reduce skills shortages? > Will it help to reduce the disparity in educational achievement between different ethnic groups?	Indices of deprivation 2015: Local Authority summary Indices of deprivation 2015: Education, skills and training domain Indices of deprivation 2015: % of the population with higher education qualifications

IIA Objective	SA//HIA/EIA Sub-Criteria for assessment	Monitoring Indicators
		% of population with no qualifications
		Proportion of resident pupils attending Southwark schools achieving 5+ A-Cs including English and Maths
IIAO3: **To improve the health of the population**	> Will it promote and facilitate healthy living and active lifestyles amongst different groups? > Will it improve access to health and social care/treatment for all sectors of the community? > Will it maintain, enhance and create green infrastructure assets (e.g. green space, woodlands, recreation and sports facilities and allotments) for recreation, exercise and access to locally produced food. > Will it improve the quality of housing for all? > Will it improve access to jobs for all and otherwise reduce poverty? > Will it encourage a range and mix of land uses that underpin local health; for example, avoiding over concentration of hot food takeaways in one location? > Will it help facilitate the supply and availability of locally produced food? > Will it help improve mental and emotional health, reducing social exclusion? > Will it promote non-polluting forms of transport? > Will it reduce exposure to poor air quality across all groups?	Life expectancy by equality group Rate of obesity in children (year 6) Obese adults Infant mortality Mortality from cancer, heart disease and stroke Smoking related deaths Alcohol specific hospital stays (under 18s) Hospital stays for alcohol related harm Drug misuse Incapacity benefit for mental illness Distance to GP premises from home Percentage of hospital admissions that were emergencies, by ethnic group Indices of deprivation 2015: health deprivation and disability Indices of deprivation 2015: barriers to housing and services domain Indices of deprivation 2015: living environment domain No. of new takeaways permitted
IIAO4:	> Will it improve safety and security?	Indices of deprivation 2015: Crime deprivation

IIA Objective	SA//HIA/EIA Sub-Criteria for assessment	Monitoring Indicators
To reduce the incidence of crime and the fear of crime	> Will it incorporate measures to reduce crime and the fear of crime, including anti-social behaviour? > Will it provide for a well maintained and inclusive public realm and other public facilities? > Will it encourage an active and connected, strong and cohesive community?	Numbers of types of crime per annum Percentage of residents who feel fairly safe or very safe outside during the day/night Reports of anti-social behaviour
IIAO5: **To promote social inclusion, equality, diversity and community cohesion**	> Will it help support the voluntary and community sectors? > Will it support active community engagement? > Will it support a diversity of lifestyles and communities? > Will it promote accessibility for those people who are elderly or disabled? > Will it improve access to low-cost transport and other facilities? > Will it help to sustain the provision of community facilities and open space that meets local needs? > Will it facilitate connection of existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction? > How will different groups of people be affected by the option or policy - including black and minority ethnic communities, women, disabled people, lesbians, gay men, bisexual and transgender people, older people, young people, children and faith groups? Will it benefit the groups listed above?	Proportion of people who think they can influence decision-making in their locality Employment/Skills/Health/ Homelessness waiting list by equality group
IIAO6: **To reduce contributions to climate change**	> Will it reduce CO_2 and other greenhouse gas emissions? > Will it reduce consumption of energy? > Will it use renewable sources of energy? > Will it help local people cope with hotter drier summers and warmer wetter winters? > Will it mitigate against the urban heat island effect? > Will it encourage the re-use of resources? > Will it encourage water efficiency and drought resilience? > Will it encourage the reuse or improvement of buildings and land that are vacant, under utilised or in disrepair? > Will it maintain or enhance biodiversity?	BREAAM and Code for Sustainable Homes Scores of major consents CO_2 emissions and energy consumption (break down by source/type) No. of extreme weather events by type No. of hospital admissions as a result of extreme weather Environmental performance of borough's housing stock

IIA Objective	SA//HIA/EIA Sub-Criteria for assessment	Monitoring Indicators
IIAO7: **To improve the air quality in Southwark**	> Will it improve air quality? > Will it help to reduce emissions of PM10, NO2? > Will it minimise construction impacts such as dust, noise, vibration and odours? > Will it encourage a reduction in amount and length of journeys made by car?	Number of days of high air pollution Annual average concentrations and number of hourly exceedences of nitrogen dioxide in air Annual average concentrations and number of daily exceedences of PM10 in air
IIAO8: **To avoid waste and maximise, reuse or recycle waste arising as a resource**	> Will it promote the reduction of waste during construction / operation? > Will it minimise the production of household and commercial waste? > Will it promote sustainable processing of waste?	Municipal waste land-filled (tonnes) Residual household waste per household (tonnes) Percentage of municipal waste sent for reuse, recycling and composting
IIAO9: **To encourage sustainable use of water resources**	> Will it result in a net increase in the demand for water, and foul sewage disposal? > Will it encourage reuse of water? > Will it maximise use of rainwater or other local water supplies? > Will it reduce discharges to surface and groundwater?	Average domestic and commercial potable water consumption (l/head/day) Water quality measure
IIAO10: **To maintain and enhance the quality of land and soils**	> Will it result in the loss of open or previously undeveloped land? > Will it promote re-use of previously developed land and buildings? > Will it use land effectively and efficiently, including mixed use and higher density development? > Will it encourage the remediation of land identified as potentially contaminated? > Will it prevent further contamination of soils? > Will it improve soil quality?	New homes built on previously developed land Number of contaminated sites Number of contaminated sites not remediated
IIAO11: **To protect and**	> Will it conserve and enhance local landscape and townscape character, and visual amenity?	Building for Life Assessments

IIA Objective	SA//HIA/EIA Sub-Criteria for assessment	Monitoring Indicators
enhance quality of landscape and townscape	> Will it improve the relationship between different buildings, streets, squares, parks and waterways and other spaces that make up the townscape character? > Will it have a negative impact on important strategic/local views? > Will it incorporate sustainable design and construction techniques?	Housing density BREAAM and Code for Sustainable Homes Scores of major consents
IIAO12: **To conserve and enhance the historic environment and cultural assets**	> Will it protect, maintain and enhance the condition and setting of features and areas of cultural, historical and archaeological heritage in the environment? > Will it promote the historic environment and also contribute to better understanding of the historic environment? > Will it promote high quality design and sustainable construction methods? > Will it respect visual amenity and the spatial diversity of communities? > Will it maintain or increase access to leisure, sporting, cultural and arts destinations and facilities? > Will it improve leisure, sporting, cultural and arts provision?	Amount of Southwark covered by Conservation Area or APZ Numbers of heritage assets in the borough on the English Heritage buildings at Risk Register Changes in numbers of listed buildings Number of scheduled ancient monuments at risk Number of conservation areas at risk Number of conservation areas with up-to-date appraisal/ management plans
IIAO13: **To protect and improve open spaces, green corridors and biodiversity**	> Will it encourage development on previously developed land? > Will it improve the quality and access to open spaces in areas of deficiency? > Will it provide a range of play spaces for children and young people? > Will it maintain, enhance and create green infrastructure assets and networks (e.g. green space, woodlands, public rights of way, open recreation and sports facilities) across the area? > Will it help protect and improve biodiversity in the area overall and in particular avoid harm to species and habitats protected by International and UK law? > Will it protect and enhance natural habitats and protect priority species? > Will it encourage the creation of new habitats, including through the provision of additional open space and green roofs? > Will it help achieve the Biodiversity Action Plan (BAP) targets? > Will it protect and provide opportunities for creating/ enhancing/improving sites designated for their nature conservation value/geodiversity level (local	Change in quantity of open space (ha) Change in SINCS and LNPS Number and net change in natural/semi-natural habitats Changes in population of selected characteristic species Open space deficiency Deficiency in access to nature Protected trees lost No. of green roofs/facades

IIA Objective	SA//HIA/EIA Sub-Criteria for assessment	Monitoring Indicators
	and national levels?)	
IIAO14: **To reduce vulnerability to flooding**	> Will the development be in an area at risk of flooding? > Will it minimise the risk of and from flooding to people and property? > Will it protect and improve flood defences and allow them to be maintained? > Will it promote the use of sustainable urban drainage systems?	Planning permissions granted contrary to EA advice Number of flooding incidents (including sewer flooding) Condition of flood defences Flood protection projects delivered as part of consents and otherwise
IIAO15: **To provide everyone with the opportunity to live in a decent home**	> Will it improve the supply of housing? > Will it contribute towards increasing the range of housing mix, sizes, tenures and affordability, to meet the identified current and future needs of all social groups and local residents, including older households? > Will it deliver 'healthy homes'? (e.g. in relation to warmth, overcrowding, noise and mental health?) > Will it improve overall design quality, including flexibility of stock to enable it to evolve to meet changing needs?	Amount of homes in the borough Percentage of households living in temporary accommodation Households in housing need Households on the housing register Households unintentionally homeless and in priority need Income to average house price ratio No. of families living in overcrowded properties Proportion of consents meeting lifetime homes criteria
IIAO16: **To promote sustainable transport and minimise the need to travel by car**	> Will it encourage development at locations that enable walking, cycling and/or the use of public transport and connected to local services and facilities? > Will it reduce car use? > Will it reduce the number and length of journeys undertaken by car? > Will it reduce road traffic accidents? > Will it improve public transport?	Estimated traffic flows per annum (mil.vehicle km) Transport related CO2 emissions The number of people killed or seriously injured in road traffic collisions

IIA Objective	SA//HIA/EIA Sub-Criteria for assessment	Monitoring Indicators
	> Will it promote walking and cycling? > Will it allow people with mobility problems or a disability to access buildings and places? > Will it improve connections across the area to local services, facilities, places of employment and green infrastructure?	Proportion of personal travel made on each mode of transport overall and by equality group
IIAO17: **To provide the necessary infrastructure to support existing and future development**	> Will it provide enough social infrastructure and meet local needs? > Does the proposal explore opportunities for shared community use and co-location of services? > Will it provide enough physical infrastructure? > Will it provide enough green infrastructure?	No. and type of existing infrastructure (social, physical and green) Capacity of existing infrastructure (social, physical and green) No. and type of proposed infrastructure (social, physical and green) Capacity of future infrastructure (social, physical and green)