

SUSTAINABILITY REPORT
123 Grove Park Supplementary Planning Document

London Borough of Southwark
Planning Policy Team
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NON-TECHNICAL SUMMARY

The sustainability appraisal (SA) process allows us to predict the likely effects of the draft planning documents on the environment, economy and community. In doing so, we can assess whether or not, and to what extent, draft planning policies and guidance will contribute towards the borough's objectives for achieving a sustainable community.

What planning document is being appraised?

The draft supplementary planning document (SPD) deals with a site in Camberwell, at 123 Grove Park. The site was most recently used as a youth offending centre. However, since 2005 the building has been vacant and suffered from illegal squatting. A supplementary planning document is needed to provide clear guidance on how the future use of the site can best meet the objectives and policies of the emerging Southwark Plan.

The draft SPD aims to:

- Facilitate the re-use of the site, maximising its potential, whilst protecting its conservation value;
- Ensure that any development preserves or enhances the character and appearance of the Camberwell Grove Conservation Area; and
- Ensure that new development on the site maximizes the social, economic and environmental potential of the site.

Section 2 of this report provides more detail on the draft SPD.

What process has been taken to appraise the likely effects of the plan?

The SA process consisted of four main steps:

1. Identifying environmental, social and economic issues and objectives contained in other plans and programmes that are relevant to planning obligations.
2. Gathering baseline information on the environmental, social and economic characteristics of the site and its context. This gives us a good impression of the present and likely future state of the site in the absence of the draft SPD.
3. Through Steps 1 and 2 we can identify the key sustainability issues facing our borough and develop a set of sustainability objectives for tackling these issues.
4. It is these sustainability objectives that are used to assess the likely significant social, environmental and economic impacts of the draft SPD, at each step of the plan making process. Three options for the site were identified and appraised. These were:
 - **Option A:** Continued community use of the site
 - **Option B:** Conversion of the existing building into residential accommodation
 - **Option C:** Conversion of the existing building into residential and building an additional housing at the rear of the site.

The likely significant effects of each of these options were compared. This helped the council to develop a preferred option for the site, which forms the basis of the guidance in the draft SPD.

This report sets out in detail the process taken to appraise the draft SPD and the findings of that appraisal. The next steps in the process are:

- Consulting on the appraisal and the draft SPD; and
- Monitoring implementation of the plan.

Section 3 of this report provides more detail on the appraisal process.

What sustainability issues are relevant to the site?

The key sustainability issues relevant to the site, which the draft SPD needs to address are:

- Population growth, which **increases demand for resources**, housing and community facilities
- Ensuring development promotes **transport choice and accessibility** by public transport, walking and cycling. It is also important that the community does not have to travel long distances to important services and facilities such as shops. Development on the site needs to weight up the potential loss of community use with the provision of housing, which is also needed in the borough;
- There are a high proportion of **disadvantaged groups** in the borough. Development should ensure that these groups are not further disadvantaged;
- The need to **protect and enhance biodiversity**. The site has a large back land containing established trees.
- **Local Character**. The site is located within a conservation area and in proximity to listed buildings. Development on the site needs to be sensitive to the character of this conservation area.

Sections 4 and 5 of this report provide more detail on the sustainability issues relevant to the site, and how these were identified.

What sustainability objectives were used to appraise the draft SPD?

Twenty four objectives were used to appraise the draft SPD. These have been drawn from the objectives used to appraise the London Plan and the emerging Southwark Plan. These objectives are:

Sustainability objectives
To focus development at locations which are currently well served by public transport with spare existing capacity, walking or cycling, or at locations where improvements are planned to achieve increases in their modal share.
To reduce car dependency by improving transport choice and thus increasing the proportion of journeys made by public transport, by bicycle and by foot.
To encourage sustainable development that is compact and mixed use as

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appropriate, with provision of key local services and amenity that will reduce the need to travel.
To ensure that London makes more efficient use of natural resources and in particular, soil, mineral aggregates, water and energy.
To protect and enhance existing biodiversity and natural habitats, and create new wildlife habitats.
To maximise the benefits of regeneration schemes for local people.
To actively promote new clean technologies, particularly potential growth sectors of the environmental economy, renewable energy production and pollution control.
To protect, maintain, restore and enhance the quality of London's open spaces, to create new open space as appropriate, and to ensure that access to open space and the wider public realm is maintained.
To reduce crime and the fear of crime
To ensure that all Londoners have access to good quality affordable housing
To ensure that where possible, new development occurs on derelict, vacant and underused previously developed land and buildings, and that land is remediated as appropriate.
To encourage communication between London's different communities, in order to improve understanding of differing needs and concerns.
To reduce emissions of greenhouse gases, and plan for further reductions, to meet or exceed national climate change targets
To improve air quality
To reduce the amount of waste requiring final disposal through waste minimisation, and to increase in order of priority, the proportion of waste reused, recycled and composted, and recovered.
To minimise ambient noise using best practice techniques.
To substantially increase the proportion of energy both purchased and generated from renewable and sustainable resources.
To promote a high quality of urban design in conjunction with sustainable construction principles and techniques.
To maintain and enhance the quality and integrity, and distinctiveness of the cityscape.
To maintain and enhance the historic environment and cultural assets of London.
To avoid development that will impact on areas at high risk from flooding.
To increase tree cover as appropriate and ensure active and sustainable management of existing woodland.
To improve the image of London/Southwark as an exemplary sustainable city
To actively challenge discrimination against all marginalised groups in a consistent and comprehensive way

Section 5 of this report provides more information on the sustainability objectives used and how they were identified.

What are the likely significant effects of the draft SPD?

Overall, the appraisal indicated that the draft SPD is likely to make a positive contribution to sustainability. While the draft SPD seeks development that would result in the loss of a community use and trees, it is considered that the negative effects of this are outweighed by the benefits of having development that compliments the conservation, brings the vacant building back into use and provides housing.

The following table summarises the overall effects of the draft SPD.

Objective	Overall Impact
Access to public transport	Overall positive impact.
Reduce car dependency	Potential to improve impact on increasing transport choice by more actively encouraging cycling and walking infrastructure.
Compact development	Overall positive impact, draft SPD supports more compact development.
Efficient use of resources	Overall positive impact on supporting efficient use of resources, despite increased intensity of development.
Protect and enhance biodiversity	Despite loss of trees, the draft SPD seeks a range of mitigation measures. Also requires more through understanding of habitat on site, and appropriate development response.
Maximise benefits of regeneration	The draft SPD encourages bringing the site back into active use and enhancing its contribution to the conservation area. Housing provided on site could also benefit local people, particularly if affordable housing is provided.
Promote clean technologies	Location of site in conservation may hinder provision of renewable energy technology on site. However other solutions could be found and draft SPD requires energy assessment to demonstrate renewable energy use has been maximised.
Protect and enhance open spaces	Potential negative impact on open space resulting from increased development in the area. Could be mitigated through planning contributions and ensuring amenity space on site is well designed.
Reduce crime and fear of crime	The emerging Southwark Plan contains policies on crime prevention through design which would apply.
Provide good quality affordable housing	Allowing backland development may enable sufficient amount of housing to be provided to support affordable housing provision.
Reuse vacant buildings and underused land	Draft SPD supports continued use of this previously development site and will encourage reuse of the vacant building.
Communication between groups	The draft SPD does not address communication between communities. This could be addressed through the consultation on the draft SPD.
Reduce greenhouse emissions	Cumulative impact unclear. Impacts of increased development on greenhouse emissions will need to be adequately mitigated. SA submitted with application will need to address this issue.

Objective	Overall Impact
Improve air quality	Requirement for replacement of trees may mitigate impact of increased building if there is a net gain in trees.
Reduce waste going to landfill	Cumulative impact unclear. Reuse of existing building will reduce waste during construction. Appropriate facilities will need to be provided on site to manage waste arising from occupants.
Minimise ambient noise	Development will need to be appropriately designed to address ambient noise issues. Requiring replacement tree planting may help mitigate ambient noise.
Increase renewable energy use	Draft SPD seeks maximisation of renewable energy, however location within conservation area may constrain this.
Use sustainable construction techniques	Draft SPD sets out specific design guidance to improve environmental performance of building, particularly relating to landscaping and energy use.
Promote high quality cityscape	Draft SPD supports development of the site that is well designed and enhances character of the local area. Bringing the existing building back into reuse will have a positive impact.
Maintain and enhance historic environment	Design guidance will ensure new building is not obstructive and protects the character of the conservation area and nearby listed buildings.
Flood risk	Overall positive impact, though this could be improved by providing better guidance on what level of on site retention of water run off should be provided.
Increase tree cover	While development is likely to result in loss of trees, draft SPD seeks replacement provision.
Southwark as exemplary sustainable city	Overall, the draft SPD should promote a positive image of Southwark as a sustainable borough.
Challenge discrimination	The draft SPD is not likely to discriminate against marginalised groups.

Section 6 of this report provides more detail on the likely significant effects of the draft SPD.

What difference has the appraisal process made?

The sustainability appraisal process has been an important companion to the plan making process. It has fed into each stage of the preparation of the draft SPD, initially helping to identify the issues that the draft SPD needs to respond to.

Later stages of the appraisal process have identified how the draft SPD would be improved or modified to provide a more sustainable outcome. In particular, the appraisal helped in the selection of the preferred option for the site and identified ways the potential negative impacts of this option could be overcome. These include:

- Seeking the replacement of trees and removal of asphaltting;
- Seeking additional ecology surveys to be carried out; and

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- Seeking development that would not be obtrusive in the conservation area.

The final stage of the appraisal process has identified additional modifications that could be made to the draft SPD to improve its sustainability further.

How to comment on this report

This report is being published for formal public consultation alongside the draft SPD from Monday 11 December 2006 until Friday 9 February 2007.

Submissions commenting on the SA are welcomed and should be addressed to:

By letter:

Planning Policy and Research Team
Regeneration Division
London Borough of Southwark
Chiltern, Portland Street, London SE17 2ES

By email: planningpolicy@southwark.gov.uk

By fax: 020 7525 5561

The closing date for comments is Friday 9 February 2007.

1. INTRODUCTION

What is this document?

This document reports on the Sustainability Appraisal of the draft supplementary planning guidance (SPD) for land at 123 Grove Park.

Once adopted, the draft SPD will form part of the Southwark Local Development Framework, and will be a material consideration in decisions made by the council on all planning applications relating to the site.

The draft SPD provides detailed guidance on the type of development that is appropriate on the site. This includes information on the land use, design, transport and servicing arrangements that will be sought.

Why do we need to carry out a sustainability appraisal?

The Planning and Compulsory Purchase Act 2004 requires that a sustainability appraisal (SA) is carried out as part of the preparation of new plans, including SPDs. The purpose of a SA is to assess whether or not, and to what extent, a plan meets our objectives for achieving a sustainable community.

In addition, the SPD falls within the definition of a 'plan or programme' under European Directive 2001/42. Because the SPD is likely to have significant environmental effects, it must also undergo a Strategic Environmental Assessment (SEA). The main purpose of an SEA is to predict what the likely significant effects of a draft plan will be on the environment and identify ways in which any negative effects can be overcome. Ways in which the actual effects of the plan will be measured and monitored, should it be adopted, are also identified as part of the SEA.

The council has undertaken a SEA of the draft SPD as part of the sustainability appraisal.

Taken together, the SA/SEA processes enable the social, environmental and economic implications of a plan to be assessed while it is being prepared, ensuring that sustainability is considered throughout the plan making process.

For the purposes of simplicity, the term sustainability appraisal is used throughout this document to include both the SA and SEA processes.

What is the structure of this report?

This report is divided into 6 sections:

- **Section 1** - provides an introduction to the report.
- **Section 2** - provides an overview of the need for and objectives of the draft SPD.
- **Section 3** - details the process used to undertake the SA.

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- **Section 4** - outlines policies, plans and strategies relevant to the draft SPD and presents baseline information, which will assist in assessing the effects of the draft SPD.
- **Section 5** - presents a summary of sustainability issues and objectives relevant to the draft SPD.
- **Section 6** - presents the actual appraisal of the draft SPD against relevant sustainability objectives. This section also outlines the different alternatives that have been considered in preparing the draft SPD.

2. THE DRAFT SUPPLEMENTARY PLANNING DOCUMENT

Why do we need an SPD for 123 Grove Park?

The existing building on the site was most recently used as a youth offending centre. However, since 2005 the building has been vacant and suffered from illegal squatting. A supplementary planning document is needed to provide clear guidance on how the future use of the site can best meet the objectives and policies of the emerging Southwark Plan. The Southwark Plan contains the core planning policies which all development in the borough needs to comply with.

More detail on the current characteristics of the site and the issues facing its future use are given at Section 4.

What are the objectives of the SPD?

The primary objectives of the 123 Grove Park SPD are to:

- Facilitate the re-use of the site, maximising its potential, whilst protecting its conservation value, consistent with Strategic Policies 14 (Sustainable buildings) and 15 (Open space and biodiversity) of the emerging Southwark Plan.
- Ensure that any development preserves or enhances the character and appearance of the Camberwell Grove Conservation Area, consistent with Strategic Policy 13 (Design and heritage) of the emerging Southwark Plan.
- Ensure that new development maximizes the social, economic and environmental potential of the site.

What are the key points of guidance of the draft SPD?

The draft SPD seeks:

- Residential use of the site (subject to evidence being submitted demonstrating that no viable alternative local community uses can be found).
- Retention and sensitive conversion of the existing building.
- A possible extension to the existing building and a new building on part of the rear land. An appropriate location for the building is identified, avoiding significant trees and their root zones.
- Building design that is sensitive to the conservation area. New building to be a maximum of 2 storeys and its density is likely to be well below 300 hr/ha.
- Vehicle access from Grove Park and possible use of rear access to the site for cycle and pedestrian access.
- Landscaping which does not use asphalt and provides replacement trees and additional native planting in identified areas.
- Bat and invertebrate surveys to be undertaken and any loss of habitat to be mitigated.
- Submissions of sustainability appraisal of the development incorporating an energy assessment. Development is expected to maximise the use of renewable energy.

3. APPRAISAL METHODOLOGY

The steps involved in undertaking a sustainability appraisal, which incorporates the requirements of the SEA Regulations, are outlined in **Figure 3.1** below.

The council has undertaken the appraisal in accordance with the Department for Communities and Local Government (DCLG) advice in *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* (November 2005) and incorporates the requirements set out in the DCLG's *A Practical Guide to the Strategic Environmental Directive* (September 2005).

The components of this report which make up the Environmental Report for the purposes of a SEA are indicated in the table at **Appendix 1**.

Deciding the scope of the sustainability appraisal

Stage A of the SA process for the draft SPD involves setting the context and objectives, establishing the baseline and deciding on the scope of the appraisal. This was set out in a scoping report, which was prepared in February 2006.

The scoping involved the following:

- Identifying policies, plans and programmes and sustainable development objectives that are relevant to the draft SPD (refer to Section 4)
- Collecting baseline information on the key environmental, social and economic characteristics of the site and surrounding area (see Section 4)
- Identifying the sustainability issues and problems that need to be addressed by the draft SPD. These were identified by analysing the key messages of the policies, plans and programmes relevant to the draft SPD as well as the baseline information (refer to Section 5).
- Developing the SA framework. This is made up of the sustainability objectives and indicators that will be used to appraise the draft SPD (refer to Section 5).
- Consulting on the draft scoping report.

Who was consulted on the scoping report?

The *Environmental Assessment of Plans and Programmes Regulations 2004*, requires the council to ask four key organisations to comment on the scoping report. These are the Environment Agency, the Countryside Agency, English Nature and English Heritage¹.

A copy of the draft scoping report was sent to these organisations on 11 October 2006 with a request for comment. All the organisations responded to the request by 18 October 2006, allowing the completion of the appraisal process.

¹ On 1 October 2006 the Countryside Agency and English Nature were formally amalgamated into Natural England.

A summary of the feedback received and how it has been taken into account by the council is given at **Appendix 2**.

Figure 3.1: The different stages of SA and SEA, showing their relationship.

SEA Stage	Sustainability Appraisal (SA) Stage that meets the requirements of the SEA Stage	SPD Stage
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	SPD Stage 1: Pre-production – Evidence gathering
Identifying other relevant plans, programmes and environmental protection objectives	A1: Identifying other relevant policies, plans and programmes and sustainable development objectives	
Collecting baseline information	A2: Collecting baseline information	
Identifying environmental problems	A3: Identifying sustainability issues and problems	
Developing SEA objectives	A4: Developing the SA framework	
Consulting on the scope of the SEA	A5: Consulting on the scope of the SA	
Stage B: Developing and refining alternatives and assessing effects	Stage B: Developing and refining options and assessing effects	
Testing the plan or programme objectives against the SEA objectives	B1: Testing the SPD objectives against the SA framework	
Developing strategic alternatives	B2: Developing the SPD options	
Predicting the effects of the plan or programme, including alternatives	B3: Predicting the effects of the draft SPD	
Evaluating the effects of the plan or programme, including alternatives	B4: Evaluating the effects of the draft SPD	
Mitigating the adverse effects	B5: Considering ways of mitigating adverse effects and maximising beneficial effects	
Proposing measures to monitor the environmental effects of the plan or programme implementation	B6: Proposing measures to monitor the significant effects of implementing the SPD	
Stage C: Preparing the Environmental Report	Stage C: Preparing the Sustainability Appraisal Report	
Preparing the Environmental Report	C1: Preparing the Sustainability Appraisal Report	

SEA Stage	Sustainability Appraisal (SA) Stage that meets the requirements of the SEA Stage	SPD Stage
Stage D: Consulting on the draft plan or programme and the Environmental Report	Stage D: Consulting on the SPD and the Sustainability Appraisal Report	
Consulting the public and Consultation Bodies on the draft plan or programme and the Environmental Report	D1: Public participation on the SA Report and the draft SPD	
Making decisions and providing information	D3: Making decisions and providing information	SPD Stage 3: Adoption
Stage E: Monitoring the significant effects of implementing the plan or programme on the environment	Stage E: Monitoring the significant effects of implementing the SPD	
Developing aims and methods for monitoring	E1: Finalising aims and methods for monitoring	
Responding to adverse effects	E2: Responding to adverse effects	

(The SEA stages were taken from *A Practical Guide to the Strategic Environmental Directive* (Figure 5, page 24, DCLG, September 2005) and the SA stages and SPD stages from *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* (Figure 2, page 19, DCLG, November 2005)).

What followed after the scoping?

The second stage in the appraisal process, involved the development of options for the draft SPD, based on the environmental and sustainability issues identified during scoping. These options represent alternative approaches that could be taken to the use and development of the site. Details of the options are given at Section 6.

These options were then assessed against the SA framework developed at the scoping stage (refer to Section 5) to identify their likely social, environmental and economic effects. The outcomes of this appraisal helped the council to decide on its preferred approach to guiding the future use and development of the site.

This preferred approach was fleshed out and became the basis of the draft SPD. The draft SPD was then subjected to a more detailed appraisal against the SA framework. The objectives of the draft SPD have also been appraised to ensure that they are consistent with the sustainability objectives.

The detailed appraisal of the draft SPD highlighted potential significant negative effects of the preferred option that needed to be overcome, either through modifying the plan or the way it is implemented. Options for increasing the positive effects of the draft SPD were also identified, where relevant.

The Sustainability Report

This report represents stage C of the appraisal process. It documents the outcomes of each of the previous stages of the appraisal process. It also sets out:

- the difficulties encountered in compiling information and carrying out the assessment is included, including any assumptions that have been made in the appraisal process (Section 6); and
- proposals for monitoring the actual effects of the plan (Section 6).

4. BASELINE AND CONTEXT

The review of plans and programmes of relevance to the draft SPD and the collection of baseline information helps identify the issues which the draft SPD needs to address and enables a robust appraisal of its significant effects.

Relevant Plans and Programmes

A detailed schedule of relevant documents is given at **Appendix 3**. A summary of the key messages of these documents is given at **Table 4.1**.

Table 4.1: Key messages of relevant plans and programmes

Messages	Document/s
Ensure high quality development that respects and enhances the urban environment, including historic elements.	PPS1, PPG15, PPG17, London Plan, Community Strategy, Southwark Plan, Southwark Open Spaces Strategy
Ensure development meets the needs of and improves the quality of life for all the diverse communities in the borough. This includes improving housing choice and access to community facilities.	PPS1, PPG17, London Plan, Community Strategy, Southwark Plan, Southwark Open Spaces Strategy, Local Implementation Plan
Ensure development is compact and efficient. Minimise damaging emissions.	PPS1, PPG17, London Plan, Community Strategy, Southwark Plan
Protect and enhance open spaces and biodiversity.	PPS1, PPG9, PPG17, London Plan, Mayor's Biodiversity Strategy, Community Strategy, Southwark Plan, Local Biodiversity Strategy, Southwark Open Spaces Strategy
Where adverse impacts on the environment are unavoidable, consideration should be given to mitigation measures.	PPS1, PPG9, PPG17, London Plan, Mayor's Biodiversity Strategy, Southwark Plan
Promote more sustainable transport choices, including walking and cycling	PPG13, London Plan, Community Strategy, Southwark Plan, Southwark Local Implementation Plan

Baseline Data

Baseline information used in this SA has been obtained from a range of sources, including from a detailed site visit with representatives from different sections of the council (including arborculturalist, development control, and conservation/urban design). A specialist tree and ecology survey has also been carried out for the site.

The baseline information, including a map of the site, is set out in **Appendix 2** of this report.

What is the likely future of the site without the draft SPD?

Regardless of whether there is an SPD or not, the site is likely to come under pressure for redevelopment, in light of the fact that it has been declared surplus to requirements and has remained vacant for several months. If no other public agencies express interest in acquiring the site it will need to be sold to a private owner.

However the site's lack of accessibility (PTAL of 3) and the costs of adapting the existing building (it currently is not accessible by disabled people) make a private community use, such as a private school or health facility, unlikely. There are also potential issues relating to the impact of community uses on the amenity of neighbours as a result of noise and traffic. It is likely a private owner would want to redevelop the site for housing, given the market for housing continues to grow and the emphasis of government and regional policy on the provision of new housing.

While the emerging Southwark Plan sets general policies to guide development of the site, uncertainties would remain as to how these would be expected to be applied to the particular circumstances of the site. Uncertainty over the appropriate use of the site could delay its sale and re-use, leaving the site vacant for a long period of time. This would not be an efficient use of land and could result in deterioration of the building.

Development proposals are likely to seek to maximise the density of development on the site. In particular, there is likely to be pressure to build on the land at the rear of the property. Proposals may also seek to modify the existing building on the site. This may not be suitable in light of its location in a conservation area and the presence of significant trees that may provide habitat to native wildlife.

5. SUSTAINABILITY ISSUES AND OBJECTIVES

A number of sustainability issues of relevance to the site and draft SPD have been identified from the baseline data and the relevant plans and programmes. These are identified in **Table 5.1**

What Objectives, Indicators and Targets are relevant to the draft SPD?

Southwark has developed an SA/SEA framework which contains 33 sustainable development objectives (see **Appendix 4**). These are closely based on those adopted by the GLA in the sustainability appraisal of the London Plan. The objectives were developed by Southwark Council in association with independent consultants (Forum for the Future CRISP) to appraise the First Draft Deposit Unitary Development Plan (UDP) in 'Southwark UDP Sustainable Development Evaluation' (August 2002). These objectives were also used in the appraisal of the Second Deposit Draft UDP and UDP Modifications.

Targets and indicators have been set for each of these objectives, against which the likely impacts of the draft SPD can be appraised.

For the purposes of assessing the draft SPD, the sustainability objectives in the SA/SEA framework have been filtered, based on an evaluation of the relevant environmental, social and economic issues. Justification for the filtering of objectives is given at **Appendix 4**.

Table 5.2 identifies the objectives and key questions to be used in the assessment of the draft SPD.

The balance between environmental, social and economic issues

Annex 1 (f) of the SEA Directive sets out a number of issues which must be examined during SEA assessment. These issues include biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, including architectural or archaeological heritage, landscape and the interrelationship between these factors. The objectives in Southwark's SA/SEA framework have been analysed to ensure they adequately address these issues.

The objectives have also been analysed for compatibility and to ensure there is a reasonable balance between social, economic and environmental issues (see **Appendix 5**).

Table 5.1: Main issues of relevance to draft SPD

Issue	Description	How can the draft SPD respond?	Key data source
Population growth and increasing demand for resources, housing and community facilities	<p>The population of the borough has grown and is expected to continue to grow over the coming years, this will place pressure on housing as well as community facilities such as open space, sports facilities, hospitals, community facilities and schools. The borough will need to accommodate additional housing, particularly affordable family housing, and there is likely to be pressure on sites to be developed for such uses. However, this will need to be balanced with the provision of additional community facilities, local services and employment development to support the community.</p> <p>There will be a need for more efficient use of land to accommodate growth and protect our open spaces. Increased development will place pressure on the environment, such as through increased emissions from traffic growth, loss of biodiversity, increased rubbish generation, or reduction in the quality of the built environment. Development of the site is likely to result in increased demand for energy.</p> <p>There is the potential for development to reverse some of the positive gains that have been made to quality of life in recent years if it is not managed properly and cumulative impacts mitigated.</p>	The SPD can provide guidance on what the most effective use of the site is and how any potential negative impacts should be mitigated.	Baseline data PPS1, London Plan, Community Strategy, Southwark Plan
Accessibility	It is important that all members of the community has equal access to housing, employment and community facilities. The type and intensity of development will need to respond to its accessibility to transport and key services to ensure that it does not have a negative impact with regard to traffic generation, encouraging non sustainable forms of transport or reducing access to essential services and facilities. The design of development itself will need to ensure that all potential users are able to access it.	The site has a medium level of accessibility to public transport and is located within 600m of protected retail frontage. It can set out what sort of development would be appropriate on the site in terms of uses and density and what measures should be taken to encourage sustainable transport.	Baseline data, PPS1, PPG13, London Plan, Community Strategy, Southwark Plan, Local Implementation Plan
High proportion of disadvantaged groups	The site is within the top 40-50% most deprived areas in the country. Southwark as a whole is the 17 th most deprived borough in the country, and has a number of communities who suffer disproportionately and do not enjoy the quality of life of other groups, for example they have higher	SPD can provide guidance on how development on the site can best contribute to mixed and balanced communities. For example,	Baseline data PPS1, London Plan, Community Strategy, Southwark Plan

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Issue	Description	How can the draft SPD respond?	Key data source
	<p>levels of unemployment, lower skills and may suffer discrimination. There are also a high proportion of lone parent families reliant on income support. Evidence also indicates a high proportion of residents suffer from a limiting long-term illness or are disabled. These communities may not be able to take advantage of the opportunities offered by new development. For example, they may not be able to afford new housing, or may not have the skills to take advantage of new employment. There may also be facilities and services they require, such as childcare for lone parent families, to help them improve their quality of life. Increased development may place further pressure on these facilities as discussed above. It is important that development contributes to mixed and balanced communities and improves the quality of life of people from disadvantaged groups.</p>	<p>development of the site presents opportunities to provide affordable family housing.</p>	
Biodiversity	<p>The council has an obligation to protect biological diversity. The borough is a very urban environment, with few opportunities to experience nature. The back land of the site contains several trees. The site itself is large and in proximity to other green spaces, including sites of importance to nature. Development of the site provides opportunities to enhance biodiversity in the borough and improve access to nature. However there are also potential negative impacts as a result of removal of existing vegetation to allow development to occur.</p>	<p>While the site is not currently identified as having any significant ecological value it potentially contains habitat for bats or stage beetles. The SPD can set out how any development of the site needs to address biodiversity.</p>	<p>Baseline data, PPS1, PPS9, PPG17, London Plan, Mayor's Biodiversity Strategy, Southwark Plan, Southwark Open Spaces Strategy, Southwark Biodiversity Action Plan</p>
Local Character	<p>It is important that the local character and amenity of local areas is protected and enhanced to assist with improving quality of life and a sense of community. The site within a heritage conservation area and is in proximity to two listed buildings. New development could have a negative impact on the character of areas if it is not sensitively design. Land and buildings that are vacant or derelict also have a negative impact on local character.</p>	<p>The SPD can provide guidance on how development of the site should be designed to make a positive contribution to the character of the local area and nearby listed buildings. The building on the site is currently vacant. The SPD could help to bring the building back into use by providing more certainty to the market over what uses would be considered acceptable.</p>	<p>Baseline data, PPS1, PPG15, London Plan, Southwark Plan, Community Strategy</p>

Table 5.2: SA/SEA Framework for the draft SPD

Sustainable development objective	Key questions/guidance	Issues
To focus development at locations which are currently well served by public transport with spare existing capacity, walking or cycling, or at locations where improvements are planned to achieve increases in their modal share.	<ul style="list-style-type: none"> Does the SPD encourage development that is appropriate in relation to its proximity to public transport, walking and cycling infrastructure? 	The site is within a medium public transport accessibility zone. Part of the London Cycling Network passes near the site on Camberwell Grove. There are opportunities to improve walking and cycling access to the site.
To reduce car dependency by improving transport choice and thus increasing the proportion of journeys made by public transport, by bicycle and by foot.	<ul style="list-style-type: none"> Does the SPD encourage provision of infrastructure for walking, cycling and/or provision of public transport? Does the SPD encourage access for all to public transport? Does the SPD consider safety of pedestrian and cyclist access? 	The SPD can potentially influence on-site car and cycle parking requirements. However, the SPD cannot require permit restricted development as the site is not in a controlled parking zone (CPZ).
To encourage sustainable development that is compact and mixed use as appropriate, with provision of key local services and amenity that will reduce the need to travel.	<ul style="list-style-type: none"> Does the SPD encourage development at an appropriate density? In relation to its proximity to key local services and amenity? Is mixed-use development appropriate on the site? Does the SPD encourage retention of key services and amenity? 	The SPD can identify appropriate densities for development on the site. It can also address the issue of what uses are appropriate on the site and whether community uses should be retained.
To ensure that London makes more efficient use of natural resources and in particular, soil, mineral aggregates, water and energy.	<ul style="list-style-type: none"> Does the SPD minimise the demand for raw materials? Does the SPD promote the use of recycled or secondary materials? Does the SPD minimise the need for energy and water? Does the SPD minimise the loss of good quality soil and maintain and enhance soil quality? 	The SPD can address how the existing UDP policies relating to energy and water are interpreted on the site. It can also address the reuse of the existing building on the site.
To protect and enhance existing biodiversity and natural habitats, and create new wildlife habitats.	<ul style="list-style-type: none"> Does the SPD consider opportunities for enhancement of sites of nature conservation importance? Does the SPD ensure protection and enhancement of the ecological value of the site? Does the SPD promote local species of flora and fauna? 	The SPD will determine how the current landscaping will be protected or replaced.
To maximise the benefits of regeneration schemes for local people.	<ul style="list-style-type: none"> Does the SPD include mechanisms that help to ensure that maximum local benefits are achieved? 	The council could enter a section 106 agreement with a developer of the site to support regeneration initiatives.
To actively promote new clean technologies, particularly potential growth sectors of the environmental economy, renewable energy production and pollution control.	<ul style="list-style-type: none"> Does the SPD encourage the inclusion of sustainable technologies, such as for renewable energy production? 	The SPD can address how the UDP policies on renewable energy and water can be delivered on the site.

Sustainability Report: 123 Grove Park SPD

Sustainable development objective	Key questions/guidance	Issues
To protect, maintain, restore and enhance the quality of London's open spaces, to create new open space as appropriate, and to ensure that access to open space and the wider public realm is maintained.	<ul style="list-style-type: none"> Does the SPD encourage restoration or enhancement of existing open spaces? Does the SPD ensure access for all to existing open spaces? Does the SPD promote provision of new open space? 	New development on the site could increase the demand on existing public open space.
To reduce crime and the fear of crime	<ul style="list-style-type: none"> Does the SPD facilitate design that discourages crime and promotes a sense of security and safety? Does the SPD promote mixed and cohesive communities? 	The SPD can influence the design of development proposals, which can affect potential opportunities for crime and fear of crime.
To ensure that all Londoners have access to good quality affordable housing	<ul style="list-style-type: none"> Does the SPD encourage an appropriate mix of quality dwellings in terms of size, mix and affordability? 	The site could potentially be developed for housing.
To ensure that where possible, new development occurs on derelict, vacant and underused previously developed land and buildings, and that land is remediated as appropriate.	<ul style="list-style-type: none"> Does the SPD encourage the re-use of derelict and vacant land/dwellings? 	The existing building on the site could be reused. The SPD could also address the more efficient use of land on the site.
To encourage communication between London's different communities, in order to improve understanding of differing needs and concerns.	<ul style="list-style-type: none"> Does the SPD provide for public participation/consultation? 	The planning process can enable London's different communities to get involved in the planning system.
To reduce emissions of greenhouse gases, and plan for further reductions, to meet or exceed national climate change targets	<ul style="list-style-type: none"> Does the SPD facilitate a reduction in the use of fossil fuels? Does the SPD promote the use of low emissions/efficient technology? Does the SPD facilitate the use of alternative modes of transport to the car? Does the SPD facilitate increased tree cover? 	The SPD can address car parking on the site, however the site is not within a CPZ. Also potential for emissions savings through energy efficient design and use of renewable energy.
To improve air quality	<ul style="list-style-type: none"> Does the SPD promote low polluting transport modes/reduce the need to travel? Does the SPD facilitate energy efficiency and clean energy sources? 	The SPD can address car parking on the site, however the site is not within a CPZ. Design features of development could reduce polluting emissions.
To reduce the amount of waste requiring final disposal through waste minimisation, and to increase in order of priority, the proportion of waste reused, recycled and composted, and recovered.	<ul style="list-style-type: none"> Does the SPD ensure reduction of waste during the development process? Does the SPD promote reduction of waste during operation? Does the SPD encourage the movement of waste up the hierarchy? 	The SPD can expand on the policies in the emerging UDP and address issues of recycling and composting facilities. Can also address reuse of existing building.
To minimise ambient noise using best practice techniques.	<ul style="list-style-type: none"> Does the SPD ensure that new noise sensitive development will not be adversely affected by noise from existing development and operations? 	The SPD can influence the design of buildings, which can have an effect on ambient noise levels.

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Sustainable development objective	Key questions/guidance	Issues
To substantially increase the proportion of energy both purchased and generated from renewable and sustainable resources.	<ul style="list-style-type: none"> Does the SPD encourage use of renewable energy infrastructure? 	The SPD can influence the type of renewable energy infrastructure and energy efficiency design sought as part of development.
To promote a high quality of urban design in conjunction with sustainable construction principles and techniques.	<ul style="list-style-type: none"> Does the SPD promote high standards of architecture and urban design? Does the SPD encourage sustainable construction? 	The SPD can influence the design of development proposals.
To maintain and enhance the quality and integrity, and distinctiveness of the cityscape.	<ul style="list-style-type: none"> Does the SPD encourage consideration to be given to the qualities of the existing townscape at the design stage? 	The SPD can influence the design of development proposals.
To maintain and enhance the historic environment and cultural assets of London.	<ul style="list-style-type: none"> Does the SPD promote the conservation of heritage? Does the SPD promote development that is sensitive to the conservation area and nearby listed buildings? 	The SPD can address how development of the site should respond to the Camberwell Grove Conservation Area.
To avoid development that will impact on areas at high risk from flooding.	<ul style="list-style-type: none"> Does the SPD encourage the use of SUDS? Does the SPD take account of future risks of flooding due to climate change? 	The SPD can potentially influence the type of landscaping required for developments.
To increase tree cover as appropriate and ensure active and sustainable management of existing woodland.	<ul style="list-style-type: none"> Does the SPD encourage provision of increased tree cover? 	The SPD can address the retention and replacement of trees in the backland of the site.
To improve the image of London/Southwark as an exemplary sustainable city	<ul style="list-style-type: none"> Will the SPD contribute to an improvement to the image of an exemplary and sustainable London? 	The SPD can provide guidance on how development on the site can be more sustainable.
To actively challenge discrimination against all marginalised groups in a consistent and comprehensive way	<ul style="list-style-type: none"> Does the SPD help to meet the needs of different communities? 	The SPD can influence the accessibility of new development through controls of the design of such developments. This would be specifically relating to equal access to buildings.

6. APPRAISAL OF DRAFT SPD

The actual appraisal of the draft SPD was undertaken in three main steps at key stages in the plan making process. These are outlined below. The appraisal tables for each stage are included at **Appendix 6**.

Compatibility of draft SPD objectives with sustainability objectives

As a first step, the objectives of the draft SPD were compared with the sustainability objectives.

The appraisal found that the objectives of the draft SPD are compatible with the sustainability objectives. Objective 3 is particularly compatible with each of the sustainability objectives.

However, a number of potential conflicts were identified with Objectives 1 and 2. This does not mean that the draft SPD will be unsustainable. “Maximising the potential” of the site will need to be carefully addressed in the draft SPD to ensure that it does not result in a level or type of development that is not compatible with the accessibility of the site and does not have a negative impact on resource use or biodiversity. Also, the aim to protect the conservation values of the site and the conservation area, while contributing to sustainability, may limit the ability of the site to provide renewable energy infrastructure.

Identifying options

The next step involved identifying different planning options for the site. These were then appraised and the potential significant effects of each compared. This process assisted in identifying the preferred planning option for the site, which formed the basis of the draft SPD.

These options were drawn directly from the suggestions and ideas given by attendees of an urban design walking audit and local business meeting carried out at the start of the plan making process. This process forms part of the consultation on the draft SPD and enables the process of developing the draft to be as transparent, and ensures that the opinions and ideas of local people are incorporated into the final document.

Additional options have also been developed from the results of the character appraisal and the scoping report, which helped to identify the key issues that require addressing.

The following three options were appraised:

Option A

This option involves seeking continued use of the site for community use.

Option B

This option seeks refurbishment of the existing building and change of use to residential, either as one single house, or sub-divided into flats. The refurbishment of existing buildings would also include the option to develop and enhance the appearance of the garage and fire escape area to the side, in keeping with the overall appearance of the conservation area.

Option C

This option seeks refurbishment of the existing building, and development of a 2-storey dwelling house in an area within the backland to the rear of the building. The additional dwelling would seek to maximise the re-use of the site, and ensure that a viable scheme comes forward. A specific footprint for the new building could be defined, giving consideration to heritage and biodiversity issues.

Appraisal of the options

There were potential positive effects on sustainability for each of the three options. Given these are strategic options and the exact details were not yet defined, there were a number of uncertainties in terms of the potential impacts, which would need to be addressed when developing the preferred option to ensure the most sustainable outcomes.

More uncertainties existed with **Option 1**. While the concept of retaining community uses on the site is positive, as it encourages local access to services in the area, there is uncertainty over whether a viable use could be found for the site. NOMS have indicated that they have not been able to find another public service user for the site, which suggests a lack of suitability of the site for community uses. It is possible a private buyer could acquire the site for a facility such as a private school or medical centre, but the site's location may not make a private community use viable. A private use may not necessarily be reflective of local need and given the average public transport accessibility of the site, community uses serving a wider catchment would not be appropriate. It is likely such uses would impact on the amenity of neighbouring residents as a result of traffic and noise. The cost of adapting the building to make it fully accessible also make continued community use of the existing building unlikely.

The option appraised has assumed that continued community use would not involve additional building on the site. This is because intensification of community uses on the site is not likely to be appropriate given the predominant residential nature of the location – it is likely that intensification would further increase amenity impacts on residents. If a viable community use cannot be found, there is the risk that the site remains vacant indefinitely. Such vacancy creates a real threat to the preservation of the character of the conservation area, as the buildings are left poorly maintained, and anti-social activities such as squatting further destroy the site. Vacant buildings are also not an effective use of land. Private community use of the site is also less likely to provide opportunities to improve the environmental performance of

the building, given the lower value of such development and costs involved in adapting the building.

Both **Options 2 and 3** sought retention of the existing building which will have positive sustainability effects. While community use of the land may be lost, residential development is also needed in the borough, particularly family accommodation and affordable housing. The higher value of residential development will provide scope for enhancements to the environmental performance of the existing site. Additional buildings on the site will increase the amount of residential accommodation of all sizes (including family accommodation) that can be provided and will increase the chances of affordable housing being provided. However, more intense development also has potential negative impacts.

Opportunities to neutralise or improve the positive impacts of the preferred options should be addressed through the development of the preferred option. In particular, the following need to be addressed:

- **Transport** – ensure the development is at an appropriate scale in relation to its public transport accessibility. Measures to restrict car use and promote walking and cycling should be considered.
- **Resources** – increasing the intensity of development on the site could increase demands on resources. This will need to be addressed through appropriate environmental design features and renewable energy technology. However, there could be conflicts with the site's location within a conservation area.
- **Biodiversity and open space** – intense development on the site could place increased pressure on public open spaces in the area. This may require suitable mitigation. Likewise, developing on the backland will remove habitat which will need to be mitigated. Increasing the footprint of buildings on the site could increase water run-off which could result in increased risk of flash flooding. This will need to be mitigated.
- **Heritage conservation** – new buildings on the site will need to be designed sensitively, to protect and enhance the character of the conservation areas as well as nearby listed buildings.

Appraisal of the preferred option

Following the appraisal of the options, a preferred option has been selected. This forms the basis of the draft SPD, the objectives and contents of which have been outlined earlier in this report. This option was selected as it was seen to present a viable scheme to preserve and enhance the conservation area and bring the vacant building back into use.

Sustainability issues have been considered in preparing the version of the draft SPD which is being consulted on. At an early stage of development of the draft an initial informal review was undertaken to identify areas of concern with regard to sustainability. The findings of this review led to refinements to the draft SPD.

The final stage in the appraisal process involved appraising each of the draft SPD's key points of guidance against the sustainability objectives. The likely significant effects of the draft were then compared against the likely future of the site without the draft SPD, identified in Section 4. In such a scenario, planning applications would be assessed against the policies in the emerging Southwark Plan.

Outcomes of the appraisal

Overall, the appraisal indicates that the draft SPD is likely to make a positive contribution to sustainability. While the draft SPD does not seek continued community uses on the site, this is based on the assumption that no viable or appropriate alternative community uses exist. The draft SPD seeks development that would result in the loss of trees on the site. It is considered that the negative effects of this are outweighed by the benefits of having development that compliments the conservation area, brings the vacant building back into use and provides housing. In particular, allowing additional building on the site will increase the potential for the site to support affordable housing. It will also enable a higher amount of family accommodation to be provided, which is needed in the area.

How are likely negative effects been mitigated?

With regard to the loss of trees, the draft SPD seeks a range of mitigation measures including guiding development to particular locations on the site and requiring replacement of trees. The draft SPD also requires a more thorough understanding of habitat on site, and sets out what response is expected should priority species be found.

The draft SPD also seeks increased building coverage of the site, which could have a negative effect with respect to drainage. Mitigation measures proposed include requiring landscaping of the site that does not involve asphalt. This could be strengthened to include particular targets relating to drainage, for example requiring no net increase in run-off from the site. The draft SPD could also seek permeable landscaping, rather than just excluding asphalt.

Another way the draft SPD could be strengthened to mitigate likely negative effects is to more actively promote the use of rear access to the site for cyclists and pedestrians. Currently, the draft SPD only raises this as a possibility and not an expectation. The draft SPD also only expects cycle parking to be provided where this is feasible or appropriate. This is not consistent with the emerging Southwark Plan, which seeks cycle parking as part of all development.

How should the draft SPD be implemented?

The major difference between the draft SPD and "no plan" options is that the draft SPD provides more certainty and clarity as to what form of development is appropriate. While the development envisaged by the draft SPD is possible

without the plan, it provides a stronger framework with which to review planning applications relating to the site. In particular, the draft SPD offers the following advantages with respect to sustainability:

- Market confidence over the development of the site, which is likely to result in the vacant building being brought into use and making a more positive contribution to the character of the conservation area; and
- Opportunities to improve the sustainability of development of the site are identified by better understanding the issues relating to the site.

This is not to say that the draft SPD will be implemented in isolation from the emerging Southwark Plan. This document, and supporting supplementary planning documents, contain policies and guidance which will be important to guide sustainable development of the site, but for which site specific guidance was not considered necessary. These include policies on:

- Community facilities;
- Parking requirements and transport impacts;
- Amenity; and
- Residential design quality and mix.

Planning applications submitted for the site will need to be accompanied by a series of supporting documents addressing in detail how a scheme has sought to mitigate potential negative impacts and enhance the positive impacts. These include:

- Evidence confirming that no viable alternative local community uses exist
- A sustainability appraisal, incorporating an energy assessment
- Design and access statement
- Transport assessment

The draft SPD also requires a Bat survey and Invertebrate survey to be undertaken, as uncertainties have been identified with regard to the potential for the site to support priority species.

Planning obligations will also play an important part in mitigating negative impacts of a proposed scheme.

Monitoring

This appraisal has identified the potential significant affects of the draft SPD and ways in which they may be mitigated. It is important that the implementation of the plan is monitored in order to determine what its actual affects are. The most appropriate mechanism with which to monitor the draft SPD is the Local Development Framework Annual Monitoring Report (AMR). The AMR monitors the type of development that is occurring as a result of the council's planning policy and guidance and what effects this development is having in terms of sustainability.

The monitoring framework used for the AMR includes indicators that measure protection and enhancement of heritage, derelict land, the intensity of development, loss of community uses, provision of housing and changes in habitat and species biodiversity. These cover the main issues dealt with in the

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draft SPD. Given the status of the draft SPD as a document which helps to achieve the objectives of the emerging Southwark Plan through the development of the 123 Grove Park, it is proposed that these existing AMR indicators are used to monitor the plan, rather than additional indicators be established.

Appendix 1 - The components of the SA Report which make up the Environmental Report for the purposes of the Strategic Environmental Assessment

Information Required in Environment Report	Where covered in SA Report
Outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Section 2, Appendix 3.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Section 4, Appendix 4.
The environmental characteristics of areas likely to be significantly affected	Section 4, Appendix 4.
Any existing environmental problems which are relevant to the plan or programme	Section 5
The environmental protection objectives which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Appendix 3, Section 5, Section 6
The likely significant effects on the environment.	Section 6, Appendix 6
The measures envisaged to prevent, reduce and offset any significant adverse effects on the environment of implementing the plan or programme	Section 6, Appendix 6
An outline of the reasons for selecting the alternatives dealt with	Section 6
A description of how the assessment was undertaken including any difficulties encountered in compiling the required information	Section 3
A description of measures envisaged concerning monitoring	Section 6
A non-technical summary of the information provided under the above.	Section 1

Appendix 2 – Feedback on scoping report received from statutory consultees with officers’ response

Environment Agency – Responded 18 October 2006

Comment	Officer response
The Environment Agency welcomes the inclusion of flood risk management as one of the key sustainable development objectives.	Noted.
Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management.	Noted. The sustainability appraisal will consider issues of flooding (objective 28), including impacts of building over existing permeable land. Mitigation could include requiring sustainable drainage on the site.
A Flood Risk Assessment of the site should be carried out to inform decisions at all stages of the planning process.	A sustainability appraisal will be required to be submitted as part of any planning application. This could include a flood risk assessment if necessary. However, Environment Agency records indicate that the site is located outside the extent of the extreme flood area. This means that the chance of flooding each year from rivers and the sea is 0.1% (1 in 1000) or less. While there is possibility of flash flooding from high rainfall in this location, PPG25 does not seek flood risk assessment for this level of risk.
The flood risk indicator and target would [sic] be quantified. This would further be enhanced to identify the number of people, houses and properties at risk of flooding.	Information has been added to the baseline on flood zone of the site. The area surrounding the site is also within the low risk flood zone.
It is important that the SPD makes reference to the provision of adequate utilities infrastructure to service development. It is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewerage flooding.	The draft SPD will be implemented as part of a suite of planning policies and other material considerations. It is felt that issues of utilities infrastructure are not particular to the site and do not need to be addressed in the draft SPD.
It is important that conservation policies are fully integrated with other policies for the area. Account should be taken of wider policies, which may affect the area’s character or appearance. The preparation of SPD should provide the best opportunity for integrating conservation policies with wider policies for the area.	Noted. The sustainability appraisal will consider the impact of the design guidance in the draft SPD on other sustainability issues, such as ecology and flooding.
A pro-active approach should be taken to water efficiency, working closely with the water company on capacity of available water supplies to accommodate the proposed development. We also recommend contacting BREEAM to discuss ways to implement water efficiency measures.	The SA scoping has identified that additional residential development places pressure on resources, including water. The potential impact of the draft SPD on water will be appraised through objective 4. With respect to policy, any development on the site will need to satisfy policy 3.9 of the emerging Southwark, which covers water efficiency.
The SPD offers the opportunity to produce development with the highest environmental standards, which can become a “flagship” site to use as best	Noted. The sustainability appraisal will identify the potential impacts of the draft SPD on the environment. It will identify ways negative impacts can be

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practice with neighbouring boroughs. We want to see the highest standards of environmental design for the new proposed development. The SPD should look to implement: green roofs, water and energy efficiency, renewable energy sources, sustainable design, layout and transport links.	mitigated and positive impacts enhanced. The emerging Southwark Plan includes policies that set out minimum requirements for environmental design which will apply to development on the site - these include water and energy efficiency, renewable energy and biodiversity. The draft SPD provides specific design guidance in response to the main environmental issues on the site.
The principles of sustainable development have since been revised. (Please refer to the UK Government Sustainable Development Strategy – Securing the Future, March 2005)	Noted. Table of relevant plans, programmes and environmental protection objectives has been updated.
Although flood risk is one of the sustainable development objectives PG25 and draft PPS25 are not included as one of the relevant plans, programmes and environmental protection objectives.	Noted. Table of relevant plans, programmes and environmental protection objectives has been updated.
Draft PPS25 requires that a SFRA is carried out to inform the preparation of local development documents. Without such an assessment, any sustainability appraisal would be considered incomplete.	PPS25 proposed requiring a strategic flood risk assessment, as appropriate, to inform planning policy. Given the low flood risk to the site and the fact that the draft SPD will provide guidance that relates to one site only and does not propose new policy, it is not considered that a detailed SFRA needs to be carried out. The sustainability appraisal will still address flooding issues.
The SPD should show how the needs of the disabled or older people would be met. It should make the developers understand the access needs of different users and make sure the design allows for inclusive access.	The emerging Southwark Plan contains policies relating to inclusive access that will apply to development on the site. An SPD is currently being prepared to provide guidance on these policies. The sustainability appraisal will consider the potential impact of the draft SPD on achieving inclusive access (objectives 1, 2 and 31). The appraisal process will determine whether additional guidance should be provided in the draft SPD to better respond to access issues.

Natural England – Responded 17 October 2006

Comment	Officer response
After careful consideration of the documents submitted Natural England considers that they adequately assess the likely significant effects on our interests in London.	Noted.
The objectives listed on pages 17 to 26 of Appendix are welcome and Natural England supports the following objectives: Objective 1; Objective 2; Objective 5; Objective 15; Objective 17; Objective 28; Objective 29	Noted.
Natural England would suggest that as few as possible car parking spaces are provided, in a move to design [sic] our car parking/usage. The provision of cycle spaces or storage is also to be welcomed.	Comment noted. The SA will appraise the sustainability of the draft SPD with regard to parking provision through Objective 2. The emerging UDP seeks to minimise the amount of car parking providing and requires the provision of

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	cycle parking in all schemes.
The Council may also wish to provide new or increased planting as both a screen for any car spaces and as a carbon trap.	Comment noted. The draft SPD identifies areas where additional planting will be sought on the site. The SA will appraise the sustainability of the draft SPD with regard to climate change and biodiversity through objectives 5, 17 and 29.

English Heritage – Responded 18 October 2006

Comment	Officer response
General comment with regard to sources of baseline data.	The Design and Conservation team has been involved in the preparation of the draft SPD. It is known that the site is within a Conservation Area and is not a listed building. It is identified as a key unlisted building. This information has been added to the baseline table.
A proofing point - at page 7 of the Scoping Report the last paragraph under heading "5. Scoping" is incomplete.	Noted.
Absence of consideration of PPG 16 Planning and Archaeology in the Scoping Report. The site is clearly part of a cultural landscape and as such anyone developing it would need to undertake a desk based archaeological assessment. English Heritage recommends that this is indicated in the Supplementary Planning Guidance and that PPG 16 is included in the baseline information for the Scoping Report.	PPG16 has been reviewed and included in the baseline information in the Sustainability Report. The emerging Southwark Plan includes policy on archaeology, in accordance with PPG 16. The site is not located within an Archaeological Priority Zone and it is not considered that archaeological remains are likely on the site. Specific guidance within the draft SPD on archaeology is therefore not considered necessary.
English Heritage trusts the determination that tourism is not relevant to the SPG will not rule out potential tourism uses for 123 Grove Park if the building is capable of conversion. English Heritage regularly advocates for the adaptive reuse of buildings for tourism purposes. Such conversions can significantly energise a locality and provide it with positive community identity. Of course the very fact of converting, rather than replacing a building that is in keeping with a conservation area also makes achievement of the cultural heritage sustainability objective much simpler.	The option of continuing to use the site for community uses has been included in the sustainability appraisal. Commercial uses are not considered appropriate given the site's location. The draft SPD seeks reuse of the existing building on the site. Issues of adaptive reuse are covered in the appraisal by sustainability objective 4 which seeks more efficient use of resources, objective 15 which seeks reuse of vacant buildings, and objective 27 which seeks protection and enhancement of the historic environment
English Heritage would welcome acknowledgement of the possibility of entering into a section 106 agreement in favour of maintenance and enhancement of the historic environment at Sustainable Development Objective 27.	The sustainability appraisal will identify potential significant effects of the draft SPD, including those on the historic environment. Measures to mitigate negative effects will be identified as part of the appraisal.
English Heritage notes that, as well as being part of the Camberwell Grove Conservation Area, 123 Grove Park has the potential to affect the setting of the Grade II listed buildings at 124 and 125 Grove Park. English Heritage	A guiding question has been added to Objective 27 referring to the potential impact of the SPD on listed buildings. Information on the site's proximity to the listed building has been added to the baseline and the targeted

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recommends that this issue is reflected in both the Sustainability Appraisal and the SPG. It should also be noted at Sustainability Development Objective 27 of this Scoping Report.	broadened to include buildings of historical interest as well as areas.
English Heritage would strongly advise that the local authority's conservation staff, including its archaeologist, be involved throughout the preparation and implementation of the Report.	Noted. Staff in the Design and Conservation team have provided input into the preparation of the draft SPD.

Appendix 3: Relevant Plans, Programmes and Environmental Protection Objectives

Document	Relevant Objectives	Relevant Targets	Implications for draft SPD
National			
<p>Securing the Future – UK Sustainable Development Strategy, March 2005</p> <p>This is the overarching document for sustainability in the United Kingdom and sets out national sustainable development framework.</p> <p>The document builds on the sustainable development principles of the 1999 strategy, with stronger international and societal dimensions.</p>	<ul style="list-style-type: none"> • The Strategy introduces five principles of sustainable development, with a stronger focus on environmental limits than in the 1999 strategy: <ul style="list-style-type: none"> - Living within environmental limits - Ensuring a strong, healthy and just society - Achieving a sustainable economy - Promoting good Governance - Using sound science responsibly • The Strategy sets the four priority areas for action: <ul style="list-style-type: none"> - Sustainable consumption and production - Climate change and energy - Natural resource protection and environmental enhancement - Sustainable communities 		<p>The SPD should reflect the aims of the national sustainable development strategy.</p>
<p>PPS1 Delivering Sustainable Development, 2005.</p> <p>PPS1 sets out the Government's overarching national policies on the delivery of sustainable development through the planning system.</p>	<ul style="list-style-type: none"> • Facilitate and promote sustainable and inclusive patterns of urban development by: <ul style="list-style-type: none"> - making suitable land available for development in line with economic; social and environmental objectives to improve people's quality of life; - contributing to sustainable economic development; - protecting and enhancing the natural and historic environment and the quality and character of existing communities; - ensuring high quality development through good and inclusive design; - ensuring that development contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community. • Planning should seek to maintain and improve the local environment and help to mitigate the effects of declining environmental quality. • Significant adverse impacts on the environment should be avoided. Where unavoidable, consideration should be given to mitigation measures. • Ensure that infrastructure and services are provided to support new and existing economic development and housing. 		<p>The SPD should reflect the principles and guidance set out in PPS1, particularly those relating to the provision of housing as part of sustainable communities.</p>

Document	Relevant Objectives	Relevant Targets	Implications for draft SPD
<p>PPS9 Biodiversity and Geological Conservation, August 2005</p> <p>PPS9 identifies principles to be taken into account when preparing local development frameworks.</p>	<ul style="list-style-type: none"> • Plans and policies should aim to maintain or enhance biodiversity and geological conservation interests and should be based on up to date information about the environmental characteristics of their area. • Plan policies in the form and location of development should take a strategic approach and recognise the contribution that sites, individually and in combination, make to the biodiversity and geology of a region. • Local authorities should also avoid and repair the fragmentation and isolation of natural habitats. • Plans and policies should promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development. • Planning authorities should consider whether proposed developments can be accommodated without causing harm to conservation interests. • Where development will result in significant harm to biodiversity and geological conservation interests, alternative sites that would result in less or no harm should be sought. Where no reasonable alternatives exist, adequate mitigation measures should be sought. Planning authorities should seek appropriate measures to compensate for any harm, which cannot be prevented or mitigated. Planning permission should be refused if significant harm cannot be avoided, mitigated or compensated. • Plans and policies should identify and protect Sites of Importance for Nature Conservation (SINC) and Local Nature Reserves (LNR). Sites for the creation and restoration of new priority habitats should also be identified and policies prepared to support the achievement of this. 		<p>The objectives of PPS9 should be considered, particularly in terms of respect for existing biodiversity, and to ensure that appropriate mitigation measures are in place if open space is to be removed.</p>
<p>PPG13 Transport</p>	<ul style="list-style-type: none"> • Promote more sustainable transport choices. • Promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling. • Reduce the need to travel, especially by car. • The development plan should indicate the likely nature and scope of contributions which will be sought towards transport improvements as part of development. • Planning obligations where appropriate in relation to transport should be based around securing improved accessibility to sites by all modes, with the emphasis on achieving the greatest degree of access by public 		<p>The SPD should reflect the principles of PPG13 and ensure any development and uses of the site promote sustainable transport.</p>

Document	Relevant Objectives	Relevant Targets	Implications for draft SPD
<p>PPG15 Planning and the Historic Environment</p> <p>PPG 15 provides a full statement of Government policies for the identification and protection of historic buildings; conservation areas; and other elements of the historic environment. It explains the role played by the planning system in their protection.</p>	<p>transport, walking and cycling.</p> <ul style="list-style-type: none"> The protection of the historic environment, including the existing building on the site, and the conservation area should be taken fully into account when determining the future options for the site. 		<p>The SPD may have an impact on the appearance and character of the conservation area.</p>
<p>PPG16 Planning and Archaeology</p> <p>PPG16 sets out the Government's policy on archaeological remains and how they should be preserved and recorded. It sets out steps to consider archaeology in the assessment of planning applications.</p>	<ul style="list-style-type: none"> Development plans should include policies for the protection, enhancement and preservation of sites of archaeological interest and their settings. Development plans should identify remains that should be preserved. Presumption in favour of physical preservation in-situ of nationally important archaeological remains. Presumption against proposals that would significantly alter or damage remains and their settings. There may be occasions, particularly where remains have lesser importance, where significance of remains does not justify in-situ preservation when weighed against other material considerations. In such a case, excavation and recording of remains should be undertaken. 		
<p>PPG17 Planning for Open Space, Sport and Recreation, 2002</p> <p>PPG17 sets out the Government's policies on open space, sport and recreation.</p>	<ul style="list-style-type: none"> The guidance observes that it is part of the function of the planning system to ensure that through the preparation of development plans adequate resources are allocated for organised sport and informal recreation. Local authorities should promote accessibility; avoid loss of amenity to residents, neighbouring uses or biodiversity; improve the quality of the public realm through good design; and consider the needs of the community. Local authorities will be justified in seeking planning obligations where the quantity or quality of provision is inadequate or under threat, or where new development increases local needs. 		<p>The SPD should seek mitigate the negative effects of any development of the site on open space and recreation facilities in the locality. The potential of the existing open space on the site to provide amenity and recreation opportunities for the users of the site should also be considered.</p>
<p>PPG25 Development and Flood</p>	<ul style="list-style-type: none"> Reduce the risks to people and the developed and natural environment 		<p>The draft SPD should consider the</p>

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<p>Risk, July 2001</p> <p>PPG25 advises local authorities on how to manage flood risk as part of the planning process in order to reduce future damage to property and loss of life.</p>	<p>from flooding.</p> <ul style="list-style-type: none"> • The planning system should ensure that new development is safe and not exposed unnecessarily to flooding by considering flood risk on a catchment-wide basis and, where necessary, across administrative boundaries. • Act on a precautionary basis and take account of climate change. • The planning system should seek where possible to reduce and certainly not to increase flood risk. It should help ensure that flood plains are used for their natural purposes, continue to function effectively and are protected from inappropriate development. • Development proposals in higher risk zones should be subject to flood risk assessment of an appropriate scale. 		<p>potential impact of any development on the site on flood risk.</p>
<p>Draft PPS25 Development and Flood Risk, December 2005</p> <p>The draft PPS25 has not yet been adopted.</p>	<ul style="list-style-type: none"> • Planning strategies should identify land at risk and the degree of risk from flooding • Reduce flood risk to people and property through location, layout and design of new development • Planning should take a sequential approach to locating development. Vulnerable development in areas of flood risk should only be permitted if no suitable alternative sites are available and the benefits of the development outweigh the risks. • Strategic flood risk assessment should be carried out, as appropriate, to inform the development of planning policy and the application of the sequential approach. Planning applications in areas of flood risk should include flood risk assessment. 		<p>The draft SPD should consider the most appropriate uses of the site given the degree of risk from flooding.</p>
Regional			
<p>The London Plan: Spatial Development Strategy for London, 2004</p> <p>The London Plan sets out strategic planning policies for London</p>	<ul style="list-style-type: none"> • Accommodate London's growth within its boundaries. • Make London a better city for people to live in. • Promote social inclusion and tackle deprivation, including securing better housing choice. • Improve London's accessibility. • Make London a more attractive, 	<ul style="list-style-type: none"> • Improvement in the proportion of development taking place on previously developed land. • Over 95% of housing density to comply with density matrix • Increasing supply of housing in line with borough allocation • Completion of 50% of new homes as affordable homes each year 	<p>The SPD should be in conformity with the London Plan and should reflect its strategic planning objectives.</p>

Document	Relevant Objectives	Relevant Targets	Implications for draft SPD
	<p>well-designed and green city.</p> <ul style="list-style-type: none"> • Protect, promote and manage biodiversity pro-actively, including taking opportunities to achieve positive gains for conservation through the form and design of development. • Ensure community facilities are easily accessed by all. 	<p>between 2004-2016.</p> <ul style="list-style-type: none"> • Use of public transport per head grows faster than use of the private car per head. • No net loss of designated sites of nature conservation importance • Reduce carbon dioxide emissions to 23% below 1993 levels by 2016 • Increase energy generated from renewable sources 	
<p>Connecting with London’s Nature: The Mayor’s Biodiversity Strategy, July 2002</p> <p>The Biodiversity Strategy sets out the Mayor’s policies for promoting biodiversity in green spaces and encouraging public access to and appreciation of nature.</p>	<ul style="list-style-type: none"> • Resist development that would have a significant adverse impact on biodiversity. • Where, exceptionally, development is permitted, secure compensatory measures to mitigate adverse effects; • Take account of the protection of wildlife habitats and biodiversity in the consideration of all planning applications; • Ensure that new development capitalises on opportunities to create, manage and enhance wildlife habitat and natural landscape. Priority should be given to sites within or near to areas deficient in accessible wildlife sites, areas of regeneration, and adjacent to existing wildlife sites. 	<ul style="list-style-type: none"> • The GLA Biodiversity Action Plan has a target of reducing deficiency in access to sites of nature conservation importance. This is defined as areas more than 1.2km away from a site of metropolitan or borough significance for nature conservation. 	<p>The SPD should be fully compliant with the Mayor’s strategy for Biodiversity, and should promote the importance of biodiversity for sustainability.</p>
Local			
<p>Draft Southwark Community Strategy: 2006-16</p>	<p>The overall vision is ‘making Southwark a better place to live, to</p>	<p>The Community Strategy will be supported by a Local Area</p>	<p>The LDF is expected to deliver the spatial aspects of the community</p>

Document	Relevant Objectives	Relevant Targets	Implications for draft SPD
<p>Sets out the council's and its partner's vision and priorities for the Borough from 2006 to 2016</p>	<p>learn, to work and have fun' which was developed in consultation with the local community. The strategy retains the five priorities from the 2003 Community Strategy to improve life in Southwark, which are:</p> <ul style="list-style-type: none"> • Tackling poverty; • Making Southwark cleaner and greener; • Cutting crime and fear of crime; • Raising standards in our schools; • Improving the health of the borough. 	<p>Agreement (LAA), which is under development at the time of writing this report. The LAA sets outcomes and targets based on ODPM and BVP Indicators, many of which are common to the Council's Corporate Plan and Annual Monitoring Report.</p>	<p>strategy. The development of the SPD should take account of this document.</p>
<p>Emerging Southwark Plan</p> <p>This plan sets out policies and proposals that will guide development in the Borough until 2016. The plan is expected to be adopted in 2007 and will then be saved as the Core Strategy for 3 years.</p>	<ul style="list-style-type: none"> • All developments should be accessible, improving people's life chances by achieving the highest possible quality developments with all of the infrastructure required to meet people's needs within Southwark. • All developments should, where appropriate, improve the range and quality of services available in Southwark and ensure that they are easily accessible by all sections of the community, particularly by foot, cycle and public transport. • All developments should, where appropriate, reduce poverty, alleviate concentrations of deprivation and increase opportunities. • All developments should, where 	<p>Performance of the plan is monitored against a series of targets on an annual basis. Relevant output targets include:</p> <ul style="list-style-type: none"> • Increase the provision of community facilities. • To demonstrate that an appropriate level of planning agreement funding has been achieved. • To reduce the level of deprivation score relative to comparable authorities. • Reduce the number of days of moderate and high air pollution by April 2006. • Increase the number of developments providing renewable energy infrastructure. • Recycle or compost 30% of municipal/household waste by 	<p>This Plan (once adopted) will become the Core Strategy for the Southwark Local Development Framework. The policies and proposals contained within the plan will form the basis for the SPD.</p> <p>The SPD should demonstrate how future development and uses of the site can best meet the objectives of the emerging Southwark Plan.</p>

Document	Relevant Objectives	Relevant Targets	Implications for draft SPD
	<p>appropriate, enable growth and development of education, community and welfare services in line with the community's needs.</p> <ul style="list-style-type: none"> • All Developments should ensure that they contribute positively to the character and quality of the surroundings, thereby making places better for people to live in and improving the communities to which they belong. • All developments should protect and improve amenity and environmental quality and encourage sustainable development. • All developments should, where appropriate reduce pollution and improve the environmental performance of buildings especially for energy, water and waste management. • All developments should be of a high standard of design and where appropriate should preserve or enhance the character and appearance of the historic environment. • All developments should, where appropriate, create, preserve and enhance open spaces, green corridors, traffic free routes, and biodiversity. The benefits of open space include those associated 	<p>2010 and 33% by 2015.</p> <ul style="list-style-type: none"> • No net loss of designated SINCS • No net loss in the amount of accessible public open space. • For 50% of the new housing built between 2004 and 2016 to be affordable. • To reduce the number of people killed or seriously injured in traffic accidents by 40% by 2010. • To ensure there is no growth in traffic between 2001 and 2011. • To increase the number of journeys made by foot by 15% between 2001 and 2011. • Increase proportion of person travel made by means other than car. 	

Document	Relevant Objectives	Relevant Targets	Implications for draft SPD
	<p>with health, sport, recreation, children’s play, regeneration, the economy, culture, biodiversity and the environment.</p> <ul style="list-style-type: none"> • All developments should, where appropriate, provide more high quality housing of all kinds, particularly affordable housing. • All developments should promote more sustainable transport choices for all members of the community, in order to reduce congestion, pollution and increase ease of movement. • All developments should reduce congestion and pollution within Southwark by minimising the need to travel, especially by car. 		
<p>Southwark Open Spaces Strategy, 2003</p>	<p>The vision of the strategy is to: “develop the extent and quality of public open spaces in Southwark in order to accelerate regeneration, encourage social inclusion, improve community health, enhance biodiversity, provide educational opportunities and enhance the quality of life of those people who live, work and visit the borough.”</p>	<p>It recommended a target provision of 2ha public accessible open space per 1,000 people by 2020.</p>	<p>The SPD can respond to the vision of the strategy by addressing the potential impacts of development on the site on open space provision. Opportunities to enhance the function and quality of the open space on the site can be addressed.</p>
<p>Draft Southwark Biodiversity Action Plan, 2006</p> <p>The Southwark Biodiversity Action Plan provides information and guidance on protecting, managing</p>	<ul style="list-style-type: none"> • Improve and protect existing natural habitats within Southwark. • Promote national and regional priority habitats and species relevant to Southwark. • Increase public awareness of 	<p>The BAP includes action plans which set out both broad actions to protect, manage and promote biodiversity across the borough, as well as more specific actions relating to particular species and habitat. Actions include:</p>	<p>The SPD can address the potential impacts of development on biodiversity and provide guidance to ensure that this development contributes to the objectives of the BAP.</p>

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Document	Relevant Objectives	Relevant Targets	Implications for draft SPD
<p>and promoting key wildlife habitats and species within the borough.</p>	<p>ecology.</p> <ul style="list-style-type: none"> • Provide ecological guidance to landowners, council departments and community groups. • Instigate creation of habitat and species working groups and community engagement. • Increase grassland, wetland and woodland habitat resources in Southwark. 	<ul style="list-style-type: none"> • Ensure design for biodiversity is incorporated into new development. • Create habitats for wildlife in parks and urban green spaces. • Ensure ecological enhancement is included in regeneration projects wherever possible. • Address areas of natural deficiency by creating habitats for wildlife in parks and open spaces 	
<p>Southwark Local Implementation Plan (LIP): 2005-10</p> <p>The Local Implementation Plan (LIP) is a detailed statement of Southwark's approach to implementing the Mayor's Transport Strategy</p> <p>The plan consists of a main document and five complimentary plans - Road Safety Plan, School Travel Plan Strategy, Parking and Enforcement Plan, Walking Plan, and a Cycling Plan.</p>	<p>10 key objectives of the TLIP are listed on page 2; and provide the basis for 6 key 'prioritised' objectives:</p> <ul style="list-style-type: none"> • Provide access to sustainable transport for all; • Increase economic opportunity for all and promote social inclusion; • Improve safety on our roads; • Improve personal safety and security; • Improve the public realm; • Enhance integration of transport and land use. 	<ul style="list-style-type: none"> • Reduce total casualties by 10%. • Increase journeys made on foot by 15% between 2001 and 2015. • Increase cycling trips. • Reduce: <ul style="list-style-type: none"> – Total number killed or seriously injured by 50%; – Total pedestrians killed or seriously injured by 50%; – Total cyclists killed or seriously injured by 50%; – Total children killed or seriously injured by 60%; – Slight casualties by 25%. • Achieve by 2011 zero growth in traffic levels on 2001 levels. 	<p>The development of the SPD should take account of this document and particularly the targets associated with road safety.</p>

Appendix 4: Baseline Information and Scoping Table

Sustainable Development Objective		Relevant SEA Issue	Are the issues raised by this objective relevant?	Indicator	Target	Baseline Information	Data Source
1	To focus development at locations which are currently well served by public transport with spare existing capacity, walking or cycling, or at locations where improvements are planned to achieve increase in modal share.	Population Human health Climactic factor	Relevant as the site is located within central London. The site is 1.5km from the terminus of the planned Cross River Tram, which will increase the public transport capacity of SE London, and connect Peckham with central London and Camden.	Public Transport Accessibility Levels (PTALs)	Minimise on-site car parking. Increase number of cycle parking spaces.	The site is 700m from Denmark Hill station, which is 12 minutes from London Bridge. The site has an average PTAL level sitting on the border between a rating of 3 and 4. A cycle lane, which is part of the London Cycling Network passes near the site on Camberwell Grove.	Council records
2	To reduce car dependency by improving transport choice and thus increasing the proportion of journeys made by public transport, by bicycle and by foot.	Population Human health Climactic factors	Relevant as the SPD can potentially influence on-site car and cycle parking requirements. However, the SPD cannot enforce car free development as the site is not in a controlled parking zone (CPZ).	(a) Number of on-site car parking spaces; (b) Number of on-site cycling spaces.	Minimise on-site car parking; Increase number of cycle parking spaces.	(a) There are currently 5 non-demarcated parking spaces on site. (b) There are currently no cycle parking facilities at the site.	Site visit
				Total trips by mode	Maintain or increase the proportion of personal travel made by means other than car	Borough-wide 2001: Car/motorcycle: 36% Foot: 17% Cycle: 6% Public transport: 41%	London Area Transport Survey, 2001
				The number of people killed or seriously injured in road traffic collisions	To reduce the number of people killed or seriously injured in traffic accidents to 96 by 2010	Borough-wide 2005: 132 people, an increase over 2004	Transport Local Implementation Plan

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Sustainable Development Objective		Relevant SEA Issue	Are the issues raised by this objective relevant?	Indicator	Target	Baseline Information	Data Source
3	To encourage sustainable development that is compact and mixed use as appropriate, with provision of key local services and amenity that will reduce the need to travel.	Population Human health Climactic factors	Relevant – the SPD can identify appropriate densities for development on the site. It can also address the issue of what uses are appropriate on the site and whether community uses should be retained.	Average density of new housing in urban zone	Development in the Urban Zone to be between 300 – 700hr/ha	There is no housing on the site. Across the borough, the average density of new development in the Urban zone in 2005/06 was 472hr/ha	2005/06 AMR
				Annual traffic volumes	Zero growth in traffic between 2001 and 2011	Borough wide: 2004: 862m vehicle kms 2001: 890m vehicle kms	Dept for Transport
				Distance to retail facilities	Development to be in proximity to key services	The site is within 600m of protected retail frontage	Council records
4	To ensure that London makes more efficient use of natural resources and in particular, soil, mineral aggregates, water and energy.	Material Assets Climactic Soil Water	Relevant as the SPD can address how the existing UDP policies relating to energy and water are interpreted on the site. It can also address the reuse of the existing building on the site.	(a) Average annual domestic consumption potable water. (b) Average annual consumption of natural gas (c) Average annual consumption of electricity (kWh).	Reduce consumption 10% of energy needs from renewable sources.	(a) On average, residential developments consume 160 litres of water per capita/day. This compares to national average of 140L (b) Variable dependent on applicable building regulations. (c) London-wide: approx. 3,500kWh/capita/year Renewable energy output of Southwark in 2005 total was 0.1536MW.	(a) and (b) Elephant and Castle Resource Flow Assessment, 2004 (C) Mayor's Energy Strategy 2004 and Southwark Renewable Energy Database

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Sustainable Development Objective	Relevant SEA Issue	Are the issues raised by this objective relevant?	Indicator	Target	Baseline Information	Data Source	
5	To protect and enhance existing biodiversity and natural habitats, and create new wildlife habitats.	Biodiversity Fauna Flora	Relevant as the SPD will determine how the current landscaping will be protected or replaced.	(a) Landscape quality	Retain high quality specimens	(a) The site contains some high quality trees, which should be retained.	(a) Ecology Appraisal, prepared by Applied Ecology Ltd, July 2006
				(b) Amount and change in designated sites (SINC's)	No net decrease in area or quality of Priority Habitat.	(b) The site is not designated as a SINC. However private gardens provide an important opportunity for many residents to experience nature and the BAP has identified them as a priority for actions to improve biodiversity in the borough.	(b) Southwark Plan
				(c) Net rise/fall in annual average abundance of indicator species.	Maintain or increase average abundance	(c) No evidence of protected species or species of high conservation value found on-site. Detailed bat and invertebrate surveys needed	(c) Ecology Appraisal
				(d) Net loss/gain in area (ha) of non-designated sites with intrinsic environmental value.	No net loss in area or quality of non-designated sites	(d) All habitat on the site is of relatively low inherent ecological and botanical interest. Presence of invasive species on the site.	(d) Ecology Appraisal
				Access to nature: % population more than 1.2km from a SINC of borough or metropolitan importance	Improve access to nature	The site does not fall within an area of deficiency in access to nature.	GLA Biodiversity Team

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Sustainable Development Objective		Relevant SEA Issue	Are the issues raised by this objective relevant?	Indicator	Target	Baseline Information	Data Source
6	To maximise the benefits of regeneration schemes for local people.	Population	Relevant as the council could enter a section 106 agreement with a developer of the site to support regeneration initiatives.	Breakdown of planning contributions received 2005/06	Mitigate impacts of new development.	AT 5 July 2006 there was £52,000 available to be spent on controlled parking schemes in Camberwell. Data is not available on total contributions collected.	S106 Monitoring Officer
				Level of deprivation	Reduce levels of deprivation	The site is ranked within 40-50% most deprived areas of the country	Southwark - ID2004 Borough Profile + GIS
7	To actively promote new clean technologies, particularly potential growth sectors of the environmental economy, renewable energy production and pollution control.	Air and Climate Material assets	Relevant. The SPD can address how the UDP policies on renewable energy and water can be delivered on the site.	Number of new development in the borough incorporating renewable energy infrastructure	10% of energy needs of major development supplied from renewable sources	Data not complete	
8	To develop London's tourism industry in ways that are economically, socially and environmentally beneficial.	SA issue	Not relevant as the SPD does not have the potential to influence London or the borough's tourist industry.	NA	NA	NA	
9	To ensure that inward investment projects are environmentally, socially and economically sustainable.	SA issue	Not relevant as this is beyond the scope of the SPD so it cannot influence this issue.	NA	NA	NA	
10	To improve river and canal ecological and amenity qualities, and to seek more sustainable uses thereof.	Water Biodiversity Landscape	Not relevant as the site is too far from a river or canal to have a direct impact.	NA	NA	NA	

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Sustainable Development Objective		Relevant SEA Issue	Are the issues raised by this objective relevant?	Indicator	Target	Baseline Information	Data Source
11	To protect, maintain, restore and enhance the quality of London's open spaces, to create new open space as appropriate, and to ensure that access to open space and the wider public realm is maintained.	Landscape Material assets Human health	Relevant While it is unlikely the site could be used for public open space, the SPD can address the use of the backland by site occupants. Also, new development on the site could increase the demand on existing public open space.	Deficiency in access to public open space	Improve access to public open space	The site is within an area of deficiency in access to District Parks. It also has a low level of access to local parks	LBS Open Space Study, 2/003
12	To improve the health of Londoners, reduce health inequalities and promote healthy living.	Human Health Population	Not relevant as the SPD cannot influence human health.	NA	NA	NA	
13	To reduce crime and the fear of crime	Population Human health	Relevant as the SPD can influence the design of development proposals, which can affect potential opportunities for crime and fear of crime.	% new premises in study area with Secure by Design Certification.	Increase % of new developments that meet Secure by Design certification.	Data not available for study area, however across the borough 17 schemes achieved certification in 2005/06.	2005/06 AMR
				Crime and disorder score in the Index of Multiple Deprivation	Reduce crime and fear of crime in the borough	The site is within the 20-30% most deprived in terms of crime and disorder.	June 2004: IMD
				% residents feeling unsafe outside	Increase feelings of safety	Camberwell CC area: 21% (day) 51% (night) Borough-wide: 11% (day) 44%(night)	2005 Southwark Residents' Survey

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Sustainable Development Objective	Relevant SEA Issue	Are the issues raised by this objective relevant?	Indicator	Target	Baseline Information	Data Source	
				Calls to "It's your Cal" Hotline	Reduce concern with anti-social behaviour	Sep05-Aug06 South Camberwell Ward: 46 Highest ward: Riverside (68):	Community Safety Partnership Team
14	To ensure that all Londoners have access to good quality affordable housing	Population Human health	Relevant as the SPD could address the mix of any housing developed on the site. Depending on its size, development could also contribute to the provision of affordable housing.	% of affordable housing	50% of new housing built between 2004 and 2016 to be affordable	No affordable housing on the site. Borough wide, 24% of housing built in 2005/04 were affordable. In 2004/05 42% was affordable.	2005/06 AMR
				Net dwelling completions	Provide 29,530 new dwellings between 1997 and 2016	No housing on the site. Across the borough, 1,468 new dwellings completed in 2005/06. Housing trajectory suggests the borough is on track to meet target.	2005/06 AMR
				ID Barriers to Housing and Services Domain - Wider Barriers Subdomain	Reduce barriers to housing	The site is within the top 10% most deprived areas with respect to barriers to housing.	Southwark - ID2004 Borough Profile + GIS
15	To ensure that where possible, new development occurs on derelict, vacant and underused previously developed land and buildings, and that land is remediated as appropriate.	Material assets Landscape	Relevant as the SPD can encourage the reuse of existing buildings on sites. The SPD could also address the more efficient use of land on the site.	% of new developments using existing buildings and on previously developed land.	Maximise the reuse of existing buildings where possible. All buildings on previously developed land.	There is currently one large building on the site. In 2005/06, almost all development occurred on previously developed land cross the borough. The exception was the City Academy at Bermondsey, which was allowed to be built on Paterson Park due to exceptional circumstances.	Site visit 2005/06 AMR
16	To encourage communication between	Population	Relevant as planning process can enable London's different	Consultation will need to occur in accordance with the Statement of Community Involvement. This will be monitored at each stage of consultation.			

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Sustainable Development Objective		Relevant SEA Issue	Are the issues raised by this objective relevant?	Indicator	Target	Baseline Information	Data Source
	London's different communities, in order to improve understanding of differing needs & concerns.		communities to get involved in the planning system.				
17	To reduce emissions of greenhouse gases, and plan for further reductions, to meet or exceed national climate change targets.	Human health Air Climatic factors	Relevant as the SPD can potentially influence the number of cars accessing Grove Park through restricting the amount site area used for car parking. This would help to reduce emissions of green house gases from car use. However, this would be an indirect impact. Also potential for emissions savings through requiring energy efficient design and renewable energy infrastructure.	CO2 emissions by sector, and per capita emissions	Reduce emissions to 23% below 1990 levels by 2016	CO2 emissions per capita were 7.32 tonnes per person in 2003.	DEFRA Regional 2003 CO2 Data Report (2005)
18	To improve air quality	Air Human health Climatic factors	Relevant as the SPD can potentially influence the number of cars accessing Grove Park through restricting the amount site area used for car parking. This would help to reduce pollution from car use thereby improving air quality. However, this would be an indirect impact. Also environmental design features of development could reduce polluting emissions.	Number of days of moderate or high pollution in the borough	Reduce number of days of moderate or high pollution	Across the borough, there was 19 days of moderate pollution, but no days of high pollution in 2005/06. The site is designated in the UDP as within an Air Quality management area.	Borough air quality monitoring stations

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Sustainable Development Objective		Relevant SEA Issue	Are the issues raised by this objective relevant?	Indicator	Target	Baseline Information	Data Source
19	To reduce the amount of waste requiring final disposal through waste minimisation, and to increase in order of priority, the proportion of waste reused, recycled and composted, and recovered.	Material assets Population Soil Landscape	Relevant as the SPD can expand on the policies in the emerging UDP and address issues of recycling and composting facilities. Can also address issues of waste by seeking reuse of existing building fabric.	Municipal waste arisings and % managed through recycling, composting, recovery of heat and energy and disposed of through landfill	At least 25% of household waste to be recycled or composted by 2005 and 30% by 2010. Increase in the volume of waste airings by no more than 3%	In 2005/06 total household waste was 106,970tonnes, an increase of 3.24% over the previous year. 11.6% household waste was recycled, 3.4% composted, 23.4% used to recover energy an 63.1% went to landfill. Recycling rates improved but waste to energy reduced due to facility not being fully operational.	Waste Management Services Performance Data
				Secondary/recycled aggregates	80% re-use of construction and demolition waste by 2011	In 2005/06 765.5 tonnes of inert material was received at council facility for recycling. Waste collected by commercial contractors unknown.	Waste Management Services Performance Data
20	To minimise ambient noise using best practice techniques.	Human health Population	Relevant as the SPD can influence the height and design of buildings, which can have an effect on ambient noise levels	% area of the study area exposed to unacceptable noise levels.	All proposals to reduce exposure risk.	The site is in the vicinity of a railway line. Noise issues will need to be addressed at design stage.	Site inspection, council GIS
21	To substantially increase the proportion of energy both purchased and generated from renewable and sustainable resources.	Climactic factors Air	Relevant as the SPD can directly influence the type of renewable energy infrastructure and energy efficiency design sought on-site.	Renewable Energy Capacity, by type (MWh).	The emerging UDP target requires 10% renewable energy from new developments.	In 2005, 0.1536MW per person were generated from renewable sources. (This is broken down as PV = 0.041; Solar Thermal = 0.11; Wind = 0.0025).	Southwark Renewable Energy Database.
22	To promote investment in and use of sustainable rail and water freight transport.	Climatic factors Air	Not relevant as the SPD cannot influence investment in freight transport.	NA	NA	NA	

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Sustainable Development Objective		Relevant SEA Issue	Are the issues raised by this objective relevant?	Indicator	Target	Baseline Information	Data Source
23	To create a climate for investment in London, with a modern employment structure based on a combination of indigenous growth and inward investment.	Population	Not relevant as the SPD cannot influence investment climate.	NA	NA	NA	
24	To promote a high quality of urban design in conjunction with sustainable construction principles and techniques.	Material assets Landscape	Relevant as the primary purpose of the SPD is to influence the design of development proposals.	(a) Median design life of buildings approved since 2005. (b) BREEAM rating of the development	(a) Increase design life of buildings (b) Good or excellent rating	The rating of the current building is unknown. However any conversion of the building and any new development will need include sustainable construction principles and techniques and address the target.	
25	To tackle poverty and social exclusion in areas of particular need.	Population	Not relevant as the SPD cannot tackle poverty or social exclusion.	NA	NA	NA	
26	To maintain and enhance the quality and integrity, and distinctiveness of the cityscape.	Landscape	Relevant as improving the cityscape through the design of developments is a key purpose of the SPD	How strongly residents identify with their neighbourhood	Increase the number of residents who identify with their neighbourhood	In 2005, 72% residents in Camberwell CC area identified very strongly/fairly strongly with their neighbourhood. This compares with 71% borough-wide.	2005 Resident's Survey
27	To maintain and enhance the historic environment and cultural assets of London.	Cultural heritage Landscape	Relevant as one of the key objectives of the SPD is to ensure the refurbishment or redevelopment enhances the character and appearance of the Camberwell Grove Conservation Area.	Location and extent of conservation areas	Preserve or enhance the special interest, historic nature or appearance of buildings or areas of historical significance.	Conservation area appraisal exists for this conservation area. The building on the site is not listed but is identified as a key unlisted building in the conservation area appraisal. The site is in proximity to Grade II listed buildings at 124 and 125 Grove Park.	Council records

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Sustainable Development Objective		Relevant SEA Issue	Are the issues raised by this objective relevant?	Indicator	Target	Baseline Information	Data Source
28	To avoid development that will impact on areas at high risk from flooding.	Water Population Material assets	Relevant as the SPD can potentially influence the type hard and soft landscaping required for developments.	% of area managed to SUDS standards. Flood Zone	Increase area of land managed to SUDS standards	It is not known how the site would rate against SUDS standard. However, there is a significant amount of pervious land to absorb storm water. The site is located outside the extent of the extreme flood area. This means that the chance of flooding each year from rivers and the sea is 0.1% (1 in 1000) or less. There is possibility of flash flooding from high rainfall.	Site inspection Environment Agency Flood Map, www.environment-agency.gov.uk
29	To increase tree cover as appropriate and ensure active and sustainable management of existing woodland.	Landscape Biodiversity Flora Fauna	Relevant as the SPD can influence the maintenance of existing tree species, and recommend additional and or replacement trees should development take place in the backland.	Number of good condition trees within study area, by (a) type & (b) age	Protect and enhance urban trees and streetscape.	Protect trees identified as of high value in the tree survey produced by Ian Keen Ltd on 5/1/06.	Ecological Appraisal
30	To improve the image of London/Southwark as an exemplary sustainable city	t	Relevant as the SPD can influence these issues through its control of development proposals.	No indicator	NA	NA	
31	To actively challenge discrimination against all marginalized groups in a consistent and comprehensive way	Population	Relevant as the SPD can influence the accessibility of new development through controls of the design of such developments. This would be specifically relating to equal access to buildings.	Comply with UDP to ensure accessibility of adequate ground floors of buildings on the site to disabled tenants / visitors	Disabled access to ground floor units.	The existing building has stepped access, with no ramp provision.	Site inspection
32	To ensure Londoners have	Population	Not relevant as the SPD	NA	NA	NA	

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Sustainable Development Objective	Relevant SEA Issue	Are the issues raised by this objective relevant?	Indicator	Target	Baseline Information	Data Source
	access to opportunities for employment and occupation.					
33	To respect people and value their contribution to society.	Population	Not relevant the SPD cannot directly influence this issue.	NA	NA	NA

Appendix 5: Coverage and Compatibility of sustainability objectives

Objective	Compatibility of objectives																																			
	SDO 1	SDO 2	SDO 3	SDO 4	SDO 5	SDO 6	SDO 7	SDO 8	SDO 9	SDO 10	SDO 11	SDO 12	SDO 13	SDO 14	SDO 15	SDO 16	SDO 17	SDO 18	SDO 19	SDO 20	SDO 21	SDO 22	SDO 23	SDO 24	SDO 25	SDO 26	SDO 27	SDO 28	SDO 29	SDO 30	SDO 31	SDO 32	SDO 33			
SDO 2	✓																																			
SDO 3	✓	✓																																		
SDO 4	✓	✓	✓																																	
SDO 5	0	0	✓	✓																																
SDO 6	✓	✓	✓	✓	?																															
SDO 7	✓	✓	✓	0	✓	0																														
SDO 8	✓	✓	✓	✓	✓	0	0																													
SDO 9	✓	✓	✓	✓	✓	✓	0	0																												
SDO 10	✓	✓	✓	✓	✓	0	✓	✓																												
SDO 11	✓	✓	✓	0	✓	✓	0	✓	0																											
SDO 12	✓	✓	✓	0	0	✓	✓	0	0	0																										
SDO 13	✓	✓	✓	0	0	✓	0	0	✓	0	✓																									
SDO 14	0	0	0	0	?	✓	0	0	0	0	0	0																								
SDO 15	0	0	✓	✓	✓	✓	✓	✓	✓	0	✓	0	0																							
SDO 16	0	0	0	0	0	✓	0	✓	0	0	0	0	0	0																						
SDO 17	✓	✓	✓	✓	0	0	✓	✓	✓	✓	0	0	0	0	0	0																				
SDO 18	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	0	0	0	0	0	0	0																			
SDO 19	0	0	0	✓	✓	0	✓	✓	✓	0	0	0	0	0	0	0	0	0																		
SDO 20	0	0	0	0	0	✓	0	✓	✓	0	✓	✓	0	0	0	0	0	0	0	0																
SDO 21	?	?	0	✓	✓	0	✓	✓	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
SDO 22	✓	✓	0	✓	✓	0	✓	✓	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SDO 23	✓	✓	✓	0	?	✓	✓	✓	?	0	0	0	✓	?	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SDO 24	✓	✓	✓	0	0	✓	0	✓	✓	0	0	0	✓	0	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SDO 25	✓	✓	✓	0	0	✓	0	0	0	0	0	0	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SDO 26	0	0	?	0	0	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SDO 27	0	0	?	0	0	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SDO 28	0	0	?	0	✓	✓	0	✓	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SDO 29	0	0	✓	0	✓	✓	0	0	0	0	0	0	0	?	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SDO 30	✓	✓	✓	✓	✓	0	✓	0	✓	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SDO 31	✓	✓	✓	0	0	✓	0	✓	✓	0	✓	✓	✓	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SDO 32	✓	✓	✓	0	0	✓	✓	✓	✓	0	0	0	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SDO 33	0	0	0	0	0	✓	0	✓	✓	0	0	0	✓	✓	0	✓	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Coverage of SA Objectives

Objective	Environmental	Social	Economic
SDO 1	✓	✓	
SDO 2	✓	✓	
SDO 3	✓	✓	✓
SDO 4	✓		
SDO 5	✓		
SDO 6		✓	✓
SDO 7	✓		✓
SDO 8	✓	✓	✓
SDO 9	✓	✓	✓
SDO 10	✓		
SDO 11			
SDO 12	✓	✓	
SDO 13		✓	✓
SDO 14		✓	
SDO 15	✓		
SDO 16		✓	
SDO 17	✓		

Objective	Environmental	Social	Economic
SDO 18	✓	✓	
SDO 19	✓		
SDO 20	✓	✓	
SDO 21	✓		
SDO 22	✓		✓
SDO 23		✓	✓
SDO 24	✓	✓	
SDO 25		✓	
SDO 26	✓		
SDO 27	✓	✓	
SDO 28	✓	✓	✓
SDO 29	✓		
SDO 30	✓	✓	✓
SDO 31		✓	
SDO 32		✓	✓
SDO 33		✓	

Appendix 6 - Appraisal Matrixes

Compatibility of objectives of draft SPD with sustainability objectives

Objectives of draft SPD

1. Facilitate the re-use of the site, maximising its potential, whilst protecting it's conservation value.
2. Ensure that any development preserves or enhances the character and appearance of the Camberwell Grove Conservation Area.
3. Ensure that new development maximizes the social, economic and environmental potential of the site.

Draft SPD Objective	Sustainability Objectives																													
	SDO 1	SDO 2	SDO 3	SDO 4	SDO 5	SDO 6	SDO 7	SDO 11	SDO 13	SDO 14	SDO 15	SDO 16	SDO 17	SDO 18	SDO 19	SDO 20	SDO 21	SDO 24	SDO 26	SDO 27	SDO 28	SDO 29	SDO 30							
1	✓	?	✓	✓	?	✓	?	?	✓	?	✓	-	?	?	✓	-	?	✓	✓	✓	?	?	✓							
2	-	-	-	-	-	✓	?	-	-	-	-	-	-	-	-	-	?	✓	✓	✓	-	?	✓							
3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓							

Legend

✓ Compatible - No relationship ? Depends on implementation X Incompatible

Commentary

Collectively, the objectives of the draft SPD are compatible with the sustainability objectives. Objective 3 is particularly compatible with each of the sustainability objectives. However, a number of potential conflicts have been identified with Objectives 1 and 2. This does not mean that the draft SPD will be unsustainable. "Maximising the potential" will need to be carefully defined in the draft SPD to ensure that it does not result in a level or type of development that is not compatible with the accessibility of the site, and does not have a negative impact on resource use or biodiversity. Also, the aim to protect the conservation values of the site and the conservation area, whilst contributing to sustainability, may limit the ability of the site to provide renewable energy infrastructure. The draft SPD will need to identify appropriate mitigation of any potential negative impacts.

Sustainability Report: 123 Grove Park SPD

Appraisal of options (strategic alternatives)

+ Positive – Negative +/- Minor
 0 Neutral ? Uncertain +++/--- Major

SDO	Option A – Seek to retain the site in a community use				Option B – Refurbish the building and convert into a residential use				Option C – Refurbish the building and convert into a residential use and allow for the development of a 2-storey dwelling in the rear garden			
	Effect			Commentary	Effect			Commentary	Effect			Commentary
	S	M	L		S	M	L		S	M	L	
1	+	+	+	Medium PTAL. Not suitable for community uses with more than a local catchment	+	+	+	Medium PTAL, suitable for housing.	+	+	+	Medium PTAL, suitable for housing.
2	?	?	?	Could improve accessibility to local services, though depends if future use serves local need.	?	?	?	Depends on scale of development, type of units and parking provision.	?	?	?	Depends on scale of development, type of units and parking provision. Opportunity to improve access to site by walking and cycling.
3	+	+	+	Encourages access to local services, though this relies on them serving a local need.	+	+	+	Increase in the number of habitable rooms per hectare contributes to the compaction of urban density zone	++	++	++	Increase in the number of habitable rooms per hectare contributes to the compaction of urban density zone
4	0	0	0	No impact (assuming does not involve additional building)	+	+	+	Encourages reuse of existing building	?	?	?	Encourages reuse, but intense development may place increased demand on resources
5	+	+	+	Retention and enhancement of garden space to the rear with additional plants and species could improve diversity.	+	+	+	Retention and enhancement of garden space to the rear with additional plants and species could improve diversity.	-	-	-	Building on rear land will remove habitat. Though site does not currently have ecological significance.
6	?	?	?	There may not be a viable community use for the site that serves local need, leaving the building and site vacant	+	+	+	Likely to accommodate less than 10 units in total, so no affordable housing provision. Though, conservation of the existing building would have local benefits, as would providing family accommodation.	++	++	++	Possible benefit if more than 10 units and affordable housing is gained. Though, conservation of the existing building would have local benefits. More dwellings provided means better mix of housing and more family accommodation.

SDO	Option A – Seek to retain the site in a community use				Option B – Refurbish the building and convert into a residential use				Option C – Refurbish the building and convert into a residential use and allow for the development of a 2-storey dwelling in the rear garden			
	Effect			Commentary	Effect			Commentary	Effect			Commentary
	S	M	L		S	M	L		S	M	L	
7	?	?	?	Depends if renewable energy infrastructure installed, though may be difficult in conservation area.	?	?	?	Depends if renewable energy infrastructure installed, though may be difficult in conservation area.	+	+	+	A high quality modern building in the backland could incorporate eco-design features such as green roof, solar panelling etc.
11	0	0	0	No impact likely.	-	-	-	Could place pressure on open space	-	-	-	Could place pressure on open space
13	?	?	?	If no viable use can be found, may be negative impact if site left vacant for long period of time.	+	+	+	Could contribute to passive surveillance of street.	+	+	+	More opportunities for passive surveillance. The new dwelling could achieve secure by design certification.
14	0	0	0	No impact	+	+	+	Will increase housing supply, including family accommodation.	++	++	++	May be scope for affordable housing provision. More housing, including family housing, provided.
15	?	?	?	Could leave building vacant if no viable use found.	+	++	++	This development will maximise the use of a previously developed site.	++	++	++	This development will incorporate a new dwelling within the limits of a vacant and underused site.
16	0	0	0	No impact	0	0	0	No impact	0	0	0	No impact
17	0	0	0	No impact (assuming no additional building)	?	?	?	Conversion of the building into flats may increase the levels of traffic usage along Grove Park over and above previous trips related to the Youth Offending Centre. However refurbishment could incorporate energy efficiency/renewable energy.	?	?	?	Potential increase in traffic, though more scope for energy efficiency design and renewable energy. Could improve access to site by cycle and walking.
18	0	0	0	No impact (assuming no additional building)	?	?	?	See above.	?	?	?	See above. Removing trees could have impact.
19	0	0	0	No significant impact (assuming no additional building)	?	?	?	Depends on design. Opportunity for recycling and composting on-site. Reuse of building will reduce waste.	?	?	?	Depends on design. Opportunity for recycling and composting on-site. Reuse of building will reduce waste.
20	-	-	-	Likely noise impacts from use of	?	?	?	Depends on design.	?	?	?	Depends on design.

SDO	Option A – Seek to retain the site in a community use				Option B – Refurbish the building and convert into a residential use				Option C – Refurbish the building and convert into a residential use and allow for the development of a 2-storey dwelling in the rear garden				
	Effect			Commentary	Effect			Commentary	Effect			Commentary	
	S	M	L		S	M	L		S	M	L		
				building and traffic generated.									
21	?	?	?	Depends if renewable energy infrastructure installed, though may be difficult in conservation area.	?	?	?	The refurbished building could incorporate micro-generation such as green roof, solar panelling., though may be difficult in conservation area.	+	+	+	A building in the backland could incorporate micro-generation such as solar panelling.	
24	0	0	0	No impact	?	?	?	Refurbishment could use sustainable construction techniques.	?	?	?	A building in the backland could incorporate eco-excellent design	
26	?	?	?	If existing building reused would contribute to appearance of the area. However, if no viable use found may lead to derelict site.	+	++	++	Directly preserves the existing appearance of the townscape of the conservation area	++	++	++	A new house offers a unique opportunity to add a 'modern element' to the conservation area.	
27	?	?	?	See comment above	+	++	++	Directly preserves the existing appearance of the townscape of the conservation area	?	?	?	Whilst the new building may enhance the cultural assets of London through creating a high quality modern design, it may also detract from the overall historical fabric of the area.	
28	0	0	0	No impact. Site not at high risk.	0	0	0	No impact. Site not at high risk.	?	?	?	Potential negative impact if permeable land lost.	
29	+	+	+	Assuming no additional buildings on site, would protect existing tree cover.	+	+	+	Potential to increase tree cover through additional planting.	+/-	+/-	+/-	Backland building may require removal of trees. However, these could be replaced on-site.	
30	?	?	?	Retention of building and community uses positive, however if no viable use found could lead to derelict site.	+	+	+	Adaptive reuse of existing building and provision of housing are positive.	+	+	+	Adaptive reuse and high quality design could demonstrate best practise of Southwark actively responding to the sustainable development imperative.	
31	?	?	?	Adaptation of the building to make it accessible may not be viable.	+	+	+	UDP policies require residential to meet access standards.	+	+	+	UDP policies require residential to meet access standards.	

Appraisal of preferred option (draft SPD)

+ Positive - Negative +/- Minor
 0 Neutral ? Uncertain +++/--- Major

Point of Guidance – Residential use of the site					
Preferred Option			No SPD option		
SDO	Effect	Commentary	Effect	Commentary	
1	+	The site has average access to public transport and is suitable for residential use.	?	Residential uses would be possible under the emerging Southwark Plan, but uncertainty over use means site may remain vacant.	
2	0	Other factors would influence car use.	0		
3	+	Encourages use of site. Site within 600m of protected retail.	?	Residential uses would be possible under the emerging Southwark Plan, but uncertainty over use means site may remain vacant.	
4	0	Other factors would influence	0	Lack of certainty over site use could leave site vacant	
5	0	Other factors would influence	0		
6	++	Residential development is needed in the borough, particularly family accommodation.	?	Lack of certainty over site use could leave site vacant	
7	0	Other factors would influence	0		
11	0/-	Residential use could increase demand on open space in area. Planning obligations will be sought to mitigate.	?	Same impact if residential allowed. Planning obligations could be sought.	
13	0	Other factors would influence	0		
14	++	Will increase housing supply in borough, including family accommodation.	?	Residential uses would be possible under the emerging Southwark Plan, but uncertainty over use means site may remain vacant.	
15	+	Will encourage continued use of the site	?	Lack of certainty over site use could leave site vacant	
16	0	No impact	0		
17	0	Other factors would influence	0		
18	0	Other factors would influence	0		
19	0	Other factors would influence	0		
20	0	Other factors would influence	0		
21	0	Other factors would influence	0		
24	0	Other factors would influence	0		
26	+	Would encourage retention of existing building	?	Lack of certainty over site use could leave site vacant	
27	+	Would encourage retention of existing building	?	Lack of certainty over site use could leave site vacant	
28	+	Site at low risk of flooding. Residential is appropriate use.	+	Residential or community uses appropriate on the site.	

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Point of Guidance – Residential use of the site				
Preferred Option			No SPD option	
SDO	Effect	Commentary	Effect	Commentary
29	0	Other factors will influence	0	
30	+	Contribute to housing supply. Emerging UDP requires housing to meet access standards.	?	If site remains vacant this would not contribute to sustainable communities. Emerging UDP requires housing to be accessible.
31	0	Site not currently in community use	0	Site not currently used by the community.
Summary: Residential development contributes to housing supply in the borough and encourages continued use of the site and preservation of the building. not having an SPD provides less certainty over the future if the site, which could leave it vacant.				

Point of Guidance – Retention and conversion of existing building				
Preferred Option			No SPD option	
SDO	Effect	Commentary	Effect	Commentary
1	0	Other factors influence	0	
2	0	Other factors influence	0	
3	+	Other factors influence	0	
4	+	Reuse of building conserves resources	+	Reuse of building could be sought under emerging UDP. However lack of guidance for site could result in site being vacant and underused.
5	+	Does not lead to habitat on site being lost	+	See above.
6	0	Other factors influence	0	
7	0	Other factors influence	0	
11	0	No impact	0	
13	0	No impact	0	
14	0	No impact	0	
15	+++	Existing vacant building will be reused	?	Lack of guidance for site could result in site being vacant and underused.
16	0	No impact	0	
17	+	Building materials have embodied energy. Less used cold reduce greenhouse emissions.	+	Same as preferred option
18	+	See above	+	See above
19	++	Reuse of materials will reduce construction waste	+	Reuse of building could be sought under emerging UDP
20	0	No impact	0	
21	0	Other factors impact	0	

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Point of Guidance – Retention and conversion of existing building					
	Preferred Option			No SPD option	
SDO	Effect	Commentary	Effect	Commentary	
24	+	Contributes to character of area and saves resources.	+	Reuse of building could be sought under emerging UDP	
26	++	Contributes to character of the area	?	Building could remain vacant and derelict due to lack of guidance	
27	+++	Allows retention of building which contributes to conservation area	?	See above	
28	0	No impact	0		
29	+	Allows tree cover to be retained or improved	+	Same as preferred option	
30	++	Reuse and adaptation will contribute to positive image	?	Lack of guidance may result in unsatisfactory solution to site	
31	0	No impact	0		
Summary: The draft SPD will provide more certainty to the retention and reuse of the existing building on the site which will have a positive impact across a number of objectives, in particular the conservation of resources and enhancement of local character.					

Point of Guidance – Extension and new building in back land					
	Preferred Option			No SPD option	
SDO	Effect	Commentary	Effect	Commentary	
1	+	Seeks to consolidate development in area with moderate access to public transport and local services.	?	Less guidance means less certainty over the development that would occur on the site.	
2	0	Other factors influence	0		
3	+	Encourages compact development in existing urban area	?	Uncertainty may lead to site remaining vacant indefinitely	
4	-	Could place additional pressure on resources, such as aggregates	?	If site remains vacant would have a neutral impact on greenhouse gases. Community use could have less intensive resource requirements.	
5	-	Building on backland will remove habitat, however SPD does require footprints to avoid significant trees	?	Lack of guidance may mean development does not occur in most appropriate location on the site to reduce impact	
6	+	Allows additional housing to be built, including family accommodation and potentially affordable housing.	?	Site could remain vacant	
7	0	Other factors influence	0		
11	0/-	Allows more intense use of site which could increase demand on open space in area. Planning obligations will be sought to mitigate.	?	Same impact if residential allowed. Planning obligations could be sought.	
13	0	Design of new building with be important	0	Design of new building with be important	
14	+++	Allows more housing to be built on the site, increasing potential for affordable housing and increasing supply of family housing.	?	Site could remain vacant	
15	+	Encourages development on previously developed land	?	See above	

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Point of Guidance – Extension and new building in back land				
	Preferred Option		No SPD option	
SDO	Effect	Commentary	Effect	Commentary
16	0	No impact	0	
17	-	Requires increased use of aggregates, the manufacture of which may release greenhouse gases. Also, more intense use of the land may result in increased traffic generation.	?	If site remains vacant would have a neutral impact on greenhouse gases. Community use could have less intensive resource requirements.
18	-	See above. A loss of trees may also lead to deterioration of air quality.	?	See above
19	?	Require additional construction materials. More housing may generate more waste, though composting and recycling facilities should be provided.	?	See above. Emerging UDP requires composting and recycling facilities to be provided.
20	?	Uncertain. New development need to be designed to reduce ambient noise and mitigate against nearby noise sources.	?	Same as preferred option.
21	0	Other factors influence	0	
24	+	Other aspects of the draft SPD cover this	+	Emerging UDP requires new buildings to incorporate sustainable construction
26	+	Draft SPD identifies appropriate location and design guidelines for new building. Opportunity for new building to contribute to character of area.	?	Emerging UDP contains policies seeking good design. However if site remains vacant this will contribute to the area.
27	+	See above. Specific guidance provided on this.	?	See above
28	0/-	Area not at high risk of flooding, however increased coverage of the site could increase run-off from the site.	0/-	Same as preferred option
29	-	Draft SPD identifies suitable locations for new development to retain significant trees. However, less significant trees may be lost.	?	Less guidance may result in tree loss due to inappropriate siting of development. However, if site remains vacant, trees will be remain.
30	?	If loss of habitat mitigated and appropriate design, new building on the site could contribute positively to image of Southwark.	?	Less certainty over the type of development that will come forward on the site.
31	?	Potential for affordable housing provision on the site	?	Uncertain
<p>Summary: Allowing more development on the site may help bring in back into use, making it more attractive to develop. It will also increase the supply of housing and potentially result in provision of affordable housing. The draft SPD sets out the parameters for this new development to help mitigate some potential impacts on loss of habitat and impact on the conservation area. However some habitat will still be lost and increasing development may increase resource consumption. The impact on ambient noise is uncertain. The same outcomes are possible without the draft SPD, however the lack of guidance may lead to the site remaining vacant for long period of time, or may result in inappropriate development schemes, which do not mitigate potential negative impacts, coming forward.</p>				

Point of Guidance – Building design sensitive to conservation area (2 storeys and 300hr/ha)					
Preferred Option			No SPD option		
SDO	Effect	Commentary	Effect	Commentary	
1	+	While density is low, this is still an increase over current density. Also, PTAL is only medium.	+	The emerging UDP allows densities up to 700hr/ha in the urban zone.	
2	0	Other factors influence	0		
3	+	Allows increased development on the site	++	Emerging UDP allows densities up to 700hr/ha in Urban Zone	
4	+/-	Allows more efficient use of land, may result in increased energy use	++/--	Allows higher densities than SPD recommends, which could lead to higher resource consumption	
5	0	Other factors influence	0		
6	+++	Improve the impact of the scheme on the conservation area	+/?	Emerging UDP requires development to be sensitive to conservation interests. However lack of specific guidance may mean best solution no achieved.	
7	-	Seeking development at the rear to minimise impact on conservation area results in loss of trees.	?	Could result in loss of trees. Or if site remains vacant, trees would be retained.	
11	0/-	Increased densities will place pressure on open space. This can be mitigated through S106	?	Higher densities could be allowed, placing more demand on open space. This can be mitigated through S106	
13	+	Design will need to contribute to crime prevention	+	Design will need to contribute to crime prevention	
14	+/?	Allows additional residential accommodation to be built on the site. Expecting a lower density may mean size of development does not make it feasible to provide affordable housing	++	Higher densities may be allowed, allowing more housing and more chance of providing affordable housing.	
15	++	Increased development on site.	+++	Allows higher densities which would maximise use of the site	
16	0	No impact	0		
17	-/0	Allowing increased development may increase emissions.	-/0	If higher densities allowed, could be more impact on emissions	
18	-	Seeking development at the rear to minimise impact on conservation area results in loss of trees.	?	Could result in loss of trees if higher densities allowed. Or if site remains vacant, trees would be retained.	
19	?	Lower density could mean less waste generated, though likely to be more generated than current. Provision of recycling and composting would help to mitigate negative impacts.	?	Higher densities could result in higher amounts of waste.	
20	?	Uncertain. New development need to be designed to reduce ambient noise and mitigate against nearby noise sources.	?	Same as preferred option	
21	-	The requirement to protect the character of the conservation area and low height of the building may constrain the possibility of	?	Same as preferred option	

Point of Guidance – Building design sensitive to conservation area (2 storeys and 300hr/ha)					
Preferred Option			No SPD option		
SDO	Effect	Commentary	Effect	Commentary	
		providing renewable technology on site.			
24	0	Other aspects of SPD address this	0		
26	+	Design guidelines seek to protect the character of the area	+	Emerging UDP contains policies seeking good design	
27	+++	The draft SPD seeks design that respects the context of the conservation area and nearby listed buildings. The height and design sought will mean the new building will not be obtrusive.	++	Emerging SPD seeks design which is sensitive to its historical context. However a lack of site specific guidance may mean that the most appropriate solution is not achieved.	
28	0	Other factors influence	0		
29	-	Seeking development at the rear to minimise impact on conservation area results in loss of trees.	?	Could result in loss of trees if higher densities allowed. Or if site remains vacant, trees would be retained.	
30	++	Seeking development that increases use of land without impacting on heritage will contribute positively to image of Southwark.	+	Emerging UDP seeks to maximise use of site and protect heritage, though less certainty over the type of development that will come forward on the site.	
31	0	No impact	0		
Summary: The emerging UDP seeks densities up to 700ha/hr in the Urban Zone. While the draft UDP identified lower densities as being appropriate on the site, this is intended to protect the character of the conservation area. Providing specific guidance for how new development should be sited and designed on the site to protect heritage is likely to have more positive benefits with respect to conservation than having no draft SPD.					

Point of Guidance – Vehicular access from Grove Park. Rear access for cyclists and pedestrians					
Preferred Option			No SPD option		
SDO	Effect	Commentary	Effect	Commentary	
1	0	No impact	0		
2	?	The draft SPD does not seek use of the rear access for pedestrian and cycle access, though notes this is a possibility.	?	Lack of site specific guidance may mean opportunities to improve transport choice are not fully realised.	
3	0	Other factors influence	0		
4	?	Better promoting pedestrian and cycle access could help reduce consumption of fossil fuels	?	See above	
5	0	No impact	0		
6	0	No impact	0		
7	0	The draft SPD could more actively promote cycling	0		
11	0	No impact	0		
13	0	No impact	0		

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Point of Guidance – Vehicular access from Grove Park. Rear access for cyclists and pedestrians					
	Preferred Option			No SPD option	
SDO	Effect	Commentary	Effect	Commentary	
14	0	No impact	0		
15	0	No impact	0		
16	0	No impact	0		
17	?	The draft SPD could better promote opportunities for walking and cycling	?	Lack of site specific guidance may mean opportunities to improve transport choice are not fully realised.	
18	?		?		
19	0	No impact	0		
20	?	Better promoting cycling and walking could reduce ambient noise through reductions in car use.	?	Lack of site specific guidance may mean opportunities to improve use of quieter forms of transport are not fully realised.	
21	0	No impact	0		
24	0	No impact	0		
26	0	No impact	0		
27	0	No impact. (Design of access way covered elsewhere)	0		
28	0	No impact	0		
29	0	No impact	0		
30	?	Could be enhanced	?		
31	0	No impact	0		
Summary: The positive impact of the draft SPD could be enhanced by more actively promoting access to the site by cycle and walking.					

Point of Guidance – No asphalt landscaping, replacement of trees and additional tree planting					
	Preferred Option			No SPD option	
SDO	Effect	Commentary	Effect	Commentary	
1	0	No impact	0		
2	0	No impact	0		
3	0	No impact	0		
4	0	No impact	0		
5	++	Seeks to mitigate impact of increasing the amount of development on the site. However no specific targets indicated in terms of mitigating this impact.	+	Lack of site specific guidance may mean opportunities to enhance and mitigate impact on biodiversity not fully realised.	
6	0	No impact	0		
7	0	No impact	0		
11	0	No impact	0		

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Point of Guidance – No asphalt landscaping, replacement of trees and additional tree planting				
Preferred Option			No SPD option	
SDO	Effect	Commentary	Effect	Commentary
13	0	No impact	0	
14	0	No impact	0	
15	0	No impact	0	
16	0	No impact	0	
17	0	No impact	0	
18	+	Could help improve air quality if more trees planted than are lost	?	Lack of site specific guidance may mean lost opportunities to replace trees.
19	?	Discarded asphalt should be reused.	?	Lack of site specific guidance may mean opportunities to reduce waste through landscaping not realised.
20	+	Replacement trees and greener landscaping will absorb some noise.	?	Outcome unclear due to lack of guidance.
21	0	No impact	0	
24	+	Promotes good urban design and improves environmental performance of development	?	Outcome unclear due to lack of guidance.
26	+	Removal of asphalt will improve appearance of streetscape	?	Outcome unclear due to lack of guidance.
27	++	See above. Designated planting areas are indicated in draft SPD to help screen the development and maintain the leafy views towards the site from the north.	?	See above
28	+	Removal of asphalt will help mitigate increased coverage of the site by buildings	?	Outcome unclear due to lack of guidance.
29	+++	Replacement trees sought	?	Outcome unclear due to lack of guidance.
30	+	Will contribute to positive image	?	Outcome unclear due to lack of guidance
31	0	No impact	0	
<p>Summary: The draft SPD provides more certainty as to what sort of landscaping response is required on the site. Seeking previous landscaping and replacement of trees will improve drainage and help replace habitat lost on the site. It is also likely that there will be a positive impact on the character of the area. There is perhaps a need for more specific guidance on how the impact of increased coverage of the site should be mitigated.</p>				

Point of Guidance – Bat and invertebrate survey required				
Preferred Option			No SPD option	
SDO	Effect	Commentary	Effect	Commentary
1	0	No impact	0	

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Point of Guidance – Bat and invertebrate survey required				
	Preferred Option		No SPD option	
SDO	Effect	Commentary	Effect	Commentary
2	0	No impact	0	
3	0	No impact	0	
4	0	No impact	0	
5	+++	Will ensure a thorough understanding of the contribution that the site can make to biodiversity. Guidance is provided on mitigation expected should priority species be found on the site.	?	Lack of understanding about the potential of the site to support priority species
6	0	No impact	0	
7	0	No impact	0	
11	0	No impact	0	
13	0	No impact	0	
14	0	No impact	0	
15	0	No impact	0	
16	0	No impact	0	
17	0	No impact	0	
18	0	No impact	0	
19	0	No impact	0	
20	0	No impact	0	
21	0	No impact	0	
24	+	Promotes sustainable construction	?	Lack of guidance means best response to ecology issues not realised
26	0	No impact	0	
27	0	No impact	0	
28	0	No impact	0	
29	0	No impact	0	
30	+	Will contribute to positive image	?	Lack of guidance means best response to ecology issues not realised
31	0	No impact	0	
Summary: The draft SPD promotes a thorough understanding of the ecology issues of the site and sets out what response is expected should priority species be found. This will have a positive impact on biodiversity. Without the draft SPD there is a lack of guidance and opportunities to protect priority species may be lost.				

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Point of Guidance – Sustainability appraisal required incorporating energy assessment. Maximise renewable energy use on-site.					
	Preferred Option			No SPD option	
SDO	Effect	Commentary	Effect	Commentary	
1	0	Other factors influence	0		
2	+	SA should demonstrate how opportunities for improving transport choice have been addressed	+	SA required by emerging Southwark Plan	
3	+	Could be addressed in SA	+	See above	
4	++	SA will need address how renewable energy, energy efficiency and water efficiency has been incorporated into a scheme	+	See above	
5	++	Could be addressed in SA	+	See above	
6	+	Could be addressed in SA	+	See above	
7	++	The draft SPD expects development on the site to maximise the use of renewable energy.	++	Emerging Southwark plan seeks use of renewable energy in schemes, unless this is not viable.	
11	0	Other factors influence	0		
13	0	Other factors influence	0		
14	0	Other factors influence	0		
15	0	Other factors influence	0		
16	0	No impact	0		
17	++	This will need to be covered in SA	+	SA required by emerging Southwark Plan	
18	+	See above	+	See above	
19	++	See above	+	See above	
20	+	This could be addressed in SA	+	See above	
21	++	The draft SPD expects development on the site to maximise the use of renewable energy.	++	Emerging Southwark plan seeks use of renewable energy in schemes, unless this is not viable.	
24	++	This will need to be covered in SA	+	SA required by emerging Southwark Plan	
26	0	Other factors influence	0		
27	+	Use of renewable energy is sought consistent with the preservation of the character of the conservation area	+		
28	+	Flood Impact Assessment could be included in SA	+	Flood Impact Assessment could be included in SA	
29	+	Could be addressed in SA	+	Could be addressed in SA	
30	+	See above	+	See above	
31	+	See above	+	See above	

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Point of Guidance – Sustainability appraisal required incorporating energy assessment. Maximise renewable energy use on-site.						
Preferred Option				No SPD option		
SDO	Effect	Commentary			Effect	Commentary
Summary: This is a very positive inclusion in the draft SPD, however could also be achieved without the draft SPD.						

Cumulative Impact of draft SPD									
	Points of Guidance								Commentary
	POG1	POG2	POG3	POG4	POG5	POG6	POG7	POG8	
SDO 1	+	0	+	+	0	0	0	0	Overall positive impact.
SDO 2	0	0	0	0	?	0	0	+	Potential to improve impact on increasing transport choice by more actively encouraging cycling and walking infrastructure.
SDO 3	+	+	+	+	0	0	0	+	Overall positive impact, draft SPD supports more compact development.
SDO 4	0	+	-	+/-	?	0	0	++	Overall positive impact on supporting efficient use of resources, despite increased intensity of development.
SDO 5	0	+	-	0	0	++	+++	++	Despite loss of trees, the draft SPD seeks a range of mitigation measures. Also requires more through understanding of habitat on site, and appropriate development response.
SDO 6	++	0	+	+++	0	0	0	+	The draft SPD encourages bringing the site back into active use and enhancing its contribution to the conservation area. Housing provided on site could also benefit local people, particularly if affordable housing is provided.
SDO 7	0	0	0	-	0	0	0	++	Location of site in conservation may hinder provision of renewable energy technology on site. However other solutions could be found and draft SPD requires energy assessment to demonstrate renewable energy use has been maximised.
SDO 11	0/-	0	0/-	0/-	0	0	0	0	Potential negative impact on open space resulting from increased development in the area. Could be mitigated through planning contributions and ensuring amenity space on site is well designed.
SDO 13	0	0	0	+	0	0	0	0	The emerging Southwark Plan contains policies on crime

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Cumulative Impact of draft SPD									
	Points of Guidance								Commentary
	POG1	POG2	POG3	POG4	POG5	POG6	POG7	POG8	
									prevention through design which would apply.
SDO 14	++	0	+++	+/?	0	0	0	0	Allowing backland development may enable sufficient amount of housing to be provided to support affordable housing provision.
SDO 15	+	+++	+	++	0	0	0	0	Draft SPD supports continued use of this previously development site and will encourage reuse of the vacant building.
SDO 16	0	0	0	0	0	0	0	0	The draft SPD does not address communication between communities. This could be addressed through the consultation on the draft SPD.
SDO 17	0	+	-	-/0	?	0	0	++	Cumulative impact unclear. Impacts of increased development on greenhouse emissions will need to be adequately mitigated. SA submitted with application will need to address this issue.
SDO 18	0	+	-	-	?	+	0	+	Requirement for replacement of trees may mitigate impact of increased building if there is a net gain in trees.
SDO 19	0	++	?	?	0	?	0	++	Cumulative impact unclear. Reuse of existing building will reduce waste during construction. Appropriate facilities will need to be provided on site to manage waste arising from occupants.
SDO 20	0	0	?	?	?	+	0	+	Development will need to be appropriately designed to address ambient noise issues. Requiring replacement tree planting may help mitigate ambient noise.
SDO 21	0	0	0	-	0	0	0	++	Draft SPD seeks maximisation of renewable energy, however location within conservation area may constrain this.
SDO 24	0	+	+	0	0	+	+	++	Draft SPD sets out specific design guidance to improve environmental performance of building, particularly relating to landscaping and energy use.
SDO 26	+	++	+	+	0	+	0	0	Draft SPD supports development of the site that is well designed and enhances character of the local area. Bringing the existing building back into reuse will have a

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Cumulative Impact of draft SPD									
	Points of Guidance								Commentary
	POG1	POG2	POG3	POG4	POG5	POG6	POG7	POG8	
									positive impact.
SDO 27	+	+++	+	+++	0	++	0	+	Design guidance will ensure new building is not obstructive and protects the character of the conservation area and nearby listed buildings.
SDO 28	+	0	0/-	0	0	+	0	+	Overall positive impact, though this could be improved by providing better guidance on what level of on site retention of water run off should be provided.
SDO 29	0	+	-	-	0	+++	0	+	While development is likely to result in loss of trees, draft SPD seeks replacement provision.
SDO 30	+	++	?	++	?	+	+	+	Overall, the draft SPD should promote a positive image of Southwark as a sustainable borough.
SDO 31	0	0	?	0	0	0	0	+	The draft SPD is not likely to discriminate against marginalised groups.