

Representation	Officer Response
<p data-bbox="188 317 517 344">SP6 Cleaner, Greener, Safer</p> <p data-bbox="188 357 394 421">Steve Lancashire NSPPSV172.8</p> <ul data-bbox="237 469 1120 858" style="list-style-type: none"> • There is insufficient recognition in the Plan to the Climate Emergency and the work currently being done in the Council in relation to this. Specific recommendations from this work should be incorporated in the Plan in order to strengthen it. This is a central issue and links many elements of the Plan. • There are questions on housing and design and town centre employment opportunities which need specifically addressing in policy statements in this section. • Open space provision is in need of urgent review and the guidelines strengthened. The plans along the Old Kent Road indicate very limited open space provision relative to the number of homes 	<p data-bbox="1144 469 2047 533">Noted. Point one, the reasons of SP6 set out that the council has declared a Climate Emergency.</p> <p data-bbox="1144 576 2018 746">The New London Plan and the Climate Change Act as legislated by the UK government set out a target to meet net carbon zero by 2050. As demonstrated in the Energy Background Paper (2020), the policies in the NSP are designed to meet this target to align with national and regional planning policy and planning policy guidance, and law.</p> <p data-bbox="1144 790 2063 927">As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. This policy will be reviewed in the context of this target which is only based on a council declaration. This is set out in the Environmental Committee Scrutiny Report November 2020.</p> <p data-bbox="1144 970 2063 1141">Point two, as set out under policies in SP2 design of new development should meet BREEAM excellent standard and reduce carbon emissions onsite in order to try and aim for net carbon zero development. Policy SP1, SP2 and SP4 set out specific details for sustainable housing, design and town centre employment opportunities.</p> <p data-bbox="1144 1184 2063 1355">Point three, the OKR AAP proposes a masterplan that is still draft and undergoing iterations. It proposed new open spaces to address the issue of open space deficiency in the Old Kent Road Opportunity Area (OKR AAP). There will be another opportunity for local residents to comment on the OKR AAP.</p>

Susan Crisp
NSPPSV456.2

The policy is not effective

The policy does not adequately cover green corridors for nature and wildlife. Poin3 should be amended to include this.

3. Protecting and improving our network of open spaces, waterways, trees and biodiverse habitats and green corridors that make places open and attractive and provide important sport, leisure, (add new wording: wildlife,) and food growing opportunities;

There is policy support in the NPPF and in local policies for nature corridors and stepping stones but there is not a local plan therefore policy guidance is needed in the NSP. They are complimentary to and support cycling and walking and can be developed in an integrated way.

Noted. P56 Biodiversity sets out more specifically how to preserve and enhance habitat for nature and wildlife. The protection of open spaces, waterways, trees and biodiversity is set out in development management polices under SP6. Walking and cycling and the connection to urban greening and open space are interrelated to the Movement Plan (2019). The Movement Plan interrelates with the designation of open spaces as it requires active travel that is based on green, peaceful and calm places.

SE5 Forum
NSPPSV465.5

Not effective

SP6.5 says

Working with local people to deliver the very best so that the borough is clean, green and safe.

Apart from the Cleaner greener grants scheme we do not see an effective method for the Council to work with local people to deliver this objective We would like to see a commitment to implement the many proposals by community groups, and an effective mechanism to work with local groups on projects that they have suggested such as:

Green walks linking Camberwell Green and Burgess Park, Brunswick Park, Noticeboards on the Green and paving stones showing the green walks and

Noted. The Statement of Community Involvement (SCI) sets out how we will consult with local residents in plan-making and development management, and this includes working with local people to ensure the borough is clean, green and safe. The council has declared a Climate Emergency and public consultation is an integral a part of this, consultation on the Corporate Climate Strategy is underway and local residents are encouraged to have their say on how we can make the borough cleaner, greener and safer. There is an opportunity here for local residents and community groups to engage as well.

The Camberwell Area Plan is another opportunity to engage with the council

<p>black history walk developed by the local community so that they can be accessed by all</p> <p>Distinctive Buildings -using the widely consulted identity and branding work carried out by the local community and incorporating the logos and palette in buildings and streetscape</p>	<p>to address the Climate Emergency and create a cleaner, greener and safer Camberwell.</p>
<p>SE5 Forum NSPPSV465.6</p> <p>Test of soundness. Not effective</p> <p>SP6 states that the Council will lead the way in tackling the climate emergency. Reason 4 states that Southwark residents are among the 20% most deprived in relation to air quality.</p> <p>The policies proposed are not sound because they will not be effective to deal with the poor air quality in the centre of Camberwell which is linked to traffic the legal EU limit for nitrogen dioxide is 40 micrograms per cubic metre(mg/m3). The level recorded in May 2018 outside McDonald’s restaurant in Camberwell was 84.3 micrograms per cubic metre, according to pollution monitors installed by Southwark Green Party. The plan does identify this issue in the area vision nor set out how this problem will be tackled</p> <p>Traffic pollution. There are options that Southwark could consider reducing pollution in the centre of Camberwell. Two below have been suggested in consultation by SE5 Forum on the revised strategic plan</p> <p>1.The A202 which goes through Camberwell is the main artery from Dover to the West End and used by HGVs. We would look for evidence that Southwark and TfL are enforcing restrictions on large HGV’s effectively through using cameras and new technology such as the scheme adopted by Islington Council. As well as avoiding this polluting problem by opening distribution centres outside London, encouraging the use of water and rail.</p> <p>2. Pollution from the traffic passing through Camberwell (on arterial routes</p>	<p>Noted. The issue of air quality is addressed in Policy P64 Improving Air Quality. This sets out that development must not exceed ait quality neutral standards.</p> <p>As a Council, tackling air quality is a key priority. The Council is monitoring Nitrogen dioxide, ozone and particles at two continuous air quality monitoring stations and nitrogen dioxide monitoring stations in several other locations in the borough to better understand air quality, how it is changing and what we can do to improve and mitigate against it.</p> <p>Southwark School Superzones is an emerging initiative that will reduce air quality around schools across the borough in the designated School Superzones. These will have benefits for local residents in these areas too.</p> <p>Southwark’s Air Quality Strategy and Action Plan (2017) sets out a number of work streams to combat air quality and address the health and equalities impacts associated with poor atmospheric pollution.</p>

north/south and east/west) could for example be mitigated somewhat by introducing carbon capturing features. Examples would be planting a Green solutions city tree outside the Tiger pub and on Camberwell Green, or Living Wall at Elephant and Castle (could be installed above card corner on the Green and planted with plants in the Camberwell colours and reflecting our C logo)
Please refer to 41.SE5 Forum in consultation responses folder

Sarah Vaughan
NSPPSV503.4

Document: NSP EIP 27A Policy: SP6 Cleaner Greener Safer
Not positively prepared, justified, effective
SP6 states that “The council has declared a climate emergency with the ambition to be carbon neutral by 2030”. This means the urgency of addressing climate change and the ecological emergency must be central to the NSP and incorporate recommendations from the council’s own Climate Emergency Strategy.
Carbon neutrality cannot be achieved without addressing embodied carbon and emissions created by the construction industry which currently make up 39% of carbon emissions.
In order to achieve carbon neutrality, as many existing healthy trees, hedges and green spaces must be preserved as possible e.g. the default position should be to retain mature trees in new developments and infrastructure upgrades with removal only considered as a last resort. Development should accommodate trees and green infrastructure and not the other way round. Tree canopy can only increase by building on existing cover: if a 100 year-old street tree is removed, a 6 year old sapling cannot replace it or any number of so-called “replacement” trees or mitigation planting
Further protection other than Tree Preservation Orders is necessary e.g. there are very few TPOs in the north of the borough but some of the lowest tree canopy. Additional criteria need to be applied such as mitigation against the effects of climate change and the importance of trees in preserving and

Noted. The New London Plan and the Climate Change Act as legislated by the UK government set out a target to meet net carbon zero by 2050. As demonstrated in the Energy Background Paper (2020), the policies in the NSP are designed to meet this target to align with national and regional planning policy and planning policy guidance, and law. As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. This policy will be reviewed in the context of this target which is only based on a Council declaration. This is set out in the Environmental Committee Scrutiny Report November 2020. An updated Energy Background Paper will be produced to set out how the NSP will meet this target.

The protection of trees is further considered in policy P60 Trees.

increasing biodiversity. Protection should be applied to all trees equally regardless of ownership - council as well as private. Building or paving over green spaces – even small areas – and the removal of healthy trees should be avoided to preserve recreational space, biodiversity and reduce flooding. To be effective green corridors, stepping stones and parklets must include trees, hedges and shrubs. Sustainable drainage including the redirection of rain water and grey water to tree-pits, swales and rain gardens must be incorporated in new development and in retrofits. In light of the climate emergency declaration and in the interests of biodiversity, all maintenance, planting and other contracts should be reviewed to see if they are still fit for purpose. Excessive mowing, hedge cutting, inattention to wildlife and outdated and inflexible regimes will scupper the council’s plans to achieve carbon neutrality and increase biodiversity unless dealt with early on. The involvement and training of volunteers and community groups is key in providing a free, skilled, green workforce to work alongside council officers, employees and contractors.

Organisation: Old Bermondsey Neighbourhood Forum
NSPPSV132.5

Document: NSP EIP 27A Policy SP6 Cleaner Greener Safer
Not positively prepared, justified, effective
Policy SP6 says “We will lead the way in ...addressing the Climate Emergency.” The foreword to the NSP says “we are also committing to developing a specific supplementary planning document focussed on the climate emergency”.
Not positively prepared
Making an add-on SPD to follow an ‘agreed’ NSP is not a positive approach to preparation of a spatial plan that will be central to achieving the Climate Emergency Strategy. Positive preparation would involve considering the carbon emission and behaviour change targets that need to be met,

Noted. The New London Plan and the Climate Change Act as legislated by the UK government set out a target to meet net carbon zero by 2050. As demonstrated in the Energy Background Paper (2020), the policies in the NSP are designed to meet this target to align with national and regional planning policy and planning policy guidance, and law. As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. This policy will be reviewed in the context of this target which is only based on a Council declaration. This is set out in the Environmental Committee Scrutiny Report November 2020. An updated Energy Background Paper will be produced to set out how the NSP will meet this target.

(consulting on them) and considering the alternatives for achieving them. There is no cross reference to the Council's draft Climate Emergency Strategy which whilst still in its early stages has the potential for real positive change. Not justified or legally compliant, effective or positively prepared.

The NSP and SP6 in particular is not justified because the submitted evidence does not include (sufficient or robust) studies on the climate emergency and its implications and there has been a lack of (proportionate) consultation on these issues. The draft Climate Emergency Strategy is clear about the need for policy changes to be included in the New Southwark Plan, however, the Council has only made minor changes to NSP policies and has not stated clearly how these amendments are contributing to the Climate Emergency Strategy - in this way (as above) it lacks internal consistency.

Proposed policy changes / areas for discussion

The Forum support the stated aim of the policy to 'lead the way in ...addressing the Climate Emergency' and would support the Council in developing and bringing forward amendments to align the NSP with the draft Climate Emergency Strategy, specifically on:

- Including emissions and embodied carbon from construction in net zero targets on developments, driving demand for a circular economy and assessing new development on life cycle costs.
- Requiring developers to consider options for reusing or repurposing existing buildings before applying for permission for demolition and new build as part of the site assessment, integrated into current usage, and an assessment of existing social and economic value with genuine community engagement - the Forum have good evidence to support discussion of this if needed.
- Taking a proactive approach to reducing fuel poverty by mapping "fuel poor" areas in the borough and requiring that energy companies meet their obligations, alongside a plan led approach for local power schemes.
- Creating traffic free zones and pedestrianised areas through thorough consultation with residents and businesses, delivering the 15 minute city objectives, low traffic neighbourhoods, school superzones. There is a very delicate balance here with the local economy in terms of deliveries etc and we have appropriate local evidence to support discussion of this if needed /

The draft Corporate Climate Strategy is still in the process of being developed and going through consultation. The details as set out in this strategy once adopted will be reflected in the NSP policy. The strategy itself follows the declaration of a Climate Emergency as set out in SP6.

useful.

- Increasing the number and quality of trees in the borough, protecting existing trees, increasing biodiversity, increasing green corridors across the borough for cycling, walking and wildlife. Again the Forum would be happy to expand on this using various local examples and with reference to the relevant supporting policies and their evidence bases.

Paula Orr
NSPPSV136.2

SP6 Cleaner, greener, safer

Not positively prepared, not justified, not effective

Policy SP6 states: “We will lead the way in providing spaces for people to connect with nature, making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste, and addressing the Climate Emergency.”

Southwark Council declared a Climate Emergency in May 2019. The council has consulted on the strategy, has a stakeholder group and has held a conference to help inform the strategy development.

<http://modern.gov.southwarksites.com/documents/s89801/Report%20Climate%20Strategy%20report.pdf>

This policy does not show leadership in addressing the Climate Emergency.

The Council has not provided information about how the New Southwark Plan will address the Climate Emergency. The Foreword to the NSP says that: “We have included a number of policy additions to assist us in achieving this target, however we are also committing to developing a specific supplementary planning document focussed on the climate emergency in line with the findings from Southwark’s Climate Summit.” Developing a supplementary planning document in the future is an inadequate response to a situation recognised as an emergency.

Policy objection

I do not consider this policy sound because it is not positively prepared.

Noted. The New London Plan and the Climate Change Act as legislated by the UK government set out a target to meet net carbon zero by 2050. As demonstrated in the Energy Background Paper (2020), the policies in the NSP are designed to meet this target to align with national and regional planning policy and planning policy guidance, and law. As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. This policy will be reviewed in the context of this target which is only based on a Council declaration. This is set out in the Environmental Committee Scrutiny Report November 2020. An updated Energy Background Paper will be produced to set out how the NSP will meet this target.

The draft Corporate Climate Strategy is still in the process of being developed and going through consultation. The details as set out in this strategy once adopted will be reflected in the NSP policy. The strategy itself follows the declaration of a Climate Emergency as set out in SP6.

Support noted for our declaration of the Climate Emergency.

Producing a supplementary planning document as an add-on after the NSP has been agreed is not a positive approach to creating a spatial plan to deliver the Climate Emergency Strategy. Positive preparation would require setting out the carbon emission and behaviour change targets that need to be met and weighing up the alternatives for achieving them.

I do not consider this policy sound because it is not justified. There is no evidence in the documents submitted to the Inspectors of any studies on the climate emergency and its implications for the NSP, e.g. looking at what has been done to reduce carbon emissions within the borough so far, the main gaps and challenges to be addressed and on the alternatives for action. There is no cross reference to the Council's draft Climate Emergency Strategy (Tackling the Climate Emergency Together, July 2020).

I do not consider this policy sound because it is not effective. The draft Climate Emergency Strategy is clear about the need for policy changes to be included in the New Southwark Plan. It states: "[For the Climate Emergency Strategy] to be implementable, changes would be required to the New Southwark Plan to do this. This strategy sets out ideas that should be considered to make policy amendments." (p41) However, the Council has only made minor changes to NSP policies and has not stated clearly how these amendments are contributing to the Climate Emergency Strategy.

Policy support

I support the stated aim of the policy to 'lead the way in ...addressing the Climate Emergency'.

I would support the Council in developing and bringing forward amendments designed to align the NSP with the draft Climate Emergency Strategy, specifically on:

- - Including emissions and embodied carbon from construction in net zero targets on developments, driving demand for a circular economy and assessing new development on life cycle costs. We note that Wales, Scotland and EU are developing circular economy strategy
- - Requiring developers to consider options for reusing or repurposing

<p>existing buildings before applying for permission for demolition and new build as part of the site assessment, integrated into current usage, and an assessment of existing social and economic value with community engagement as outlined in the Development Charter</p> <ul style="list-style-type: none"> · - Taking a proactive approach to reducing fuel poverty by mapping “fuel poor” areas in the borough and requiring that energy companies meet their obligations, alongside a plan led approach for local power schemes · - Creating traffic free zones and pedestrianised areas, delivering the 15 minute city objectives, low traffic neighbourhood, school superzones · - Increasing the number and quality of trees in the borough, and protecting existing trees, increasing biodiversity · - Increasing green corridors across the borough for cycling, walking and wildlife 	
<p>Corinne Turner NSPPSV40.3</p> <p>SP6: Cleaner, greener, safer I do not consider this policy to be sound because there is no provision to give: ☑ adequate recognition and protection of existing and historic public footpaths and public rights of way in the Borough when envisioning and mapping regeneration and redevelopment schemes</p>	<p>Noted. Further consideration to the protection of existing and historic public footpaths is set out in SP2.</p>
<p>Corinne Turner NSPPSV40.4</p> <p>SP6: Cleaner, greener, safer and P59 Biodiversity I do not consider these policies to be sound because: ☑ they are not robust enough to withstand the continued loss across the Borough of biodiversity, green space and natural habitats resulting from redevelopment</p>	<p>Noted. SP6 is the overarching strategic policy and policy P59 Biodiversity sets out more specific requirements to ensure that development contributes to net gains in biodiversity.</p>
<p>Corinne Turner</p>	

NSPPSV40.6

SP6: Cleaner, greener, safer and P60 Trees

I do not consider these policies to be sound because:

☒ they are not robust enough to withstand the continued loss across the Borough of mature trees, trees and tree canopies with TPO's, large specimen trees and canopies with high amenity value, trees and canopies within conservation areas and other trees, often resulting from regeneration and redevelopment plans

☒ there is inadequate protection of trees as described above - including street trees, trees located on council property whether public park land or council estate amenity space, inside or near to the boundaries of redevelopment sites, which are cleared in preparation of the demolition and redevelopment of those sites

Noted. Policy P60 Trees sets out that trees should be planted in new development as part of landscaping and public realm schemes, and development must retail and enhance the boroughs tree's and canopy cover.

Organisation: Southwark Planning Network (SPN) Climate Emergency

Working Group

NSPPSV501.1

Policy: SP6 Cleaner, greener, safer

Not positively prepared, justified, effective

Policy SP6 states: "We will lead the way in providing spaces for people to connect with nature, making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste, and addressing the Climate Emergency."

Southwark Council declared a Climate Emergency in May 2019. The council have consulted on the strategy, have a stakeholder group and have held a conference to help inform the strategy development.

<http://modern.gov.southwarksites.com/documents/s89801/Report%20Climate%20Strategy%20report.pdf>

This policy does not show leadership in addressing the Climate Emergency.

The Council has not provided information about how the New Southwark Plan will address the Climate Emergency. The Foreword to the NSP says that:

"We have included a number of policy additions to assist us in achieving this

Noted. The New London Plan and the Climate Change Act as legislated by the UK government set out a target to meet net carbon zero by 2050. As demonstrated in the Energy Background Paper (2020), the policies in the NSP are designed to meet this target to align with national and regional planning policy and planning policy guidance, and law. As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. This policy will be reviewed in the context of this target which is only based on a Council declaration. This is set out in the Environmental Committee Scrutiny Report November 2020. An updated Energy Background Paper will be produced to set out how the NSP will meet this target.

The draft Corporate Climate Strategy is still in the process of being developed and going through consultation. The details as set out in this strategy once adopted will be reflected in the NSP policy. The strategy itself

target, however we are also committing to developing a specific supplementary planning document focussed on the climate emergency in line with the findings from Southwark's Climate Summit."

We do not consider this policy sound because it is not positively prepared. Producing a supplementary planning document as an add-on after the NSP has been agreed is not a positive approach to preparation of a spatial plan that will be central to achieving the Climate Emergency Strategy. Positive preparation would involve considering the carbon emission and behaviour change targets that need to be met and considering the alternatives for achieving them.

We do not consider this policy sound because it is not justified. There is no evidence in the documents submitted to the Inspectors of any studies on the climate emergency and its implications for the NSP, e.g. looking at what has been done to reduce carbon emissions within the borough so far, the main gaps and challenges to be addressed and on the alternatives for action. There is no cross reference to the Council's draft Climate Emergency Strategy (Tackling the Climate Emergency Together, July 2020).

We do not consider this policy sound because it is not effective. The draft Climate Emergency Strategy is clear about the need for policy changes to be included in the New Southwark Plan. It states: "[For the Climate Emergency Strategy] to be implementable, changes would be required to the New Southwark Plan to do this. This strategy sets out ideas that should be considered to make policy amendments." (p41) However, the Council has only made minor changes to NSP policies and has not stated clearly how these amendments are contributing to the Climate Emergency Strategy.

We support the stated aim of the policy to 'lead the way in ...addressing the Climate Emergency'.

We would support the Council in developing and bringing forward amendments designed to align the NSP with the draft Climate Emergency Strategy, specifically on:

- Including emissions and embodied carbon from construction in net zero

follows the declaration of a Climate Emergency as set out in SP6.

Support noted for our declaration of the Climate Emergency.

targets on developments, driving demand for a circular economy and assessing new development on life cycle costs. We note that Wales, Scotland and EU are developing circular economy strategy

- Requiring developers to consider options for reusing or repurposing existing buildings before applying for permission for demolition and new build as part of the site assessment, integrated into current usage, and an assessment of existing social and economic value with community engagement as outlined in the Development Charter
- Taking a proactive approach to reducing fuel poverty by mapping “fuel poor” areas in the borough and requiring that energy companies meet their obligations, alongside a plan led approach for local power schemes
- Creating traffic free zones and pedestrianised areas, delivering the 15 minute city objectives, low traffic neighbourhood, school superzones
- Increasing the number and quality of trees in the borough, and protecting existing trees, increasing biodiversity
- Increasing green corridors across the borough for cycling, walking and wildlife

Celia Cronin
NSPPSV32.3

EIP 27B SP6 Cleaner Greener Safer

The Plan is not sound as this policy has not been positively prepared or justified.

Following last year’s claim by Southwark Council that we were in a state of Climate Emergency, there was a further aspiration for the borough to become carbon neutral by 2030. In the council’s draft carbon reduction strategy document, ‘Tackling the Climate Emergency Together’, we are told ‘The strategy should be clear in its targets’. (p8) However this policy and various others in this version of the Plan read as if phrases about tackling the climate emergency have been added for the sake of adding them. There is nothing specific and no targets.

Noted. The New London Plan and the Climate Change Act as legislated by the UK government set out a target to meet net carbon zero by 2050. As demonstrated in the Energy Background Paper (2020), the policies in the NSP are designed to meet this target to align with national and regional planning policy and planning policy guidance, and law. As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. This policy will be reviewed in the context of this target which is only based on a Council declaration. This is set out in the Environmental Committee Scrutiny Report November 2020. An updated Energy Background Paper will be produced to set out how the NSP will meet this target.

On p 40 of the draft carbon reduction document, it is claimed 'Re-using or retrofitting existing buildings is the most efficient way to reduce carbon.' Yet the Site Allocations in this New Southwark Plan version present us with dozens and dozens of buildings to be demolished.

And again on p 41 we are told the council is planning to 'Make Policy amendments to the New Southwark Plan to ensure it fully reflects the impact of the climate emergency....'

I look forward to reading these amendments but they do not appear to be in this version.

Abby Taubin
NSPPSV218

I do not consider this policy sound because it is not effective. The draft Climate Emergency Strategy is clear about the need for policy changes to be included in the New Southwark Plan. It states: "[For the Climate Emergency Strategy] to be implementable, changes would be required to the New Southwark Plan to do this. This strategy sets out ideas that should be considered to make policy amendments." (p41) However, the Council has only made minor changes to NSP policies and has not stated clearly how these amendments are contributing to the Climate Emergency Strategy.

Policy support

I support the stated aim of the policy to 'lead the way in ...addressing the Climate Emergency'.

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Support noted for our declaration of the Climate Emergency.

- Requiring developers to consider options for reusing or repurposing existing buildings before applying for permission for demolition and new build as part of the site assessment, integrated into current usage, and an assessment of existing social and economic value with community engagement as outlined in the Development Charter
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Sarah Vaughan
NSPPSV503.4

Document: NSP EIP 27A Policy: SP6 Cleaner Greener Safer
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Carbon neutrality cannot be achieved without addressing embodied carbon and emissions created by the construction industry which currently make up 39% of carbon emissions.
In order to achieve carbon neutrality, as many existing healthy trees, hedges and green spaces must be preserved as possible e.g. the default position should be to retain mature trees in new developments and infrastructure

Noted. The New London Plan and the Climate Change Act as legislated by the UK government set out a target to meet net carbon zero by 2050. As demonstrated in the Energy Background Paper (2020), the policies in the NSP are designed to meet this target to align with national and regional planning policy and planning policy guidance, and law. As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. This policy will be reviewed in the context of this target which is only based on a Council declaration. This is set out in the Environmental Committee Scrutiny Report November 2020. An updated Energy Background Paper will be produced to set out how the NSP will meet this target.

Policy P60 Trees sets out the protection of trees, and encourages their strategic planting to support greening in new development and our evidence

upgrades with removal only considered as a last resort. Development should accommodate trees and green infrastructure and not the other way round. Tree canopy can only increase by building on existing cover: if a 100 year-old street tree is removed, a 6 year old sapling cannot replace it or any number of so-called “replacement” trees or mitigation planting

Further protection other than Tree Preservation Orders is necessary e.g. there are very few TPOs in the north of the borough but some of the lowest tree canopy. Additional criteria need to be applied such as mitigation against the effects of climate change and the importance of trees in preserving and increasing biodiversity. Protection should be applied to all trees equally regardless of ownership - council as well as private. Building or paving over green spaces – even small areas – and the removal of healthy trees should be avoided to preserve recreational space, biodiversity and reduce flooding. To be effective green corridors, stepping stones and parklets must include trees, hedges and shrubs.

Sustainable drainage including the redirection of rain water and grey water to tree-pits, swales and rain gardens must be incorporated in new development and in retrofits.

In light of the climate emergency declaration and in the interests of biodiversity, all maintenance, planting and other contracts should be reviewed to see if they are still fit for purpose. Excessive mowing, hedge cutting, inattention to wildlife and outdated and inflexible regimes will scupper the council’s plans to achieve carbon neutrality and increase biodiversity unless dealt with early on.

The involvement and training of volunteers and community groups is key in providing a free, skilled, green workforce to work alongside council officers, employees and contractors.

base and Southwark’s Tree Management Strategy (2013) and Southwark’s Biodiversity Action Plan (2013) recognises the value of trees for mitigating against and adapting to climate change.

Jenny Morgan
NSPPSV510.4

Do you consider this policy is sound? - why not sound - Effective

This policy does not adequately cover green corridors for nature and wildlife.

Noted. Green corridors and nature and wildlife stepping zones are examples of green infrastructure that development may utilise to deliver green infrastructure. Nature and wildlife are further considered in P59:

Point 3 should be amended to include this:

3. Protecting and improving our network of open spaces, waterways, trees and biodiverse habitats and green corridors that provide connectivity between parks and green stepping stones for wildlife including reptiles, amphibians and small mammals such as hedgehogs.

There is policy support in the NPPF and in local policies for nature corridors and stepping stones, but there is not a local plan, therefore policy guidance is needed in the NSP. They are complimentary to and support cycling and walking and can be developed in an integrated way.

Biodiversity.

Southwark's Open Space Strategy 2013 details a strategy for ongoing management and enhancement of open spaces. This has informed this policy. Walking and cycling and the connection to urban greening and open space are interrelated to the Movement Plan (2019). The Movement Plan interrelates with the designation of open spaces as it requires active travel that is based on green, peaceful and calm places.

Representation	Officer Response
<p data-bbox="188 209 506 236">P55 Protection of Amenity</p> <p data-bbox="188 248 353 312">Abby Taubin NSPPSV218.3</p> <p data-bbox="188 357 1111 432">Development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users</p> <p data-bbox="188 475 1048 550">This is too vague. Tall Buildings pose safety risks and reduce living standards</p> <p data-bbox="188 593 1093 802">there is a large body of research suggesting that under some circumstances, some demographics do report higher mortality rates living on higher versus lower floors. A survey of recent studies reveals that the risks can run the gamut from slower emergency response times to social isolation and depression.</p>	<p data-bbox="1140 357 2063 384">Noted. The impact of tall buildings is further considered in P14: Tall Buildings.</p>

Representation	Officer Response
<p data-bbox="188 320 387 347">P56 Open Space</p> <p data-bbox="188 360 846 421">Organisation: Old Bermondsey Neighbourhood Forum NSPPSV132.25</p> <p data-bbox="188 467 1137 1289">Document EIP 27A Policy: P56 Open Space, P58 Green Infrastructure, P59 Biodiversity and P60 Trees. Not legally compliant, Not positively prepared or justified. P56 Open space allows for development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS) in exceptional circumstances which is not supported - there is no evidence that this takes proper account of equalities in terms of the value of open space for different groups of people and undermines strategic aspirations in the plan in SP2, SP3, SP5, SP6 as well as emergency climate emergency issues. The additional wording to P58 "Extend and upgrade the walking and cycling networks between spaces to promote a sense of place and ownership for all." is supported however this policy is still too vague lacking definitions about for example types, sizes of green infrastructure and there is no evidence of this being considered strategically as a linked / networked provision. The additional wording to P59 " Protecting and avoiding damage to" is supported however the following is not " Any shortfall in net gains in biodiversity must be secured off site through planning obligations or as a financial contribution ." and there should be clarity as to whether an alternative (the inverse) has been considered given the new pandemic situation and the emergent climate emergency policy context. Similarly trees need much greater protection and monitoring - there are many examples of poor maintenance and needless damage and removals and the policy should take into account the wider ecological value of mature settings and canopy covers.</p>	<p data-bbox="1164 467 2040 596">Noted. Green spaces are protected as described in P56. Southwark Open Space Strategy (2013) sets out the evidence of Southwark's clear strategy to maintain and improve the provision of open space and green infrastructure.</p> <p data-bbox="1164 639 2063 769">Policy P56 sets out that these circumstances where development may be permitted on OOS are exceptional. If development of this kind is permitted, the OOS must be replaced with an equivalent or greater size or substantially better quality OOS.</p> <p data-bbox="1164 813 2063 986">With regard to BOL and MOL, development on this sites in exceptional circumstances may be permitted if the extent, massing and scale is the same as the existing building or if it consists of ancillary facilities to existing uses of the BOL and MOL. Development must not affect the quality of the open space.</p>
<p data-bbox="188 1334 353 1394">Richard Lee NSPPSV148.6</p>	

P56 Open Spaces

The change is that development can be permitted on MOL/ BOL. The evidence for this is unsound, as there is a deficiency of green space in most parts of Southwark and the Council's Climate Emergency Declaration requires an increase in green space. MOL and BOL are the largest areas of green space in the Borough and therefore highly significant for species which need continuous space in which to move around. Increasing the amount of land that is protected for nature, in accordance with the Aichi UN Declaration on Biodiversity, to which the UK is a signatory, cannot be achieved by building on those green spaces in the Borough which have the highest protection.

Noted. This policy has not changed from the Proposed Submission Version of the New Southwark Plan. Saved Southwark Plan (2007) Policy 3.25 sets out a general presumption against inappropriate development on MOL sites. Development on MOL and BOL sites will only be permitted in exceptional circumstances where ancillary facilities that positively contribute to the MOL or BOL are proposed or where existing buildings are not disproportionately extended above the original building. Any development must positively contribute to the BOL or MOL if it were to be permitted.

Jenny Morgan
NSPPSV511.3

Do you consider this policy is sound? - why not sound - Effective

The policy should be more strongly worded to prevent the loss of green spaces. MOL Borough Open Land and Other Open Spaces.

The wording of the London Plan and new London Plan make a presumption for no development. The London Plan uses the wording "The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL."

The current Southwark Plan policy did not prevent the loss of Greendales where there was considerable opposition. The wording should be strengthened.

Noted. The loss of open space is not permitted unless in exceptional circumstances as set out in P56 Open Space.

The policy should refer to maintaining the openness of MOL

. This is vital to prevent development encroaching and providing walls around the space.

The importance of MOL and the Green Belt status is covered in the Open Space background paper SP601

Anastasia Cavouras
NSPPSV493

Green spaces and treelined streets.

- It is important to consider how treelined streets will be conceived and accommodated throughout the Borough to provide safer pedestrian and cycle routes, and more attractive and inviting public realm and how these green spaces will be maintained and areas around construction sites will have dampening and key neighbourhood EIA compliance to avoid harm and inconvenience.
- How lighting will be considered and managed to avoid crimes increasing
- How permeability will be enhanced in a safe way to make pedestrian routes more attractive to those seeking to buy or rent their homes in Southwark

The cyclist bridge installed in the Albion channel needs to be reconsidered with immediate effect as it does not complement the heritage and ambiance of the local area and replace it with a bridge to mirror the others and complement the local areas to avoid harm to the local Dock heritage.

Noted. The protection of trees and use of trees in street design is further considered in P60 Trees. The issue of design is further considered in P12 Residential design. Lighting is further considered in P15 Designing out crime.

The Movement Plan (2019) sets out a strategy for active travel in the borough including walking and cycling, this aims to improve accessibility and safety of active travel to incentivise more sustainable travel modes. The Albion cycle bridge was consulted on extensively and the replacement of the bridge has upgraded the cycle route for Quietway 14 to improve safety and accessibility to this strategic cycle route.

- Where are the Black moors that were removed?
- Where will they be repositioned?
- When will the historic pebbles be replaced along the Albion channel that were removed as part of the First phase of the Notting hill housing and decathlon project to avoid a trip hazard as this area is accessed by the public?
- Will wildlife be introduced to the Bird sanctuary as we have seen a significant year on year reduction?
- The trees along the front of the decathlon site need to be replaced as the selection was not suited.

Priority: must be for sustainable developments in the context of a neighbourhood, for those that live here and for those that the community wishes to attract to ensure that the new housing strategy does not encroach on the aspirations of locals and their families who wish to rent or buy and for those who wish to join the community by purchasing homes.

It is reasonable to state that adopting just a rental strategy restricts trade and does not provide the aspirations of those living and working nearby nor does it implore diversity or community.

As history, and antidotally in context, many our homeowners many years ago attended a local consultation meeting with a rival developer who claimed that our buildings were ugly. It reasonable to state that for the majority in attendance found the comments offensive. We want to protect our homes for the duration of the term.

It is therefore reasonable that the land management of adjacent sites to be

complementary with award-winning architecture, great design, and be a neighbourhood of balance and beauty to avoid unattractive and uninviting spaces. To accommodate the people and homes that exist and for there to be a 'mirror' so that any residential buildings or businesses must be in complement and those new businesses can become part of our communities. It is the breadth of knowledge that provides a template for mixed communities to thrive as we should respect each other despite our socioeconomics and backgrounds. It is this that we wish to implore and safeguard. It is reasonable to state that we don't accept fear, intimidation, harassment, crime, or discrimination in our local communities. This doesn't implore the type of place that many of us chose to buy our properties in, live and work in.

Liam Hennessy
NSPPSV380.5

Do you consider this policy is sound? - why not sound - Justified

Do you consider this policy is sound? - why not sound - Effective

Do you consider this policy is sound? - why not sound - Positively Prepared

Burgess Park - one of Southwark's greatest assets - is being directly harmed by Southwark Council. The Council's own 10 storey building proposed at 21-23 Parkhouse Street is one of the most shameful in London - making Southwark LESS green, not Greener. The fact that the Council is encouraging several others alongside means that a significant

Noted. P56 Open Space sets out that development on MOL or BOL will not be permitted except in exceptional circumstances. The strategy for tall buildings in the borough is further considered in P14 Tall Buildings.

proportion of a Site of Importance for Nature Conservation, SINC, will suffer from major overshadowing for many months of the year. Southwark Council's harming of Burgess Park is a disgrace - greatly diminishing its greenness and its amenity value.

Southwark Council's so-called Planning Office needs to make a professional outfit, fit for purpose. Right now it is the opposite of fit for purpose - it is directly and severely harming Southwark's Public Realm and the residents of Southwark.

Abby Taubin
NSPPSV218.4

1. Development will not be permitted on Metropolitan Open Land (MOL) or Borough Open Land (BOL). In exceptional circumstances development may be permitted on MOL or BOL when:

2. Development will not be permitted on Other Open Space (OOS). In exceptional circumstances development may be permitted if it consists of replacement OOS of equivalent or greater size or substantially better quality can be secured on site or nearby before development commences.

You cannot dig up space sanitise it plant sapplings and have biodiversity. The word reflects complex organic left alone old growth. It has to be contiguous. There are hundreds of books on the subject. You cannot write a plan with "biodiversity" as a heading and tick a box and global warming goes away

Noted. The strategy to achieve net gains in biodiversity is further considered in P58 Biodiversity and Southwark's Biodiversity Action Plan (2013).

https://www.designingbuildings.co.uk/wiki/Biodiversity_in_the_urban_environment

Susan Crisp
NSPPSV456.3

The policy is unsound
The policy should be more strongly worded to prevent the loss of green spaces, MOL Borough Open Land and Other Open Spaces.

On page 15 the NSP sets out strategic targets including to: “Retain all Metropolitan Open Land, Borough Open Land and Other Open Space.”

The wording of the London Plan and new London Plan make a presumption for no development.

The London Plan, using wording which says: “The strongest protection should be given to London’s Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.”

The current Southwark Plan policy wording did not prevent the loss of Greendales where there was considerable opposition. The Burgess Business Park planning inquiry (site allocation NSP 22) identified the importance of building set back from the park edge which had a specific role in character and amenity of the park. The impact of overshadowing due to building height is a cause of opposition in Canada Water impact not only two local Nature Reserves but also two primary schools. These would be put in the shade by adjacent buildings with long term effects for wildlife and play space. The wording should be strengthened.

Overall the policy is not specific enough to protect

Noted. Development on MOL and BOL sites will only be permitted in exceptional circumstances where ancillary facilities that positively contribute to the MOL or BOL are proposed or where existing buildings are not disproportionately extended above the original building. Any development must positively contribute to the BOL or MOL if it were to be permitted, this includes preserving the openness of the MOL and development must not conflict with its MOL function.

The policy should refer to maintaining the openness of MOL. This is vital to prevent development encroaching and providing walls around the space. Retention of the land is not enough if it is surrounded by tall building. The pressure on green space in north and central Southwark is huge. Every developer want to overlook green space. Developments built too close to green space will lead to a poorer quality space, impact on wildlife, and failure to deliver on policy objectives.

The importance of MOL and the Green Belt status is covered in the Open Space background paper SP601.

John Taylor
NSPPSV519

Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - legally compliant

Yes

Do you consider this policy is sound? – sound

No

Do you consider this policy is sound? - why not sound – Effective

Effective

Do you consider this policy is sound? - why not sound - Positively Prepared

Positively Prepared

The policy has a major omission.

In paragraph 1 add a 4th point to read:

3 “Development on the boundary of any of these spaces will only be permitted

Other policies in the Plan, in particular Policy P12 design of places, P14 residential design and Policy P16 tall buildings, require the consideration the site context, including the surrounding area, the height, scale and massing of proposed development which need to be considered in the design of any development coming forward on the boundary of open space. Policy P12 requires development to respond positively to the existing townscape, character and context.

if it is of a height and massing that respects their character. In the case of woodland this means not impairing the quality of enclosure.”

My reason: Developments that loom over or intrude on these spaces detract from the benefits of being within nature.

Representation	Officer Response
<p data-bbox="188 320 465 347">P57 Open Water Space</p> <p data-bbox="188 360 353 424">Richard Lee NSPPSV148.7</p> <p data-bbox="188 469 1106 603">P57 Water Space The new text “berths, residential, commercial and visitor moorings” requires evidence and policy on houseboat dwellers. This is covered in my comments on Policy 11.</p>	<p data-bbox="1140 469 2051 568">Noted. The need of berth holders is currently being considered through the preparation of a Boat Dweller Assessment. These representations have been further addressed in our P11 response.</p>
<p data-bbox="188 651 353 715">Abby Taubin NSPPSV218.5</p> <p data-bbox="188 759 1070 1107">Development within designated Open Water Space will only be permitted when it consists of ancillary facilities that positively contribute to the setting, accessibility and quality of the open space and they do not affect its openness or detract from its character. Development within designated Open Water Space will only be permitted when it consists of ancillary facilities that positively contribute to the setting, accessibility and quality of the open space and they do not affect its openness or detract from its character.</p> <p data-bbox="188 1145 1106 1222">Same as above. There has to be density of growth and wild contiguous places on water banks. Yes you can have this in a city. Children need it.</p>	<p data-bbox="1140 718 2051 817">Noted. P57 aims to only permit development within designated Open Water Space if it is an ancillary facility that positively contributes to the setting, accessibility and quality of open space.</p>

Representation	Officer Response
<p data-bbox="185 316 488 343">P58 Green Infrastructure</p> <p data-bbox="185 355 353 419">Susan Crisp NSPPSV456.4</p> <p data-bbox="185 464 1108 675">The policy is not effective The policy does not adequately recognise the importance of green corridors and nature and wildlife stepping stones. It could be included in Point 4 of the policy to: “Extend and upgrade the (add new wording: nature corridors,) walking and cycling networks between spaces to promote a sense of place and ownership for all.”</p> <p data-bbox="185 715 1115 853">The Southwark Open Spaces Strategy 2013 (Evidence base SP602) references green routes and the biodiversity benefits but this is not developed into more detailed plans. The Southwark Nature Action Plan 2020 also references strategic habitat conservation routes.</p> <p data-bbox="185 893 1097 1104">Without a detailed local plan for wildlife corridors and stepping stones need to be referenced in the green infrastructure policy. The Open Spaces Background Paper SP601 sets out a number of suggestions for nature corridors and stepping stones, joining up major green spaces. For example linking Burgess Park/Surrey canal Walk along Rye Lane to Peckham Rye. The proposals need to be linked through to Area Visions and site allocations.</p>	<p data-bbox="1142 491 2056 630">Noted. Green corridors and nature and wildlife stepping zones are examples of green infrastructure that development may utilise to deliver green infrastructure. Nature and wildlife are further considered in P59: Biodiversity.</p> <p data-bbox="1142 670 2065 842">Southwark’s Open Space Strategy 2013 details a strategy for ongoing management and enhancement of open spaces. This has informed this policy, and a number of new developments that are proposing increased and better quality open space including the Canada Water masterplan and emerging Old Kent Road masterplan in the Old Kent Road Area Action Plan.</p>
<p data-bbox="185 1150 676 1214">Old Bermondsey Neighbourhood Forum NSPPSV132.6</p> <p data-bbox="185 1257 1064 1326">Document EIP 27A Policy: P56 Open Space, P58 Green Infrastructure, P59 Biodiversity and P60 Trees.</p> <p data-bbox="185 1331 880 1358">Not legally compliant, Not positively prepared or justified.</p> <p data-bbox="185 1362 1097 1431">P56 Open space allows for development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS) in exceptional</p>	<p data-bbox="1142 1219 1653 1246">Noted. With regard to P58, support noted.</p> <p data-bbox="1142 1286 2056 1425">P58 Green Infrastructure sets out the specifications for design of any green infrastructure, including for the benefit of health of people and wildlife. A high quality open space which delivers effect urban greening cannot only be measured through size as there are many other factors to consider like</p>

<p>circumstances which is not supported - there is no evidence that this takes proper account of equalities in terms of the value of open space for different groups of people and undermines strategic aspirations in the plan in SP2, SP3, SP5, SP6 as well as emergency climate emergency issues.</p> <p>The additional wording to P58 “Extend and upgrade the walking and cycling networks between spaces to promote a sense of place and ownership for all.” is supported however this policy is still too vague lacking definitions about for example types, sizes of green infrastructure and there is no evidence of this being considered strategically as a linked / networked provision.</p> <p>The additional wording to P59 “ Protecting and avoiding damage to” is supported however the following is not “ Any shortfall in net gains in biodiversity must be secured off site through planning obligations or as a financial contribution .”</p> <p>and there should be clarity as to whether an alternative (the inverse) has been considered given the new pandemic situation and the emergent climate emergency policy context. Similarly trees need much greater protection and monitoring - there are many examples of poor maintenance and needless damage and removals and the policy should take into account the wider ecological value of mature settings and canopy covers</p>	<p>quality of the space, biodiversity and provision of habitat and trees. The area visions and site allocations set out where the provision of open space is suitable and each of these spaces should deliver green infrastructure alongside major development. More strategic delivery of green infrastructure will be considered in major applications and regeneration.</p>
<p>Richard Lee NSPPSV148.8</p> <p>P58 Green infrastructure The change adds the importance of walking and cycling networks and a “sense of ownership for all”. This is unsound because there is no sense of how these aspirations will be delivered. There is no data of what exists now in terms of these networks, no target for their extension, and no mention of green routes which are well established in Southwark (this would be a more appropriate terminology given this is the green infrastructure policy). Ownership is mentioned, but with no guidance on how residents will be able</p>	<p>Noted. Public consultation and engagement with citizens is conducted on strategies and projects to deliver urban greening in plan making and development management processes. A sense of ownership for all is created from a connection and appreciation of a space, as well as contributing to its development.</p> <p>Walking and cycling and the connection to urban greening and open space</p>

<p>to participate. To be sound, there should be a substantial citizen science component, with a developer contribution to Green Infrastructure and Biodiversity review panels. This would mitigate the loss of expertise on these issues within the Local Authority, by bringing together active citizens and specialists.</p>	<p>are interrelated to the Movement Plan (2019). The Movement Plan interrelates with the designation of open spaces as it requires active travel that is based on green, peaceful and calm places.</p>
<p>Living Bankside NSPPSV239.18</p> <p>Green Infrastructure & Open Space</p> <ul style="list-style-type: none"> · There is no evidence that the Council has calculated the amount of new green space needed to provide adequately for the growing population, taking account of requirements of different ages within the population. · Where areas have a green space deficit (as set out in Southwark’s Open Space Strategy) this should be identified in the relevant Area Vision along with a commitment and plan to address the deficit working with local stakeholders and landowners. <p>The plan should specify in site allocation where green infrastructure and open space should be delivered. The plan should be ambitious and illustrate a commitment to the creation of large green spaces in the north west of the Borough - in Borough and Bankside.</p>	<p>Noted. The Open Spaces Background Paper (2013) sets out that there will be an increase in population and recognises this is a key issue to consider when protecting, enhancing and creating new and existing open spaces. The area visions and site allocations indicate where open space is desirable but this is not exhaustive.</p>
<p>Jenny Morgan NSPPSV511.4</p> <p>Do you consider this policy is sound? - why not sound - Effective</p> <p>The policy does not adequately recognise the importance of green corridors and nature and wildlife stepping stones. It could be included in point 4 of the policy to: Extend and upgrade the nature corridors, walking and cycling networks between spaces to promote a sense of place and ownership for all.</p> <p>The Southwark Open Spaces Strategy 2013 (Evidence base SP602) reference</p>	<p>Noted. Green corridors and nature and wildlife stepping zones are examples of green infrastructure that development may utilise to deliver green infrastructure. The area visions and site allocations set out where the provision of open space is suitable and each of these spaces should deliver green infrastructure alongside major development. More strategic delivery of green infrastructure will be considered in major applications and regeneration.</p>

green routes and the biodiversity benefits, but this is not developed into more detailed plans. The Southwark Nature Action Plan 2020 also references strategic habitat conservation routes.

A detailed local plan for wildlife corridors and stepping stones needs to be referenced in the green infrastructure policy. The Open Spaces Background Paper SP601 sets out a number of suggestions for example, linking Burgess Park/Surrey Canal Walk along Rye Lane to Peckham Rye. The proposals need to be linked through to Area Visions and site allocations.

Abby Taubin
NSPPSV218.6

1. Provide multiple benefits for the health of people and wildlife; and vertical farming in the “multi storey carpark”

<https://digital.olivesoftware.com/Olive/ODN/FTUK/Default.aspx>

FT 2/11/20

Vertical farming has become a hot topic during the coronavirus pandemic, as supply chain disruptions and labour shortages feed perennial fears over global food security.

The nascent sector, in which crops are grown in stacked indoor systems under artificial light and without soil, has enjoyed a flurry of activity this year.

Noted. Food growing is encouraged in policy P58 Green infrastructure to encourage biodiversity, improved habitats and community cohesion and improved access to green space. Vertical farming is a tool that a development may utilise to deliver food growing.

Representation	Officer Response
<p data-bbox="188 320 383 347">P59 Biodiversity</p> <p data-bbox="188 360 353 421">Susan Crisp NSPPSV456.5</p> <p data-bbox="188 467 1106 564">The policy is not effective. The policy ambition for net gains in biodiversity is supported but this needs a basis for measurement.</p> <p data-bbox="188 611 1093 708">The policy needs to set out a measurement to assess and measure the net gains. The new London Plan proposed the Urban Greening Factor, there are other methods which could be used or developed.</p> <p data-bbox="188 754 1077 852">Southwark needs to introduce a method alongside the policy. Whilst there are government plans with the Environment Bill, the time scale and legislation is not yet in place, until then another method is needed.</p>	<p data-bbox="1140 467 2042 596">Noted. P59 Biodiversity is in compliance with the New London Plan. It sets out measures to protect and enhance biodiversity in new and existing open spaces, SINC's and LNRs. The Urban Greening Factor is a tool so it would not be in a policy.</p>
<p data-bbox="188 903 353 963">Richard Lee NSPPSV148.9</p> <p data-bbox="188 1010 383 1037">P59 Biodiversity</p> <p data-bbox="188 1043 1099 1141">The change allows net gains in biodiversity to be secured off-site. Habitat should not be traded as part of a system of off-sets. There is no guidance as to the typology for biodiversity.</p> <p data-bbox="188 1153 1093 1358">The evidence base documents are all dated, which does not conform with the New London Plan requirement to make use of the best ecological information on priority species and areas of deficiency. There is no register of threatened species in Southwark, or datasets that monitor the loss of species in any one part of the Borough, so that local extinction can be stopped.</p>	<p data-bbox="1140 1038 2056 1136">Noted. Policy P59 Biodiversity is consistent with the New London Plan policy. It sets out how it will protect against the loss of biodiversity and how biodiversity can be enhanced.</p>
<p data-bbox="188 1374 376 1434">Corinne Turner NSPPSV40.5</p>	

<p>SP6: Cleaner, greener, safer and P59 Biodiversity I do not consider these policies to be sound because:</p> <ul style="list-style-type: none"> • they are not robust enough to withstand the continued loss across the Borough of biodiversity, green space and natural habitats resulting from redevelopment 	<p>Noted. The policy is designed to increase biodiversity and militate against any loss of biodiversity. This is further set out in the Southwark Biodiversity Action Plan (2013).</p>
<p>Ralph Smith NSPPSV164.7</p> <p>Policy P59 biodiversity is similarly inadequate, focusing on protecting existing parks, rather than planning positively for greening more streets by reallocating space away from driving and parking cars to create links between existing green spaces. In turn this lack of policy support is likely to hinder the ability of developments to secure Biodiversity Net Gain locally. Mapping is required for strategic prioritisation where such gains should be, such as with reference to aspirations for coherent local ecological networks or deficits in accessible natural greenspace, as required by the new natural environment PPG.</p>	<p>Noted. The policy is designed to increase biodiversity and militate against any loss of biodiversity. This is further set out in the Southwark Biodiversity Action Plan (2013). P59 sets out that development must contribute to net gains in biodiversity.</p>
<p>Jenny Morgan NSPPSV511.5</p> <p>Do you consider this policy is sound? - why not sound - Effective</p> <p>The policy for net gains in biodiversity is supported.</p> <p>The policy needs to set out a measurement to assess and measure the net gains. The new London Plan proposed the Urban Greening Factor, there are other methods which could be used or developed.</p> <p>Southwark needs to introduce a method alongside the policy. Whilst there</p>	<p>Support noted. P59 Biodiversity is in compliance with the New London Plan. This policy will be reviewed as part of the response to the Climate Emergency, as declared by the Council in March 2019.</p>

are government plans with the Environment Bill, the time scale and legislation is not yet in place, until then, another method is needed.

Old Bermondsey Neighbourhood Forum
NSPPSV132.27

Document EIP 27A Policy: P56 Open Space, P58 Green Infrastructure, P59 Biodiversity and P60 Trees.

Not legally compliant, Not positively prepared or justified.

P56 Open space allows for development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS) in exceptional circumstances which is not supported - there is no evidence that this takes proper account of equalities in terms of the value of open space for different groups of people and undermines strategic aspirations in the plan in SP2, SP3, SP5, SP6 as well as emergency climate emergency issues. The additional wording to P58 "Extend and upgrade the walking and cycling networks between spaces to promote a sense of place and ownership for all." is supported however this policy is still too vague lacking definitions about for example types, sizes of green infrastructure and there is no evidence of this being considered strategically as a linked / networked provision. The additional wording to P59 "Protecting and avoiding damage to" is supported however the following is not "Any shortfall in net gains in biodiversity must be secured off site through planning obligations or as a financial contribution."

and there should be clarity as to whether an alternative (the inverse) has been considered given the new pandemic situation and the emergent climate emergency policy context. Similarly trees need much greater protection and

With regard to P59, support noted. The financial contribution creates secondary benefits from any shortfall in biodiversity by funding other projects and initiatives that have a wider societal benefit.

monitoring - there are many examples of poor maintenance and needless damage and removals and the policy should take into account the wider ecological value of mature settings and canopy covers.

Abby Taubin
NSPPSV218.7

Biodiversity benefits people within and outside Southwark by maintaining ecosystems, providing natural resources, regulating the environment and enriching mental health and wellbeing as well as having intrinsic value. Regeneration, particularly in areas of natural deficiency, presents the opportunity to deliver net biodiversity gains benefitting local people by introducing features for wildlife as part of green infrastructure. Due to the intense pressure on land for development, it is important that areas of nature conservation value or ecological importance are identified and the flora and fauna are protected and enhanced.

Support noted.

Representation	Officer Response
<p data-bbox="188 317 309 344">P60 Trees</p> <p data-bbox="188 357 353 421">Susan Crisp NSPPSV456.6</p> <p data-bbox="188 464 607 491">The policy is not sound or effective</p> <p data-bbox="188 536 1173 600">The policy is unchanged but the pressure of development and the focus on climate emergency and ecological emergency have increased.</p> <p data-bbox="188 644 1142 708">The council's Climate Emergency strategy identifies Theme 4: Biodiversity, trees and green spaces. This includes planting or more trees.</p> <p data-bbox="188 753 1155 887">More needs to be done to retain and maintain the trees we have. They biodiversity, embodied carbon capture and environmental benefits of large trees are significantly greater than new trees. They also add to the townscape and character of an area.</p> <p data-bbox="188 932 1173 1104">The policy does not define ancient, veteran or notable tree. Nor are they defined in the council Tree Management and Risk Policy. The council do not have a register of ancient, veteran or notable trees, although the policy identifies this need. http://modern.gov.southwark.gov.uk/documents/b50011195/Appendices%20Tuesday%2017-Dec-2019%2016.00%20Cabinet.pdf?T=9</p> <p data-bbox="188 1149 1167 1353">Unless existing trees are retained there will be not ancient trees in the future. The policy of replacement of trees is important, this is a calculation for a numerical numbers of trees to replace canopy. A balance and planned approach is needed between fast growing and types of trees which will become future ancient trees. More needs to be done to monitor the success of tree replacement and ensuring that those trees survive.</p>	<p data-bbox="1200 427 2051 705">Noted. The importance of trees to protecting the climate is fully recognised in the New Southwark Plan and background papers. For this reason, trees that are removed go through an intense assessment process known as an Arboriculture report, to ensure that loss to the overall biodiversity of the area is mitigated. This policy is supported by Southwark's Biodiversity Action Plan (2013). This sets out Southwark's Tree strategy and how trees and strategic tree planting can contribute to enhanced biodiversity as well as the monitoring of trees.</p>
<p data-bbox="188 1367 676 1431">Old Bermondsey Neighbourhood Forum NSPPSV132.28</p>	

Document EIP 27A Policy: P56 Open Space, P58 Green Infrastructure, P59 Biodiversity and P60 Trees.

Not legally compliant, Not positively prepared or justified.

P56 Open space allows for development on Metropolitan Open Land (MOL), Borough Open Land (BOL) and Other Open Space (OOS) in exceptional circumstances which is not supported - there is no evidence that this takes proper account of equalities in terms of the value of open space for different groups of people and undermines strategic aspirations in the plan in SP2, SP3, SP5, SP6 as well as emergency climate emergency issues. The additional wording to P58 "Extend and upgrade the walking and cycling networks between spaces to promote a sense of place and ownership for all." is supported however this policy is still too vague lacking definitions about for example types, sizes of green infrastructure and there is no evidence of this being considered strategically as a linked / networked provision. The additional wording to P59 "Protecting and avoiding damage to" is supported however the following is not "Any shortfall in net gains in biodiversity must be secured off site through planning obligations or as a financial contribution."

and there should be clarity as to whether an alternative (the inverse) has been considered given the new pandemic situation and the emergent climate emergency policy context. Similarly trees need much greater protection and monitoring - there are many examples of poor maintenance and needless damage and removals and the policy should take into account the wider ecological value of mature settings and canopy covers.

Noted. Information on Southwark's Tree Strategy can be found in the Southwark Biodiversity Action Plan (2013) in point 3.6. This sets out Southwark's Tree strategy and how trees and strategic tree planting can contribute to enhanced biodiversity as well as the monitoring of trees. The importance of trees to protecting the climate is fully recognised in the New Southwark Plan and background papers. For this reason, trees that are removed go through an intense assessment process known as an Arboriculture report, to ensure that loss to the overall biodiversity of the area is mitigated.

Corinne Turner
NSPPSV40.7

SP6: Cleaner, greener, safer and P60 Trees

I do not consider these policies to be sound because:

- ☒ they are not robust enough to withstand the continued loss across the Borough of mature trees, trees and tree canopies with TPO's, large specimen trees and canopies with high amenity value, trees and canopies within conservation areas and other trees, often resulting from regeneration and redevelopment plans
- ☒ there is inadequate protection of trees as described above - including street trees, trees located on council property whether public park land or council estate amenity space, inside or near to the boundaries of redevelopment sites, which are cleared in preparation of the demolition and redevelopment of those sites

Noted. The monitoring of trees and biodiversity is set out in Southwark's biodiversity strategy 2013. This will be continually updated to protect against the loss of trees and biodiversity. Significant trees are protected in policy which includes trees with TPO's, ancient trees and trees with high amenity value.

Point two, the protection of trees is set out in line with national and regional policy.

Jenny Morgan
NSPPSV511.6

Do you consider this policy is sound? - why not sound - Effective

The policy is unchanged but the pressure of development and the focus on climate emergency and ecological emergency have increased.

The Council's Climate Emergency strategy identifies Theme 4: Biodiversity, trees and green spaces. This includes planting of more trees.

More needs to be done to retain and maintain the trees we have. The biodiversity benefits, carbon capture and environmental benefits of large trees is significantly greater than new trees. They also add to the townscape and character of the area.

The policy does not define ancient, veteran or notable trees. Nor are they defined in the council Tree Management and Risk Policy. The council do not have a register of ancient or venerable trees, although the policy identifies this need.

<http://modern.gov.southwark.gov.uk/documents/b50011195/Appendices>

Noted. The importance of trees to protecting the climate is fully recognised in the New Southwark Plan and background papers. For this reason, trees that are removed go through an intense assessment process known as an Arboriculture report, to ensure that loss to the overall biodiversity of the area is mitigated. This policy is supported by Southwark's Biodiversity Action Plan (2013). This sets out Southwark's Tree strategy and how trees and strategic tree planting can contribute to enhanced biodiversity as well as the monitoring of trees.

[%20Tuesday%2017-Dec-2019%2016.00%20Cabinet.pdf?T=19](#)

Unless existing trees are retained, there will not be ancient trees in future.the policy of replacement of trees is important, this is a calculation for a numerical number of trees required to replace canopy. A balanced and planned approach is needed between fast growing and types of trees which will become future ancient trees. More needs to be done to monitor the success of tree replacement and ensuring that those trees survive.

Corinne Turner
NSPPSV40.7

SP6: Cleaner, greener, safer and P60 Trees

I do not consider these policies to be sound because:

- they are not robust enough to withstand the continued loss across the Borough of mature trees, trees and tree canopies with TPO's, large specimen trees and canopies with high amenity value, trees and canopies within conservation areas and other trees, often resulting from regeneration and redevelopment plans
- there is inadequate protection of trees as described above - including street trees, trees located on council property whether public park land or council estate amenity space, inside or near to the boundaries of redevelopment sites, which are cleared in preparation of the demolition and redevelopment of those sites

Sarah Vaughan
NSPPSV502.1

Document EIP 27A Policy: P60 Trees

Noted. P60 Trees protects significant trees including trees with a high amenity value, in Conservation Areas, curtilage of listed buildings or Veteran, ancient and notable trees must be retained and protected. Trees in Southwark are further managed in accordance with Southwark's Tree Management Strategy (2013). This, alongside Southwark's Biodiversity Action Plan (2013) sets out the monitoring of trees and sets out how the stock is managed and maintained.

Noted. P60 Trees goes beyond the protection of TPO trees. Trees with a high amenity value, in Conservation Areas, curtilage of listed buildings or Veteran, ancient and notable trees must be retained and protected.

Not positively prepared or effective

Further protection other than TPOs is necessary to preserve existing and mature trees. There are few TPOs in the north of the borough, comparatively low tree canopy, plus an increased risk of major flooding within the next 50 years. Additional criteria other than those currently listed for awarding TPOs should be applied, such as mitigation against the effects of climate change and the importance of trees in preserving and increasing biodiversity. Protection should be applied to all trees equally regardless of ownership - council as well as private.

Tree species in developments need to be carefully selected by experts in close consultation with the Urban Forester to take into account the ecosystem services they provide, not just for aesthetics, fashion or convenience, e.g. reducing heat island effect and cooling buildings, increasing canopy cover, adding to biodiversity. Larger, long-lived species should be planted wherever possible and underplanted with hedges and shrubs.

Trees should not be automatically be removed to “facilitate development”, on the contrary, retaining mature and existing trees should be the default position for all developments and should only be removed as a last resort. Development should accommodate trees and green infrastructure and not the other way round.

Developers and contractors must be held to account for the trees which fail due to poor planting and lack of care

A monitoring system is needed to ensure that the trees planted fulfil the benefits promised.

Currently the contract of care last for 3 years but trees often fail in the fourth or fifth year after planting.

Trees in Southwark are further managed in accordance with Southwark’s Tree Management Strategy (2013). This, alongside Southwark’s Biodiversity Action Plan (2013) sets out the monitoring of trees and sets out how the stock is managed and maintained.

A tier system for maintenance could ensure that trees survive:

1. Maintenance and care of “new” heavy-standard trees on streets, estates and in parks – watering, staking/protecting, pruning, monitoring for and treatment of pests and diseases, measuring outcomes: 3 tiers

i. 0 - 3 years intensive – watering 50 litres once a fortnight increasing to once or twice a week in dry weather as needed (March – October) + monitoring + reporting problems e.g damage, disease, pests, failure to thrive + response + solution + outcome

ii. 3 – 5 years – occasional monitoring, application of protocols e.g. watering in drought + reporting problems e.g. damage, disease, pests, failure to thrive + response + solution + outcome

iii. 5 – 10 years – occasional monitoring/inspection + reporting problems e.g. damage, nuisance, disease, pests, failure to thrive + response + solution + outcome

iv. 10 years & over - usual inspection cycle + monitoring of delivery of eco-system services

Abby Taubin
NSPPSV218.8

In exceptional circumstances removal of trees protected by TPO or conservation area status will be permitted where sufficient evidence has been provided to justify their loss. Replacement planting will be expected where removal is agreed. The replacement of TPO trees must take into account the loss of canopy cover as

Noted. The management of trees is set out in Southwark’s Biodiversity Action Plan (2013), and Southwark’s Tree Management Strategy (2018).

measured by stem girth and biodiversity value.

Fill the cemeteries with old growth. Leave them alone to wild. Have elaborate ceremonies of grief that end with a another tree planted/ a plaque on an existing tree a donation to children in need or end hunger for school kids. We are running out of time to show high intellect and imagination based on David Attenborough and scientists from around the world. Our children need to see leadership from government on climate

Representation	Officer Response
<p data-bbox="188 317 434 347">P61 Reducing Waste</p> <p data-bbox="188 357 353 421">Richard Lee NSPPSV48.10</p> <p data-bbox="188 466 1106 890">P61 Reducing waste & P62 Land for waste management The change in P62 adds an increase in the amount of waste to be processed by 2041, up from 247,000 tonnes of waste in 2036 to 308,000 tonnes in 2041. This substantial increase over a 5 year period suggests the policies in P61 that are designed to reuse, and therefore reduce, waste are not justified and effective. Southwark seems to be planning for a massive increase in waste. For the policy to be sound, there needs to be an assessment of the different waste streams, a more effective statement of how the circular economy will operate, and 5 year waste reduction targets that can be monitored. Applications should be required to promote the circular economy and aim to be net zero waste.</p>	<p data-bbox="1140 427 2051 671">Noted. Adequate waste facilities for all land uses are required by Policy P61 Reducing waste. This ensures that all measures are put in place to reduce waste generation, and ensure that it is handled sustainably. Policy 62 Land for waste management sets out requirements for the development of waste management facilities. This type of land use has potential for harm to residential amenity, environment and transport and therefore must be managed properly within policy to limit and mitigate against this harm.</p>

Representation	Officer Response
<p data-bbox="188 316 593 347">P62 Land for Waste Management</p> <p data-bbox="188 357 369 421">Richard Lee NSPPSV148.11</p> <p data-bbox="188 466 1106 890"> P61 Reducing waste & P62 Land for waste management The change in P62 adds an increase in the amount of waste to be processed by 2041, up from 247,000 tonnes of waste in 2036 to 308,000 tonnes in 2041. This substantial increase over a 5 year period suggests the policies in P61 that are designed to reuse, and therefore reduce, waste are not justified and effective. Southwark seems to be planning for a massive increase in waste. For the policy to be sound, there needs to be an assessment of the different waste streams, a more effective statement of how the circular economy will operate, and 5 year waste reduction targets that can be monitored. Applications should be required to promote the circular economy and aim to be net zero waste. </p>	<p data-bbox="1140 427 2049 673"> Noted. Adequate waste facilities for all land uses are required by Policy P61 Reducing waste. This ensures that all measures are put in place to reduce waste generation, and ensure that it is handled sustainably. Policy 62 Land for waste management sets out requirements for the development of waste management facilities. This type of land use has potential for harm to residential amenity, environment and transport and therefore must be managed properly within policy to limit and mitigate against this harm. </p>

Representation	Officer Response
P63 Contaminated Land and Hazardous Substances	
No representations received.	

Representation	Officer Response
<p data-bbox="188 320 495 347">P64 Improving Air Quality</p> <p data-bbox="188 360 371 424">Richard Lee NSPPSV148.12</p> <p data-bbox="188 469 367 496">P64 Air quality</p> <p data-bbox="188 504 1093 675">The change addresses a shortfall in achieving air quality neutral standards, removing the hierarchy and increasing the likelihood of financial contributions. This is unsound, as it allows developers to pay to pollute and will not be effective in improving the very poor air quality that we are living with in Southwark.</p> <p data-bbox="188 683 1093 818">For the Plan to be sound, there should be encouragement for development to achieve an Air Quality Positive approach and special measures proposed for Air Quality Focus Areas – both of which are policy requirements in the New London Plan.</p>	<p data-bbox="1140 499 2040 635">Noted. Developers are required to achieve or exceed air quality neutral standards. If this is not met, financial contributions are collected. These are used to fund projects which may have secondary benefits to improve air quality.</p> <p data-bbox="1140 679 2063 815">The financial contributions collected from the requirements for the reduction for carbon onsite not being achieved are collected into the Carbon Offset Fund. This has secondary benefits of improving air quality by reducing carbon emissions.</p>

Representation	Officer Response
P65 Reducing Noise Pollution and Enhancing Soundscapes	
No representations received.	

Representation	Officer Response
<p data-bbox="188 320 479 347">P66 Reducing water use</p> <p data-bbox="188 360 365 424">Jenny Morgan NSPPSV511.2</p> <p data-bbox="188 467 954 494">Do you consider this policy is sound? - why not sound - Effective</p> <p data-bbox="188 536 1055 603">Wording is not strong enough. Both Grey water and rainwater should be used for toilet flushing, community gardens and/or rain gardens.</p> <p data-bbox="188 644 1099 799">2. Incorporating measures to reduce the demand for mains water treated to drinking standard by ensuring that rainwater is harvested for community gardens and/or rain gardens and other outside use and that grey water and rainwater are used for toilet flushing.</p> <p data-bbox="188 841 293 868">Reasons</p> <p data-bbox="188 909 752 936">London is facing a worsening water shortage....</p>	<p data-bbox="1140 429 2063 564">Noted. Policy P66 Reducing water use sets out that grey water and rain water should be used for non-drinking uses and this includes toilet flushing. Policy P67 Reducing flood risk sets out the drainage hierarchy which development must follow to ensure that water and sewer capacity is not exceeded.</p>

Representation	Officer Response
P67	
<p data-bbox="188 360 443 387">Environment Agency</p> <p data-bbox="188 395 338 422">NSPPSV48.2</p> <p data-bbox="188 467 1048 568">We support amendments to wording of Policy 67 –reducing flood risk to include reference to floor levels set no lower than 300mm above the predicted water level in flood risk areas.</p>	<p data-bbox="1140 427 2040 491">Support noted. This amendment has been made in a previously in response to this comment having been previously made.</p>

Representation	Officer Response
<p data-bbox="188 316 528 344">P68 Sustainability Standards</p> <p data-bbox="188 357 443 421">Team London Bridge NSPPSV179.5</p> <p data-bbox="188 464 1104 743">Sustainability and the climate emergency – We welcome the widened scope of Policy P68 in addressing sustainability and not just environmental standards. This needs to be further developed in line with the stated commitment in the Foreword to addressing the climate emergency. We look forward to an ambitious supplementary planning document and the positive impact this will have on future development. We urge that climate considerations be made more central to pre-application discussions with immediate effect.</p>	<p data-bbox="1140 459 1323 488">Support noted.</p>
<p data-bbox="188 790 371 853">John Bussy NSPPSV373.11</p> <p data-bbox="188 898 443 927">P68: SUSTAINABILITY</p> <p data-bbox="188 935 1104 1107">One way this policy could be made more effective is to promote the retention and reuse of buildings wherever possible. Demolition of existing buildings should be controlled and justified throughout the Borough, not just in historic areas. This could avoid much of the environmental damage from redevelopment.</p>	<p data-bbox="1140 927 1973 991">Noted. Planning permission is required for demolition and will only be consented where essential for redevelopment.</p>
<p data-bbox="188 1155 371 1219">Richard Lee NSPPSV148.13</p> <p data-bbox="188 1262 528 1291">P68 Sustainability standards</p> <p data-bbox="188 1299 1104 1362">The change of title from environmental standards to sustainability standards has implications which should be followed through in the policy.</p> <p data-bbox="188 1370 1077 1434">Most people think sustainability is about environment, but sustainability is supposed to have two other ‘pillars’: social and economic. Social</p>	<p data-bbox="1140 1222 2024 1358">Noted. By retitling the policy sustainability standards it recognises the benefits on sustainability of meeting these standards, which not only have environmental impacts but secondary impacts for social and economic sustainability.</p>

<p>sustainability needs to be recognised: to sustain the continued viability of low- and mixed-income communities – their homes, jobs and shared facilities. Covid 19 has shone a bright light on the un-sustainable conditions in which key workers and their families have to survive being confined to inadequate homes and neighbourhoods because they are relatively poor and to a disproportionate extent are from ethnic minorities.</p>	
<p>Living Bankside NSPPSV239.4</p> <p>Sustainability Standards & Energy The plan should make reference to net zero carbon and the whole life carbon model.</p>	<p>Noted. The intend to publish version of the New London Plan sets out the target of meeting net carbon zero by 2050. This is echoed by commitments by the UK government, who have legislated for a net zero carbon target by 2050. This policy aligns with this commitment, as set out in the Energy Background Paper by LB Southwark.</p> <p>As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. This policy will be reviewed in the context of this declaration and that of the emerging New London Plan planning guidance which sets out principles and requirements for whole life cycle carbon assessments to ensure development is meeting net zero carbon.</p>

Representation	Officer Response
<p data-bbox="188 317 327 347">P69 Energy</p> <p data-bbox="188 357 371 421">Richard Lee NSPPSV148.14</p> <p data-bbox="188 464 327 494">P69 Energy</p> <p data-bbox="188 501 1099 600">Southwark has produced new evidence in the form of the Energy Policy Background Paper. However, no changes to P69 have come forward. This is unsound.</p> <p data-bbox="188 608 1099 815">The background paper finds that emissions in Southwark are not forecast to be zero by 2050 on the current pathway. Therefore, further policy intervention will be required for Southwark to achieve the statutory target under the Climate Change Act 2019. Furthermore, the background paper acknowledges that it relies heavily on assumptions and concludes that Further evidence is required:</p> <ul data-bbox="188 823 1099 1430" style="list-style-type: none"> • to confirm these assumptions • to define 'Net Zero Carbon' outside of the built environment • to integrate transport energy use and policy goals into the wider energy policy • to determine appropriate local policy interventions versus necessary national policy interventions to achieve the national Statutory target • to map a pathway to achieving the national and any agreed local targets • to consider the sources and impact of other greenhouse gas emissions associated with energy production, consumption and distribution in the borough, and potential policy interventions to control these In addition to this further investigation is required into: • Appropriate Climate Change adaption for the Borough • Embodied Energy and emissions, the circular economy and whole life carbon assessment • The role of local large infrastructure interventions, in particular the use of District Heating networks • Limitations in delivering net zero carbon buildings in city environments 	<p data-bbox="1140 459 2051 850">Noted. Point one, The New London Plan and the Climate Change Act as legislated by the UK government set out a target to meet net carbon zero by 2050. As demonstrated in the Energy Background Paper (2020), the policies in the NSP are designed to meet this target to align with national and regional planning policy and planning policy guidance, and law. As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030.This policy will be reviewed in the context of this target which is only based on a Council declaration. This is set out in the Environmental Committee Scrutiny Report November 2020. An updated Energy Background Paper will be produced to set out how the NSP will meet this target.</p> <p data-bbox="1140 890 2051 1102">Point two, there remain a number of unknowns and policy and evidence are still emerging on best practice energy and climate policy, and there are a number of external factors that affect the effectiveness of the policy. The Energy Background Paper (2020) sets this out and emphasises that the development of energy and climate policy is iterative and flexible to existing and emerging evidence and best practice guidance.</p>

- The deployment of Carbon offset funding raised through policy
 - Measuring and monitoring the impact of funds, where they are deployed
- Given the background paper, it is not considered that P69 is a reasonable and proportionate response to achieving the statutory requirement or Southwark’s 2030 Declaration.

Representation	Officer Response
<p data-bbox="181 544 539 576">SP6 – Cleaner, greener, safer</p> <p data-bbox="181 584 365 651">Derek Kinrade NSPPSV47</p> <p data-bbox="181 692 1095 903">SP6: isn’t ‘leading the way’ a bit strong? Shouldn’t you be up front and say you discourage car use? How will you address the climate emergency: more trees? Should you say that you will continue to provide CGS grants? Doesn’t the exception of Borough and London Bridge from crime deprivation fly in the face of recent history? As a general comment, isn’t the new material somewhat pretentious?</p> <p data-bbox="181 1342 331 1372">Richard Lee</p>	<p data-bbox="1126 692 2080 1046">Noted. The New London Plan and the Climate Change Act as legislated by the UK government set out a target to meet net carbon zero by 2050. As demonstrated in the Energy Background Paper (2020), the policies in the NSP are designed to meet this target to align with national and regional planning policy and planning policy guidance, and law. As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. This policy will be reviewed in the context of this target which is only based on a Council declaration. This is set out in the Environmental Committee Scrutiny Report November 2020. An updated Energy Background Paper will be produced to set out how the NSP will meet this target.</p> <p data-bbox="1126 1086 2080 1225">The draft Corporate Climate Strategy is still in the process of being developed and going through consultation. The details as set out in this strategy once adopted will be reflected in the NSP policy. The strategy itself follows the declaration of a Climate Emergency as set out in SP6.</p> <p data-bbox="1126 1265 2080 1334">Car parking and car free development is further considered under SP5 Healthy active lives and P53 Car Parking.</p>

SP6 Cleaner, Greener, Safer

Prior to submission, the Council had declared a Climate Emergency and its intention to achieve zero carbon by 2030. This was not mentioned in the submission version, but has been brought forward as a proposed change. However, it is not sound to give a high level intention, but not to set out policies and mechanisms to achieve this. These can be found in the Council's draft Climate Emergency Strategy (CES) and should be included in the NSP. The CES states "This strategy sets out actions that could take place at the borough level to reduce our carbon impact. However, to be implementable, changes would be required to the New Southwark Plan to do this" and "Make policy amendments to the New Southwark Plan to ensure it fully reflects the impact of the climate emergency, including requirements for whole life cycle carbon assessments."

(both quotations taken from Tackling the Climate Emergency Together, Draft for consultation, July 2020, page 41)

These should be brought forward as Main Modifications and in a timely way so that they can be given proper consideration in written statements and not introduced at the last minute at the EiP hearings. Relevant policies in the CES which need to cross over to the NSP have been set out in a useful set of tables produced by the Climate Justice sub-group of Southwark Planning Network. In brief,

- Net zero targets
- Recognition of embodied carbon
- Repurposing of existing buildings
- Retrofit buildings to a higher energy standard
- Traffic free zones and pedestrianised areas
- Felling trees only as a last resort
- Increase green corridors
- Increase support and promotion of markets, using local supply chains
- Track food deserts where areas do not have access to fresh produce

New text in SP6 draws attention to the Living Environment Deprivation

Noted. The New London Plan and the Climate Change Act as legislated by the UK government set out a target to meet net carbon zero by 2050. As demonstrated in the Energy Background Paper (2020), the policies in the NSP are designed to meet this target to align with national and regional planning policy and planning policy guidance, and law. As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. This policy will be reviewed in the context of this target which is only based on a Council declaration. This is set out in the Environmental Committee Scrutiny Report November 2020. An updated Energy Background Paper will be produced to set out how the NSP will meet this target.

The draft Corporate Climate Strategy is still in the process of being developed and going through consultation. The details as set out in this strategy once adopted will be reflected in the NSP policy. The strategy itself follows the declaration of a Climate Emergency as set out in SP6.

The Living Environment Deprivation Domain sets out the context for the regeneration strategy that SP6 Cleaner, greener, safer aims to deliver.

Domain. This is a strange choice, referring back to the Index of Multiple Deprivation 2008 and its 4 indicators that relate to social and private housing in poor condition, air quality and road traffic accidents involving injury to pedestrians and cyclists. More relevant baseline data is needed.

Joanne Mackowski
NSPPSV523.2

Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - legally compliant NO

Do you consider this policy is sound? - sound NO

Do you consider this policy is sound? - why not sound - Justified JUSTIFIED

Do you consider this policy is sound? - why not sound - Effective EFFECTIVE

Do you consider this policy is sound? - why not sound - Positively Prepared Positively Prepared

Policy SP6 says "We will lead the way in ... addressing the Climate Emergency." The foreword to the NSP says "we are also committing to developing a specific supplementary planning document focussed on the climate emergency".

Making an add-on SPD to follow an 'agreed' NSP is not a positive approach to preparation of a spatial plan that will be central to achieving the Climate Emergency Strategy. Positive preparation would involve considering the carbon emission and behaviour change targets that need to be met, consulting on them and considering the alternatives for achieving them. There is no cross reference to the Council's draft Climate Emergency Strategy (Tackling the Climate Emergency Together, July 2020).

The NSP and SP6 in particular is not justified because the submitted evidence does not include sufficient or robust studies on the climate emergency and its implications and there has been a lack of proportionate consultation on

Noted. The New London Plan and the Climate Change Act as legislated by the UK government set out a target to meet net carbon zero by 2050. As demonstrated in the Energy Background Paper (2020), the policies in the NSP are designed to meet this target to align with national and regional planning policy and planning policy guidance, and law. As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. This policy will be reviewed in the context of this target which is only based on a Council declaration. This is set out in the Environmental Committee Scrutiny Report November 2020. An updated Energy Background Paper will be produced to set out how the NSP will meet this target.

The draft Corporate Climate Strategy is still in the process of being developed and going through consultation. The details as set out in this strategy once adopted will be reflected in the NSP policy. The strategy itself follows the declaration of a Climate Emergency as set out in SP6.

Support noted for the declaration of a Climate Emergency. The points raised in relation to the Climate Emergency would be considered cross council in responding to the Climate Emergency.

Policy P59 Biodiversity further considers the need for net gains in biodiversity.

these issues.

The draft Climate Emergency Strategy is clear about the need for policy changes to be included in the New Southwark Plan. It states: “[For the Climate Emergency Strategy] to be implementable, changes would be required to the New Southwark Plan to do this. This strategy sets out ideas that should be considered to make policy amendments.” (p41) However, the Council has only made minor changes to NSP policies and has not stated clearly how these amendments are contributing to the Climate Emergency Strategy.

I support the stated aim of the policy to ‘lead the way in ...addressing the Climate Emergency’ and I would support the Council in developing and bringing forward amendments to align the NSP with the draft Climate Emergency Strategy, specifically on:

- Including emissions and embodied carbon from construction in net zero targets on developments, driving demand for a circular economy and assessing new development on life cycle costs.
- Requiring developers to consider options for reusing or repurposing existing buildings before applying for permission for demolition and new build as part of the site assessment, integrated into current usage, and an assessment of existing social and economic value with community engagement as (vaguely) outlined in the Development Charter.
- Taking a proactive approach to reducing fuel poverty by mapping “fuel poor” areas in the borough and requiring that energy companies meet their obligations, alongside a plan led approach for local power schemes.
- Creating traffic free zones and pedestrianised areas through thorough consultation with residents and businesses, delivering the 15 minute city objectives, low traffic neighbourhoods, school superzones.
- Increasing the number and quality of trees in the borough, protecting existing trees, increasing biodiversity, increasing green corridors across the borough for cycling, walking and wildlife.

Extinction Rebellion

Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? No

Do you consider this policy is sound? – sound – No

Do you consider this policy is sound? - why not sound – Effective

Policy SP6 states: “We will lead the way in providing spaces for people to connect with nature, making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste, and addressing the Climate Emergency.”

Southwark Council declared a Climate Emergency in May 2019. The council have consulted on the strategy, have a stakeholder group and have held a conference to help inform the strategy development.

<http://modern.gov.southwarksites.com/documents/s89801/Report%20Climate%20Strategy%20report.pdf>

This policy does not show leadership in addressing the Climate Emergency.

The Council has not provided information about how the New Southwark Plan will address the Climate Emergency. The Foreword to the NSP says that: “We have included a number of policy additions to assist us in achieving this target, however we are also committing to developing a specific supplementary planning document focussed on the climate emergency in line with the findings from Southwark’s Climate Summit.”

I do not consider this policy sound because it is not positively prepared.

Producing a supplementary planning document as an add-on after the NSP has been agreed is not a positive approach to preparation of a spatial plan that will be central to achieving the Climate Emergency Strategy. Positive preparation would involve considering the carbon emission and behaviour change targets that need to be met and considering the alternatives for achieving them.

I do not consider this policy sound because it is not justified. There is no evidence in the documents submitted to the Inspectors of any studies on the

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Support noted for the declaration of a Climate Emergency. The points raised in relation to the Climate Emergency would be considered cross council in responding to the Climate Emergency.

Policy P59 Biodiversity further considers the need for net gains in biodiversity.

climate emergency and its implications for the NSP, e.g. looking at what has been done to reduce carbon emissions within the borough so far, the main gaps and challenges to be addressed and on the alternatives for action. There is no cross reference to the Council's draft Climate Emergency Strategy (Tackling the Climate Emergency Together, July 2020).

I do not consider this policy sound because it is not effective. The draft Climate Emergency Strategy is clear about the need for policy changes to be included in the New Southwark Plan. It states: "[For the Climate Emergency Strategy] to be implementable, changes would be required to the New Southwark Plan to do this. This strategy sets out ideas that should be considered to make policy amendments." (p41) However, the Council has only made minor changes to NSP policies and has not stated clearly how these amendments are contributing to the Climate Emergency Strategy.

I support the stated aim of the policy to 'lead the way in ...addressing the Climate Emergency'.

I would support the Council in developing and bringing forward amendments designed to align the NSP with the draft Climate Emergency Strategy, specifically on:

- Including emissions and embodied carbon from construction in net zero targets on developments, driving demand for a circular economy and assessing new development on life cycle costs. We note that Wales, Scotland and EU are developing circular economy strategy
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Derek Kinrade
NSPPSV47

SP6: isn't 'leading the way' a bit strong? Shouldn't you be up front and say you discourage car use? How will you address the climate emergency: more trees? Should you say that you will continue to provide CGS grants? Doesn't the exception of Borough and London Bridge from crime deprivation fly in the face of recent history?

As a general comment, isn't the new material somewhat pretentious?

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Representation	Officer Response
<p data-bbox="185 694 387 722">P56 Open Space</p> <p data-bbox="185 730 432 759">Friends of Stave Hill</p> <p data-bbox="185 767 331 796">NSPPSV520</p>	
Representation	Officer Response
<p data-bbox="185 911 1093 975">Open Land (MOL) or Borough Open Land (BOL) except in exceptional circumstances.</p> <p data-bbox="185 983 1093 1086">This Policy focusses solely on proposed Development within MOL/BOL. This Policy does not consider impacts on MOL/BOL immediately adjacent to Development and therefore within the Development area of influence</p> <p data-bbox="185 1094 1081 1158">There is no statement regarding the assessment, measuring, recording and monitoring of potential or actual impact on adjacent MOL/BOL</p> <p data-bbox="185 1166 1104 1262">In an increasingly urbanised cityscape, it is more likely that Development will have some impact on adjacent sites. A Planning Policy, particularly with reference to open space, must reflect this.</p> <p data-bbox="185 1270 1104 1477">This Policy is neither effective nor properly prepared as it refers solely to Development on the footprint of MOL/BOL. This Policy does not recognise or allow for impacts on adjacent MOL/BOL land; Development is therefore unlikely to consider the developmental needs of surrounding or adjacent MOL/BOL or it's role in supporting biodiversity at local, regional or national level.</p>	<p data-bbox="1135 911 2042 1086">MOL/BOL Is indicated on area vision and site allocation maps, as well as on Southwark maps. Planning applications should take into consideration the site and context of the site location when proposing new development. The fact box for Open Space sets out further detail on the designation and protection of Open Space.</p> <p data-bbox="1135 1126 1697 1158">This policy is effective and positively prepared.</p>

P58 Green Infrastructure

Friends of Stave Hill
NSPPSV520

P58 Green infrastructure

This Policy states that:

1. Major development must: (1.) Provide green infrastructure with arrangements in place for long term stewardship and maintenance funding and
2. Large-scale major development must: (1) Provide new publicly accessible open space and green links.

The term “long term stewardship” is insufficiently detailed. There is no requirement for targets to be set and met to increase locally important species or habitats, or to monitor impacts on existing locally important species or habitats, or to monitor biodiversity net gain during the establishment of newly created green space

This Policy further states that:

Green infrastructure should be designed to: (2). Integrate with the wider green infrastructure network.

The Policy does not make clear how this will be achieved, or when this integration process will start. There is no stated requirement for consultation with local stakeholders or conservation organisations responsible for any pre-existing wider green infrastructure. There is no requirement for independent environmental assessment of any pre-existing wider green infrastructure in order to create sustainable biodiversity net gain and long term enhancement of the local landscape.

This Policy is neither effective or positively prepared as there is a lack of detail with regard to future proofing, connectivity with the borough wide green network and the borough Core Habitat Areas, or provision of Key Performance Indicators to demonstrate the success of green infrastructure. Furthermore, the Policy makes no reference to pre-assessment of proposed green infrastructure to ensure local suitability and sustainability.

Noted. P58 Green Infrastructure sets out the specifications for design of any green infrastructure, including for the benefit of health of people and wildlife. A high quality open space which delivers effect urban greening cannot only be measured through size as there are many other factors to consider like quality of the space, biodiversity and provision of habitat and trees. The area visions and site allocations set out where the provision of open space is suitable and each of these spaces should deliver green infrastructure alongside major development. More strategic delivery of green infrastructure will be considered in major applications and regeneration.



Representation	Officer Response
<p data-bbox="188 619 389 647">P59 Biodiversity</p> <p data-bbox="188 657 434 724">Friends of Stave Hill NSPPSV520</p> <p data-bbox="188 766 385 794">P59 Biodiversity</p> <p data-bbox="188 839 461 868">This Policy states that:</p> <p data-bbox="188 912 1012 941">1. Development must contribute to net gains in biodiversity through:</p> <p data-bbox="188 986 1088 1228">(1.) Enhancing the nature conservation value of Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves (LNRs), designated and undesignated ancient woodland, populations of protected species and priority habitats/species identified in the United Kingdom, London or adopted Southwark Biodiversity Action Plan; and (2.) Protecting and avoiding damage to SINCs, LNRs, populations of protected species and priority habitats/species.</p> <p data-bbox="188 1273 1048 1337">The Policy does not state how this enhancement of nature conservation value will be effected.</p> <p data-bbox="188 1347 1075 1410">The Policy does not state how any potential net gain in biodiversity will be identified, recorded or monitored.</p> <p data-bbox="188 1420 1106 1554">The Policy does not make clear whether the SINCs, LNRs, designated and undesignated ancient woodland, populations of protected species and priority habitats/species referred to are solely those within the footprint of a Development.</p> <p data-bbox="188 1564 1079 1592">The Policy does not make it clear as to whether impacts on adjacent SINCs,</p>	<p data-bbox="1140 766 1227 794">Noted.</p> <p data-bbox="1140 839 2063 941">P59 Biodiversity sets out the requirement for new development to contribute to net gains in biodiversity. Where this is not possible a financial contribution will be provided to ensure net gains of biodiversity can be delivered.</p> <p data-bbox="1140 986 2054 1158">This policy is supported by Southwark’s Biodiversity Action Plan (2013). This document sets out the strategy for the management and growth of biodiversity in the borough. This sets out Southwark’s Tree strategy and how trees and strategic tree planting can contribute to enhanced biodiversity as well as the monitoring of trees.</p> <p data-bbox="1140 1203 1859 1232">P59 Biodiversity is in compliance with the New London Plan.</p>

LNRs, designated and undesignated ancient woodland, populations of protected species and priority habitats/species will be recognised. It is not made clear whether potential or actual impacts on adjacent nature conservation sites will be recognised, assessed, measured or mitigated against.

The Policy does not allow or prepare for logical increases in biodiversity on effectively managed SINC or LNRs, nor does it allow for potential upgrades in designation of sites, such as from LNR to Metropolitan Site of

The Policy does not state how compliance with national guidelines will be independently monitored and recorded, nor does it state how evidence of compliance will be publicly accessible.

The Policy does not provide a requirement for full Environmental Survey of sites within a Developments area of influence.

The Policy does not provide for independent Environmental Impact Assessment of sites within a Developments area of influence.

This Policy further states that:

2. Where exceptionally, such developments are permitted, adequate mitigation must be provided, or as a last resort, compensation for the harm to biodiversity; and

3. Including features such as green and brown roofs, green walls, soft landscaping, nest boxes, and habitat restoration and expansion, improved green links and buffering of existing habitats.

2. Any shortfall in net gains in biodiversity must be secured off site through planning obligations or as a financial contribution.

The Policy does not provide for impacts on, and mitigation to sites outside a Developments footprint, but within its area of influence.

The Policy does not provide for independent assessment of potential harm to biodiversity.

The Policy does not provide for independent, external monitoring for full compliance with national guidelines, and consequently how full compliance will be enforced.

Within the Reasons for this Policy, it states that:

Due to the intense pressure on land for development, it is important that areas of nature conservation value or ecological importance are identified.

The Policy does not state how these areas will be identified and by whom. Supporting evidence for SINCs designation does not include updated status of sites, including upgrades to Local Nature Reserve status.

The Policy does not evidence the new Southwark Nature Action Plan.

The Policy does not provide for evidence of local stakeholder consultation or input.

The Policy is not properly prepared or effective as it has insufficient detail on Developer and Council compliance and monitoring of compliance, insufficient detail on monitoring either impacts on or net gains to biodiversity, and a lack of detail on Key Performance Indicators to assess the success of mitigation habitats.

The Policy is not effective as there is no requirement for major Development to provide a level of benefit to linked habitat systems such as South East London Green Chain or the four Core Habitat Areas within Southwark.

The Policy is neither effective or properly prepared as the evidence base is insufficient, not up to date or has recommendations that are ignored.

EIP72A - Integrated Impact Assessment Appendices 1-13 (August 2020) provides evidence of The Strategic Environmental Assessment Regulations 2004 requirements checklist. This is a checklist for sites within a development's footprint, and does not support or protect sites within a developments area of influence.

SP604 - Southwark Sites of Interest for Nature Conservation Review (2016)
 does not show up to date designation of SINCs or LNRs.
 SP602 - Southwark Open Space Strategy (2013)"

Representation	Officer Response
<p data-bbox="179 577 539 608">SP6 – Cleaner, greener, safer</p> <p data-bbox="179 616 365 683">Derek Kinrade NSPPSV47</p> <p data-bbox="179 724 1095 898">SP6: isn't 'leading the way' a bit strong? Shouldn't you be up front and say you discourage car use? How will you address the climate emergency: more trees? Should you say that you will continue to provide CGS grants? Doesn't the exception of Borough and London Bridge from crime deprivation fly in the face of recent history?</p> <p data-bbox="179 906 1021 936">As a general comment, isn't the new material somewhat pretentious?</p>	<p data-bbox="1126 724 2074 1082">Noted. The New London Plan and the Climate Change Act as legislated by the UK government set out a target to meet net carbon zero by 2050. As demonstrated in the Energy Background Paper (2020), the policies in the NSP are designed to meet this target to align with national and regional planning policy and planning policy guidance, and law. As a council, we have declared a Climate Emergency and set a target to meet net carbon zero as a borough by 2030. This policy will be reviewed in the context of this target which is only based on a Council declaration. This is set out in the Environmental Committee Scrutiny Report November 2020. An updated Energy Background Paper will be produced to set out how the NSP will meet this target.</p> <p data-bbox="1126 1123 2074 1262">The draft Corporate Climate Strategy is still in the process of being developed and going through consultation. The details as set out in this strategy once adopted will be reflected in the NSP policy. The strategy itself follows the declaration of a Climate Emergency as set out in SP6.</p> <p data-bbox="1126 1303 2074 1366">Car parking and car free development is further considered under SP5 Healthy active lives and P53 Car Parking.</p>

Richard Lee
NSPPSV148

SP6 Cleaner, Greener, Safer

Prior to submission, the Council had declared a Climate Emergency and its intention to achieve zero carbon by 2030. This was not mentioned in the submission version, but has been brought forward as a proposed change. However, it is not sound to give a high level intention, but not to set out policies and mechanisms to achieve this. These can be found in the Council's draft Climate Emergency Strategy (CES) and should be included in the NSP. The CES states "This strategy sets out actions that could take place at the borough level to reduce our carbon impact. However, to be implementable, changes would be required to the New Southwark Plan to do this" and "Make policy amendments to the New Southwark Plan to ensure it fully reflects the impact of the climate emergency, including requirements for whole life cycle carbon assessments."

(both quotations taken from Tackling the Climate Emergency Together, Draft for consultation, July 2020, page 41)

These should be brought forward as Main Modifications and in a timely way so that they can be given proper consideration in written statements and not introduced at the last minute at the EiP hearings. Relevant policies in the CES which need to cross over to the NSP have been set out in a useful set of tables produced by the Climate Justice sub-group of Southwark Planning Network. In brief,

- Net zero targets
- Recognition of embodied carbon
- Repurposing of existing buildings
- Retrofit buildings to a higher energy standard
- Traffic free zones and pedestrianised areas
- Felling trees only as a last resort
- Increase green corridors
- Increase support and promotion of markets, using local supply chains
- Track food deserts where areas do not have access to fresh produce

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The Living Environment Deprivation Domain sets out the context for the regeneration strategy that SP6 Cleaner, greener, safer aims to deliver.

New text in SP6 draws attention to the Living Environment Deprivation Domain. This is a strange choice, referring back to the Index of Multiple Deprivation 2008 and its 4 indicators that relate to social and private housing in poor condition, air quality and road traffic accidents involving injury to pedestrians and cyclists. More relevant baseline data is needed.

Joanne Mackowski
NSPPSV523.2

Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - legally compliant NO

Do you consider this policy is sound? - sound NO

Do you consider this policy is sound? - why not sound - Justified JUSTIFIED

Do you consider this policy is sound? - why not sound - Effective EFFECTIVE

Do you consider this policy is sound? - why not sound - Positively Prepared Positively Prepared

Policy SP6 says "We will lead the way in ... addressing the Climate Emergency." The foreword to the NSP says "we are also committing to developing a specific supplementary planning document focussed on the climate emergency".

Making an add-on SPD to follow an 'agreed' NSP is not a positive approach to preparation of a spatial plan that will be central to achieving the Climate Emergency Strategy. Positive preparation would involve considering the carbon emission and behaviour change targets that need to be met, consulting on them and considering the alternatives for achieving them. There is no cross reference to the Council's draft Climate Emergency Strategy (Tackling the Climate Emergency Together, July 2020).

The NSP and SP6 in particular is not justified because the submitted evidence does not include sufficient or robust studies on the climate emergency and

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Support noted for the declaration of a Climate Emergency. The points raised in relation to the Climate Emergency would be considered cross council in responding to the Climate Emergency.

Policy P59 Biodiversity further considers the need for net gains in biodiversity.

its implications and there has been a lack of proportionate consultation on these issues.

The draft Climate Emergency Strategy is clear about the need for policy changes to be included in the New Southwark Plan. It states: “[For the Climate Emergency Strategy] to be implementable, changes would be required to the New Southwark Plan to do this. This strategy sets out ideas that should be considered to make policy amendments.” (p41) However, the Council has only made minor changes to NSP policies and has not stated clearly how these amendments are contributing to the Climate Emergency Strategy.

I support the stated aim of the policy to ‘lead the way in ...addressing the Climate Emergency’ and I would support the Council in developing and bringing forward amendments to align the NSP with the draft Climate Emergency Strategy, specifically on:

- Including emissions and embodied carbon from construction in net zero targets on developments, driving demand for a circular economy and assessing new development on life cycle costs.
- Requiring developers to consider options for reusing or repurposing existing buildings before applying for permission for demolition and new build as part of the site assessment, integrated into current usage, and an assessment of existing social and economic value with community engagement as (vaguely) outlined in the Development Charter.
- Taking a proactive approach to reducing fuel poverty by mapping “fuel poor” areas in the borough and requiring that energy companies meet their obligations, alongside a plan led approach for local power schemes.
- Creating traffic free zones and pedestrianised areas through thorough consultation with residents and businesses, delivering the 15 minute city objectives, low traffic neighbourhoods, school superzones.
- Increasing the number and quality of trees in the borough, protecting existing trees, increasing biodiversity, increasing green corridors across the borough for cycling, walking and wildlife.

Extinction Rebellion

NSPPSV525.1

Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? No

Do you consider this policy is sound? – sound – No

Do you consider this policy is sound? - why not sound – Effective

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