



Proposed changes to the Submitted New Southwark Plan Integrated Impact Assessment

(August, 2020)

CONSULTATION	TIMETABLE
Let's talk about your high streets	Informal consultation took place between October 2013 and February 2014
New Southwark Plan Options (Draft Policies and Area Visions) (2014)	Consultation took place between 31 October 2014 and 6 March 2015.
New Southwark Plan Preferred Option Part 1: Policies (including IIA for all DM policies)	Consultation took place between October 2015 and February 2016
New Southwark Plan Preferred Option Part 2: Site Allocations and Area Visions (including IIA for all area visions)	<p>Informal consultation took place throughout 2016 where draft visions for each area that were consulted on previously were placed on the council's website and comments invited on areas and vision content. In November 2016 the council circulated a reminder email to the policy consultation list inviting any further representations in preparation for the drafting of the visions and site allocations. Officers attended key stakeholder groups in visions areas to discuss the content of visions.</p> <p>Formal consultation initially took place on this document 6 February 2017 to 28 April 2017 however was extended to & July 2017.</p>
New Southwark Plan: New and Amended Preferred Option Policies Consultation	21 June to 13 September 2017.
New Southwark Plan Proposed Submission Version (including an IIA appraisal to assess the updated visions, sites and policies)	Informally consulted on from 25 October 2017 for 12 weeks. Formal consultation took place from 1 December 2017 to 27 February 2018.
Consideration of responses and developing the New Southwark Plan submission version alongside all relevant documents.	February to December 2018.
New Southwark Plan Proposed Submission Version: Amended Policies 2019 (including an IIA appraisal to assess the updated visions, sites and policies)	Informally consulted on from 15 January 2019 for 12 weeks. Formal consultation took place from 23 January 2019 to 17 May 2019.
Submission version (including this IIA appraisal to assess the updated visions, sites and policies)	Submitted to the Secretary of State on 16 January 2020.
Proposed changes to the Submitted New Southwark Plan	To be consulted on in summer 2020
Public examination	Expected to take place in winter 2020
Submission of the draft Old Kent Road Area Action Plan Integrated Impact Assessment Report to the Planning Inspectorate	Expected summer 2021
New Southwark Plan	To be adopted summer 2021

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Appendices relevant to the background:

- Appendix 1: Strategic Directive Requirement
- Appendix 2: Relevant Plans, Programmes and Strategies
- Appendix 3: Baseline data – Facts and Figures
- Appendix 4: Sustainability Appraisal Framework

Appendices with detailed appraisals:

- Appendix 5: Assessment of the Area Visions and Site Allocations
- Appendix 6: Assessment of the Strategic and Development Management Policies
- Appendix 7: Assessment of the Implementation Policies

Appendices of indicators, monitoring and option testing:

- Appendix 8: Monitoring indicators against sustainability objectives
- Appendix 9: Baseline Indicators Table
- Appendix 10: Options Testing
- Appendix 11: Scoping Report
- Appendix 12: Reasonable alternatives considered
- Appendix 13: Policy Evolution

Glossary

AAP	Area Action Plan
AMR	Authority Monitoring Report
BLE	Bakerloo Line Extension
CAZ	Central Activities Zone
EqIA	Equalities Impact Assessment
GLA	Greater London Authority
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
IIA	Integrated Impact Assessment
LDS	Local Development Scheme
MWIA	Mental Well-being Impact Assessment
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NSP	New Southwark Plan
NSPIIASR	New Southwark Plan, Integrated Impact Assessment: Scoping Report
NSP PSV	New Southwark Plan Proposed Submission Version
NSPPO	New Southwark Plan, Preferred Option
NSP AVs&SAs	New Southwark Plan Area Visions and Site Allocations
NSP SV	New Southwark Plan, Submission Version
OA	Opportunity Area
OAPF	Opportunity Area Planning Framework
PSV	Proposed submission version
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SCI	Statement of Community Involvement
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
SRC	Social Regeneration Charter
SUDS	Sustainable Urban Drainage Systems
TFL	Transport for London

1. Non technical summary

What is this document?

- 1.1 This document reports on the Integrated Impact Assessment (IIA) of the Proposed Changes to the Submitted New Southwark Plan. The IIA fulfils the requirement for a Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Analysis (EQIA) 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. It also illustrates the council's approach to promoting sustainable growth in the borough with equality, diversity and the health of residents at the heart of everything we do.
- 1.2 The Council has previously completed a thorough IIA for the New Southwark Plan Proposed Submission Version (NSP PSV 2017) policies, area visions and site allocations which assessed the options for how the NSP PSV 2017 can manage growth in the area (Options-testing appraisal can be found in **Appendix 10**). A subsequent IIA for the Amended Policies 2019 version of the NSP was submitted appraising changes to policies, area visions and site allocations, as part of the subsequent round of consultation for the NSP.
- 1.3 This report replaces and updates the New Southwark Plan Final Submission Version Integrated Impact Assessment (December, 2019). New Southwark Plan was submitted to the Secretary of State in January 2020 and two Inspectors have been appointed to examine the plan. The Inspectors wrote to the Council on 20 April 2020 to request further information on the Council's approach to flooding and the sequential test; and the reasonable alternative options considered for the overall strategic approach to development in the Borough.
- 1.4 Within the IIA submitted in January 2020 the site allocations have been grouped together with their respective site area visions. This grouping has been followed for the appraisal and each vision area has been assessed as a whole including the allocation sites pertaining to the area visions. The Inspectors have pointed out that this approach did not allow the consideration of an individual site's performance against the Council's appraisal objectives nor it enabled the consideration of any potential mitigation measures required. As such, the IIA has now been updated with the site appraisal for each individual site allocation against the IIA objectives and this is set out in **Appendix 5**.
- 1.5 The borough is at risk of flooding from a number of sources including from the River Thames as well as from ground and surface water flooding. The Inspectors have pointed out that no evidence was provided that a sequential, risk based approach to the location of development as required by paragraph 157 of the Framework has been carried out. Within the sustainability appraisals set out in Appendix 5, Objective 14 details how the sequential test (and exception test if required) has been applied with further analysis for each site allocation.
- 1.6 The IIA has been further updated to more clearly set out the Council's considerations of reasonable alternatives for planning for growth on each site allocation and this is set out in **Appendix 12**, and it now provides details Option C: Higher Option. All site allocation capacities considered during different iterations are also set out within this appendix. The final indicative site capacity assumptions are set out in Appendix 12, and are also provided within the Sites Allocations Methodology Report (July 2020) and the Proposed changes to the Submitted Plan July 2020).
- 1.7 This IIA provides the final version of all policies, area visions and site allocations for the Proposed Changes to the Submitted New Southwark Plan version, responding to all previous consultation feedback.

- 1.8 As part of the IIA, the final submission policies, site allocations and area visions are assessed against seventeen sustainability, health and equalities objectives, initially established by the New Southwark Plan, Integrated Impact Assessment: Scoping Report (NSPIIASR found in Appendix 11: Scoping Report), published and consulted upon in February 2015. The seventeen objectives are subsequently referred to in this report as IIA Objectives, numbered from one to seventeen, and answer the combined sustainability, health and equalities questions set out in **Appendix 4: Sustainability Appraisal Framework**.
- 1.9 The methodology for selecting these IIA Objectives, appraising Proposed changes to the Submitted New Southwark Plan version policies, area visions and site allocations and future monitoring of the adoption of the NSP are established in the subsequent section of the report. Each of the IIA Objectives is monitored by a number of Baseline Indicators, which are established in **Appendix 3: Baseline data – Facts and Figures**. This uses existing data monitored by the council, to regularly indicate sustainability outcomes from the implementation of the NSP. The Baseline Indicators to continuously monitor the adoption of the NSP are presented in table format in Appendix 9: Baseline Indicators Table.
- 1.10 The role of this document is to explain the process that the council has undertaken to establish these IIA Objectives, which are legally compliant with European, national and regional legislation. Secondly, to appraise the Proposed changes to the Submitted New Southwark Plan policies, area visions and site allocation using these IIA Objectives and Baseline Indicators, which can be found in **Appendix 5: Assessment of the Area Visions and Site Allocations**, Appendix 6: Assessment of the Strategic and Development Management Policies **and Appendix 7: Assessment of the Implementation Policies**. Thirdly, this document indicates how the council proposes to continue to monitor the consequences of implementing the Proposed changes to the Submitted New Southwark Plan (Option B: Place-shaping and Plan-making selected as the most sustainable option over Option A: Business-as-usual in the NSPIIASR and Option C: Higher option) in Appendix 9: Baseline Indicators Table. As such, it presents a case that the draft Local Plan is legally compliant with all relevant legislation, plans and programmes, as established in Appendix 2: Relevant Plans, Programmes and Strategies.

2. Introduction

What does this document do?

- 2.1 The IIA identifies the impacts of the NSP policies, area visions and site allocations on sustainability objectives, health of the population and equality groups. The process has consisted of the collection of baseline information on the environmental, social and economic characteristics of the borough (scoping). This collection of information has been used to identify sustainability issues, objectives and indicators in order to assess the likely impacts of the policies in the Proposed changes to the Submitted New Southwark Plan and to enable monitoring of progress in the future.
- 2.2 The established appraisal framework for undertaking the IIA sets out sustainability, health and equality objectives, referred to as IIA Objectives (IIAO), with associated supporting indicators, known as Baseline Indicators, which are used to measure the impacts of the emerging NSP. These objectives inform the criteria for assessment of policies, area visions and site allocations (appraised in **Appendix 5, 6 and 7**) with relevant questions that identify any risks or negative consequences of implementing a policy/area vision or site allocation (questions and targets using baseline indicators can be found in **Appendix 4: Sustainability Appraisal Framework**). The sustainability appraisal of the NSP, provides the opportunity for the Council to respond to any potential negative impact of a policy by amending or mitigating through future monitoring of the plan.
- 2.3 The conclusions reached in undertaking the IIA are a result of both quantitative and qualitative (i.e. subjective and based on professional opinion) judgements made by predicting the outcome of a potentially complex mix of social, economic and environmental factors. It is important to recognise where baseline indicators and IIAO's overlap to inform any outcome in the final appraisal. The overlap of IIAO and Baseline Indicators are visually represented in a matrix in **Appendix 8**, which help to inform the appraisals (**Appendix 5, 6 and 7**).

What has been taken from the previous IIA?

- 2.4 Having undertaken a detailed IIA through previous draft Local Plan consultations, it is considered that the six strategic policies (or topic areas) were positively represented through the seventeen IIAOs, and will continue to reflect this in the future monitoring of Baseline Indicators (**Appendix 4**). Key positive impacts are identified in terms of social, economic and environmental sustainability in the summary of appraisals provided in this report. Some risks have been identified but these are generally mitigated by other policies in the plan.

Structure of this Document

- 2.5 This document will firstly outline the policy requirements for the IIA in the following chapter, with more detailed information provided in **Appendix 1 and Appendix 2**. Secondly, it will provide a background into the IIA and the NSP, summarizing how the IIA developed through earlier consultations and how these have informed the Proposed changes to the Submitted New Southwark Plan. Thirdly, it will provide a brief overview to the approach taken to collecting baseline data and subsequently forming baseline indicators that will be used to monitor the future impacts of adopting the NSP. The entirety of baseline data, including baseline indicators and contextual characteristics are included in **Appendix 3**.
- 2.6 The fourth chapter provides detailed overview into the IIA appraisal methodology, describing the conjunction of baseline indicators and IIAOs, used to appraise the NSP policies, area visions and site allocations. The formation of the IIAOs, to inform sustainability, health and equalities targets are provided in **Appendix 4**. This appendix

describes how the IAOs were selected based on the requirements of regulation described in Chapter 2, to justify legal compliance of the proposed Local Plan to meeting sustainability, health and equality targets. It also indicates the targets of the Council's baseline indicators which are continuously being monitored across different teams at the Council, and how these baseline indicators align with the objectives, to support the negative and/or positive impacts of future adoption of the draft Local Plan.

- 2.7 The fifth chapter identifies the process of identifying options within **Appendix 10**, for the Proposed changes to the Submitted New Southwark Plan, summarizing the NSP Scoping Report that was submitted and consulted upon in 2015. This is included in full in **Appendix 11** and justifies why the selection of Option B: Place-shaping and Plan-making is identified as more supportive to the health, sustainability and equality objectives than Option A: Business-as-usual, which includes keeping the adopted Southwark Plan (2007) and Core Strategy (2011) or by selecting Option C: Higher option. Further information on the Council's considerations of reasonable alternatives for planning for growth and the site allocation capacities which informed the final indicative site capacity assumptions are set out within **Appendix 12**.
- 2.8 The sixth chapter sets out how the seventeen objectives were developed that formed the basis of the IIA appraisal methodology and assessment; and further details on how the IIA appraisal was carried out.
- 2.9 The seventh Chapter summarizes the full Sustainability Appraisal of the NSP policies, found in detail in **Appendix 6**, and identifies any mitigation or negative impacts that could arise based on the objectives as a result of adopting policies from the draft Local Plan. This chapter is a summary and overview as to whether the policies are positively prepared to support the sustainability, health and equality objectives of the regulatory bodies in adopting the draft Local Plan.
- 2.10 Chapter eight summarizes the appraisals from **Appendix 5** of the sustainability of the Area Visions and Site Allocations. Chapter eight further summarizes the approach to the sequential test (and exception test if required).
- 2.11 Chapter nine summarizes the appraisals from **Appendix 7** of the sustainability of the Implementation Policies.
- 2.12 Finally, the tenth chapter sets out how the impacts of the Proposed changes to the Submitted New Southwark Plan on sustainability, health and equality will be monitored, based on continued feedback from the Baseline Indicators. This is included in further detail in **Appendix 8** and **Appendix 9**.

3. Regulatory requirements for the IIA

Why is this document required?

3.1 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.

3.2 Paragraph 32 of the NPPF (2019) states:

“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)”.

3.3 Southwark 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”.

3.4 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 move towards Integrated Impact Assessment

3.5 The council is also required by UK law to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics, as set out in the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act 2010). The council carries out Equalities Analysis (EqIA) of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals on the key 'protected characteristics' in the Equality Act 2010 and on Human Rights.

3.6 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.

3.7 An Equalities Impact Assessment (EQIA) has been conducted in addition to the equalities considerations made in the Integrated Impact Assessment (IIA) to form the equality analysis.

3.8 The equalities impact of the Proposed changes to the New Southwark Plan has been assessed at every stage of the plan. The document assesses the Plan against the protected characteristics highlighting where there is a positive impact, negative impact or neutral impact. Each strategic policy, development management policy, implementation policy and area vision has been assessed for its equalities impact. A summary is also

provided of the key equalities issues and positive and negative impacts of the Strategic and Implementation Policies. It also sets out the mitigation where appropriate.

- 3.9 The IIA sets out the baseline data and indicators that have informed the assessment of the equalities impacts of the policies in the Proposed changes to the Submitted New Southwark Plan. The EQIA pulls out further data more specifically related to the protected characteristics and socio-economic disadvantage. Appendix 1 - Supporting Datasets of the EQIA has also highlighted where the data is unavailable for more specific datasets.
- 3.10 The outcome of this assessment of equalities sits alongside the HRA, HIA, and SA to create a comprehensive sustainability assessment.
- 3.11 The IIA considers if there are any unintended consequences for people within the equalities and health groups and if the policies will be fully effective for all target groups. Crucially, assessing policies from these different perspectives - that is 1) a sustainability perspective (including environmental, social and economic sustainability), 2) an equalities perspective and 3) a health perspective - enables a considered and holistic approach to assessing the policies in the Proposed changes to the Submitted New Southwark Plan in an integrated way.
- 3.12 There are overlaps in the methods and outputs of the above documents and therefore an approach which fuses the statutory requirements of the SA, SEA, EqIA and HIA into a single integrated impact assessment is used to assess the impact of the Proposed changes to the Submitted New Southwark Plan in an integrated way.

Strategic Environmental Assessment Directive

- 3.13 SAs are also required to satisfy the European Directive 2001/42/EC. The Directive requires a formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. SEA is transposed into UK legislation through the Environment Assessment of Plans and Programmes Regulations 2004. SEA is focused primarily on environmental effects, whereas SA goes further by examining all the sustainability related effects of plans, whether they are social, environmental or economic. The process for undertaking SA is conducted in accordance with the requirements of the SEA Directive. Appendix 1 explains what the SEA directive is and signposts where the relevant information can be found within the document.

Habitats Regulations Assessment

- 3.14 The Conservation of Habitats and Species Regulations (as amended) (2010) [the Habitats Regulations] require that Habitats Regulation Assessment (HRA) is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance.
- 3.15 The objective of the HRA screening process is to determine whether likely significant effects on designated Natura 2000 sites, either alone or in combination may result from the implementation of Proposed changes to the Submitted New Southwark Plan. 'Likely significant effect' in this context is any effect that may reasonably be predicted as a consequence of the plans that may affect the conservation objectives of the features for which a site was designated.
- 3.16 The information collated in the baseline information and from consultation on the scoping report has been mapped, reviewed and assessed against the draft policies and strategies of the Proposed changes to the Submitted New Southwark Plan to determine whether there is potential for the integrity of these sites to be affected. Site integrity is defined as:

“the coherence of its structure and function across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified”

- 3.17 The HRA of the Proposed changes to the Submitted New Southwark Plan has been undertaken alongside the IIA, with the findings of the HRA informing the IIA. The methods and findings of the HRA process are reported separately from the IIA and the report has been approved by the statutory consultee (Natural England) and placed online to be accessed by the wider public.
- 3.18 The HRA screening process has found that the policies and site allocations to be adopted under the Proposed changes to the Submitted New Southwark Plan will have no negative impact on the four European Sites that are located within a 10km boundary of Southwark, either alone or when considered in combination with other existing plans and projects. In light of this finding, it is not required to carry out any further HRA analysis.

Health Impact Assessment

- 3.19 Health Impact Assessment (HIA) is a combination of procedures, methods and tools by which a policy, program or project may be judged as to its potential effects on the health of a population, and the distribution of these effects within the population. In this context health can be defined as both physical and mental health and well-being. HIA also considers the potential effects on the determinants of health such as life circumstances and lifestyles. HIA is still a relatively new concept and as yet, there is no one standard method for conducting HIAs. However it should involve all relevant stakeholders and use a range of methods to gather data as evidence. While HIA is not required by law it is considered good practice, particularly since responsibility in managing the health of populations was transferred from national government to local authorities following the Health and Social Care Act 2012.
- 3.20 A Health and Wellbeing Impact Assessment (HIA) has been collated to identify the impacts of planning issues on health in the borough. This is centred round the assessment of the plan using four key themes:
- Housing design and affordability;
 - Accessibility and active travel;
 - Healthy environment; and
 - Vibrant neighbourhoods.
- 3.21 These findings are reflected in a separate report and used to inform the IIA. This report is a desktop based assessment of the health impacts of the NSP. The HIA uses the HUDU Model to identify health impacts of the policies in the Proposed changes to the Submitted New Southwark Plan. The HUDU Planning Contributions Model is a comprehensive tool to assess the health service requirements and cost impacts of new residential developments. The public health team at Southwark was also given the opportunity to comment and give guidance.
- 3.22 The key identified health impacts on the Proposed changes to the Submitted New Southwark Plan are surrounding mental health and wellbeing in regards to creating a strong sense of place, and easily navigable and legible pedestrian routes and public realm. This is especially important for the elderly, and for those with neurological conditions or disabilities as it allows for independent living and improves safety and security for all. There are also issues surrounding the prevalence of hot food takeaways and obesity, which Strategic Policy 5 Healthy, active lifestyles aims to address.

- 3.23 The transport policies and low line routes policies ensure greater safety and accessibility to active travel and improve the pedestrian experience to encourage more active lifestyles for all. In terms of air quality and pollution, there are also issues around the impact of poor air quality on life expectancy, health and quality of life. These are all issues the Plan aims to mitigate.
- 3.24 The Health and Well-being Impact Assessment is integrated into the IIA. The IIA in its assessment of the policies and their impact has taken into consideration the potential health impacts of the plan. The sustainability objectives also make due regard to the potential health impacts arising from the implementation of policies in the NSP. The baseline data and indicators in the IIA provide a context for need in the borough and have informed the assessment of policies in the HIA.
- 3.25 The EQIA has also assessed the health impacts of the policies of the Proposed changes to the Submitted New Southwark Plan against the protected characteristics and socio-economic disadvantage. It has indicated what the potential positive, negative or neutral impacts will be on health, and provided a mitigation method where there is a negative impact.

4. Background to the Integrated Impact Assessment (IIA) to inform the New Southwark Plan (NSP)

Purpose of the Integrated Impact Assessment

4.1 The purpose of Sustainability Appraisal (SA) is to ensure that sustainable development has been integrated in the formulation of development plans and to verify that due consideration has been given to social, economic and environmental factors. The SA must also show how the requirements of the Strategic Environmental Assessment (SEA) Directive have been met. The National Planning Practice Guidance (NPPG) states that SEA can be undertaken as an integral part of the SA. The Integrated Impact Assessment (IIA) considers the sustainability impacts of the plan in addition to impacts on health and equalities

Planning and Sustainable Development

4.2 The National Planning Policy Framework (NPPF) (2019) provides the over-arching national policy to deliver sustainable development through the planning process. The framework suggests that the purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system having three overarching objectives:

- *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- *an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

4.3 The National Planning Policy Framework states that:

*“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains).”- **NPPF, para 32***

4.4 The NPPG sets out the key stages and tasks for the SA process and their relationship with the Local Plan process, which are illustrated in Figure 3.1. These key stages and tasks are applicable to the IIA process for the New Southwark Plan PSV, NSP Amended Policies 2019 and the Proposed changes to the Submitted New Southwark Plan. It is important to note that IIA is an iterative and on-going process. Stages and tasks in the IIA process may

be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.

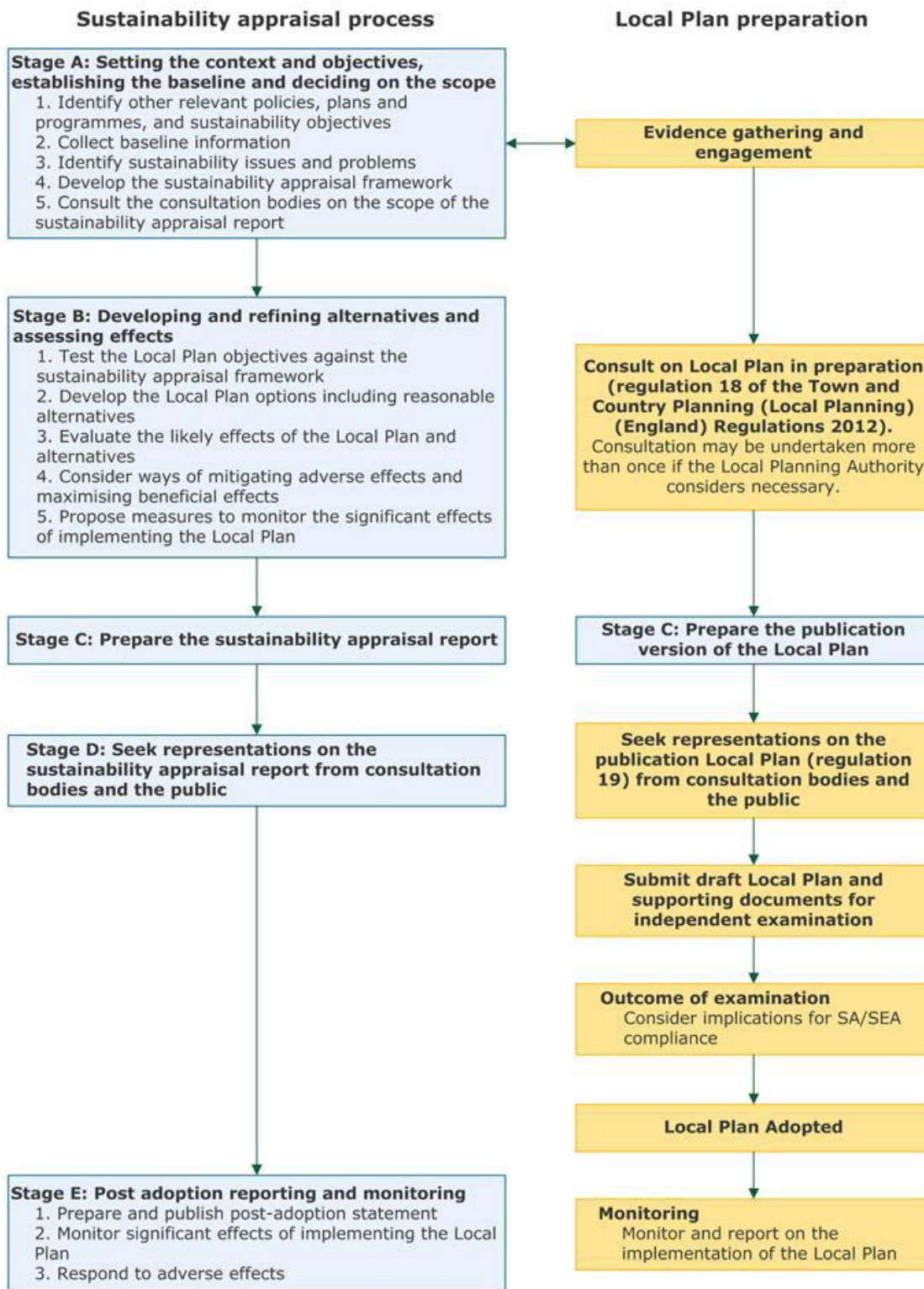


Figure 3.1 Stages of the Sustainability Appraisal Process ¹

¹ Local plan-making, National Planning Practice Guidance 2014

Stage A – Scoping	<p>Setting the context and objectives, establishing the baseline and deciding on the scope.</p> <p>Consultation on the NSP scoping report took place in February and March 2015.</p>
Stage B – Testing alternatives	<p>Developing and refining options and assessing effects against the IIA framework.</p> <p>Options were considered during the preparation of the NSP in 2016.</p>
Stage C – Prepare the Integrated Impact Assessment Report	<p>This stage involves testing in detail the impacts of the preferred options. Following this, the updated IIA report has been prepared for consultation with the public along with the consultation on the NSP proposed submission version.</p>
Stage D – Seek representations from consultation bodies and the public	<p>Consultation on the preferred option IIAs took place across later 2015 and early 2016 and 2017 alongside their associated NSP parts. The NSP proposed submission version and IIA was then consulted on between October 2017 and February 2018. The NSP PSV: Amended Policies 2019 was consulted on in January – May 2019, informing the New Southwark Plan SV 2019. The Proposed changes to the Submitted New Southwark Plan is assessed in this appraisal which will be consulted on in summer 2020.</p>
Stage E – Post adoption reporting and monitoring	<p>The plan will be monitored through the Baseline Indicators, Authority’s Monitoring Report and the Social Regeneration Indicators. Further information on this is set out in Chapter ten of this report. The NSP will be continuously influenced by other tiers of planning at national, regional, borough and local levels. Any changes to other spheres of planning legislation will require the IIA and NSP to be updated accordingly to align with these new targets set.</p>

Figure 3.2 Sustainability Appraisal Stages Timetable

Stages of Preparation for the New Southwark Plan

4.5 The New Southwark Plan has been prepared in several stages. At the preferred option stage the council split the plan, and stages of consultation in two parts: Firstly, the policies set out the strategic and development management policies which proposals will be assessed against and expected to comply with following adoption of the Proposed changes to the Submitted New Southwark Plan.

4.6 Part 2: Site Allocations and Area Visions provides an indication of the council’s expectations for planned growth across the borough and to shape the development of the borough’s distinct areas by setting out area-based and site-based planning policies. These

have been brought together in the proposed submission version and remain as such in the current Proposed changes to the Submitted New Southwark Plan. To date the council has undertaken the following stages of consultation to inform the formulation of draft Local Plan policies.

- 4.7 The first stage of consultation, 'Let's talk about your high streets' was a very informal initial stage of consultation to get people thinking about their high streets and what they want from them. This consultation helped shape area visions and planning policies for the New Southwark Plan Options Document.
- 4.8 The New Southwark Plan Options version included draft visions for Aylesbury, Bankside, Bermondsey and the Blue, Blackfriars Road, Camberwell, Canada Water, Dulwich, Elephant and Castle, Herne Hill, London Bridge, Old Kent Road, Nunhead, Peckham and Tower Bridge Road. The Options version also set out initial proposed site allocations and policies and an implementation plan for seven main planning and regeneration topics.
- 4.9 The New Southwark Plan Preferred Option Part 1 (Policies) took into account representations received in response to the Options consultation in order to develop the preferred option for development management policies and regeneration strategy for Southwark.
- 4.10 The New Southwark Plan Preferred Option Part 2 (Sites Allocations and Area Visions) develops the site allocations and visions taking into account consultation on the Options and Preferred Options Part 1 versions. Informal consultation took place to ensure stakeholders could participate in the development of the visions and site allocations before they were formally drafted.
- 4.11 Between 21 June and 13 September 2017 the council consulted on a selected set of new and amended policies for both the New Southwark Plan and Old Kent Road Area Action Plan with the NSP going to cabinet again for the Preferred Submission Version in October 2017. Consultation responses received, as with previous stages and consultation periods, were carefully considered and informed the proposed submission version of the plan.
- 4.12 The Council then carried out the Proposed Submission 2017 consultation to provide interested stakeholders with an opportunity to comment on the revised policies, visions and site allocation. However, responses were only accepted at this stage that related to two things: 1) Does the plan comply with the relevant planning legislation and regulations? And 2) Is the plan 'sound'? That is:
- Has it been positively prepared
 - Are the policy requirements robustly justified with sound reasoning and evidence-led
 - Will the plan be effective in what it is supposed to achieve; and
 - Is it in conformity with regional and national tiers of policy?
- 4.13 Following a review of the consultation responses received to the proposed submission version, amendments to some of the policies were made as required.
- 4.14 The Amended Policies 2019 were consulted on between 15 January 2019 and 17 May 2019. This has informed the Proposed changes to the Submitted of the Plan 2020, submitted for Examination in Public, to be tested to make sure it is both legal and sound.

The Proposed changes to the Submitted New Southwark Plan will be further consulted on in Summer 2020, while the Examination in Public remains open.

- 4.15 Our Statement of Community Involvement (SCI) sets out how individuals, community groups, developers and anyone else who may have an interest in local plans should be consulted on planning documents. This ensures that our consultation is therefore with our community groups.

The New Southwark Plan, Integrated Impact Assessment: Scoping Report

- 4.16 The New Southwark Plan, Integrated Impact Assessment: Scoping Report (NSPIIASR) was published in February 2015. The NSPIIASR (**Appendix 11**) considered relevant baseline information (**Appendix 3**) regarding key environmental, social and economic matters within the borough which are likely to be impacted by NSP policies. 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. These were updated as part of consultation responses, where the finalised seventeen IIA Objectives can be found in **Appendix 4**. The way which these objectives will be monitored on an ongoing basis is identified in **Appendix 8** through selected baseline indicators.

Consultation Responses on the IIA

- 4.17 The first stage of formal consultation for the NSP IIA involved the IIA Scoping Report, which was published for consultation in February and March 2015. SEA regulations require that the contents of the scoping report must be consulted on with the following ‘authorities with environmental responsibility’:
- Natural England
 - Environment Agency
 - Historic England
 - Sport England
- 4.18 The law requires the statutory organisations be provided with five weeks in which to respond to the Scoping Report. Consultation responses from all respondents to the consultation have been used to update the relevant elements of this IIA report and to inform the preparation of the Proposed changes to the Submitted New Southwark Plan.
- 4.19 Consultation responses on the Scoping Report included suggestions for some minor amendments to be incorporated and also suggestions were put forward for: additional baseline information to be included in the appendices; recommendations for amending some of the objectives; recommendations for new sustainability questions and suggestions for amending and creating new indicators.
- 4.20 As we move forward we will continue to assess the sustainability implications across the wider area. We will also consult the same groups and organisations on the sustainability report at this stage.

- 4.21 Government guidance also recommends that additional bodies can be consulted in order to represent the social and economic aspects of sustainability. An extensive list of local consultees on our planning policy consultation database was consulted.

Social Regeneration Indicators (Fairer Future Promises)

- 4.22 Southwark Council has prepared a set of social regeneration indicators which will monitor social regeneration impacts in the borough. The social regeneration indicators will sit alongside the Council Plan to monitor the high-level impact that our actions are having across the borough and the progress we are making in achieving our regeneration for all ambitions.
- 4.23 The council adopted an initial Southwark Regeneration Framework in September 2017. A revised Regeneration that Works for All Framework was adopted in January 2019. The Framework identifies 10 Social Regeneration Charter Areas in the borough. A Social Regeneration Charter must be prepared for each area which will set out the vision, the specific opportunities, challenges and our priorities for the area, using the Social Regeneration Indicators as a means of monitoring. The Charters will also inform the local Community Infrastructure Levy priorities for the area.
- 4.24 Social Regeneration Charters have been adopted for Canada Water (December 2018), St Thomas Street (December 2019), and the Old Kent Road (January 2020). A draft Charter for Borough & Bankside is awaiting adoption at the time of writing. Charters are currently being prepared for Bermondsey & The Blue, Camberwell, Peckham and Nunhead, and Walworth subject to public consultation.
- 4.25 The outcomes measured through the Social Regeneration Indicators inform the IAOs and Baseline Indicators described in **Appendix 4** and **Appendix 8**. They will be used across the council and by partners to inform council activities, plan strategically for the future and influence others.

Identifying Other Relevant Plans, Strategies and Programmes

- 4.26 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 Proposed Changes to the submitted New Southwark Plan. The process of an IIA appraisal 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.
- 4.27 The policy framework is constantly evolving: at a national level, the NPPF and NPPG are now in place; at a regional level, the New London Plan and associated SPG's are subject to on-going review.
- 4.28 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.

4.29 **Appendix 2** provides an overview of the key international, national, regional and local policies, plans and programmes that inform the NSP and the accompanying IIA.

Southwark's Local Plan

4.30 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. Points 1-7 together, below, make up Southwark's current Local Plan:

4.31 The National Planning Policy Framework (NPPF) was updated in 2019. 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.

4.32 The New London Plan (Intend to Publish version) and London Plan 2016 (adopted) contain 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.

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

4.34 The Core Strategy (adopted in 2011) 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.

4.35 Area Action Plans (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.

4.36 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.

4.37 Neighbourhood Plans – Southwark has several Neighbourhood Forums either established or currently in the process of being established with the objective of designating a Neighbourhood Area. Designated Neighbourhood Forums are able to prepare a Neighbourhood Plan which must be in general conformity with the local, regional and national planning policy. At the time of writing, a Neighbourhood Plan prepared by the Southbank and Waterloo Neighbourhood Forum is due to be presented at Council

Assembly and adopted in summer 2020. Lambeth is the lead authority and adopted the plan on 16 December 2019.

- 4.38 The Local Development Scheme (LDS) 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, and 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

- 4.39 Once adopted, the New Southwark Plan (NSP) will replace the 'saved' policies of the Southwark Plan (2007) and the Core Strategy (2011), incorporating the strategic and detailed policies into 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.

- 4.40 The NSP explains the council's strategy for regeneration from 2020 to 2035. The NSP:

- Sets policies to support the provision of new homes including 11,000 new Council homes
- Protects our existing schools and community facilities in the borough and provide more where this is needed
- Protects local businesses and attracts more businesses into the borough to increase job opportunities
- Supports our high streets and increases the range of shops to increase their vitality
- Directs growth to certain areas of the borough, predominantly in the Old Kent Road, Elephant and Castle, Canada Water, East Walworth, Blackfriars Road, Bankside and along the River Thames where there is greater public transport accessibility
- Introduces policies to improve places by enhancing local distinctiveness and protecting our heritage assets
- Sets policies to provide more green infrastructure and to promote opportunities for healthy activities

- 4.41 The NSP is a spatial plan. Not only does it set out planning policies to guide development but it also explains how development will be delivered and may inform future decisions about investment in infrastructure to provide a Fairer Future for all residents, as identified in the council's Fairer Future Promises².

² Fairer Future Promises link

What are Area Visions and Site Allocations?

- 4.42 **Area visions:** Southwark’s neighbourhoods each have a rich, varied and unique character. The New Southwark Plan will contain a vision for each area setting out what the neighbourhood will be like in the future, and how new development will help achieve this. The visions set out the existing individual character of the borough’s neighbourhoods and how the New Southwark Plan will help to build on this character as sites come forward for development. They will set out how development will seek to protect, enhance and incorporate heritage assets in new development and will identify key opportunities for new development including improvements in public realm, walking and cycling routes, health and education facilities and green links.
- 4.43 **Site allocations:** Site allocations comprise a detailed list of potential development sites that the council has identified for future development. Councils are required to identify and allocate development sites in their local plans to help ensure strategic needs for housing, employment, schools and health facilities and more can be met. To ensure this, the council has the opportunity to set out key land use and other requirements for each site, including indicative densities, routes through sites and any other requirements the council deem necessary.

Appraisal of the site allocations and area visions

- 4.44 Area visions provide the strategic vision for the future of Southwark’s distinct places and neighbourhoods. They set out key infrastructure enhancements, opportunities for public realm and transport improvements and growth opportunities for new homes and jobs. Area visions also identify the prevailing character of different places to be renewed, retained or enhanced. Development proposals should be formulated in the context of the relevant area vision and should demonstrate how they contribute towards realising the strategic vision for that area.
- 4.45 Site Allocations are planning policies which apply to key potential development sites of strategic importance. Site allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs and infrastructure. Site allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. For example, site allocations may specify that development must provide new public open space, new public access routes, and new health or education facilities.
- 4.46 The full appraisal of the area visions and site allocations is provided within **Appendix 5**.

How has sustainability, health and equalities been considered in the development of the Proposed changes to the Submitted New Southwark Plan?

- 4.47 For the HIA element of the IIA the impacts on the population groups listed in Table 3.3 will be considered:

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 problems	Physical disabilities
Residents	Carers
Visitors	People who experience domestic violence

Table 3.3 Population groups considered in the HIA.

- 4.48 The IIAO indicators give due regard to the population groups in Table 3.3. The HIA assesses the health impacts of the policies on the above population groups in more detail in a separate document.
- 4.49 For the EqIA element of the IIA the impacts on the protected characteristics listed below in Table 3.4 will be considered.
- 4.50 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.

Age	A person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18-30 year olds).
Disability	A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
Gender reassignment	The process of transitioning from one gender to another.
Marriage and civil partnership	In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
Race	A group of people defined by their race, colour and nationality (including citizenship) ethnic or national

	origins.
Religion and belief	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.
Sex	A man or a woman.
Sexual orientation	Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Table 3.4 Protected Characteristics included in the Equalities Act 2010 and their definitions as set by the Equalities and Human Rights Commission³

4.51 The EQIA also assesses the impact of the policies in the **Proposed changes to the Submitted New Southwark Plan** on those with socio-economic disadvantage. This is aligned with Southwark Council's objectives to deliver a fairer future for all.

Southwark Council's approach to equality: delivering a fairer future for all (2011) ⁴

4.52 This report sets out the overarching equality objectives which are linked to the strategic priorities of the council. The objectives below will also be considered in the IIA and are set out below:

- Improve the quality of life for Southwark's people through better access to services and creating sustainable mixed communities with opportunities for local people that come from being in the heart of London.
- Improve social cohesion by promoting positive relationships and a sense of community and belonging, by reducing fear and tensions, and encouraging civic responsibility so that the contributions individuals and groups make to their communities are properly valued.
- Promote people's rights and responsibilities. We will do this by ensuring that the council does all it should in providing leadership and by encouraging its partners to do likewise. We will act to protect the rights of those who live in Southwark by ensuring that abuse; mistreatment or discrimination is identified and dealt with.
- Ensuring we have a workforce that understands and is committed to achieving these goals and retains the confidence of our local communities.

³ Equality and Human Rights Commission, 'Equality Act' (2010)

⁴ Fairer Future (2011)

5. Baseline Data: Summary of Findings

Links to other policies, plans and programmes

- 5.1 In order 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 NSP. This process enables potential relationships to be identified that will allow synergies to be exploited and any inconsistencies and constraints to be addressed. It will also identify additional objectives and indicators, which will assist in analysing and comparing economic, environmental and social impacts throughout the IIA and help in identifying key sustainability issues.
- 5.2 The policy framework is constantly evolving: at a national level, the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) are now in place, at a regional level, the new London Plan and associated Supplementary Planning Guidance (SPG) are subject to on-going review.
- 5.3 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 NSP documents are prepared.
- 5.4 It is important to identify this policy framework at an early stage as a wide range of guidance and initiatives influence the United Kingdom's planning system and the development of planning policy in Southwark. A considerable number of relevant documents were identified at the international, national, regional and local levels as part of the Scoping Report (**Appendix 11**). Since the consultation on the Scoping Report, additional or more recent documents of relevance have been identified and these have been included in the table set out in **Appendix 2**. This provides an overview of the key international, national, regional and local policies, plans and programmes that informs the NSP and accompanying IIA.

Baseline information

- 5.5 The aim of collecting baseline information is to assemble data on the current state of the area and the likely future state. The information then provides the basis for predicting and monitoring effects. Collecting baseline information is also a way of identifying sustainability problems and alternative ways of dealing with them.
- 5.6 Both qualitative and quantitative data has been used to inform the baseline analysis. Quantitative data has been taken from monitoring and research activities currently being carried out by a variety of organisations. Qualitative information is more often based on judgement and is particularly useful for objectives that relate to the character and quality of the built environment.
- 5.7 The baseline information collected is set out in **Appendix 3**.

Problems in collecting baseline data

5.8 Problems arose because in some instances where data did exist it was often either at the wrong geographical scale e.g. regional/national or held over insufficient time to show a trend. There was also a case where some baseline data was no longer being collected. Where qualitative data has been used, it has not always been possible to provide an analysis of trends.

5.9 Monitoring is carried out more frequently for some indicators than others. In addition, some of the gaps in data still remain. In the future, if data is still not available for some indicators it may be more appropriate to select alternative indicators. However, in some cases where there are no suitable indicators relating to an objective, the objective itself may need to be revised or deleted. The baseline data has been used to describe the current social, economic and environmental characteristics. Where possible, data specific to the borough has been used.

Key environmental, health and equality objectives

5.10 Table 4.1 identifies key sustainability issues that have been identified for the NSP which the IIA will address. These have been abstracted from the findings of **Appendix 3** which divide contextual characteristics and baseline indicators into economic, social and environmental conditions.

5.11 These have also been identified through monitoring, engagement with stakeholders, a review of relevant policies, strategies and programmes and existing council evidence base documents, and a survey of baseline data and information about the borough.

5.12 The sustainability issues are set out in the context of a number of themes, in recognition of the over-arching status and the format of the emerging NSP.

Homes
<ul style="list-style-type: none">• Providing everyone with a decent and affordable home to live in to meet housing needs of present and future generations• Providing and maintaining suitable accommodation for those with specialist needs, vulnerable individuals and families.• Lack of living space - overcrowding• Improving existing housing stock and delivering new council housing• Providing the right mix and balance of housing types, sizes and tenures in areas of the borough• Optimising the efficient use of land at appropriate densities.• Delivery of the London Plan housing target
Revitalised Neighbourhoods

- Relatively high levels of deprivation
- Access to services and health inequalities
- Limited access to healthy food linked to obesity and related diseases
- Mental illness and poor self-esteem associated with unemployment and poverty
- High levels of crime and fear of crime
- Growing population
- Poor environment leading to physical inactivity
- Improving the health of Southwark residents by promoting healthy lifestyles.
- Maintaining local distinctiveness and protecting and enhancing place-making assets.

Design, Heritage and Environment

- Ensuring a high quality of design in new developments to ensure accessibility, inclusivity and interaction
- Protecting and enhancing biodiversity and access to the natural environment
- Mental health benefits from access to nature, biodiversity, green space and water
- Address existing open space deficiencies and improving the use of open spaces for sport, leisure and environment purposes
- Increasing green links and improving the public realm
- Need to preserve and enhance the historic environment and built heritage
- Protection of landscape features and designated sites
- Sensitivities around very tall buildings

Town Centres

- Increasing the vitality and viability of town and local centres
- Improving retail choice and the balance of retail and other town centre uses
- Supporting local people to make healthier choices
- Attracting and facilitating town centre investment
- Protecting essential shopping services for local communities

Social Infrastructure

- The creation of healthy, cohesive, inclusive and safe environments
- Providing adequate community facilities and infrastructure to meet the needs

of a growing population and facilitate social interaction

- Identifying appropriate locations for community facilities

Business, Employment and Enterprise

- Addressing employment inequalities and reducing the barriers to employment
- Increasing employment opportunities through training to increase skills
- Maintaining concentrations of employment floorspace in key accessible locations
- Improving land use efficiency through managed release of surplus employment land.
- Providing space for businesses of all sizes to establish and grow.
- Protecting space for small and medium sized enterprises
- Improving the educational attainment, skills and aspirations of residents

Transport

- Improving the transport network and infrastructure
- Providing and maintaining sustainable transport choices for all members of the community
- Reducing congestion and pollution
- Managing delivery and servicing activities
- Improving accessibility by public transport

Sustainability

- Mitigating and adapting to climate change
- Minimising flood risk and improving resilience to flood risk.
- Improving recycling and the management of waste.
- Improving energy efficiency and use of renewables
- Providing opportunities for heat and power networks.
- Improving air quality and decreasing level of emissions from industry, residential, construction and traffic.
- Need for sustainable use of water resources
- Need to ensure that there is social, physical and green infrastructure capacity for existing and future needs
- Reducing the impact of noise

- Ensuring high standards of sustainable design are achieved in the built environment.
- Health risks from toxicity of contaminated land
- Opportunities for food growing – active lifestyles, healthy diet and tackling food poverty

6. Options-testing for the NSP

The Assessment of Options

- 6.1 This section outlines and provides a summary on the options that have been considered for the New Southwark Plan.
- 6.2 In addition to the options presented below, the development of the policies within the New Southwark Plan and the justification for their evolution is set out within the following Background Papers:
- Industrial Background Paper
 - Housing Background Paper
 - Offices Background Paper
 - Retail Background Paper
- 6.3 These extracts are provided at **Appendix 13**. This does not include all policies of the Plan. It includes the main industrial, housing, office and retail policies and the policies which have been changed from the Southwark Plan 2007 (saved policies) and the Core Strategy 2011.
- 6.4 As set out earlier in the report, in response to the Inspectors' letter, the IIA has been updated to clearly detail our reasonable alternative options considered during the preparation of the New Southwark Plan.
- 6.5 As part of the preparation of the New Southwark Plan, three options have been assessed:
- Option A: Business-as-usual (Reasonable alternative)
 - Option B: Place Making and Place Shaping (Plan option)
 - Option C: Higher Option (Reasonable alternative).
- 6.6 The assessment compares the sustainability implications between adopting a new Local Plan (the New Southwark Plan), or two reasonable alternatives of committing to a Business-as-usual scenario of maintaining the adopted Southwark Plan (2007) or a higher option development scenario through increasing the capacity of housing on site allocations (which is based on the New Southwark Plan).
- 6.7 The full Option-testing sustainability appraisal is included in **Appendix 10**, this provides the justification on why the decision to develop and adopt a new Local Plan through the selection of Option B: Place Making and Plan Shaping was deemed preferable to achieve increased sustainability, health and equality objectives in the borough compared to the two identified reasonable alternatives.
- 6.8 The reasonable alternatives considered are set out within **Appendix 12**. This demonstrates how the indicative capacities have changed throughout different iterations (Preferred Option; Proposed Submission Version and Proposed changes to the Submitted NSP) of the Plan.

What options have been considered and why?

- 6.9 The NSPPO consultation sets out the council's proposed strategy for planning and regeneration in Southwark to help deliver the Fairer Future promises in the Council Plan, in conformity with the ambitious targets for development in the borough set by the London Plan. The NSPPO also stated that the final version of the NSP would contain area visions setting out aspirations for places and site allocations with specific requirements for land uses and densities for development.
- 6.10 Part of the NSP strategy is to build more homes of every kind in Southwark, and to use every tool at the council's disposal to increase the supply of all different kinds of homes in the borough. The strategy also aims to revitalise neighbourhoods and work to make sure Southwark has a strong economy, identifying regeneration areas extending across most of the borough including London Plan opportunity areas and local action areas.
- 6.11 We have also assembled an extensive evidence base which confirms both the need and opportunity for large scale redevelopment of land in Southwark as well as the need for planning policy to guide development to ensure that it is sustainable, equitable and supports health and wellbeing.
- 6.12 Within this context, potential NSP AVs&SA options were assessed for their 'reasonableness' prior to being taken forward for appraisal. This involved considering a series of questions:
- will implementation of the option assist in fulfilling the objectives of the NSP?
 - is it a genuine option?
 - will the necessary resources be available to deliver the NSP?
 - will there be sufficient time within the plan period to implement the option?
 - is there an unacceptable risk that the option will not be fully implemented for one reason or another?
 - is the option sufficiently flexible to accommodate changing circumstances?
 - does the option generally conform with the London Plan and NSP?
- 6.13 All options were assessed against the IIA framework set out in **Appendix 10**.

Option A: Business as Usual

- 6.14 Option A involves the description of Area Visions and the identification of Site Allocations but relies on other local plan policies in the NSP and London Plan to determine planning applications. This Option does not provide any significant new material guidance for development, such as site development capacities, land use, infrastructure requirements or design criteria. Area Visions describe the character of areas and the council's broad regeneration aims but do not seek to shape the contribution of development opportunities within each area.
- 6.15 This option selects sites for allocation from the potential sites consulted on at the NSP Options stage, land identified through an ongoing call-for-sites, the London

Strategic Housing Land Availability Assessment (SHLAA), and by planning and regeneration officers. All sites of sufficient size, generally above 0.25 ha, and where clear constraints on development would not prevent comprehensive redevelopment, are allocated as opportunity sites for development.

Summary of Option A

6.16 This option would help to deliver the NSP strategy by encouraging development on sites that could make a significant contribution to regeneration. Planning applications would be determined in line with planning policies in the same way as proposals on other sites that are not allocated. Area visions would have limited implications on planning proposals but would help communicate the council's goals to developers and other stakeholders. This option quantifies the strategic development opportunities in the borough allowing estimates of growth to demonstrate how key objectives, such as housing delivery, would be met; it is therefore a genuine reasonable alternative.

6.17 Option A would not present fundamental barriers in terms of resources, time or risks as it relies on the routine operation of the planning department. Flexibility is offered as changing circumstances would be reflected in other material considerations in the determination of applications. General conformity with the London Plan and NSP would be achieved through the application of their policies but it would only achieve the minimum towards their goals.

Option B: Place Making and Place Shaping

6.18 Option B sets out Area Visions and Site Allocations as per Option A. However, alongside the description of Area Visions and identification of Site Allocation there is additional policy and guidance that is material to the determination of applications. It thereby takes a proactive approach to place making and place shaping, integrating sites with their context and steering growth to deliver the regeneration strategy.

Area Visions

6.19 In this option, Area Visions provide a more specific strategy for each area, the associated policy and guidance must be taken into account by all relevant development proposals in the borough. They set out key infrastructure requirements, opportunities for public realm and transport improvements and growth opportunities for new homes and jobs. Area Visions also identify the prevailing character of different places to be conserved or enhanced.

Site Allocations

6.20 In this option, Site Allocations set out the land uses that *must* and *should* be provided as part of any redevelopment, and other acceptable land uses that *may* be provided. Site allocations set out the indicative development capacity; this is not a minimum or maximum capacity but will indicate the scale of development that is likely to be

acceptable. A site allocation may also provide site specific design guidance that should be considered in the event of redevelopment.

- 6.21 Housing is a required or encouraged use on most sites. As well as maximising the provision of new homes, this will help to ensure that all sites have the potential to generate an increase in land value to incentivise development. Our housing requirements are met through site allocations which 'must' provide housing, including sites in the Old Kent Road Opportunity Area.
- 6.22 In the CAZ, the reprovision or uplift of employment floorspace is a 'must' requirement in the site allocations. Housing is a 'should' which encourages mixed use development where the reprovision or uplift of employment floorspace can be achieved.
- 6.23 As identified in the 5 and 15 Year Housing Land Supply, our strategic housing target as set in the adopted London Plan of 2,736 homes per year can be met through Option B. Following the Examination of the London Plan, the panel of Inspectors required the New London Plan target for Southwark to be reduced from 25,540 over 10 years (2,554 per annum) to 23,550 over the 10 years, as such this revised figure can be met with a buffer with Option B. The annual target can also be met over the 15 year period.

Indicative development capacities within the site allocations

- 6.24 The key purpose of the indicative development capacities is to ensure Southwark can meet its future strategic needs for new homes, jobs, public open space, public access routes, transport and social infrastructure. It will ensure the Council has an understanding of the strategic distribution of development expected to come forward across the borough over the course of the plan period.
- 6.25 The indicative development capacities have been inserted into the New Southwark Plan site allocations as requested by the Inspectors, along with the housing trajectory which indicates the expected housing delivery within the borough, including through site allocations.
- 6.26 The indicative development capacity of site allocations within Option B and set out within the Plan have been determined through the sites methodology approach set out within Sites Allocations Methodology Report (July 2020), and by taking into consideration any relevant masterplanning work and approved planning permissions. Where an approved application is relevant to a site allocation, it is considered that the planning application represents the optimum use and capacity of the site, as this has been tested by a planning application.
- 6.27 The site capacities have taken into account consultation responses; approved planning applications and any masterplanning work to better reflect site-specific circumstances and respond positively to the site context and policy requirements set out in the NSP.

- 6.28 Where appropriate, in Option B the higher capacities have been taken forward to be the indicative development capacity to take into consideration representations received, recent engagement from developers to redevelop the site, with masterplanning being undertaken, where this capacity better optimises the use of the site.
- 6.29 In some instances the higher capacity options were not appropriate to be taken forward in Option B, as they did not optimise the use of the site. The consideration of these higher capacities would require detailed design and masterplanning to truly understand the impact on the wider area.
- 6.30 In this option, site allocations are selected through the same process described for Option A. The site capacities are the most appropriate figures for Option B.
- 6.31 Significant growth is expected in addition to the site allocations identified within the NSP. Although certain site allocations have been omitted from the NSP (reasons for omission are set out within Appendix 1 of the Sites Allocations Methodology Report (July 2020)) the redevelopment of a number of these omitted sites can be achieved through NSP policies, where acceptable. These sites were mainly omitted for the following reasons:
- Small site without the clear opportunity for major intensification where acceptable redevelopment could be achieved under other NSP policies. If these sites come forward these are classed as windfall sites (see below).
 - It has been recently redeveloped and is therefore unlikely to come forward during the life of plan period.
 - Development is already under construction on the site.
 - Redevelopment could be achieved under other NSP policies.
 - The site owner has confirmed there is no prospect of the site being redeveloped.
- 6.32 As part of this option, it is expected that given the policy and guidance set out in the NSP, windfall sites will also contribute to delivering growth, infrastructure and design outcomes sought by the London Plan and NSP. Windfall sites are defined in the glossary chapter of the NPPF as sites not specifically identified in the development plan. Paragraph 70 of the NPPF states that, a windfall allowance may be justified as part of the supply, if the local planning authority has compelling evidence that windfall sites provide a reliable source. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends. The 5 and 15 year housing land supply report sets out that in the past significant development of housing has been delivered in Southwark on windfall sites.

Old Kent Road site allocations

- 6.33 The residential capacity options for the Old Kent Road allocations set out in Option B are based on Opportunity Area wide options which were considered in the 2016

Allies and Morrison Place Making Study for the Old Kent Road. These three options were based on the delivery of the Bakerloo Line Extension:

- High density scenario – 2 new stations
- Medium density scenario – 1 or 2 new stations
- Low density scenario – no Bakerloo Line Extension

- 6.34 The London Plan sets out that the Old Kent Road Opportunity Area should be able to deliver 12,000 homes and 5,000 jobs. Other Local Development Studies and Urban Design Studies have been undertaken, which make up the evidence base for the Old Kent Road Area Action Plan 2017. Based on these it was decided that the Old Kent Road could exceed the target set out by the London Plan and achieve the delivery of 20,000 homes and 10,000 jobs over a 20 year period.
- 6.35 Continuous masterplanning work, which takes into account planning applications and various constraints, has been undertaken for site specific allocations to come to the capacity as various iterations of the AAP have been published. There is currently masterplanning work being carried out for the latest version of the AAP so it is expected that capacities for some sites could increase again. Where capacities are decreasing (e.g. NSP55 Mandela Way) it is due to the reduction of residential floorspace to increase employment floorspace.
- 6.36 The site allocations within the Old Kent Road will be intensified for mixed use development and industrial co-location. Development will include an innovative new approach to create new town centres which include community facilities, retail, office, education and health uses. Industrial development will be included alongside or underneath new homes with specific design criteria to ensure businesses can operate successfully without harming residential amenity.

Summary of Option B

- 6.37 In addition to encouraging development in general, this option would seek to fulfil the NSP objectives by providing greater certainty as to the broad parameters of acceptable development within Area Vision and on specific Site Allocations. This option would ensure we exceed our housing target (as demonstrated within the 5 and 15 Year Housing Land Supply). It would also secure land for infrastructure and deliver an uplift in certain land uses, such as those generating employment and contributing to the growth of economic clusters.
- 6.38 In resource, time and risk terms this option should be beneficial in clarifying the priorities for different areas and the status of sites upfront – de-risking development. While creating certainty could be less flexible, this options allows a range of acceptable land uses, avoids absolute capacity limits and through the application of other local plan policies it will still allow development to respond to changing circumstances. This option would seek to proactively deliver growth, infrastructure and design outcomes sought by the London Plan and the NSP.

- 6.39 Option B represents the optimum indicative capacity for development across the borough which would help achieve the strategic objectives of the Plan and growth during the plan period by being sympathetic to site surroundings, meeting the site requirements set out in the Plan and by taking into account site considerations and policy designations.

Option C: Higher option

- 6.40 In response to the Inspectors' letter in April, 2020 the IIA has been updated to clearly set out the Council's considerations of the reasonable alternative for planning for growth on each site allocation as part of Option C: Higher Option. The sustainability appraisal is set out in **Appendix 12**.
- 6.41 Option C sets out Area Visions and Site Allocations using the same approach as Option B, i.e. there is additional policy and guidance in the Site Allocations that is material to the determination of applications.

Site Allocations

- 6.42 Option C determines a higher capacity of housing using the methodology set out within the Site Allocations Methodology Report but increasing the capacity through either a larger development footprint or an increased number of storeys on the building. The capacity of the site allocations as part of the Old Kent Road Area Vision are explained above within Option B which would be consistent for Option C.
- 6.43 Where the capacity of a site allocation has been reduced during the plan making process to take into account site constraints to delivery and the site context, the previous higher capacity represents the high capacity in Option C.
- 6.44 The higher option capacities are indicative, if a development proposed within a site allocation achieved a higher capacity it would need to be considered against the existing site context and surroundings, the site specific policy and guidance, the other development management policies in the NSP, London Plan and SPDs.
- 6.45 The higher option is applied only to residential development capacities identified in Option B. This is because many site allocations contain existing employment floorspace. In suitable locations, sites seek the re-provision of the existing quantum of employment space as a minimum or 50% of the total floorspace, whichever is greater.
- 6.46 As with Option B, significant growth is expected in addition to the site allocations within Option C. Although certain site allocations have been omitted from the NSP (reasons for omission are set out within Appendix 1 of the Sites Allocations Methodology Report (July 2020)) the redevelopment of these omitted sites, where acceptable, could be achieved through NSP policies.

- 6.47 As part of this option (as with Option B), given the development management policies set out in the NSP, windfall sites would also contribute to delivering growth, infrastructure and design outcomes sought by the London Plan and NSP.

Option C Summary

- 6.48 Option C would significantly increase the delivery of homes and affordable homes in the borough, which is a priority locally, nationally and regionally and would deliver benefits to residents. This needs to be carefully balanced against the delivery of other uses which have other economic, social and environmental benefits.
- 6.49 A higher capacity of housing on sites could impact on the delivery of employment. A higher capacity of employment uses could impact on the delivery of housing. Given our requirements for the provision of employment floorspace, along with the intensification of these sites with housing, retail, education community spaces and open space, a balance has to be struck to ensure we can meet our identified need and strategic targets for jobs and homes within the borough. Option C would jeopardise the delivery of these requirements collectively.
- 6.50 An increased housing capacity also provides uncertainties on the planned social and transport infrastructure in the borough and London and whether this would meet the demand of more residents. The impact of the increased capacity on the borough's heritage asset, borough views and open space, green corridors and biodiversity would also be uncertain.
- 6.51 Given the uncertainties with Option C and the potential detrimental impact on the delivery of important employment generating uses, this has not been carried forward in the New Southwark Plan.

What have the options identified?

- 6.52 Each option is considered against the 17 identified IIA objectives incorporating SEA objectives, sustainability, health and equality. The full appraisal can be found in **Appendix 10**. The assessment summarises the impacts and gives an overall score based on the opportunities the Plan could offer in each scenario. The following summary explains the results and gives a qualitative analysis of the complexities and challenges of the two alternative approaches.
- 6.53 **Option A** generated a high degree of uncertainty around its effects, particularly in the medium to long term. Through identifying land for development but without detailed guidance, opportunities to meet the IIA objectives are unlikely to be taken. Although other local plan policies will secure positive effects, they may not always be as successful without policy guidance providing coordination. In particular, infrastructure that requires land for its delivery would be more challenging to bring forward. In the medium term, delays to infrastructure delivery could slow development overall and a favourable balance between housing and land uses providing services and employment would less likely be achieved. At least some minor negative social

impacts in the long term would be anticipated as these outlined uncertainties would impact particular groups.

- 6.54 In the short term Option A would be neutral, with positive effects attributed to accelerated redevelopment of sites providing employment in construction, remediating land and delivering much needed new homes. If this option was taken forward then the assessment indicates that the plan would be highly reliant on development management policies to mitigate potential negative effects. These policies may need to be revisited in light of the need to create certainty on how employment growth will be supported, infrastructure will be delivered alongside affordable housing and cumulative environmental effects mitigated.
- 6.55 The assessment indicates that **Option B** would result in wide ranging positive effects by giving a clear idea of how each development site and the regeneration of vision areas can contribute towards an overall strategy for sustainable growth. Major positive effects are attributed to the delivery of education and health facilities, business space, open space, green infrastructure and new housing including affordable homes. As with Option A, this would rely on the implementation of the development management policies of the plan to secure positive effects and mitigate negative ones. The addition of place making and place shaping guidance to these policies generates overall positive scores.
- 6.56 Option B would leave some residual uncertainty for which further mitigation to minimise any negative effects could be considered. There may be opportunities to go further in supporting the mitigation of some environmental effects and in the delivery of care facilities. These areas will be considered further as part of council-wide strategies.
- 6.57 **Option C** indicates there would be positive impacts as a result of the increased housing supply including affordable homes, which could be achieved by taking forward the high capacity options on all site allocations, however, this could compromise the delivery of employment floorspace. Option C generated a high degree of uncertainty around its effects overall. The sustainability appraisal indicates that as a result of higher capacity options the impacts of high density developments are uncertain on: the historic environment and cultural assets; open spaces, green corridors and biodiversity; and the provision of adequate infrastructure to support existing communities and the future growth. Whilst proposals will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy, it would need to be assessed if the contributions would sufficiently offset the impacts of the development.

What option was chosen for the Proposed changes to the Submitted New Southwark Plan and why?

- 6.58 The Proposed changes to the Submitted New Southwark Plan has been prepared in accordance with the principles outlined in **Option B**.

- 6.59 Option B provides in excess of our housing targets for housing without compromising other strategic aims of the borough, including good design principles, heritage, provision of non-residential uses and open spaces. Option B also provides a healthy buffer of housing, over our New London Plan housing target which is identified in the 5 and 15 Year Housing Land Supply Report.
- 6.60 **Appendix 10 (Table 1)** sets out the averaged scoring for the three options against the 17 sustainability objectives, encompassing economic, social and environmental aspects. The options appraisal found that Option B: Place Making and Place Shaping would have an overall score of 59% against the sustainability objectives and this option would result in positive impacts overall. 12 of 17 objectives received a positive scoring in achieving the sustainability objectives.
- 6.61 This option will provide more positive social, economic and environmental benefits than Option A or C, which will improve the health and wellbeing of Southwark's communities.
- 6.62 The benefits anticipated through this preferred approach will be achieved through securing growth in housing, employment, town centre amenities, primary health and care facilities, school places, higher education and public open spaces. They will also be served by enhancing and expanding physical networks of sustainable transport and habitats for wildlife, social interaction and economic interaction within local business clusters.
- 6.63 Guidance in the NSP will complement local plan policy requirements through site specific information so that it is understood how proposals can integrate into their local context and help to deliver area visions. The positive effects of these policies will thereby be enhanced.
- 6.64 The options appraisal considers Option A to have an overall neutral score of 17%, and this option would have overall neutral social, economic and environmental impacts. The majority of the objectives in this option have scored uncertain (11 out of 17) and neutral (4 out of 17). The sustainability appraisal found that without the identification of land to provide infrastructure, including new education, health facilities and open space and without the identification of area-wide improvements the delivery of infrastructure would be uncertain and less coordinated. Furthermore, without guidance on sites and areas, opportunities to improve places for community cohesion and support for a diversity of lifestyles could be missed. Without guidance the full consideration of heritage assets and opportunities for heritage-led regeneration might not be incorporated into development proposals; and without the identification of opportunities for new open space and green links sufficient space might not be provided to serve the needs of a growing population or habitats provided and connected for wildlife.
- 6.65 Option A has not been taken forward, whilst it would be a reasonable alternative to identify opportunity sites for development and rely on other local plan policies to

shape growth, the social, economic and environmental effects would be deeply uncertain.

- 6.66 The options appraisal considers Option C to have an overall neutral score of 41%, and that this option would have overall neutral social, economic and environmental impacts. The majority of the objectives in this option have scored uncertain (6 out of 17) and neutral (4 out of 17). Option C has not been taken forward, because whilst it would be a reasonable alternative, and there would be positive impacts as a result of increased housing delivery, the social, economic and environmental impacts on the borough would be deeply uncertain and the mitigation against any negative impacts would be highly reliant on development management policies. Given our requirements for the provision of employment floorspace, along with the intensification of these sites with housing, retail, education community spaces and open space, a balance has to be struck to ensure we can meet our identified need and strategic targets for jobs and homes within the borough. Option C would jeopardise the delivery of these requirements collectively.

What are the significant positive effects?

- 6.67 Accelerating the delivery of housing development will provide major contribution towards providing everyone with the opportunity to live in a decent home. By creating certainty around the requirements for other land uses and infrastructure on site allocation this will also support affordable housing delivery by allowing the more accurate understanding of development costs in the valuation of land.
- 6.68 Option B more than meets our New London Plan housing target as detailed in the 5 and 15 Year Housing Land Supply without compromising our other strategic aims of the borough including good design principles, heritage, provision of non-residential uses and open spaces.
- 6.69 The plan generates major positive effects to tackle poverty and encourage wealth creation. The acceleration of development in most areas will create jobs in construction. Where a significant uplift in commercial floor space is planned for there will be further increases in employment opportunities. The opportunity for the occupation of affordable workspace to provide support for start ups, small or independent businesses is vital to secure Southwark's thriving economy. This will include job opportunities secured for local people as well as procurement opportunities for other local businesses. Support for the most promising economic clusters within the borough will generate higher wages and economic resilience.
- 6.70 The policies seek to retain some of the previously removed Strategic Protected Industrial Land and to allocate a couple of the sites as Locally Significant Industrial Sites (LSIS); this will ensure the retention of the businesses and employment on these sites.

- 6.71 The expansion of the Camberwell Town centre will ensure that additional local employment can be accommodated to sustain this town centre and securing growth for this part of the borough.
- 6.72 The introduction of the Aylesbury area vision in the Amended Policies 2019 provides further guidance for development in Aylesbury. It specifies that development should generate new neighbourhoods with a range of housing tenures that will attract existing residents to stay and new people to move in, including Southwark residents who want to stay and benefit from the great connections, facilities and communities. It also requires development to establish a local hub with a range of community facilities including a new Health Centre, Library, pharmacy café and public square, which will benefit residents.
- 6.73 The health of the population will be improved by encouraging active lifestyles and wellbeing through a network of green links, cycle routes and open spaces across the borough and maintained by additional health and care facilities. These will provide the opportunity to deliver integrated health services to improve the quality of their operation. Public spaces, public realm, cultural facilities and a flexible range of new town centre amenities will have major long term positive effects to promote social inclusion, equality, diversity and community cohesion by creating spaces for interaction as well as a diversity of different lifestyles.
- 6.74 In parts of the borough redevelopment will deliver area-wide improvements in the architectural quality of buildings and the public realm alongside new or enhanced open space and urban greening. These will deliver major positive effects and enhance the quality of landscape and townscape.

What are the significant negative effects?

- 6.75 The plan does not generate major negative effects in the appraisal although there are residual areas of uncertainty, discussed further below, which could result in negative effects; particularly where they are cumulative in nature.
- 6.76 The site allocations and area visions seek to steer development opportunities that already exist towards delivering a sustainable regeneration strategy. Furthermore they are supported by the strategic and development management policies to further mitigate negative effects.
- 6.77 The appraisal does indicate minor negative effects in the short term in some areas towards social inclusion, equality, diversity and community cohesion. This is related to the loss of some community assets in the short term, which may impact particular groups, and the potential disruption of social interaction through the impacts of construction. This would be in locations where the acceleration of development brings forward a number of sites concurrently within a small area as development management policies will seek general mitigation of the impacts of construction. The appraisals indicate that this disruption will occur in areas that will likely accrue more significant benefits in the long run towards this sustainability objective. Nevertheless,

opportunities for further mitigation in the short term could be explored through targeted community infrastructure development and the coordination of quick wins from regeneration and meanwhile uses.

Uncertain impacts

- 6.78 The plan provides a positive strategy for growth however there are some impacts that may be uncertain at this stage.
- 6.79 Option B sets out the housing capacity for each site which enables us to meet our 5 and 15 Year Housing Land Supply based on the adopted London Plan target and the New London Plan target which is lower than the adopted. Within the 6-15 year supply there is a buffer of 7,062 homes in addition to the New London Plan target and the Secretary of State within his response to the New London Plan (Intend to Publish version) to the Mayor of London stated that boroughs should be encouraged and supported to deliver more homes.
- 6.80 It is important to have a buffer in our housing land supply as all homes that are approved are not always delivered and having a buffer will increase our potential to meet our housing target. The 6-15 year supply includes windfall sites (as set out in the Planning Practice Guidance and detailed above) which comprises an average of past delivery, therefore there is no certainty that these sites will come forward. The 6-15 year supply includes Old Kent Road delivery sites which comprise approximately 6,500 homes. Within Phase 2 of the Old Kent Road sites, for which completion is expected up to 2036 and goes beyond our 15 year supply, there is an additional 4,000 units (approximately) to the 6,500 units (10,500 approximately in total) identified through masterplanning.
- 6.81 This buffer is important as all of the homes in the pipeline and the windfall sites may not come forward or these homes may fall into later supply beyond the 15 years planned. However, the delivery of the 10,500 homes planned up to 2036 rely on the Bakerloo Line Extension (BLE) as this has been agreed through a phasing plan with the GLA and TfL. The BLE is critical for the long-term planning for delivering homes in the Old Kent Road, including beyond the Old Kent Road Action Plan Area timeframe.
- 6.82 Southwark Council together with Lewisham have been actively campaigning and promoting the BLE given its importance for the delivery of homes in the boroughs. This infrastructure is essential to meet our future housing need up to 2036, given the planned delivery of new homes in the Old Kent Road Opportunity Area in Southwark and New Cross and Catford Opportunity Areas in Lewisham. Both parties are also working with the Greater London Authority and Transport for London to develop these proposals for the BLE and to make the case to government to ensure the project is delivered. We have agreed a phasing plan for the delivery of these new homes with the GLA and TfL which can be found at Appendix 3 of the Site Allocations Methodology Paper.

- 6.83 However, should the BLE not be delivered or delivery be delayed, this could significantly impact upon our housing land supply for years 6-15 and beyond should some pipeline permissions, site allocations or windfall sites not come forward.
- 6.84 While on the whole the allocation of flexible employment space will have major positive effects for the local economy and employment, redevelopment of sites will in several instances result in the loss of existing businesses. For lower value storage or industrial space or where businesses are less compatible with existing land uses similar operations may be challenging to re-incorporate. In order to maintain and enhance economic diversity there may be further opportunities for mitigation from regeneration and engaging stakeholders to curate the offer of commercial space within vision areas.
- 6.85 Sustainable transport improvements and greening will help to mitigate the causes of climate change. However, traffic congestion impacts of construction could add to emissions in some locations. There may be further opportunities to reduce emissions overall all in the medium to long term through decentralised energy. If opportunities are identified for area-wide energy networks beyond those proposed in the Old Kent Road area, there could be scope for the final version of the NSP to further support their delivery. Congestion could similarly affect air quality and there may be as yet unidentified opportunities for area-wide responses.
- 6.86 Within critical drainage areas policy will seek flood risk assessments and sustainable drainage measures. Where redevelopment is particularly concentrated there may be a greater risk of cumulative impacts. Opportunities for strategic solutions to manage any risk could be further investigated.

Cumulative impacts

- 6.87 The SEA Directive requires an assessment of secondary, cumulative, and synergistic effects, which should be incorporated in the SA. Collectively these effects are called cumulative impacts. Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects (e.g. noise, dust and visual) have a combined effect.
- 6.88 Synergistic effects interact to produce a total effect greater than the sum of the individual effects. The potential of these are outlined in **Appendix 10**. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.
- 6.89 There could be cumulative impacts with development occurring in Southwark and the surrounding boroughs. Engagement is continuous with these boroughs to ensure the cumulative impact of development can be realised and mitigated where required. In particular, Lewisham also has significant growth planned within the Opportunity Areas, there is continuous communication with Lewisham to ensure there is the

required infrastructure for the planned development. This includes working positively and in cooperation with Greater London Authority and Transport for London to support the business case for, and secure delivery of, the Bakerloo Line Extension which will run through Old Kent Road, Lewisham and beyond to Hayes. Further information on this can be found in the Sites Methodology Paper Appendix 3.

- 6.90 A number of other Statements of Common Ground have been prepared with the surrounding boroughs and the GLA and TfL which can be found on the Examination webpage:
- Bromley
 - Bexley
 - City of London
 - Greenwich
 - Tower Hamlets
 - Westminster
 - Lambeth
 - Croydon
- 6.91 These agree to continue to work together on strategic matters with other boroughs, GLA and TfL.
- 6.92 The growth planning within the New Southwark Plan is within the context of the New London Plan which has been assessed at Examination and cumulative impacts across London have been tested.
- 6.93 The cumulative impact of policies with a minor negative or uncertain impact could result in a major negative impact overall. It is difficult to assess the extent of such impacts at this stage in the process with the lack of detailed information on the design of proposals for individual sites. Providing that suitable mitigation measures are applied to individual proposals it is considered that the potential negative impacts will remain minor and, with the development of new technologies and regulations, could even be reduced further over time. Cumulative impacts may also be positive – for example several minor positive impacts on open space and biodiversity could lead to a major positive impact for an area as a whole.
- 6.94 The cumulative impacts of the policies will need to be kept under review through the monitoring process and assessment of planning applications to measure the success of implementing the policies and inform any amendments that may be needed to policies and guidance.

Proposed mitigation

- 6.95 Where the SA identified potential shortcomings, mitigation measures are proposed to help off-set the negative impacts. To a large extent mitigation measures are provided in the Proposed Changes to the Submitted New Southwark Plan Version 2020 for development management policies. To mitigate against the loss of businesses as set

out under uncertain impacts, Policy P32 (Business Relocation) which aids the uncertainty and assists existing businesses as much as possible.

6.96 The following measures warrant further investigation following potential negative consequences of selecting Option B: Place-shaping and plan-making:

- short-term offsets to benefit communities disrupted by concentrated largescale construction;
- curation of business space;
- de-centralised energy networks;
- air quality improvement;
- strategic sustainable drainage systems and flood risk.

6.97 These will be cross-examined in further detail in the IIA appraisal summary included in the following chapters, to identify whether the benefit of policies outweigh risks.

Uncertainties and Risks

6.98 The conclusions that were reached in undertaking the IIA of the Proposed Changes to the Submitted New Southwark Plan are a result of both quantitative and qualitative (i.e. subjective) judgement by planning professionals within the council. In addition, predicting the outcome of a potentially complex mix of social, economic and environmental factors is an inherently difficult task to undertake, and can only be undertaken on the basis of the background data that is available.

6.1 Consequently, the way area visions and site allocations were ranked against particular sustainability objectives may be subjective. However, whilst some rankings are assessment individually, it is the overall performance of policy against the IIA Framework (**Appendix 4**) taken as a whole, which is the most important element to consider.

7. IIA Appraisal Methodology

- 7.1 The establishment of appropriate objectives and indicators is central to the assessment process and provides a way in which the performance of the polices can be assessed. By researching specific issues affecting Southwark through a detailed desktop analysis and internal discussions, seventeen objectives (**Appendix 4**) were developed that formed the basis of the IIA appraisal methodology and assessment. The associated baseline indicators table, for which the IIAOs are to be continuously monitored, has been included in **Appendix 9**.
- 7.2 Upon developing an appraisal, each of the development management policies are grouped into six strategic policy areas identified in the NSP and summarised as such as part of the following appraisal chapter.

IIA Topics derived from Strategic policies within the Proposed changes to the Submitted New Southwark Plan

- 7.3 The IIA appraisal is reflective of the move towards integrating impact assessments for the Plan, linking the Sustainability Appraisal, Health Impact Assessment and Equalities Analysis. The sustainability, equalities and health impacts of policies have been assessed with reference to the following 'strategic policy' areas outlined in the Proposed changes to the Submitted New Southwark Plan to ensure a consistent approach is used by the IIA. Each strategic policy area relates to a particular topic or set of related topic areas. These have been revised and identified for use by the IIA to include:
- SP1 – Quality affordable homes
 - SP2 – Regeneration that works for all
 - SP3 – Best start in life
 - SP4 – Strong local economy
 - SP5 – Healthy, active lives
 - SP6 – Cleaner, greener, safer
- 7.4 Policies SP1a and SP1b are overarching policies for all strategic policies (SP1-SP6) presenting the targets for growth in each strategic policy and the vision for the Borough in achieving this. As such these two policies have not been included in the sustainability appraisal within **Appendix 6**.

Method of Assessment

- 7.5 This section explains the approach and methods for the IIA of the Proposed changes to the Submitted New Southwark Plan. The IIA Framework presented in Appendix 4 form the basis for assessing the NSP policies (strategic, implementation and development management), site allocations and area visions. That includes the indicators that will be used to continuously monitor each of the IIA objectives (IIAOs). **Appendix 4** also sets out the IIA objectives and associated questions that have been asked when undertaking the appraisal methodology, to ensure that the IIA objectives are consistently appraised across all of the strategic, development management policies, implementation policies, area visions and site allocations.
- 7.6 The IIA is structured under the objectives in the IIA Framework **Appendix 4**, which incorporate topics in the SEA Directive (**Appendix 1**). This provides a framework and structure to evaluate the likely significant effects of the policies within the Proposed changes to the Submitted New Southwark Plan against these key sustainability appraisal topics determined above, which include health and equality. The appraisal takes short, medium and long term effects into consideration, but does not explicitly determine on each of these basis separately.
- 7.7 The appraisal is undertaken using professional judgment, supported by the baseline information and wider evidence base.
- 7.8 A summary appraisal commentary alongside the system of symbols is provided in **Appendix 5, 6 & 7** of this IIA report to set out any significant effects identified for the Proposed changes to the Submitted New Southwark Plan policies, area visions / site allocations and implementation policies, along with suggestions for mitigation or enhancement to be made where relevant. The nature of the likely effects (including positive/negative, duration, permanent/ temporary, secondary, cumulative and synergistic) are described, along with any assumptions or uncertainties noted. Where necessary, the appraisal commentary also identifies any potential cumulative effects for that option.

Symbol and colour	Scoring Value (%)	Score	Description
✓✓	100	Major or direct positive	The proposed option/policy contributes significantly to the achievement of the objective.
✓	50	Minor or indirect positive	The proposed option/policy contributes to the achievement of the objective but not significantly or indirectly.
-	0	Neutral	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
x	-50	Minor or indirect negative	The proposed option/policy detracts from the achievement of the objective but not significantly.
xx	-100	Major or direct negative	The proposed option/policy detracts significantly from the achievement of the

			objective.
?	N/A	Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.

Table 5.3 Individual scoring metric against each objective included in sustainability appraisals of Appendix 5, 6 and 7

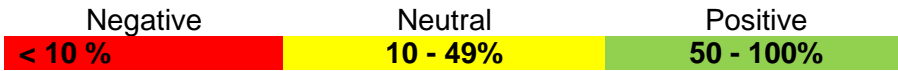


Table 5.4 Ranks of the averages of scoring, in positively or negatively meeting the IIA Objectives. Used in sustainability appraisals of Appendix 5, 6 and 7.

8. Appraisal Summary for the Strategic and Development Management Policies

8.1 The strategic vision for Southwark is to continue to be a network of successful, unique, historic, distinct places with affordable housing and business space, plenty of shops and cultural activities, open spaces and clean air that are linked together, to Central and the rest of London by an accessible and affordable transport network between 2020 and 2035.

8.2 In response to the Inspectors letter received on 20 April 2020, amendments were made to the submitted Plan. In the Proposed changes to the submitted New Southwark Plan, the following two new strategic policies have been added:

- SP1a Southwark's Development Targets
- SP1b Southwark's Places

8.3 SP1a sets out the target that developments need to deliver to achieve growth and improvements as part of the strategic objectives and the council's regeneration strategy. SP1b sets out how we will work with our partners, local communities and developers to ensure that developments improve our places for local communities through delivery of regeneration in our Opportunity and Action Areas to achieve our targets. Policies SP1a and SP1b are overarching policies for all strategic policies (SP1-SP6) setting out targets for growth in each strategic policy and the vision for the Borough in achieving this. As such these two policies have not been included in the sustainability appraisal within Appendix 6.

8.4 The strategic policies are borough-wide policies which set out the council's regeneration strategy to work with local people to improve neighbourhoods and create new opportunities for the future. They are also used to set the context for our detailed planning policies and to make planning decisions. Development management policies set out further detail which is required to deliver the strategic policies. They are used to assess planning applications.

8.5 The IIA appraisal tables in **Appendix 6** set out the full appraisal and impacts for of the six (SP1-SP6) strategic policies which overarch the development management policies and subsequent development management policies. These are assessed against the seventeen IIA objectives in the IIA framework (**Appendix 4**) and use the baseline indicators as future monitoring of these appraisals (**Appendix 9**). Each appraisal is grouped by Strategic Policy with development management policy that falls under each overarching strategic policy contained in the Proposed Changes to the Submitted New Southwark Plan.

SP1. Quality affordable homes

Overall Summary: Positive

8.6 Strategic Policy 1: “quality affordable homes” and the development management policies that sit under it as a topic area (P1-P11) 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 and private rented sector homes. The provision of affordable homes is encouraged through the fast track route for affordable housing in P1 (social rented and intermediate housing). It also removes the higher bracket of affordable housing in private rented homes, which ensures more affordable private rented homes are delivered for people more in need in Policy P4 (private rented homes).
- Support for housing for the elderly, people with specialist needs (including wheelchair user homes and wheelchair accessible homes), students. Policy P11 (Homes for Gypsies and Travellers) safeguards the borough’s four existing Gypsy and Traveller sites where there is an identified need for them, as well as making provision for the identification of new sites to meet any identified need for additional Gypsy and Traveller accommodation.
- The updated policies aim to deliver these new homes, and to optimise the delivery of new homes, requiring more quality housing to be built and should relieve pressure on existing housing stock, reducing homelessness and increasing affordability and security. This security includes the safeguarding of our existing Gypsy and Traveller sites in Policy P11 (Homes for Travellers and Gypsies).
- Optimising the delivery of new homes at higher densities through sustainable land use on small and infill sites or brownfield land would contribute to Southwark’s housing need and towards its economic growth. This would increase delivery of affordable housing and reduce homelessness, ultimately leading to the improvement of resident’s mental and physical health in the borough under the reassurance that they have a good quality, permanent home.
- Negative trends in the findings include the contextual challenge of the River Thames flood risk zones and critical drainage areas cover the majority of the borough, therefore any housing development in Southwark will most likely be in an area at risk of flooding, however the appraisal evaluates the provisions the policy makes to ensure that these negative trends are minimised.
- Flooding was identified as one of the few negative points which intersected with almost all policies. Flooding and critical drainage areas, which are being closely monitored and major development requires strategic flooding assessments. The council is aware of this contextual limitation and aims to protect all development

from this environmental threat through additional flood risk reduction and mitigation.

- Average level of benefit were identified for P4 (Private rented homes) and P10 (Self and custom build), whereas all other SP1 policies had high levels of alignment with the IIA objectives.
- P4 (Private Rented homes) has an indirect impact on the IIA objectives because privately rented homes do not directly function to tackle poverty, improve health, reduce the incidence of crime and promote social inequality. Though flood risk is an indirect risk to all of development in the borough, it brings the weighting of P4 policy to an average or neutral appraisal score because of the indirect positive impact this policy will have on other aspects of the IIA objectives. No mitigation is therefore required in regards to this policy as this is covered in separate Strategic Flood Risk Assessment (2017) evidence-base and is not uniquely influenced by the content of this policy.
- In conclusion, SP1 has been positively prepared in regards to the sustainability objectives for the reasons described above. There are certain contextual elements in Southwark which require constant monitoring such as flood risk mitigation. Secondly, there are certain implications for delivering high density housing that could have indirect impact on existing assumptions for delivering environmental sustainable urban development. This is due to the consumption and infrastructure requirements necessary for sustaining increased needs for a larger population. Improving the infrastructure to support the housing delivery targets does provide an opportunity to upgrade efficiency of water, air quality and waste infrastructure. In terms of economic and social sustainability these policies have been positively prepared and no further mitigation is required.

SP2. Regeneration that works for all

Overall Summary: Positive

8.7 Strategic Policy 2: “Regeneration that works for all” and the development management policies that sit under it as a topic area (P12-P25) 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:

- The aim of SP2 is to ensure that Southwark makes use of its strategic position as having one of the most ambitious regeneration programmes in the country, and makes sure that the benefits of these developments are captured and provided for the benefit of all of our existing residents. This requires design policies that ensure that our places are revitalized and regenerated to the highest design standards. Secondly that they recognize the existing contextual heritage and are able to provide sensitive design that enhances these characteristics, ensuring coherency between the new and the old, in the urban fabric. The aim of this policy is for everyone to proud of the places where they live and work.

- The SP2 development management policies are positively prepared with our sustainability objectives because it supports the highest design quality that protects local character, requires multiple amenity and environmental benefits, it supports strong and cohesive communities, it prioritizes safety and seeks to reduce flooding. It outlines that homes are being built rapidly with most of the change taking place in the north and center 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.
- Development which provides accessible and inclusive design for all ages and especially for people with disabilities and vulnerable people is supported ensuring future development is in compliance with the Equalities Act 2010, relevant London Plan policies and Part M of the Building Regulations (2010). It therefore seeks to promote protected characteristics and equality in its policies.
- 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 location's micro-climate. The amendment to the tall buildings policy seeks to provide more guidance for the location of tall buildings to minimise impact by locating in them in areas where they are considered possible. 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.
- P18 (Listed buildings and structures) falls below average in the sustainability appraisal. The reason for this is that there could be a perceived clash with the benefits of protecting heritage listed building and townscapes (IIA12) and other IIA objectives. That is that heritage listings can prevent the optimum sustainability or environmental standards to be met or prioritized in development or retrofitting of a building. This negative impact is outweighed by the cultural and mixed-social benefit of preserving heritage assets to the borough. Furthermore, there are opportunities for climate change and sustainability standards to be met in listed buildings to be improved with modernization of technology.
- The treatment of listed buildings and structures are established in national level policy, required by the Planning (Listed Buildings and Conservation Areas) Act 1990, therefore there are limited amendments that could be made to this policy to make it more socially, economically and environmentally sustainable. There is argument to

suggest that utilizing existing sources has short-term reuse benefits that outweighs the carbon costs of demolishing and erecting new buildings, with the costs of producing and transporting materials to site. Therefore in the short-term the benefits of retaining existing buildings are high, but in the long-term whether they are able to meet energy efficient standards and if not, there could be long term detrimental impact in overall sustainability. It is therefore a mitigation requirement that the sustainability standards of heritage buildings are monitored. Encouraging the retrofitting of existing stocks and the treatment of retrofitting on listed building requires further study as part of the Heritage SPD. The evidence for the carbon costs of listed buildings has not been captured yet so it is not something that we are able to directly monitor and mitigate against at the present time. For this reason, there has to be an uncertainty weighting with the overall sustainability of this policy.

- P22 (Archaeology) as a process provides no contribution to climate change. The benefits of protecting archaeological finds are considered to significantly outweigh the disbenefits identified in the increase in carbon emissions. Overall there is nothing that can be mitigated from a policy perspective on the management of archaeology to increase sustainability.
- In conclusion, the treatment of sustainability for preserving heritage assets requires further studies that should be published through an SPD rather than required through policy at this stage. With existing technologies SP2 ensures that optimum design and development standards are met which fulfill satisfactory requirements of the sustainability appraisal.

SP3. Best start in life

Overall Summary: Positive

8.8 Strategic Policy 3: “Best Start in Life” and the development management policies that fall under it as a topic area (P26-P27) 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.

- No mitigation is required as part of the SP3 development management policies which are weighted highly in the sustainability appraisal.

SP4. Strong Local Economy

Overall Summary: Positive

8.9 Strategic Policy 4: “Strong Local Economy” and the development management policies that sit under it as a topic area (P28-P43) 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.
- Small and independent businesses make up the majority of businesses in Southwark providing jobs for local people and providing opportunities for start-ups and self-employment. 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. Policy P30 (Affordable Workspace) now specifies 10% affordable workspace in major developments delivering employment space to ensure it is delivered. It also encourages the use 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. To further support the economy, Policy P40 (Hotels and other visitor accommodation) has been amended to require a minimum of 10% of the total floorspace to be provided as ancillary facilities in the hotel developments incorporating a range of daytime uses and other employment opportunities. It is recognised that Southwark’s historic assets can promote and enable tourism opportunities, through the protection of heritage assets and the recognition of the contribution of pubs to the historic character of a given area
- Development management policies aim to help and improve employee education and training programmes. The council’s Economic Wellbeing Strategy (2017)⁵ objective of overcoming barriers to employment is supported by policies which promote a targeted approach to improve employment participation within Southwark and an entrepreneurial approach to business, especially amongst young people. The plan also seeks to ensure small and independent businesses,

⁵ LB Southwark ‘Economic Wellbeing Strategy’ (2017)

which make up an overwhelming proportion of employers in Southwark, are provided for in development.

- Recognition and support is given to P34 (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.
- P28 (Strategic protected industrial land (SPIL)) falls below average sustainability rating. The protection of SPIL does not necessarily promote sustainable forms of transportation in the borough, as vehicle deliveries are directly correlated with the uses on SPIL and are normally heavily polluting either through exhaust emissions or re-suspended particulates from tyre and break functions. The management of these impacts includes the council working with other stakeholders to ensure that improved technology that is cleaner, and better consolidation or distribution networks, exist within the borough. The implementation of this need to be continuously monitored to reduce the impact of this policy in the future.
- Secondly, P28 (Strategic protected industrial land (SPIL)) presents a risk in promoting criminal behavior and fear of crime. The surrounding public realm around SPIL sites can add to the incidences of fear of crime as it might not be well-integrated, with active frontages and natural surveillance as required by P12 (Design of Places). Effects of negative impact on the public realm that can be caused by SPIL sites is mitigated by P12 (Design of Places) and P17 (Efficient use of Land). It is imperative that surrounding public realm is designed around the highest levels of natural surveillance possible and that neighbouring use classes are strategically selected.
- Thirdly, the varied activities that take place on SPIL sites have an uncertain relationship with the IIAO to reduce carbon emissions and tackle climate change depending on the business and operation on the site. The transportation of goods requiring vehicle emissions will have a direct negative impact on air quality in these areas. This will naturally be mitigated when cleaner transportation and technology are developed, however it is important that P64 (Improving air quality) is recognized for its value in mitigating the impacts of undesirable emissions on

SPIL sites by monitoring air quality levels and particularly for vulnerable users such as the elderly and schools.

- In the case of Southwark, P28 (Strategic protected industrial land (SPIL)) does play a role in conserving historic environment and cultural assets. Some areas of Southwark were notably strategic industrial land that played a strong role on the people who have worked and lived in our borough in the past and up to present time. The relationship with quality of landscape and townscape and conservation of historic environment is therefore uncertain and it is important that this policy exists (further detail can be found in the SPIL Background Paper).
- P28 (Strategic protected industrial land (SPIL)) SPIL can have negative effects on biodiversity and green infrastructure or corridors by presenting potential difficulties between connecting green links. This policy ensures that SPIL are limited and do not increase to places that have not historically been designated as SPIL. This protects biodiversity in former areas of protected industrial land that has been released for various reasons.
- P35 (Development outside town centres) has the potential to reduce the density in naturally-occurring town centres. This could cause an undesirable spread of intensity of development which contradict P17 (Efficient use of Land). Disruption of agglomeration benefits could have negative impact on other town centres nearby. Secondly, they could have physical, mental and emotional health impacts for residents and workers. Thirdly it could impact social inclusion and promote unsustainable forms of travel due to lower public transport accessibility levels (PTAL). These new town centres would require revised infrastructure planning and would be monitored through the use of impact assessment in considering a grant of planning permission on a case-by-case basis. Mitigation of this is required using an impact assessment which justifies this choice based on the sequential test. The sequential test is sufficient mitigation as it addresses the viability of new town centres based on criteria similar to the IIAO.
- In conclusion, SP4 policies have been positively prepared in relation to the sustainability objectives. Whilst certain elements of economic town centres may have negative or uncertain sustainability implications, such as development outside town centres and SPIL, they are effectively managed through policy to improve upon pre-existing condition. They therefore contribute more directly to sustainable development objective in the borough than the business-as-usual scenario.

SP5. Healthy, Active Lives

Overall Summary: Positive

8.10 Strategic Policy 5: “Healthy active lives” and the development management policies that sit under it as a topic area (P44-P54) 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 the 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.

- No negative sustainability implications have been identified as part of the appraisal of SP5 and underlying development management policies. Instead it is considered that the promotion of sustainable modes of transport supports each of the IIA objectives directly or indirectly and is positively prepared.

SP6. Cleaner, Greener, Safer

Overall Summary: Positive

8.11 Strategic Policy 6: “Cleaner, greener, safer” and the development management policies that sit under it as a topic area (P55-69) 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 CO₂ 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. The air quality neutral policy has been supplemented with a requirement to provide measures beyond air quality neutral which should offset a development’s impact. This is considered to be a best-fit compromise between the need to improve air quality and also deliver homes and employment space.
- 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. NSP policy directly addresses this risk. 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. The NSP policy directly addresses this risk.
- 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 CO2 emissions.

- Ensuring new buildings and existing buildings are built or retrofitted to high environmental standards will also save energy and reduce greenhouse gas emissions (P69). 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 'fit 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.
- No negative sustainability implications have been identified as part of the appraisal of SP6 and underlying development management policies. Instead it is considered that the promotion of environmental policies supports each of the IIA objectives or indirectly and is positively prepared.

Conclusion

8.12 The overall impact of the six identified strategic policies and the associated development management policies in terms of the seventeen objectives in the IIA framework (**Appendix 4**) have been assessed and are all positively prepared. Risks that have been identified are generally mitigated by other policies in the plan.

9. Appraisal Summary for NSP Area Visions and Site Allocations

- 9.1 As set out earlier in the report, within the IIA submitted in January 2020 with the New Southwark Plan Submission Version, the site allocations had been grouped together with their respective site area visions. The Inspectors have indicated that this approach did not allow the consideration of an individual site's performance against the Council's appraisal objectives nor it enabled the consideration of any potential mitigation measures required.
- 9.2 The IIA has now been updated with the site appraisal for each individual site allocation against the IIA objectives and this is set out in **Appendix 5**. A summary of the sustainability appraisal for both area visions and site allocations is set out further below.
- 9.3 The area visions and site allocations are assessed with explicit reference to the short, medium and long term impacts of the designations. These are assessed against the 17 IIA objectives. This is considered appropriate due to acknowledging that the temporal impacts, including those from the implementation of policies alongside the area visions and site allocations, will be experienced to varying degrees in each area, i.e. spatially. Further information about impact of the policies is set out below. The following area visions are within the Proposed changes to the Submitted New Southwark Plan:
- Aylesbury
 - Bankside and the Borough
 - Bermondsey
 - Blackfriars Road
 - Camberwell
 - Crystal Palace and Gipsy Hil
 - Dulwich
 - East Dulwich
 - Elephant and Castle
 - Herne Hill and North Dulwich
 - London Bridge
 - Nunhead
 - Old Kent Road
 - Peckham
 - Rotherhithe
 - Walworth
- 9.4 Chapter six of this report sets out the IIA Appraisal Methodology on the basis of which the sustainability appraisal was carried out. As set out in Tables 5.3 and 5.4, each objective is measured on a scoring scale, with each grade assigned a numeric value, symbol and colour. The colour bar within Table 5.4 divides the overall scoring into three categories from negative (< 10 %), neutral (10 - 49%) and positive (50 - 100%).

Area Visions and Site Allocations

9.5 The table below shows the averaged scoring for the area vision appraisals across all time periods, to indicate the overall efficacy in meeting the sustainability objectives.

Site	Area vision appraisal across all time periods
Aylesbury	62%
Bankside and borough	47%
Bermondsey	50%
Blackfriars Road	56%
Camberwell	53%
Crystal Palace and Gipsy Hill	38%
Dulwich	47%
East Dulwich	47%
Elephant and Castle	50%
Herne Hill and North Dulwich	35%
London Bridge	57%
Nunhead	38%
Old Kent Road	69%
Peckham	59%
Rotherhithe	65%
Walworth	50%

9.6 To note, the scale for the appraisals is the same however the color coding is different. It is clear that anything above the score of 10% is neutral whereas anything above 50% is positive. For that reason most of the short and medium-term impacts will be assessed as neutral, as the amount of change that will happen to these areas as a result of site allocations and area visions will take time to take effect. In no circumstance under the site appraisal process has an impact of a site or area action plan been negative and for this reason there are no negative results identified. Instead the appraisal differentiates by area based on the time-sensitive effectiveness of these visions.

9.7 Social inclusion was recognized as a short term issue in Blackfriars Road, Camberwell, Elephant and Castle, Peckham, Rotherhithe and Walworth. This is due to a concentration of short-term redevelopment, where it will take time before improvements to the public realm and accessibility enhancements are realized. For this reason, in the short-term while redevelopment is occurring it is likely that elements of social inclusion, equality and diversity are reduced due to the difficulty in accessing sites that are under construction with not enough mitigation in place. Policy ensures that once development is completed, that public realm is enhanced.

9.8 The contribution to climate change was uncertain in the short-term for Bankside and the Borough, Blackfriars Road, Camberwell, Elephant and Castle, London Bridge and Rotherhithe. The reason for the short-term uncertainties are because at present these areas suffer from particularly poor air quality and high carbon dioxide emissions with high levels of motorized private or public transport. Development

intends to encourage a modal switch towards walking and cycling in all these areas but at present there is uncertainty as to whether these will be effective in the short-term.

- 9.9 A negative contribution to climate change and uncertain sustainable use of water resources is identified in the Old Kent Road, which is subject to experience a particularly high level of growth in the short-term which will lead to an immediate demand on resources. Strategies to develop utilities, energy, flood risk and water management to inform policies in the AAP have been developed in order to mitigate the overwhelming amount of growth anticipated on social, economic and environmental sustainability benefits. New underground stations and improved surface transport suggests that the health of the population and more sustainable modes of travel are expected. Overall the benefits of the regeneration, designated as an opportunity area in the London Plan outweighs any of these negative short term costs. The focus will be to ensure that the infrastructure is in place to mitigate negative impact in the long run.
- 9.10 The site allocations and area vision impacts will be more prominent in their effect on sustainability in the sites marked as green than the sites marked as yellow. The overall impact of the site allocations and area visions are positive with eight of the area visions containing site allocations all scoring above 50 and scoring notably highly in area visions; Borough and Bankside, Bermonsdey, Dulwich Herne Hill, Elephant and Castle, London Bridge, Old Kent Road and Walworth. It is important to note that Aylesbury and Nunhead Area Visions do not contain any site allocations.
- 9.11 The sustainability appraisal of the site allocations demonstrate that most of the sites will be positively contributing to the housing stock within these areas by providing housing of various tenures (objective 15) including affordable housing, encouraging more activity within retail centres, through the provision of various town centre uses which helps to stimulate the economy and sites will at least be re-providing or delivering an uplift of employment in commercial uses specifically office use which will also help to encourage wealth and creation within the borough (objective 1).
- 9.12 The site allocations also score highly in promoting active modes of transport (objective 16), through providing green links to open spaces and supporting the low line walking route, this in turn has positive effects on climate change (objective 6) and air quality (objective 7) where the use of more active modes of transport such as cycling and walking will naturally reduce carbon emissions from private vehicles, as cars and motorcycles are used less often. Beneficial outcomes from encouraging more active modes of transport also positively contribute to improving health within the borough (objective 3) through encouraging residents to partake in more physical activity.
- 9.13 Most of the sites allocations also score highly in contributing to increasing the provision of infrastructure (objective 17) to support new development. This is mainly being done through enabling the provision for community and assembly and leisure facilities. New development within the area visions will also be subject to community infrastructure payments and the necessary s106 payments which will deliver the required infrastructure to mitigate impact of the development. This in turn will help in creating community interaction and cohesion (objective 5) where residents and visitors are able to participate and have access to a wide range of community cultural and leisure facilities together. The sustainability appraisal of the site allocations also demonstrates that the sites also contribute towards creating a safer Borough

(objective 4) in encouraging more natural surveillance within the area through active frontages, more walking and cycling routes and generally increasing the population within the Borough through providing more housing which would naturally result in more people coming into the area and using local essential facilities. This also increases the perception of a safer environment amongst residents as more people will be moving within the Borough which aids in creating natural surveillance.

Flood Risk of Site Allocations


- 9.14 The borough is at risk of flooding from a number of sources including from the River Thames as well as from ground and surface water flooding. The Inspectors have pointed out that no evidence was provided that a sequential, risk based approach to the location of development as required by paragraph 157 of the Framework has been carried out. Within the sustainability appraisals set out in Appendix 5, Objective 14 details how the sequential test (and exception test if required) has been applied with further analysis for each site allocation.
- 9.15 The next section within this chapter sets out the NPPF approach to flood risk management in the preparation of a local plan; and further information on the sequential and exceptions tests. This section further elaborates on the Council's approach to flooding and an appraisal summary for site allocations sequential and exception tests.

NPPF approach to flood risk management in the preparation of a local plan

- 9.16 The National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance emphasise the responsibility of Local Planning Authorities to ensure that flood risk is understood and managed effectively and sustainably throughout all stages of the planning process.
- 9.17 The greatest risk to property and life from flooding within Southwark is as a result of tidal activity within the River Thames. However, the Borough is currently protected from combined tidal and fluvial flooding by the River Thames Tidal Defences, up to the 1 in 1000 year event. The risk is therefore of a residual nature, associated with overtopping or breaching of defences. Excepting the River Thames, there are no other watercourses within Southwark known to present a risk of fluvial flooding. A potential risk of flooding from other (non-river related) sources exists throughout the Borough, including sewer surcharge and surface water flooding as a result of heavy rainfall and/or blocked drainage systems.
- 9.18 Southwark plays a key role in managing this risk as a Lead Local Flood Authority, under the Flood and Water Management Act (2010) and the Flood Risk Regulations (2009). Areas of the Borough are also thought to be susceptible to elevated groundwater levels, which may additionally interact with and exacerbate these other sources of flood risk. It is expected that changing climate patterns will have a substantial impact on the level of flood risk from all sources within Southwark.
- 9.19 The NPPF approach aims to ensure that flood risk is considered at all stages of the planning process and to avoid inappropriate development in areas of greatest flood risk; steering development towards areas of lower risk. Development is only permissible in areas at risk of flooding in exceptional circumstances where it can be demonstrated that there are no reasonably available sites in areas of lower risk, the

sustainability benefits of that development outweigh the risks from flooding and, the development will be safe for its lifetime without increasing flood risk elsewhere.

- 9.20 Such development is required to include mitigation/management measures to minimise risk to life and property should flooding occur. Building on these principles, the NPPF and Technical Guidance have established a process for the assessment of flood risk, with each stage building upon the previous assessment with a refinement of the evidence base. Utilising a Source – Pathway – Receptor approach, the source of flooding, the spatial distribution of flood risk and the vulnerability of development types are assessed to inform decision making through each of the key stages of the Flood Risk Management Hierarchy, as outlined in the NPPG and shown in the table below.



Stage	Approach
Level 1 SFRA	Assessment (broad scale and comprehensive)
Sequential Test Across Planning Area	Avoidance
Level 2 SFRA (if required)	Detailed Assessment (Growth Area or Site Specific)
Sequential Approach at Site	Avoidance
Control and Improvement	Through Design (e.g. SuDS)
Mitigate Remaining Risks	Flood Resilient Design and Construction

Applying the sequential test

- 9.21 The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. (paragraph 158 of the NPPF). As such, development should not be permitted in areas of flood risk, where there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.
- 9.22 Planning Practice Guidance requires inappropriate development in areas at risk of flooding (i.e. in flood zones 2 and 3 or land within flood zone 1 which has critical drainage problems) to be avoided by directing development away from areas at highest risk. Where development is necessary, it is required that it is made safe without increasing the risk of flooding elsewhere. The NPPF sets out a sequential approach in order to achieve this. This requires that development can be located in flood zone 2 and then flood zone 3 only if there are no reasonably available sites in flood zone 1. The Sequential Test should be carried out on all development sites and can be applied at all levels and scales of the planning process, both between and within Flood Zones.
- 9.23 The approach seeks to prevent the allocation of sites that are inappropriate on flood risk grounds by considering the vulnerability of the type of development proposed and how compatible the intended use is with the level of flood risk at the site. The NPPF Technical Guidance Note classifies the flood risk vulnerability of land uses into five categories, as follows:

1) Flood risk vulnerability of land uses

i. Essential infrastructure

Includes:

- Essential transport infrastructure;
- Essential utility infrastructure including electricity generating power stations, water treatment works;
- Wind turbines.

ii. Highly vulnerable

Includes:

- Police stations, fire stations and ambulance stations;
- Emergency dispersal points;
- Basement dwellings;
- Caravans, mobile homes and park homes intended for permanent residential use;
- Installations requiring hazardous substances consent.

iii. More vulnerable

Includes:

- Hospitals;
- Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels;
- Buildings used for dwelling houses, student halls of residence, drinking establishment, nightclubs and hotels;
- Non-residential uses for health services, nurseries and educational establishments;
- Landfill and sites used for waste management facilities for hazardous waste;
- Sites used for holiday or short-let caravans and camping.

iv. Less vulnerable

Includes:

- Police, ambulance and fire stations which are not required to be operational during flooding;
- Buildings used for shops; financial, professional and other services; restaurants and cafes; hot food takeaways; offices; general industry; storage and distribution; non-residential institutions not included in 'more vulnerable', and assembly and leisure;
- Land and buildings used for agriculture and forestry;
- Waste treatment;
- Minerals working and processing;
- Water treatment works;
- Sewage treatment works.

v. Water-compatible development

Includes:

- Flood control infrastructure;
- Water transmission infrastructure and pumping stations;
- Sewage transmission infrastructure and pumping stations;
- Sand and gravel workings;
- Docks, marinas and wharves;
- Navigation facilities;
- MOD defence installations;

- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location;
- Water-based recreation (excluding sleeping accommodation);
- Lifeguard and coastguard stations;
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation; and
- Essential facilities such as changing rooms; essential ancillary sleeping or residential accommodation for staff required by uses in this category.

9.24 The below table sets out the types of development that are considered as suitable within areas of varying perceived flood risk.

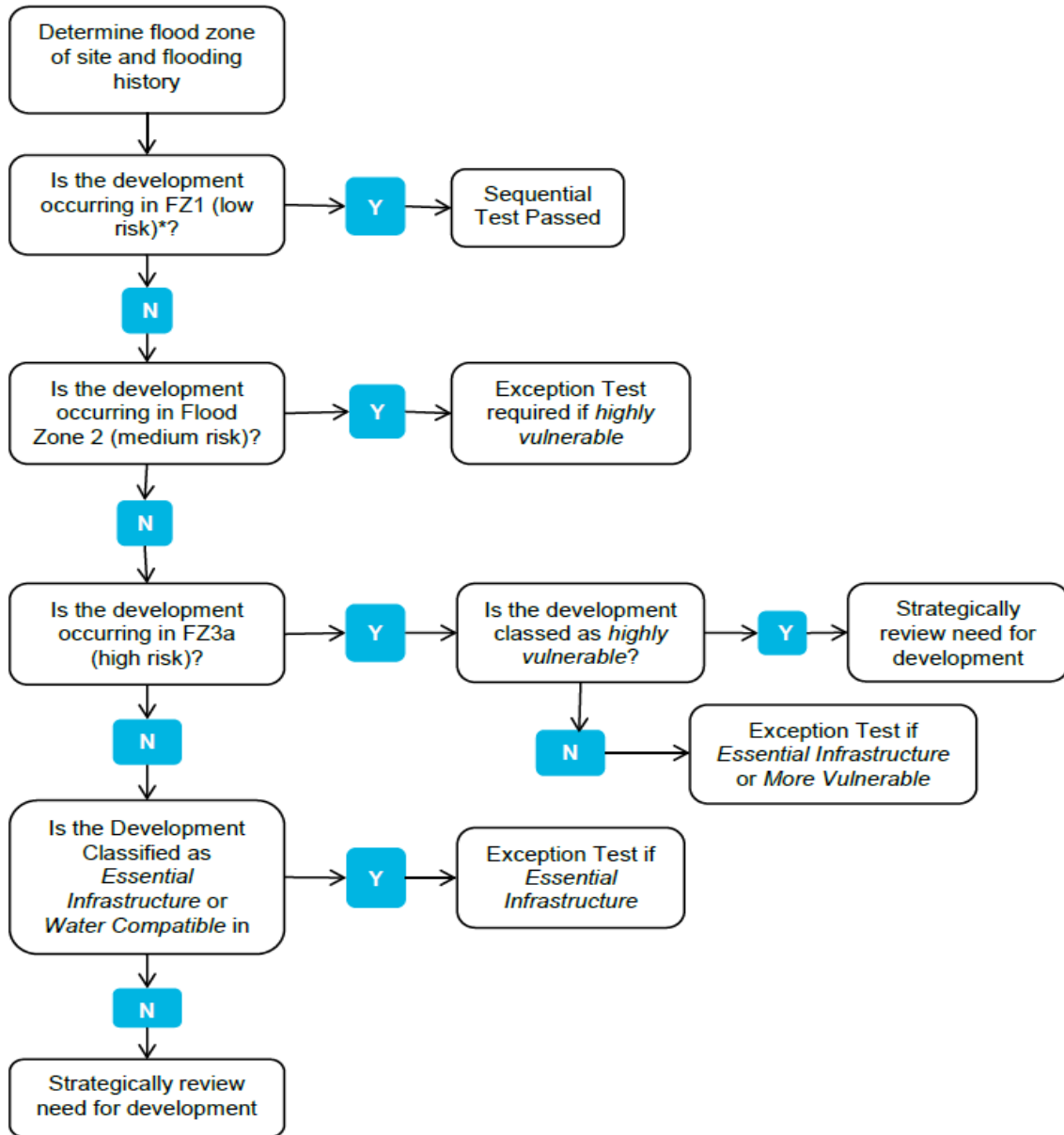
2) Flood zones and development compatibility

Flood Zone	Description	Annual probability of river or sea flooding	Appropriate uses
Zone 1	Low Probability	1 in 1,000 (<0.1%)	<ul style="list-style-type: none"> • All uses
Zone 2	Medium Probability	1 in 100 – 1 in 1,000 (river) (1-0.1%) 1 in 200 – 1 in 1,000 (sea) (0.5-0.1%)	<ul style="list-style-type: none"> • Water Compatible • Less Vulnerable • More Vulnerable • Essential Infrastructure • Highly Vulnerable*
Zone 3a	High Probability	1 in 100 or greater (river) (>1%) 1 in 200 or greater (sea) (>0.5%)	<ul style="list-style-type: none"> • Water Compatible • Less Vulnerable • More Vulnerable* • Essential Infrastructure*
Zone 3b	The Functional Floodplain	1 in 20 or greater (5%) or land which is designed to flood in an extreme (0.1%) flood.	<ul style="list-style-type: none"> • Water Compatible • Essential Infrastructure*

Notes: *only if Exception Test passed

The Sequential Test

9.25 There is significant development and regeneration proposed in Southwark in the future, with a large number of site allocations located in medium-to-high risk flood zones 2 or 3. As such it is crucial that the allocation of development considers flood risk early in the planning process. It is therefore necessary for Southwark to consider whether potential development sites in flood zones need to and can pass the sequential and exception test. Within the *Strategic Flood Risk Assessment (SFRA) Level 1 (2017)* it is set out how the Sequential Test has been undertaken and how the below flow diagram has been applied to identify the suitability of a site for allocation, in relation to the flood risk classification.



* Other sources of flooding also need to be considered

- 9.26 Southwark is an inner London borough with a large proportion of land located in flood zone 2 and 3; therefore locating all required development in the Borough away from these areas is unlikely to be achievable. In order to effectively manage flood risk, a sequential test has been applied for each site allocation in the *Strategic Flood Risk Assessment (SFRA) Level II: Sequential test of site allocations* according to the NPPF risk-based approach. The test confirms if the proposed land use is acceptable and compatible with the flood risk zone or requires an additional exception test to allow the development to occur for wider sustainability reasons (paragraph 159 of the NPPF).
- 9.27 The greatest risk to property and life from flooding within London Borough of Southwark (LBS) is as a result of tidal activity within the River Thames. However, the Borough is currently protected from combined tidal and fluvial flooding by the River

Thames Tidal Defences (TTD) up to the 1 in 1000 year event. The risk is therefore of a residual nature, associated with overtopping or breaching of defences. Excepting the River Thames, there are no other watercourses within Southwark known to present a risk of fluvial flooding.

- 9.28 A potential risk of flooding from other (non-river related) sources exists throughout the Borough, including sewer surcharge and surface water flooding as a result of heavy rainfall and/or blocked drainage systems. Southwark plays a key role in managing this risk as a Lead Local Flood Authority, under the Flood and Water Management Act (2010) and the Flood Risk Regulations (2009).
- 9.29 Areas of the Borough are also thought to be susceptible to elevated groundwater levels, which may additionally interact with and exacerbate these sources of flood risk. It is expected that changing climate patterns will have a substantial impact on the level of flood risk from all sources within Southwark.
- 9.30 The SFRA identifies the tidal floodplains associated with the River Thames and presents Flood Zone Maps that delineate the flood zones outlined in the NPPF. Breach modelling has additionally been undertaken to enable a greater understanding of the residual risk associated with this source. The resulting hazard, depth and velocity mapping contained within the SFRA provide further definition of the spatial variations of flood risk within Flood Zone 3.
- 9.31 The majority of the northern half of the Borough is located within Flood Zone 3a and therefore classed as at high risk of flooding. The floodplain areas within Southwark associated with the River Thames do not have a Flood Zone 3b or functional floodplain associated with them, as they are classed as defended and would not flood during a 1 in 20 year event. Therefore, the functional floodplain has been defined as the area situated on the river side of the raised defence line.
- 9.32 Many site allocations are located in the four opportunity areas designated for significant growth in the London Plan (Canada Water, Borough, Bankside and London Bridge, Elephant and Castle and Old Kent Road). Many of the sites in the north of the borough are required to deliver the quantum of housing necessary to meet the borough needs, as well as the development of employment and retail floorspace, particularly in the Central Activities Zone (north of the borough). Additional social infrastructure and new parks will also be delivered as part of the regeneration objectives of these areas. The development of these areas, in conformity with the London Plan objectives for growth and housing targets, is considered to bring significant sustainability benefits to the local communities.
- 9.33 The development envisaged for these areas to meet the requirements of meeting the boroughs targets for growth, the duty to cooperate with neighbouring boroughs (for example to secure significant infrastructure improvements such as the Bakerloo Line extension) and the Opportunity Area designations for growth in the London Plan. The scale of development envisaged for these areas is unlikely to be achievable in other parts of the borough and would not meet other sustainability objectives of the IIA. Whilst many of the sites are located in Flood Zone 3, these benefit from the Thames Tideway defences, and many safety measures are incorporated into NSP Policy P67 to ensure the developments are safe. The sequential test for the site allocations is therefore considered to be passed.

The Exception Test

9.34 A local planning authority should demonstrate through evidence that it has considered a range of options in the site allocation process, using the Strategic Flood Risk Assessment to apply the Sequential Test and the Exception Test where necessary. This can be undertaken directly or, ideally, as part of the sustainability appraisal. Where other sustainability criteria outweigh flood risk issues, the decision making process should be transparent with reasoned justifications for any decision to allocate land in areas at high flood risk in the sustainability appraisal report.

9.35 **Appendix 5** contains a detailed sustainability appraisal, where every area vision and site allocation was assessed against the Council's objectives. For every site allocation under objective 14 (To reduce vulnerability to flooding) it is set out whether it has satisfied the sequential test, or an exception test was required. As set out in SFRA Level II, if the sequential test is passed, the development is permitted as it proposes 'less vulnerable' land uses which are acceptable within the respective Flood Zone. If the sequential test confirms that the site will have 'more vulnerable' land uses, an exception test has been carried out to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. Within the exception test two criterion need to be satisfied, as per paragraph 160 of the NPPF as follows:

1. Demonstrate wider sustainability benefits to the community that outweigh flood risk

Evidence of wider sustainability benefits to the community should be provided, for instance, through the sustainability appraisal. If a potential site allocation fails to score positively against the aims and objectives of the sustainability appraisal, or is not otherwise capable of demonstrating sustainability benefits, the local planning authority should consider whether the use of planning conditions and/or planning obligations could make it do so. Where this is not possible the Exception Test has not been satisfied and the allocation should not be made.

2. Demonstrate that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall

Wider safety issues need to be considered as part of the plan preparation. If infrastructure fails then people may not be able to stay in their homes. Flood warnings and evacuation issues therefore need to be considered in design and layout of planned developments. In considering an allocation in a Local Plan a level 2 Strategic Flood Risk Assessment should inform consideration of the second part of the Exception Test.

9.36 Where an exception test was required, to satisfy the sequential test criterion, under objective 14 we have set out the wider sustainability benefits for each site allocation in Appendix 5 such as social, economic and environmental benefits that would be brought to the community that outweigh flood risk.

9.37 Many site allocations are located in the four opportunity areas designated for significant growth in the London Plan (Canada Water, Borough, Bankside and London Bridge, Elephant and Castle and Old Kent Road). Many of the sites in the

north of the borough are required to deliver the quantum of housing necessary to meet the borough needs, as well as the development of employment and retail floorspace, particularly in the Central Activities Zone (north of the borough). Additional social infrastructure and new parks will also be delivered as part of the regeneration objectives of these areas. The development of these areas, in conformity with the London Plan objectives for growth and housing targets, is considered to bring significant sustainability benefits to the local communities. The following regeneration benefits are relevant:

- Making use of brownfield sites;
- New homes to meet and exceed our housing targets including affordable housing to meet the borough needs of social rented and intermediate housing
- An increase in high-quality office accommodation to support the growth of the local economy and bring increased job opportunities and prosperity to the borough including the provision of affordable workspace;
- A variety of town centre uses and retail at ground floor level to provide active frontages and create a vibrant urban area;
- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development;
- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant;
- Delivery of the Low Line walking route creating improved accessibility and the quality of experience for walking. Improved walking networks encourage active travel and exercise, which is beneficial for health, as well as activating railway arches for a variety of commercial uses;
- Bringing more destinations closer to residents through strategic walking routes and improved accessibility, with improved pavements, crossings and public spaces encourage people to walk more. Measures to encourage walking can also help tackle social isolation and routes should accommodate parents and older or disabled people;
- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
- New homes will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health;
- Some sites are required to deliver new open space in areas of deficiency. New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialisation, nature conservation, food growing and cultural events. This will maintain and improve open spaces to ensure health and wellbeing benefits associated with these activities are accrued;
- The provision of open space is valuable in supporting active travel and walking which has the potential to encourage a reduction in climate change. By reducing the intensity of carbon emissions released in a certain area contributes to better air quality;

- The increased provision of open space will help absorb negative CO2 emissions and this will contribute to better air quality;
- The requirement to improve pedestrian movement and permeability through site developments will enhance connectivity across the area, promoting healthy lifestyles and improving access to services.
- Redevelopment opportunities will also enable social infrastructure such as schools and health facilities to be provided.

These sites are therefore considered to pass part 1 of the Exceptions Test.

- 9.38 Furthermore, to meet the second requirement that the development is safe for its lifetime, and that flood risk to people and property will be managed satisfactorily, recommendations set out in the SFRA Level II report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS have been incorporated under objective 14 in Appendix 5 for each site. The site allocations in Flood Zone 3 are in the 'defended' zone, meaning they benefit from protection from combined tidal and fluvial flooding by the River Thames Tidal Defences (TTD) up to the 1 in 1000 year event. The risk is therefore of a residual nature, associated with overtopping or breaching of defences.
- 9.39 Ongoing maintenance of these defences is critical, and the SFRA recommends priority should be given to safeguarding the Standard of Protection (SoP) provided by defences over the lifetime of any development. Additionally, the SFRA recommends consideration should be given to the specific recommendations of the Environment Agency's Thames Estuary 2100 (TE2100) plan in requiring reduction of current and future flood risk through raising, maintaining and enhancing flood defences.
- 9.40 Policy P67 in the New Southwark Plan requires a number of measures in developments to promote safety measures which would apply to all site allocations:
- Finished floor levels set no lower than 300mm above the predicted maximum water level
 - Reducing surface water run-off to greenfield run-off rates including the use of SUDS to the drainage hierarchy and water sensitive urban design
 - Permeable paving and gardens
 - A set back of 10 metres for development on sites located adjacent to the River Thames defence wall
- 9.41 A Flood Risk Assessment (FRA) would also be required for any development proposals in flood risk zones 2 and 3. The FRA must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, include site specific measures to, reduce flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas, as recommended in the Level 1 SFRA.
- 9.42 Where an approved application is relevant to a site allocation, further information has been provided under objective 14 to set out the flood risk considerations that were taken into account during the decision making process, and what recommendations have been made to reduce flood risk and making the development safe for its lifetime. The SFRA also recommended using Integrated Water Management

Strategies (IWMS) for areas which would receive a significant amount of development to manage surface water run-off on a strategic scale. An IWMS has been prepared for the Old Kent Road AAP incorporating these principles. Overall, the site allocations requiring the exceptions test are considered to be able to demonstrate the development will be safe, protecting the vulnerability of its users, and without increasing flood risk elsewhere by using the principles of Policy P67, Integrated Water Management Strategies and individual Flood Risk Assessments, in accordance with Part 2 of the Exceptions Test.

- 9.43 The sustainability appraisal of objective 14 (in Appendix 5) was undertaken using professional judgment, supported by the baseline information and wider evidence base. Out of 82 sites, all sites have passed the sequential test. A number of sites also required additional exception tests. All sites required for the exception test have satisfied the two criteria of the exception test. None of the site allocations represented inappropriate development which is incompatible with the flood risk level as defined in the NPPF.
- 9.44 As such, overall the sustainability appraisal of each site demonstrates a positive appraisal. No risks have been identified as part of the site appraisals and if any arose at a later time, they are generally mitigated by other policies in the plan.

10. Appraisal Summary for NSP Implementation Policies

10.1 The IIA appraisal tables in **Appendix 7** set out the details of the impacts for of the six implementation policies in terms of the seventeen objectives in the IIA framework.

IP1. Infrastructure

Overall Summary: Positive

10.2 Overall this policy is positively prepared. The only item to note is all aspects of infrastructure are supported by these two implementation policies, there is potential for clashing incentives, for instance between sustainable urban drainage systems and green infrastructure with highways and public transport infrastructure. For this reason IIOA9 and IIAO14 are uncertain as to whether they are actively seeking to achieve these objectives, although they are included in the infrastructure policy, benefits provided might be minimised by other infrastructure capacities supported by this policy.

IP2. Transport Infrastructure

Overall Summary: Positive

10.3 Overall this policy is positively prepared as it encourages improvements to transport infrastructure which should reduce unsustainable transport usage and support more environmentally-friendly modes of travel. Secondly, improved transport systems will allow more people the opportunity to travel, potentially improving their quality of life.

IP3. Community Infrastructure levy (CIL) and Section 106 planning obligations

Overall Summary: Positive

10.4 This policy is positively prepared as it ensures that principles of sustainable development can be mitigated through financial contributions, allowing development to support sustainable functioning in the local community and for surrounding neighbourhoods whether or not they are able to achieve it in their design.

IP4. Enforcement against unlawful development

Overall Summary: Positive

10.5 This policy ensures that the objectives of the council are met by discouraging development to take place that does not conform to the sustainable principles promoted by the NSP, where not adhering to these policies present risk of adverse harm to the borough and its residents. Regulating the development that takes place unlawfully ensures that the wellbeing of residents can be protected and impact of the development can be mitigated if adverse harm is created. This ensures that development takes place which optimizes benefits for all members of the community.

IP5. Compulsory Purchase Order (CPO)

Overall Summary: Positive

10.6 This policy provides purchasing rights to the Council to support wider regeneration objectives. It requires power to be given to the Council to strategically select land that can be seen to provide long-term social, environmental and economic benefits to the overall wellbeing of its residents. This is justified if the Council is able to provide a compelling case in the public interest. Such a case requires a long-term vision into the future, and the cooperation of a number of stakeholders and funding provisions to be provided. In the short-term, claiming land in this way can be disruptive to communities. It is however a requirement of national legislation. Although the methods of acquiring land through Compulsory Purchase Order (CPO) are often criticised, there are examples showing where these have been of an overall benefit to wider communities in the long-term. The Council provides multiple forms of support to property owners and residents who are at risk of being displaced by the CPO process, including the provision of compensation. CPO remains the last resort for the Council in securing vacant possession of land for regeneration.

IP6. Monitoring Development

Overall Summary: Positive

10.7 Monitoring development is an ongoing requirement of the Council done through its AMR, which is discussed in an earlier section of this appraisal. The AMR procedure ensures that fundamental Council data is publicised and made transparent, so that the Council is able to adjust planning policies at interim reviews. This provides a fundamental feedback mechanism that enables planning policies to be improved upon on a regular basis. It has numerous indirect benefits for these reasons. Depending on the indicators, there will be benefit towards meeting the Council's Climate Emergency targets of reducing carbon emissions to neutrality by 2030⁶. The benefits are uncertain however, as the regularity to which indicators are updated, reported upon and modified are not made clear in this policy. Therefore, there is a potential for indicators to be inaccurate or ineffective in informing planning policy, thereby not directly supporting any of the IIA objectives. Overall, the appraisal is indirectly positive or uncertain for these reasons.

IP7. Statement of Community Involvement

Overall Summary: Positive

- 10.8 The SCI supports all stakeholders and interested parties to the planning policies to provide comments and recommendations regarding all planning documents and guidance. It ensures that sufficient community engagement takes place to specifically target harder to reach groups, who may be affected by planning policy, however are unaware of the process behind providing comments. The intention of the SCI is to improve equality and incorporate the benefits of a wider range of stakeholders in the borough to develop the most effective and beneficial planning policies and supplementary guidance.

Conclusion

- 10.9 While there is room for improvement in IP5 the remainder of the Implementation Policies are positively prepared and therefore recommended.

11. Monitoring and Implementation of the NSP

Proposals for monitoring

- 11.1 This plan will be monitored through Baseline Indicators found in **Appendix 9** which refer to findings of **Appendix 3: Baseline Data**. Each of the baseline indicators are attributed to specific IAOs which have been used during the appraisals of the NSP (**Appendix 5, 6 and 7**).
- 11.2 The most appropriate way to monitor the plan is through the Local Development Framework Authority's Monitoring Report (AMR). The AMR monitors the type of development that is occurring as a result of all of the council's planning policies and guidance and what effects this development is having in terms of sustainability.
- 11.3 The indicators will also be monitored through publication of Social Regeneration Indicators published alongside the Council Plan. These indicators will be reported to Cabinet on an annual basis so they can monitor the progress of the indicators. Social Regeneration Charters will be updated in response to the annual analysis of the Social Regeneration Indicators to ensure that the charter goals and promises remain up to date.
- 11.4 The sources of monitoring for all indicators can be found in **Appendix 9**.

How will the plan be implemented?

- 11.5 The plan will shape development in Southwark from 2018 to 2033 through the application of area vision guidance and strategic, development management and site allocation policies to planning proposals. As a spatial planning document it will also influence the investment decisions of the council and its development and infrastructure partners. We will ensure the NSP is implemented by working with the local community and businesses, developers, neighbouring borough councils, GLA, TFL and other partners to deliver the plan.
- 11.6 Southwark Council together with Lewisham will continue to actively campaign and promote the BLE given its importance for the delivery of homes in the boroughs. This infrastructure is essential to meet our housing target, given the planned delivery of new homes in the Old Kent Road Opportunity Area in Southwark and New Cross and Catford Opportunity Areas in Lewisham. Both parties will continue working with the Greater London Authority and Transport for London to develop these proposals for the BLE and to make the case to government to ensure the project is delivered.
- 11.7 Implementation of the NSP policies will be achieved through our development management function when we make decisions on planning applications. We will work with landowners and developers to ensure schemes make effective use of land across the borough and consider the wider context. We will use the council's delivery programmes to help deliver new council homes and using our compulsory purchase

powers where necessary to ensure that land is made available for development where it is needed to deliver the NSP strategy.

- 11.8 Our Statement of Community Involvement (SCI) sets out how and when the community will be involved in preparing planning policy documents and in making decisions on planning applications. The SCI was developed by working with many local people, businesses, voluntary and community organisations, councillors and statutory organisations. The SCI includes: information on different consultation methods; how to overcome barriers to involve different groups and; the consultation process for both planning policy documents and planning applications. Involving the community at the earliest stage possible in the planning process helps to implement development that is wanted and needed by the community.
- 11.9 New development also needs to be supported by adequate social, physical and green infrastructure. This includes: social infrastructure such as schools, health and other community facilities; physical infrastructure such as transport and utilities; green infrastructure such as parks and open spaces. Where infrastructure is needed to support development, it should be provided along side it. Development should not be permitted unless essential infrastructure can be completed prior to occupation of the new development.
- 11.10 We will continue to work in partnership with infrastructure providers, including both internal council departments and external agencies, throughout the development of the NSP to identify infrastructure required to facilitate the development set out in the plan.
- 11.11 We will use S106 planning obligations/CIL to overcome negative impacts of development and to make sure that infrastructure needed to support development is provided. We will use planning obligations in accordance with government guidance, set out in the CIL Regulations. We have an approved Planning Obligations/CIL SPD which explains our policies in more detail and sets out a series of standard charges to be applied to development. Through implementing this SPD and collecting CIL we will secure financial contributions to mitigate the impacts of development.

Links to other tiers of plans, programmes and other guidance

- 11.12 The NSP will be continuously influenced by other tiers of planning at national, regional, borough and local levels. Any changes to other spheres of planning legislation will require the IIA and NSP to be updated accordingly to align with these new targets set.
- 11.13 The NPPF updates the approach to plan making by simplifying the process and returning to a system of Local Plans. We are preparing the Proposed changes to the Submitted New Southwark Plan to replace the Core Strategy and Saved Local Plan policies. The Local Development Scheme (available on our website) sets out the programme for the production of documents.

11.14 It should be noted that local planning policy is produced within a framework set by national and regional government planning guidance such as the NPPF and the London Plan. This guidance indicates the broad principles that local policy should adopt. For example, the London Plan identifies opportunity areas which are expected to deliver new homes, jobs and infrastructure to be determined in more detail in a local level plan.

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