

Matter 7 – Policies on Health and the Environment

Issue

Whether the Plan is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to health, the environment, heritage and tall buildings. Relevant Policies – SP6, P44-P47, P55 – P69

SP6 - Cleaner, greener, safer

7.5 Is the overall approach in Policy SP6 justified, effective and consistent with national policy?

7.6 Does the policy provide sufficient strategic guidance for other policies such as those which seek to provide new open space?

See representation on Proposed Changes

P56 - Open Space

7.18 Are the requirements for Metropolitan Open Land (MOL) and Borough Open Land (BOL) respectively justified and consistent with the Framework?

7.19 Is criterion 3 sufficiently clear in respect of what is meant by a building being no larger than the building it replaces? How will this be defined and/or calculated?

7.20 Are the proposed allocations/ designations of additional areas of MOL/ BOL or Other Open Space (OOS) set out within strategic policies? What are their boundaries?

7.21 How will the amount of new areas of open space to be provided from developments be calculated? Where is this information contained and what does it say?

7.22 Are any main modifications to Policy P56 necessary for soundness?

See representations on Proposed Changes and Submission version

P57 - Open Water Space

7.23 Is the policy justified, effective and consistent with national policy? What is the evidence in respect of houseboats? What does it indicate?

See representations on Proposed Changes and Submission version

P58 - Green Infrastructure

7.24 Are the requirements for maintenance funding contributions sufficiently clear and are they justified and viable?

7.25 Over what period are Planning Obligations expected to provide for management and maintenance costs and is this justified?

7.26 Is the definition of large-scale major developments sufficiently clear and is it justified?

See representation on Proposed Changes

P59 – Biodiversity

7.27 Is the policy consistent with paragraph 174 of the Framework in respect of identifying ecological networks and the hierarchy of international, national and locally designated sites of importance for biodiversity?

7.28 Is the requirement in P59(2) that any shortfall in biodiversity net gains must be secured through planning obligations or contributions justified? How will the amount be calculated? Would it be viable?

See representations on Proposed Changes and Submission version

Southwark's new Nature Action Plan 2020 should be added to the examination library.

P60 – Trees

7.29 Is the policy justified, effective and consistent with national policy?

See representation on Proposed Changes

Southwark's Tree Management Strategy 2019 should be added to the examination library.

P61 - Reducing Waste

7.30 Is the policy justified, effective and consistent with national policy?

P62 - Land for waste management

7.31 Is the policy justified, effective and consistent with national policy?

7.32 Is the site for the IWF required? Is there a reasonable prospect of the use coming forward within the plan period?

See representation on Proposed Changes.

To make the Plan sound, there needs to be consistency with London Plan Policy SI 7. Major applications should promote circular economy outcomes with the aim to be net zero waste. A Circular Economy Statement should be submitted at pre-application stage to set out how the development will retain and reuse materials, what constitutes minimal residual waste and how these can be monitored.

Southwark Council has announced it intends to do this, but it should be brought to this EiP, as until this policy is adopted it cannot apply to qualifying developments in Southwark. Mayor of London recent guidance on circular economy statements should be added to the examination library.

Facilities and sites for waste management need to be suitable and sustainable, balanced against community needs on amenity and environmental protection.

P64 - Improving Air Quality (P66)

7.34 Is the policy justified, effective and consistent with national policy?

7.35 Are the requirements justified and in accordance with Regulation 122 of the CIL Regulations (as amended)?

7.36 Is the requirement for developer contributions in P64(2) justified and how will it be calculated? Would it be viable?

7.37 Can the Council clarify whether the Air Quality Evidence Base Report referred to in response to representation NSPPSV238.6 is the AQSAP (2017) or a different document?

See representations on Proposed Changes and Submission version

P68 - Sustainability Standards

7.45 Is the policy overall justified, effective and consistent with national policy?

7.46 Taking each of the requirements in turn, are they justified, viable and supported by evidence?

See representation on Proposed Changes

P69 – Energy

7.47 What is the evidence to support the Council's approach to energy? What does it say?

7.48 Are the requirements in P69(2) for the proposed reductions in CO2 beyond the Building Regulations justified, consistent with national policy and the London Plan? Are they viable?

See representation on Proposed Changes.

To make the Plan sound, changes are required in accordance with New London Plan policy. These must include,

- whole life cycle carbon assessments at each stage of the application process
- a requirement on major developments to have a detailed energy strategy and to link heat networks with estates where there is high fuel poverty
- the use of “be seen” monitoring guidance to monitor the actual energy performance of consented buildings

Southwark Council has announced that it has prepared main modifications on the above, and will bring these forward for consultation after the examination hearings have closed. We can see no merit in this delay. Until the policy is adopted as part of the NSP it cannot apply to qualifying developments in Southwark. Mayor of London recent guidance on Be seen monitoring and whole life carbon assessments should be added to the examination library.

