

## **Short note on how spatial alternatives and reasonable alternatives have been considered as part of the Integrated Impact Assessment process of the New Southwark Plan**

1. This note supplements the information provided in the IIA EIP72 and EIP72a and the Council's statement in relation to Matter 2.
2. The overall spatial strategy for Southwark is set by the London Plan (2021), the statutory Spatial Development Strategy for London. The London Plan prescribes the following spatial parameters for the NSP:
  - The Central Activities Zone (CAZ) Policy SD4
  - Opportunity Areas at Bankside, Borough and London Bridge, Elephant and Castle, Old Kent Road and Canada Water. These have strategic targets in the London Plan and we have set targets in the NSP.
  - Action areas - SD10 Strategic and local regeneration
  - Strategic Areas for Regeneration Figure 2.19 (20% most deprived lower super output areas in England) Camberwell, Peckham, Bankside, Old Kent Road/East Street Annex A
  - Local Area for Regeneration (Aylesbury)
  - The Town Centre Network – Policy SD6 Town centres and high streets, Policy SD7 Town centres: development principles and Development Plan Documents, SD8 Town centre network (Major town centres at Elephant and Castle, Peckham and Canada Water, District town centres at Bankside and Borough, London Bridge, Camberwell, Lordship Lane, Herne Hill, Old Kent Road north, Old Kent Road south). The NSP also designated local centres at The Blue, Dulwich Village, Nunhead and Tower Bridge Road. Figure A1.1 Future Potential Changes To The Town Centre Network
  - The Strategic Cultural Areas – South Bank Strategic Cultural Quarter, Canada Water Strategic Cultural Area, Elephant and Castle Strategic Cultural Quarter, Old Kent Road Strategic Cultural Area
  - Offices, other strategic functions and residential development in the CAZ Policy SD5
  - The Thames Policy Area
  - Designation of Strategic Protected Industrial Land and Locally Significant Industrial Sites (LSIS) - Publication London Plan (2020) policies E4-E7
  - Safeguarding of existing waste sites (Integrated Waste Management Facility, Old Kent Road);
  - Metropolitan Open Land; Borough Open Land, Other Open Space and Open Water Space;
  - Identification of air quality management areas
  - Tall buildings policy
  - The Transport for London road network
  - Public Transport Accessibility Levels (PTAL)
  - Maximum car parking standards for each PTAL
  - Minimum cycle parking standards for each PTAL

- Visitor infrastructure - Policy E10 London Plan (2021)
3. These strategic spatial parameters underwent sustainability appraisal through the preparation of the London Plan. The NSP must be in general conformity with the London Plan and so needs to follow the strategy, where a Southwark-specific issue is required to be different then evidence can be presented to justify this approach.
  4. Other spatial parameters are set by national policy, such as the town centre first principle for main town centre uses and the requirement to define primary shopping areas.
  5. Within this context, the scope for the NSP to consider spatial alternatives is therefore limited to the following main land use matters:
    - How and where to plan for housing growth to meet the London Plan housing target (including on small sites)
    - Where to support particular types of housing
    - Defining the boundary of opportunity and action areas
    - Defining the boundary of town centres and strategic cultural areas
    - The mix of uses within the CAZ and town centres
    - Defining the boundary of LSIS and how to plan to meet the London Plan requirement to maintain industrial floor-space capacity
    - How to meet the London Plan waste apportionment
    - Where to manage air quality through planning decisions
    - Whether to identify Southwark specific car and cycle parking standards relating to PTAL based on local evidence; and how to manage roadscape
  6. The Planning Practice Guidance sets out the key stages and tasks for the Sustainability Appraisal process and their relationship with the Local Plan process. The preparation of the Integrated Impact Assessment, including the Sustainability Appraisal has taken place since 2015. The different stages of the preparation have been:
    - Stage A – scoping – this involved setting out the context and objectives, establishing the baseline considering relevant baseline information (Appendix 3) regarding key environmental, social and economic matters within the borough which are likely to be impacted by NSP policies and deciding the scope. The consultation on the scoping report took place in early 2015.

- Stage B - testing alternatives took place in 2016 – this involved developing and refining options and assessing effects against the IIA framework. Options were considered during the preparation of the NSP in 2016.
  - Stage C – preparing the IIA report – this involved testing in detail the impacts of the preferred options, following this, the updated IIA report was prepared for consultation with the public along with the Proposed Submission Version in late 2017.
  - Stage D – we sought representations from consultation bodies and the public - Consultation on the preferred option IIAs took place across later 2015 and early 2016 and early 2017 alongside their associated NSP parts. The NSP proposed submission version and IIA was then consulted on between October 2017 and February 2018. The NSP PSV: Amended Policies 2019 was consulted on in January – May 2019, informing the New Southwark Plan SV 2019. The IIA was then updated following the Inspectors letter in April 2020 requesting further information on the Council’s approach to flooding and the sequential test; and the reasonable alternative options considered for the overall strategic approach to development in the borough. The IIA was also updated with the site appraisal for each individual site allocation against the IIA objectives set out in Appendix 5. This was prepared in advance of the consultation of the Proposed changes to the Submitted New Southwark Plan.
7. The sustainability appraisal framework in the IIA is set out at Appendix 4. Key positive impacts are identified in terms of social, economic and environmental sustainability in the summary of appraisals provided. Some risks have been identified but these are generally mitigated by other policies in the plan. The established appraisal framework for undertaking the IIA sets out sustainability, health and equality objectives, referred to as IIA Objectives (IIAO), with associated supporting indicators, known as Baseline Indicators, which are used to measure the impacts of the emerging NSP. These objectives inform the criteria for assessment of policies, area visions and site allocations (appraised in Appendix 5, 6 and 7) with relevant questions that identify any risks or negative consequences of implementing a policy/area vision or site allocation (questions and targets using baseline indicators can be found in Appendix 4: Sustainability Appraisal Framework).The sustainability appraisal of the NSP, provides the opportunity for the Council to respond to any potential negative impact of a policy by amending or mitigating through future monitoring of the plan.
  8. Chapter 6 of the IIA sets out the options considered, Appendix 13 sets out the policy evolution of the Plan for a number of our main policies in response to consultation which is also referenced in the relevant background papers. Table 1 below also sets out reasonable alternatives with a spatial dimension appraised in the SA.
  9. As part of the preparation of the Plan, three development options have been assessed:

- Option A: Business-as-usual (Reasonable alternative)
- Option B: Place Making and Place Shaping (Plan option)
- Option C: Higher Option (Reasonable alternative).

10. The assessment compares the sustainability implications between adopting a new Local Plan (the New Southwark Plan), or two reasonable alternatives of committing to a Business-as-usual scenario of maintaining the adopted Southwark Plan (2007) or a higher option development scenario through increasing the capacity of housing on site allocations (which is based on the New Southwark Plan).

11. The full Option-testing sustainability appraisal is included in Appendix 10, this provides the justification on why the decision to develop and adopt a new Local Plan through the selection of Option B: Place Making and Plan Shaping was deemed preferable to achieve increased sustainability, health and equality objectives in the borough compared to the two identified reasonable alternatives.

12. The reasonable alternatives considered are set out within Appendix 12. This demonstrates how the indicative capacities have changed throughout different iterations (Preferred Option; Proposed Submission Version and Proposed changes to the Submitted NSP) of the Plan.

13. The conclusions reached in undertaking the IIA are a result of both quantitative and qualitative (i.e. subjective and based on professional opinion) judgements made by predicting the outcome of a potentially complex mix of social, economic and environmental factors. It is important to recognise where baseline indicators and IIAO's overlap to inform any outcome in the final appraisal. The overlap of IIAO and Baseline Indicators are visually represented in a matrix in Appendix 8, which help to inform the appraisals (Appendix 5, 6 and 7).

14. Table 1 below sets out the reasonable alternatives with a spatial dimension considered as part of the Sustainability Appraisal, it also highlights the option that was chosen to take forward into the NSP.

**Table 1 – Reasonable alternatives with a spatial dimension appraised in the SA of the NSP**

Key spatial issue	Reasonable alternatives considered and appraised
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<b>Managing housing growth</b>	<p>Option A: Option A: Business-as-usual (Reasonable alternative) for housing delivery</p> <p>Option B: Place Making and Place Shaping (Plan option) for housing delivery (chosen option)</p> <p>Option C: Higher Option (Reasonable alternative) for housing delivery</p> <p>Further details of these options can be found in the IIA (EIP72 and EIP72A)</p>
<b>Quantity vs Quality of housing</b>	<p>Follow London Plan space standards (chosen option)</p> <p>Higher than London Plan space standards</p> <p>Lower than London Plan space standards</p> <p>Carry forward the space standards within the Aylesbury Area Action Plan for the Action Area Core, which are higher than the London Plan space standards (chosen option)</p> <p>Follow London Plan residential amenity space standards (chosen option)</p> <p>Higher than London Plan residential amenity space standards</p> <p>Lower than London Plan residential amenity standards</p> <p>Specific essential amenity standards due to local circumstances (chosen option)</p> <p>Follow London Plan play space standards (chosen option)</p> <p>Higher than London Plan play space standards</p> <p>Lower than London Plan play space standards</p> <p>Require 5sqm of public open space per dwelling in addition to the communal amenity space requirement for Old Kent Road AAP (chosen option)</p>
<b>Affordable housing in minor developments</b>	<p>Require affordable housing for minor housing developments (chosen option).</p> <p>Do not require affordable housing for minor housing developments.</p>
<b>Student housing</b>	<p>Student housing encouraged everywhere in the borough</p> <p>Student housing encouraged in areas of high PTAL</p> <p>Student housing is encouraged in opportunity areas and action areas</p> <p>Student housing allowed in saturation areas</p> <p>No Student housing</p> <p>Student housing has to provide the London Plan level of affordable student rooms</p> <p>Student housing has to provide the 35% council policy for private housing of affordable housing</p> <p>Student housing has to provide the 35% council policy and the London Plan level of affordable student rooms (chosen option)</p> <p>Student housing has to provide no affordable housing or affordable student rooms.</p>

<b>Co-living – purpose built shared living</b>	Policy covered by student housing, requiring the same provision of affordable housing. Reliance on the London Plan 2021. New policy specifically for development for co-living / purpose built shared living with specific affordable housing requirements (chosen option).
<b>Build to rent</b>	All new development could be build to rent with no provision of affordable housing All new development could be build to rent with 35% provision of affordable housing All new development of 100 units or more could be build to rent providing the 35% affordable housing (chosen option) All new development of 100 units or more could be build to rent with no provision of affordable housing
<b>Housing tenure</b>	Consider requiring a higher requirement of intermediate housing on development Consider requiring a higher requirement of social rented housing on development Borough wide requirement of 25% social rented and 10% intermediate housing with the exception of Aylesbury Action Area Core (chosen option).
<b>Family homes</b>	Continue with the same percentages of family homes based on density Increase the percentage of family homes in the Central Activities Zone. Continue with the same percentage of family homes in the CAZ at 20% (chosen option) Increase the requirement of family homes in the Potters Field, London Bridge, Elephant and Castle opportunity area and the north of Blackfriars Road to 20% (chosen option). Increase the percentage of family homes in the Urban Zone to 25% (chosen option). Reduce the percentage of family homes in Old Kent Road. Family housing should be two bed Family housing should be three bed (chosen option) Carry forward the family home requirements within the Aylesbury Area Action Plan for the Action Area Core which has a higher requirement for larger family homes (chosen option)
<b>Housing for older people</b>	Require affordable housing for developments of new specialist housing for older people (chosen option) Do not require affordable housing for developments of new specialist housing for older people Allow specialist housing for older people anywhere in the borough Allow specialist housing for older people in areas suitable for older people which have good access to local goods and services and be located in, or close to town centres (chosen option)

<b>HMOs</b>	<p>Require affordable housing for developments of HMOs (chosen option)</p> <p>Do not require affordable housing for developments of HMOs</p> <p>Do not allow them to contribute to overconcentration of HMOs (chosen option)</p> <p>Allow HMOs anywhere in the borough</p> <p>Inclusion of the assessment for overconcentration of HMOs in the borough (chosen option)</p> <p>The assessment for overconcentration of HMOs in the borough not included</p>
<b>Supported housing and hostels</b>	<p>Inclusion of the assessment for overconcentration of supported housing and hostels in the borough (chosen option)</p> <p>The assessment for overconcentration of supported housing and hostels in the borough not included</p>
<b>Self and custom build housing</b>	<p>Allow the development of sites for self and custom build housing only where this would make efficient use of land (chosen option)</p> <p>Allow lower density development where this comprises self and custom build housing, as an exception of usual housing density policies</p>
<b>Gypsy and Traveller Sites</b>	<p>Retain the 4 Gypsy and Traveller sites subject to need (chosen option)</p> <p>Reduce the number of Gypsy and Traveller sites</p>
<b>Small business space</b>	<p>Continue with policy context of saved policies 1.4 and 1.5 and Core Strategy strategic policy 10 to protect small business space (business as usual)</p> <p>Strengthen policy to require re-provision of employment space on key site allocations, town centres, CAZ, opportunity areas.</p> <p>Introduce an affordable workspace policy and a business relocation policy to support small businesses (chosen option)</p>
<b>Key Industrial Business Areas</b>	<ol style="list-style-type: none"> <li>1. Do not amend current SIL boundaries (No change to current position, business as usual)</li> <li>2. Release all SIL to mixed use neighbourhoods (preferred options version of NSP)</li> <li>3. Retain some SPIL for industrial uses only and LSIS designations for industrial co-location (chosen option): <ul style="list-style-type: none"> <li>- Retain SPIL at South Bermondsey and IWMF. Proposed new SPIL designation at Admiral Hyson Trading Estate (Proposed submission version)</li> <li>- Deletion of Old Jamaica Road site allocation and inclusion as SPIL. Minor amendment to SPIL boundary at gasworks/IWMF.</li> </ul> </li> </ol> <p>Retain Mandela Way as LSIS, designate part of Ossory Road and Hatcham/Ilderton Road as LSIS (Amended policies 2019) (industrial relocation)</p> <ul style="list-style-type: none"> <li>- Extend South Bermondsey SPIL to include railway arches (NSP submission)</li> </ul>

	<ul style="list-style-type: none"> <li>- Promote some industrial uses in line with the typologies in the Old Kent Road AAP site allocations alongside other strategic uses.</li> <li>- Require employment uses to be provided on site allocations that meet current market demand (which may include office, industrial, hybrid and studio workspaces) (Policy P29)</li> </ul>
<b>Betting and payday loan shops</b>	<p>Allow betting and payday loan shops everywhere</p> <p>Restrict betting and payday loan shops to protected shopping frontages and where there is no more than 5% of the total and be at least 10 premises away from other premises of the same use (chosen option)</p>
<b>Take aways</b>	<p>Allow takeaways everywhere</p> <p>Allow takeaways outside the secondary school zones</p> <p>Allow takeaways outside the primary and secondary school zones (chosen option)</p>
<b>Night time economy</b>	<p>Promote night time economy in town centres, protect leisure arts and cultural uses (chosen option)</p> <p>Do not protect night time economy venues from change of use or require retention of leisure arts and cultural uses</p>
<b>Hotels and short term lets</b>	<p>Hotels encouraged everywhere in the borough (chosen option)</p> <p>Hotels encourages in areas of high PTAL</p> <p>Hotels encouraged in opportunity areas and action areas</p> <p>Hotels not allowed in saturation areas</p> <p>No hotels</p>
<b>Where to require Air Quality Assessments</b>	<p>Require air quality neutral boroughwide in an air quality management area (chosen option)</p> <p>Do not require air quality standards</p> <p>This policy is considered alongside other policies</p>
<b>Waste</b>	<p>Identify specific sites in Southwark for additional waste management (chosen option)</p> <p>Identify broader areas for waste rather than allocating specific sites.</p> <p>Allow replacement waste sites to be outside Southwark in the South East Waste area.</p> <p>Allow replacement waste sites to be outside Southwark outside the South East Waste Area</p>
<b>Car free developments</b>	<p>All new development should be car free except for disabled parking</p> <p>New development should be car free except for disabled parking in parts of the borough that are most polluted congested</p> <p>New development should be car free except for disabled parking in parts of the borough that have the highest access to public transport.</p>

	<p>Development should be car free except disabled parking particularly in areas where alternative modes of transport are available and where public transport accessibility is high (chosen option)</p> <p>No change to current position</p>
<p><b>Managing roadspace (some of the alternatives have been taken forward through the Movement Strategy rather than the local plan)</b></p>	<p>Give more priority to buses across the borough</p> <p>Develop measures to reduce overall traffic and protect local streets from 'rat running' traffic</p> <p>Use parking controls to manage demand for parking, prioritising the needs of residents and protecting essential access</p> <p>Prioritise alternative uses of the kerbside such as car club bays, cycle parking and electric vehicle (EV) charging points, in response to user demand</p> <p>(All of the above)</p> <p>No change to current position</p>
<p><b>Climate change</b></p>	<p>No target</p> <p>Net zero 2030 target set out in Council's Climate Emergency declaration</p> <p>2050 statutory target as per Climate Change Act and London Plan (chosen option)</p>
<p><b>Borough views</b></p>	<p>No borough views</p> <p>Carefully considered borough views (chosen option)</p>
<p><b>Locally listed buildings</b></p>	<p>No locally listed buildings</p> <p>Locally listed buildings (chosen option)</p>
<p><b>Strategic views</b></p>	<p>No strategic views</p> <p>London View Management Framework (LVMF) strategic views (chosen option)</p>
<p><b>Building heights</b></p>	<p>Tall buildings throughout the entire borough</p> <p>No tall buildings in the borough</p> <p>Tall buildings in the opportunity areas and action area cores</p> <p>Tall buildings in the opportunity areas</p> <p>Tall buildings in site allocations as part of strategic development sites</p> <p>Tall buildings in the opportunity areas and Aylesbury Action Area core and site allocations outside those areas (chosen option)</p>
<p><b>Retail parking</b></p>	<p>No retail parking</p> <p>Car free apart from disabled parking</p> <p>Differential levels of parking depending on the PTAL (chosen option)</p>
<p><b>Office parking</b></p>	<p>No office parking</p> <p>Car free apart from disabled parking (chosen option)</p> <p>Differential levels of parking for offices</p>

<b>Open space</b>	Protect all open spaces (chosen option) Build on some of the protected open spaces
<b>Town centres and shops</b>	Plan for retail development in town centres (chosen option) Protect A1 uses in shopping frontages (policy proposed but affected by Class E) Introduce small shops policy (chosen option) Require a sequential test for development outside town centres for over 1000sqm (chosen option) Require a sequential test for development outside town centres for 2500sqm Protect the loss of shops outside protected shopping frontages, town and local centres (chosen option) Do not protect the loss of shops outside protected shopping frontages, town and local centres Provide protection for pubs (chosen option)
<b>Offices and business</b>	Intensify offices in CAZ, town centres, site allocations, OAs, require a marketing strategy and prevent loss of offices or employment workspace unless two years marketing can be demonstrated (chosen option) Protect employment floorspace borough-wide Require less or more than two years marketing evidence Require training and jobs for local people (chosen option) Provide support for existing businesses and business relocation (chosen option) Support commercial uses in railway arches (chosen option)
<b>Arts, culture and leisure uses</b>	Protect all arts, cultural and leisure uses (chosen option) Protect certain arts, cultural and leisure uses Protect no arts, cultural and leisure uses
<b>Schools</b>	No new schools New schools to meet the needs based on growth (chosen option)
<b>Bakerloo Line extension</b>	1. Plan for development options in Old Kent Road without the Bakerloo Line Extension 2. Prepare an Area Action Plan for Old Kent Road to include strategic infrastructure improvements and promote the Bakerloo Line extension (chosen option)
<b>Thames Policy Area</b>	Develop to the London Plan height in the Thames Policy Area (chosen option) Develop to a higher height in the Thames Policy Area

15. The Site Allocations Methodology Report (EIP82b) explains how the site allocations were drawn from a range of sources. The site allocations are generally over 0.25ha to identify opportunities for intensification. Appendix 1 explains which sites were discounted the reasons they were omitted. There are 83 site allocations identified in the New Southwark Plan. Sites are identified in the four opportunity areas in the borough, in town centres as well as in other strategic locations, in accordance with the London Plan (2021) and the NPPF. Each of the sites includes an indicative development capacity. Section 4 of the

site allocation methodology report sets out the options that were undertaken when determining the site capacities when the site allocations were prepared.

16. In addition to site selection, we have consulted on the site allocations at various stages of the Plan, as a result, we have amended, deleted and added sites to the NSP in response to consultation demonstrating we have considered a number of options. A full summary, the benefits and drawbacks of the options are set out in Chapter 6 of the IIA and justification for choosing Option B Place Making and Plan Shaping.

17. We have complied with the relevant requirements in the Planning and Compulsory Purchase Act as detailed in the IIA.