

# Statement of Common Ground between Southwark Council and Southwark Planning Network Climate Emergency Working Group

March 2021



If you are representing an organisation, you may paste your logo here.

## Introduction

This Statement of Common Ground (SCG) addresses matters specific to Southwark Council and (insert name here) which relate to the Proposed Modifications for Examination Version of the New Southwark Plan.

This SCG has been prepared by Southwark Council in agreement with (insert name here) and will be used to inform the contents of the New Southwark Plan.

The purpose of the SCG is for both parties to acknowledge areas of common or uncommon ground relating to the contents of the New Southwark Plan, and to progress in cooperating on the best approach to addressing these areas.

### Southwark Council

Southwark Council is the local authority for the London Borough of Southwark in Greater London, England.

### Southwark Planning Network Climate Emergency Working Group

Southwark Planning Network (SPN) is a self-managed informal network of active citizens. Residents and small local businesses from all over the borough are members. SPN set up its Climate Emergency and Planning sub-group in 2020.

## Strategic Matters

(Please use this section to provide details of matters relating to specific policies, Area Visions, or site allocations. You may include as many strategic matters as is relevant.)

### **1. Specific statements relating to existing areas of agreement / disagreement**

Disagree with the Proposal (in Foreword) to “develop specific supplementary planning document focussed on the climate emergency in line with the findings from Southwark’s Climate Summit” in the future. This is an inadequate response to a situation recognised as an emergency.

#### ***Council response:***

A Supplementary Planning Document is used to set out specific guidance to support the delivery and implementation of policy. Responding to Climate Change is central to the NSP, there are policies to adapt and mitigate to climate change to respond to the statutory 2050 net zero carbon target. This amendment cannot be included and is not required for soundness of the plan.

#### ***Agreements:***

- A clarification has been proposed for the foreword to set out the approach to meeting the climate emergency including the 2050 net carbon target.

Replace previous paragraph with the below:

~~The Council declared a Climate Emergency in March 2019. Policies have been amended and further improvements are scheduled to accelerate the improvements required to meet the 2030 target.~~

1. The Council declared a Climate Emergency in March 2019 to achieve the goal of doing all that it can to make the borough carbon neutral by 2030. The new Southwark Plan in aiming to meet the statutory net carbon zero target by 2050 is a stepping stone to meeting the net carbon zero target by 2030. Policies have been prepared to mitigate and adapt to climate change. Further policy improvements to meet the declared 2030 net zero target will form part of early review of the Plan.

#### ***Disagreement:***

- Add the following after bullet point on Council’s proposed change:
- CEWG would like to see the Foreword go further than referencing the future Supplementary Planning Guidance. Some policies to address the climate emergency are coming through in the NSP and this should be mentioned.
- CEWG further proposes adding a paragraph in the SoCG to give detail about how the early review will happen. It was recognised that this level of detail could not be included in the NSP but it would be reassuring to include in the SoCG the detail about how and when the early review will happen and how the Council, the CEWG and other interested parties would liaise before the consultation on the SPG.

## **2. SP2 Regeneration that works for all.**

There is no mention in SP2 of the climate emergency. The climate emergency should be a cross-cutting theme for the whole NSP. It is particularly relevant to SP2 which (1) establishes the characteristics of regeneration across the borough in the future; and (2) establishes the principle of social justice in regeneration, which is expected to bring benefits for all Southwark residents, current and future.

We commend the Council's emphasis on the benefits of regeneration working for all. However, we don't think this policy is effective as there is no information on how this admirable intention would be put into practice, with no link between the strategic policy and the policies which sit underneath it.

Currently regeneration in Southwark is led by demolition and redevelopment. This has many negative consequences for existing communities: noise, dust, air pollution and construction traffic as well as climate change impacts. Carbon emissions from demolition and new construction are a very significant contributor to the climate emergency.

One way of moving away from a demolition-led idea of regeneration that does not work for existing communities, would be to introduce a policy promoting the reuse and refurbishment of buildings instead of demolition and rebuild. A good example is Policy CS15 in the City of London's 2015 Local Plan "Avoiding demolition through the reuse of existing buildings or their main structures and minimising the disruption to businesses and residents using sustainably sourced materials and conserving water resources."

### ***Council Response:***

The GLA has brought in guidance for Whole Lifecycle Carbon assessments and Circular Economy Statements have been introduced by the GLA in the Published London Plan and this will be reflected in the NSP. These are important components of regeneration.

### ***Disagreements:***

- Add new heading 'Disagreements' and add bullet point as follows:
- Changes to policy SP2 Regeneration for all as set out in the Climate Change Draft Table of Changes to clarify the 2050 net carbon target and make factual updates should be major modifications to reference the demolition hierarchy now included in the Published London Plan (Figure 3.2).
- Add second bullet point: We consider that to make the NSP sound, SP2 should have a stronger policy on the climate emergency by making the reuse, refurbishment and repair of buildings the first priority for regeneration.

### **3. Policy P12 Design of Places**

Positive statement on the creation of open space.

#### ***Agreements:***

- Agree minor modification to reflect the London Plan policy G4 Open Space point 4 surrounding public open space as set out in the draft Climate Change Proposed Changes.

In the policy:

4. Ensure buildings, public spaces, open spaces and routes, are positioned according to their function, importance and use; and

Add to the reasons:

Good design of places and the public realm are important to promote active travel and encourage use of these spaces for movement, which contributes to mitigating climate change by reducing carbon emissions.

### **4. Policy 13 Design Quality**

Linking to the proposed requirement in SP2 for an assessment of existing social and economic value, P1 should introduce a building materials hierarchy, to be taken into account in considering planning applications. Re-use of buildings would be at the top of the hierarchy, followed by re-use of building materials, then recycling of materials on site. This approach is consistent with the WRAP programme's resource hierarchy.

#### ***Council Response***

The introduction of a building materials hierarchy cannot be met as a requirement and it is not required for soundness.

The GLA has set out requirements and policy in relation to the reuse and repurposing of buildings. The London Plan is now adopted and forms a part of the Development Plan for Southwark.

#### ***Agreements:***

- Changes to policy P13 Design Quality as set out in the Climate Change Draft Table of Changes EIP182 and below to clarify the 2050 net carbon target and make factual updates as minor modifications to align with the Published London Plan 2021.

Add to the policy:

5. Buildings and spaces which are constructed and designed sustainably to adapt to climate change; and

Add sentence to the end of point 3 of Reasons:

This is crucial to adapt and mitigate against climate change.

***Disagreements:***

- Modify the Council's proposed changes to policy P13 Design Quality as set out in the Climate Change Draft Table of Changes to the following:
- "5. Buildings and spaces which are constructed and designed sustainably to adapt to climate change and conform to the Published London Plan's building materials hierarchy to minimise greenhouse gas emissions."

**5. SP6 Cleaner Greener Safer**

Many of the policies under SP6 are key to tackling the climate emergency. SP6 should refer to the Council's Climate Change Strategy (currently in draft form) and explain how SP6 integrates planning policy to address the climate emergency.

To link to P68 Sustainability standards, SP6 should set out the Council's targets for net zero carbon emissions by 2030.

***Council Response:***

Responding to climate change through adaptation and mitigation is central to the NSP. The 2050 net zero carbon target will be clarified in the strategic policy.

***Disagreements:***

- CEWG disagrees that the proposed changes to SP6 go far enough to progress towards achieving the 2030 net zero carbon emissions target and therefore considers that the NSP does not represent a 'stepping stone' in this direction.

**6. P56 Open Space**

The policy is very focused on protection of green and open space as opposed to Should a threshold be included? Should there be a requirement for open space in P12?

There are deficiency maps from 2007 saved policies (figures 8 and 9) that are not included in this version of the plan. This should be included in this version of the plan required.

***Council Response:***

Policy P56 Open Space has been reviewed to assess where we can put increase open space in. Deficiency of open space varies across Southwark and it is important that what is existing is protected and enhanced and where possible new green and

open space will be created. The London Plan in A.3 sets out that development plans should promote the creation of new areas of publically accessible open space, particularly green space.

The deficiency maps be added as an addendum to the Open Spaces Background Paper, as set out in the 2007 saved policies (figures 8 and 9) are set out in the 2013 Southwark Open Space Strategy Evidence Report. These have been considered and updated in the Old Kent Road Area Action Plan Open Spaces Background Paper. This is not required in the plan. These are also available online.

**Agreements:**

- Changes to policy P56 Open Space as set out in the Climate Change Draft Table of Changes EIP182 and below to clarify the 2050 net carbon target and make factual updates as minor modifications to align with the Published London Plan 2021.

Add reasons.

[Protecting and improving open space plays an important role in climate change adaption and mitigation.](#)

- Open Space Section 106 at the Elephant and Castle is to increase and improve open space and this is the most significant area of deficiency in Southwark.

**Disagreements:**

- New policy 3 Development should increase the amount of open space, and particularly green space, in areas of deficiency (main modification)
- Add to Reasons: Areas of deficiency are identified in the Council Open Space Strategy (minor modification)

**7. P60 Trees**

Mature trees have greater capacity for carbon storage. There is a stronger case needed for protection of trees. A positive statement should be included to protect all trees. They are crucial for ecosystems and for carbon capture and storage.

***Council Response:***

Policy P60 Trees sets out that development must retain and enhance the borough's trees and canopy cover. Tree management is set out in the Biodiversity Action Plan.

The London Plan (2021) in relation to the protection of trees, Policy G7 Trees and woodlands – point C sets out development proposals should ensure that wherever possible existing trees of value are retained and point B2 – identify opportunities for tree planting in strategic locations. Policy P60 Trees is in general conformity with the London Plan (2021).

***Disagreements:***

- Proposed modification to Policy P60 in the Council's Table of Modifications does not address the weak protection for mature trees in P60 Trees. A new point to ensure the retention of all mature trees should be included in the 'policy' section, avoiding the use of the term 'significant'.

## **8. P64 Air Quality**

The policy should be updated to select the link between prioritising actions for air quality and carbon reduction.

### ***Council response***

The London Plan (2021) in relation to air quality and climate change sets out that air quality neutral development will make development proposals acceptable and this is the same approach as P64 Air Quality.

### ***Disagreements:***

- CEWG disagrees with the current agreement. The proposed modification in the Climate Change Draft Table of Changes does not make policy P64 align with the Published London Plan. The London Plan includes the concept of Air Quality Positive approaches for areas where the air quality is particularly poor and there are concerns about proximity to high exposure such as schools. This concept is not included in the NSP.

## **9. P68 Sustainability standards**

P68 should refer to the Council's target for net zero emissions by 2030. It should include emissions and embodied carbon from construction in net zero targets for development schemes.

### ***Council response:***

Embodied Carbon will be reviewed in the early review of the NSP P69 Energy policy because we need to develop a robust and sound evidence base to suggest the crucial policy changes need to address this complex issue. The NSP is achieving the 2050 net carbon zero target and primarily considers carbon reduction in new development.

### ***Agreements:***

- Changes to policy P68 Sustainability Standards as set out in the Climate Change Draft Table of Changes EIP182 and below:
  - Swap point 1.1 and 1.2 to match the updated cooling hierarchy as set out in the Publication London Plan. Reduction should be the starting point of the cooling hierarchy.
  - Add to Point 1 of the Reasons
    - are not effectively mitigated to address climate change and contribute to meeting net carbon zero by 2050.

To clarify the 2050 net carbon target and make factual updates as minor modifications to align with the Published London Plan 2021.

***Disagreements:***

- CEWG does not agree that the proposed modifications go far enough to ensure that emissions and embodied carbon from construction are being taken into account in net zero targets for development schemes.

**10. P69 Energy**

The energy policy should reflect the principle of regeneration that works for all by stating that the Council will map fuel poverty across the borough and prioritise action to address fuel poverty as part of development schemes.

***Council response:***

Fuel poverty is addressed in the Integrated Impact Assessment Appendix 9 in the Environment section. There are three important aspects of fuel poverty. This includes: household income; household energy requirements; and fuel prices. Planning policy can only impact on household energy requirements and policy P69 Energy aligns with the London Plan to require all major development to be 100% net carbon zero.

***Agreements:***

- Changes to policy P69 Energy as set out in the Climate Change Draft Table of Changes to clarify the 2050 net carbon target and make factual updates as minor modifications to align with the Published London Plan 2021.
- Agree Climate Change and Energy Addendum is required and useful to signpost the 2050 climate change target and indicative roadmap to the 2030 target for the climate emergency.
- An energy policy to meet zero carbon targets by 2030 will come forward as part of the 1<sup>st</sup> review of the New Southwark Plan.
- Add a fact box for Whole Life-cycle Carbon Assessments

***Disagreements:***

Add to Decentralised energy

- Use zero emission or renewable and secondary heat sources.
- New and existing networks will incorporate good practice design and specification standards to provide a reliable service for customers and avoid high energy bills.

**Council Response**

Due to the nature of how decentralised heat networks in Southwark this is not possible to include as it is incorrect regarding the heat sources available in Southwark. We support the use of zero emissions or renewable and secondary heat sources. In Southwark it is too prescriptive to include in policy as it would reduce opportunities for connection to DHN and therefore conflict with the decentralised energy hierarchy.

### ***Disagreements:***

- Add to Reasons
  - The whole life cycle carbon assessment will require developers to provide information on embodied carbon and operational carbon. Metrics for monitoring energy performance at all stages of the development process, will ensure that what is built is consistent with what is consented. Note – more information would be helpful. (minor modification)
- Insert separate point after 'address fuel poverty as part of development schemes':
- 17,000 households owned by Southwark Council are connected to District Heating networks. These systems constantly break down and leave households in the cold throughout winter. Some estates are particularly affected and are forced to use plug-in heaters every winter to stop them freezing and to carry boiling water to wash in. This represents a threat to existing tenants' health. It also means they are not getting a service they are paying for and are incurring additional costs, e.g. because of having to pay for use of plug-in heaters. Policy P69 is intended to address the climate emergency. The policy is not effective because the poor performance of DHNs forces many tenants to rely on use of plug-in heaters during frequent district heating outages. The council should fix the existing networks before rolling out any further heat networks.
- Add new bullet point:
  - "Add to policy on Decentralised energy:
  - Use zero emission or renewable and secondary heat sources.
  - New and existing networks will incorporate good practice design and specification standards to provide a reliable service for customers and avoid high energy bills.
  - Development will support the retrofitting of existing homes, to reduce energy bills and carbon emissions."

### **Council Response**

- This has been set out in a fact box for Whole Life-cycle Carbon Assessments as additional information to support the policy.

## Signatories

This statement has been informed by engagement between Southwark Council and (insert name here).

'We agree that this statement is an accurate representation of matters discussed and issues agreed upon.

It is agreed that these discussions will inform the New Southwark Plan and that both parties will continue to work together collaboratively in order to meet the duty to cooperate.'

Signed: Paula Orr \_\_\_\_\_

Name: Paula Orr

Position: Member

Date: 26.0.2021

Signed:  \_\_\_\_\_

Name: Simon Bevan

Position: Director of Planning

Date: 26 March 2021